



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

THIS IS THE BEGINNING OF MUR # 2425
DATE FILMED 11/25/87 CAMERA NO. 3
CAMERAMAN A.S.

87040564310

Public Record Index MUR - 2425

1. Memo, 10 Feb 87, John D. Gibson (Reports Analysis Division) to Charles N. Steele, subj: Referral of Associated Life Insurance Group National Policyholder Advisory Committee (ALIGN), w/atch (RAD Referral Package).
2. First General Counsel's Report, 18 May 87.
3. Certification of Commission Action, 22 May 87.
4. Ltr, 8 Jun 87, Scott E. Thomas (Chairman, FEC) to Ellison Morgan (Treas., ALIGN) w/atch.
5. Ltr, 29 Jun 87, John P. Carey (Counsel, ALIGN PAC) to FEC, w/atches.
6. General Counsel's Report, 17 Jul 87.
7. Certification of Commission Action, 22 Jul 87.
8. Ltr, 24 Jul 87, Lawrence M. Noble (Acting General Counsel, FEC) to John P. Carey.
9. General Counsel's Report, 25 Aug 87.
10. Certification of Commission Action, 28 Aug 87.
11. Ltr, 31 Aug 87, L.M. Noble to J.P. Carey, w/atch (Executed Conciliation Agreement).
12. Ltr, 15 Sep 87, John P. Carey to FEC, w/atch.

- 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.

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Attachment 1

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 10, 1987

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: NON-FILER REFERRALS OF MONTHLY UNAUTHORIZED COMMITTEES

Attached is a listing of thirty-four (34) monthly filers which failed to file a report covering the pre-election period by Election Day, November 4, 1986. In accordance with Standard 3 of the 1985-1986 RAD Review and Referral Procedures, further examination is required by your office.

On September 29, 1986, prior notification was sent to all unauthorized committees which specifically informed monthly filers of the requirement to file a 12 Day Pre-General Report by October 23, 1986 (Attachment 35). Each committee which failed to submit either a 12 Day Pre-General Report or a November Monthly Report was sent a Non-Filer Notice on November 14, 1986 (Attachment 36). The following six (6) committees were not sent Non-Filer Notices because a report covering the pre-election period was indexed by November 14, 1986:

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2

The attached printout lists the name, address and treasurer for each committee being referred. Any telephone conversations are referenced under Contacts with Filers. The Summary Pages of the late-filed reports and/or letters of explanation are included under Reports Filed/Response(s).

In addition, a "C" index has been included for each committee. Please note that the aggregate receipt and disbursement figures may be inflated in some cases because a) reports were submitted covering portions of the same period (e.g., a 12 Day Pre-General Report covering October 1, 1986 through October 15, 1986 and a November Monthly Report covering October 1, 1986 through October 31, 1986), or b) 1987 February Monthly Reports have been filed.

If you have any questions, please contact Lisa Stolaruk at 376-2480.

Attachments

87040664313

(3)

C00171322

Associated Life Insurance Group
National Policyholder Advisory
Committee (ALIGN)

87NF-13

87040664314

(36)

**ASSOCIATED LIFE INSURANCE GROUP NATIONAL POLICYHOLDER
ADVISORY COMMITTEE (ALIGN)**

(Attachments 6a - 6c)

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NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION

ASSOCIATED LIFE INSURANCE GROUP NATIONAL POLICYHOLDER ADVISORY COMMITTEE (ALIGN)				NON-PARTY QUALIFIED		ID #C00171322
CONNECTED ORGANIZATION: NONE						
1985	MISCELLANEOUS REPORT			31JAN85 TO FEC	1	85FEC/362/4318
	MID-YEAR REPORT	215,146	188,482	1JAN85 -30JUN85	54	85FEC/394/1556
	MID-YEAR REPORT - AMENDMENT	215,146	188,482	1JAN85 -30JUN85	89	85FEC/388/2014
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN85 -30JUN85	7	85FEC/388/5238
	MID-YEAR REPORT - AMENDMENT	215,146	182,482	1JAN85 -30JUN85	14	86FEC/394/2049
	MID-YEAR REPORT - AMENDMENT	214,646	176,246	1JAN85 -30JUN85	15	86FEC/399/4473
	MID-YEAR REPORT - AMENDMENT	214,646	180,855	1JAN85 -30JUN85	7	86FEC/427/2722
	REQUEST FOR ADDITIONAL INFORMATION			1JAN85 -30JUN85	1	85FEC/392/2223
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN85 -30JUN85	2	86FEC/394/0358
	YEAR-END	61,483	105,644	1JUL85 -31DEC85	107	86FEC/399/5312
	YEAR-END - AMENDMENT	-	-	1JUL85 -31DEC85	3	86FEC/406/1427
	YEAR-END - AMENDMENT	64,973	105,644	1JUL85 -31DEC85	9	86FEC/412/5139
	YEAR-END - AMENDMENT	64,973	99,285	1JUL85 -31DEC85	9	86FEC/427/2730
	1ST LETTER INFORMATIONAL NOTICE			1JUL85 -31DEC85	1	86FEC/404/0504
1986	MISCELLANEOUS REPORT			21APR86 TO FEC	1	86FEC/412/0889
	APRIL QUARTERLY	57,895	76,953	1JAN86 -31MAR86	34	86FEC/412/0810
	APRIL QUARTERLY - AMENDMENT	57,894	76,952	1JAN86 -31MAR86	9	86FEC/427/2740
	APRIL QUARTERLY - AMENDMENT	57,894	76,952	1JAN86 -31MAR86	2	86FEC/436/1679
	MAY MONTHLY	25,082	18,627	1APR86 -30APR86	11	86FEC/414/2716
	MAY MONTHLY - AMENDMENT	25,082	18,627	1APR86 -30APR86	2	86FEC/427/2750
	MAY MONTHLY - AMENDMENT	25,082	18,627	1APR86 -30APR86	2	86FEC/436/1685
	JUNE MONTHLY	9,556	9,995	1MAY86 -31MAY86	11	86FEC/417/3201
	JUNE MONTHLY - AMENDMENT	9,556	9,995	1MAY86 -31MAY86	2	86FEC/427/2753
	JUNE MONTHLY - AMENDMENT	9,556	9,995	1MAY86 -31MAY86	3	86FEC/436/1675
	REQUEST FOR ADDITIONAL INFORMATION			1MAY86 -31MAY86	1	86FEC/418/3940
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAY86 -31MAY86	2	86FEC/424/4369
	JULY MONTHLY	18,954	17,329	1JUN86 -30JUN86	12	86FEC/423/1214
	JULY MONTHLY - AMENDMENT	18,954	17,329	1JUN86 -30JUN86	1	86FEC/427/2756
	JULY MONTHLY - AMENDMENT	18,954	17,329	1JUN86 -30JUN86	2	86FEC/436/1682
	AUGUST MONTHLY	52,312	40,001	1JUL86 -31JUL86	21	86FEC/428/3538
	REQUEST FOR ADDITIONAL INFORMATION			1JUL86 -31JUL86	1	86FEC/438/4492
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL86 -31JUL86	2	86FEC/433/4724
	SEPTEMBER MONTHLY	63,667	41,988	1AUG86 -31AUG86	19	86FEC/431/0662
	OCTOBER MONTHLY	49,876	70,381	1SEP86 -30SEP86	19	86FEC/436/1688
	PRE-GENERAL	4,750	24,143	1OCT86 -15OCT86	11	86FEC/444/4138
	NOTICE OF FAILURE TO FILE			1OCT86 -15OCT86	1	86FEC/444/1524
	POST-GENERAL	9,574	9,694	16OCT86 -24NOV86	14	86FEC/446/1286
	YEAR-END	2,804	4,838	25NOV86 -31DEC86	13	87FEC/454/3565
TOTAL		574,088	0 594,088	0	511	TOTAL PAGES

Ending cash-on-hand as of 12/31/86: \$3,356.74

Debts: \$0

All reports have been reviewed except the 1986 Year End Renort.

ATTACHMENT 6a

37

ALIGNPAC

November 19, 1986

RECEIVED AT THE FEC
 HAND DELIVERED
 11 NOV 20 11:00
 400 S.W. Morrison Ave
 Suite 200
 Portland, Oregon 97201
 503 236-1421

Ms. Robyn Jimeson
 Reports Analyst
 Federal Election Commission
 Reports Analysis Division, Rm. 701
 999 E Street, N.W.
 Washington, DC 20463

Dear Ms. Jimeson,

Enclosed for filing is Alignpac's Pre-General Report. Simply put, the committee was under the mistaken impression that by filing monthly reports, rather than quarterly reports, we were not required to file pre-election reports. In fact, our monthly report for October (due November 20) was ready for filing when the notice was received from the Commission regarding the missed report. This mistake was the result of misunderstanding our counsel's advice last spring to convert to monthly filing to avoid having to file pre-PRIMARY reports.

Alignpac is a relatively new committee, having been formed 3 years ago. During the last election cycle, a volunteer handled reporting. This was the first election cycle for the current staff; thus, we had no prior experience with the special rules for pre- and post-election reports. The committee has expended substantial time and expense to reorganize our reporting procedures to assure full compliance with the law. For example, recent amendments to prior reports were filed to reflect adjustments necessary after a complete audit was performed by a certified public accountant. The committee has also recently obtained approval to file computer-generated reports to assure further the accuracy and timeliness of reports.

We recognize the public interest in providing information on campaign finance in a timely fashion and have always intended to comply fully with the letter and spirit of the law. We will be happy to provide any further information you request. Please contact me or our Washington counsel, Beth Emery of Paul, Hastings, Janofsky & Walker, (202) 457-9424.

Sincerely,

Jean A. Blackburn
 Jean A. Blackburn
 Administrator

JB:sd
 Encl.

868730440:2463317

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

(Summary Page)

RECEIVED AT THE FEC
MAILED DELIVERED
06 NOV 20 4:11
39

1. Name of Committee (in Full)

**Associated Life Insurance Group
National Policyholder Advisory Council**

Address (Number and Street)

5200 S.W. Macadam Ave., Suite 500

City, State and ZIP Code

Portland, OR 97201

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00171322

3. ☐ This committee qualified as a multi-candidate committee during the Reporting Period on _____

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 Pre-General Election

☐ 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 10-1-86 through 10-15-86

6. (a) Cash on hand January 1, 19 86

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

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

7. Total Disbursements (from Line 20)

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

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

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

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

Ellison C. Morgan

Type or Print Name of Treasurer

Ellison C Morgan

SIGNATURE OF TREASURER

11-19-86

Date

For further information contact:

Federal Election Commission
400 E Street, N.W.
Washington, D.C. 20543
Tel: 202-456-6000
Local: 202-376-3420

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

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 3X (3-80)

End 1

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3631456433

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 REFERRALS 97NF-08 to 41
STAFF MEMBER
Deborah Currey**

**SOURCE OF INFO: INTERNALLY GENERATED
RESPONDENTS' NAMES:**

**Associated Life Insurance Group National
Policyholder Advisory Committee (ALIGN)
and Ellison Morgan, as treasurer**

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RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(B) and
11 C.F.R. 104.5(c)(3)(ii)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This matter was generated by the Reports Analysis Division ("RAD") after a review of the disclosure reports of the above-named committees. The RAD referral reveals that the above mentioned committees and their treasurers, may have violated 2 U.S.C. § 434(a)(4)(B) by failing to file the 1986 Pre-General Election Report in a timely manner.

II. FACTUAL AND LEGAL ANALYSIS

Attached is a listing of thirty-four (34) monthly filers which failed to file a report covering the pre-election period by Election Day, November 4, 1986. (Attachment 1) On September 29, 1986, prior notification was sent to all unauthorized committees which specifically informed monthly filers of the requirement to file a 12 Day Pre-General Report by October 23, 1986. (Attachment 1, page 137) Each committee which failed to submit either a 12 Day Pre-General Report or a November Monthly Report was sent a Non-Filer Notice on November 14, 1986. (Attachment 1, page 139) The following six (6) committees were not sent Non-Filer Notices because a report covering the pre-election period was indexed by November 14, 1986:

The attached printout lists the name, address and treasurer for each committee being referred. (Attachment 1, pages 5-10) Any telephone conversations are referenced under Contacts with Filers. The Summary Pages of the late-filed reports and/or letters of explanation are included under Reports Filed/Response(s).

In addition, a "C" index has been included for each committee. (Attachment 1) Please note that the aggregate receipt and disbursement figures may be inflated in some cases because (a) reports were submitted covering portions of the same period (e.g., a 12 Day Pre-General report covering October 1, 1986 through October 15, 1986 and a November Monthly Report covering October 1, 1986 through October 31, 1986), or (b) 1987 February Monthly Reports have been filed.

2 U.S.C. § 434(a)(4)(B) requires that monthly filers file a Pre-General Election Report, covering financial activity from October 1 through October 15, by October 23, 1986. The above

referenced committees failed to file the 1986 Pre-General Election Report by the required deadline. Therefore, though the Commission is in receipt of report(s) disclosing financial activity covering the pre-general election period, such report(s) were not filed in a timely manner.

With regard to thirty-two non-filers listed below, the Office of General Counsel recommends that the Commission open MURs and find reason to believe these committees and their treasurers violated 2 U.S.C. § 434(a)(4)(B).

III. RECOMMENDATIONS

1. Open MURs with respect to those committees listed in Recommendation 2.
2. Find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(B):

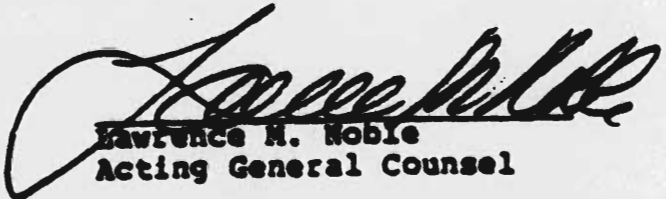
Associated Life Insurance Group National
Policyholder Advisory Committee (ALIGN)
and Ellison Morgan, as treasurer

87040364322

3. Approve the attached sample letter and sample Factual and Legal Analysis to be sent to each committee listed in Recommendation 2.

Date

5/18/87


Lawrence M. Noble
Acting General Counsel

Attachments

1. Referral Materials
2. Sample Letter (1)
3. Sample Factual and Legal Analysis (1)

3 2 3 2 3 6 4 3 2 3 8 7 0 4 0 5

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

RAD Ref. 87NF-08 to 41

**Associated Life Insurance Group National
Policyholder Advisory Co-mittee (ALIGN)
and Ellison Morgan, as treasurer**

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(continued)

Federal Election Commission
Certification for RAD Ref. 87NF-08 to 41
May 21, 1987

Page 2.

87040664325

3

(continued)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 21, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 87NF-08 to 41:

1. Open MURs with respect to those committees listed in Recommendation 2.
2. Find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a) (4) (B):

Associated Life Insurance Group National
Policyholder Advisory Committee (ALIGN)
and Ellison Morgan, as treasurer

(continued)

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Federal Election Commission
Certification for RAD Ref. 87NF-08 to 41
May 21, 1987

Page 4

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Federal Election Commission
Certification for RAD Ref. 87NF-08 to 41
May 21, 1987

Page 5

3. Approve the sample letter and sample Factual and Legal Analysis to be sent to each committee listed in Recommendation 2, as recommended in the First General Counsel's Report signed May 18, 1987.
- 4.

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

Attest:

5-22-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Tues., 5-19-87, 9:22
Circulated on 48 hour tally basis: Tues., 5-19-87, 4:00
Deadline for vote: Thurs., 5-21-87, 4:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 8, 1987

Ellison Morgan, Treasurer
Associated Life Insurance Group National
Policyholder Advisory Committee (ALIGN)
5200 S.W. Macadam Avenue, Suite 580
Portland, OR 97201

RE: MUR 2425
Associated Life Insurance
Group National
Policyholder Advisory
Committee (ALIGN)
Ellison Morgan, as
treasurer

Dear Mr. Morgan:

On May 21, 1987, the Federal Election Commission found that there is reason to believe Associated Life Insurance Group National Policyholder Advisory Committee (ALIGN) ("the 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 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 the 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 the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or

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

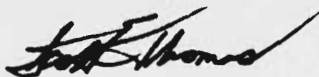
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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 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 Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Statement

87040564330

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RDM

**FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS**

RESPONDENTS: Associated Life Insurance Group **MUR 2425**
National Policyholder Advisory
Committee (ALIGN) and Ellison Morgan,
as treasurer

The RAD referral reveals that the above-mentioned committee and treasurer may have violated 2 U.S.C. § 434(a)(4)(B) by failing to file the 1986 Pre-General Election Report in a timely manner.

On September 29, 1986, prior notification was sent to all unauthorized committees which specifically informed monthly filers of the requirement to file a 12 Day Pre-General Election Report by October 23, 1986. The above-mentioned Committee failed to file a report covering the pre-election period by Election Day, November 4, 1986. Each Committee which failed to submit either a 12 Day Pre-General Election Report or a November Monthly Report was sent a Non-filer Notice on November 14, 1986, unless the Commission had received the reports by that date.

2 U.S.C. § 434(a)(4)(B) required that monthly filers file a Pre-General Election Report, covering financial activity from October 1 through October 15, by October 23, 1986. The above-referenced committee failed to file the 1986 Pre-General Election Report by the required deadline. Though the Committee may have filed a report which disclosed financial activity covering the pre-general election period, such report was not filed in a

-2-

timely manner. Therefore, the Office of General Counsel recommends the Commission open a MUR in this matter and find reason to believe the above-mentioned Respondents have violated 2 U.S.C. § 434(a)(4)(B).

87040564332

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CC#3749
RECEIVED AT THE
HAND DELIVERED

87 JUN 29 4:48

LAW OFFICES OF
PAUL, HASTINGS, JANOFSKY & WALKER

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

TWELFTH FLOOR

1050 CONNECTICUT AVENUE, N. W.

WASHINGTON, D. C. 20036

TELEPHONE (202) 823-9000

CABLE ADDRESS: PAULHAST WSH

TWX: 710-622-9062

COUNSEL
LEE G. PAUL
ROBERT R. HASTINGS
LEONARD S. JANOFSKY
CHARLES M. WALKER

LOS ANGELES OFFICE
TWENTY-SECOND FLOOR
888 SOUTH FLOWER STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 488-4000

ORANGE COUNTY OFFICE
SEVENTEENTH FLOOR
685 TOWN CENTER DRIVE
COSTA MESA, CALIFORNIA 92626
TELEPHONE (714) 841-1100

WEST LOS ANGELES OFFICE
FIFTH FLOOR
1290 OCEAN AVENUE
SANTA MONICA, CALIFORNIA 90401
TELEPHONE (213) 481-1200

ATLANTA OFFICE
FORTY-SECOND FLOOR
GEORGIA-PACIFIC CENTER
133 PEACHTREE STREET, N. E.
ATLANTA, GEORGIA 30303
TELEPHONE (404) 588-9600

CONNECTICUT OFFICE
SECOND FLOOR
THREE LANDMARK SQUARE
STAMFORD, CONNECTICUT 06901
TELEPHONE (203) 387-0100

NEW YORK OFFICE
EIGHTH FLOOR
299 PARK AVENUE
NEW YORK, NEW YORK 10171
TELEPHONE (212) 759-1166

OUTSIDE NO:

87 JUN 30
A10:37

June 29, 1987

BY HAND

Jonathan Levin, Esq.
Office of General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2425, Associated Life Insurance Group
Policyholder Advisory Committee

Dear Mr. Levin:

Pursuant to our telephone conference of today, the Associated Life Insurance Group National Policyholder Advisory Committee ("ALIGNPAC") respectfully requests, under 11 C.F.R. § 111.18(d), to enter into negotiations towards reaching a pre-probable cause conciliation agreement.

As set forth in the attached Statement of Designation of Counsel, ALIGNPAC has designated N. Beth Emery, Esq., me, and the law firm of Paul, Hastings, Janofsky & Walker as counsel for ALIGNPAC in this matter. Please direct any and all correspondence and communications regarding this matter to the undersigned.

Finally, enclosed as promised, is ALIGNPAC's letter dated November 19, 1986 to Ms. Robyn Jameson, Reports Analyst, Federal Election Commission regarding the filing of ALIGNPAC's

37040364333

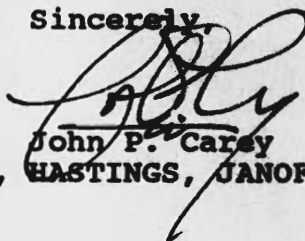
PAUL, HASTINGS, JANOFSKY & WALKER

Jonathan Levin, Esq.
June 29, 1987
Page Two

Pre-General Election report. This letter explains, in some detail, some of the reasons for the delay in filing the ALIGNPAC's Pre-General Election report.

Should you have any questions regarding this matter, please contact me directly. We look forward to resolving this matter through the conciliation process in a manner mutually agreeable to both the Commission and ALIGNPAC.

Sincerely,



John P. Carey
for PAUL, HASTINGS, JANOFSKY & WALKER

JPC/lg

Enclosures

cc: Mr. Eli C. Morgan

87040364334

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2425

NAME OF COUNSEL: N. Beth Emery, Esq. John P. Carey

ADDRESS: Paul, Hastings, Janofsky & Walker

1050 Connecticut Avenue, N.W.

Washington, D.C. 20036

TELEPHONE: (202) 223-9000

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.

6/26/87

Date

EC Morgan
Signature

RESPONDENT'S NAME:

Ellison Morgan, Treasurer
Associated Life Insurance Group National
Policyholder Advisory Committee

ADDRESS:

5200 S.W. Macadam Avenue, Suite 580
Portland, Or. 97201

HOME PHONE:

BUSINESS PHONE:

(503) 226-1421

ALIGNPAC

November 19, 1986

4640 S W Macadam Ave
Suite 250
Portland Oregon 97201
503 226-1421

Ms. Robyn Jameson
Reports Analyst
Federal Election Commission
Reports Analysis Division, Rm. 701
999 E Street, N.W.
Washington, DC 20463

Dear Ms. Jameson,

Enclosed for filing is Alignpac's Pre-General Report. Simply put, the committee was under the mistaken impression that by filing monthly reports, rather than quarterly reports, we were not required to file pre-election reports. In fact, our monthly report for October (due November 20) was ready for filing when the notice was received from the Commission regarding the missed report. This mistake was the result of misunderstanding our counsel's advice last spring to convert to monthly filing to avoid having to file pre-primary reports.

Alignpac is a relatively new committee, having been formed 3 years ago. During the last election cycle, a volunteer handled reporting. This was the first election cycle for the current staff; thus, we had no prior experience with the special rules for pre- and post-election reports. The committee has expended substantial time and expense to reorganize our reporting procedures to assure full compliance with the law. For example, recent amendments to prior reports were filed to reflect adjustments necessary after a complete audit was performed by a certified public accountant. The committee has also recently obtained approval to file computer-generated reports to assure further the accuracy and timeliness of reports.

We recognize the public interest in providing information on campaign finance in a timely fashion and have always intended to comply fully with the letter and spirit of the law. We will be happy to provide any further information you request. Please contact me or our Washington counsel, Beth Emery of Paul, Hastings, Janofsky & Walker, (202) 457-9424.

Sincerely,



Jean A. Blackburn
Administrator

JB:sd
Encl. .

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

(Summary Page)

1. Name of Committee (In Full)

Associated Life Insurance Group
National Policyholder Advisory Council

Address (Number and Street)

5200 S.W. Macadam Ave., Suite 580

City, State and ZIP Code

Portland, OR 97201

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00171322

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 Pre-General Election

☐ 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 10-1-86 through 10-15-86

6. (a) Cash on hand January 1, 19 86

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

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

7. Total Disbursements (from Line 28)

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

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

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

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

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

\$ 22,837.02

\$ 24,905.17

\$ 4,750.00

\$ 282,094.61

\$ 29,655.17

\$ 304,931.63

\$ 24,143.54

\$ 299,420.00

\$ 5,511.63

\$ 5,511.63

\$

\$

For further information contact:

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463
Toll Free 800-424-9530
Local 202-376-3120

Ellison C. Morgan

Type or Print Name of Treasurer

Ellison C Morgan

SIGNATURE OF TREASURER

11-19-86

Date

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

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

FEC FORM 3X (3/80)

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

Name of Committee (on Page 1)

Associated Life Insurance Group National Policyholder
Advisory Council

Report Covering the Period

From: 10-01-86 To: 10-15-86

COLUMN A
Total This Period

COLUMN B
Calendar Year-To-Date

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitemized \$)

(b) Political Party Committees

(c) Other Political Committees

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

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

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

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

17. OTHER RECEIPTS (Dividends, Interest, etc.)

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

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND
OTHER POLITICAL COMMITTEES

22. INDEPENDENT EXPENDITURES (use Schedule E)

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES
(2 U.S.C. § 441 a(d)) (Use Schedule F)

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

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

27. OTHER DISBURSEMENTS

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

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

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

30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)

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

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

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

8704064338

CAMPAIGN FINANCE SYSTEM

Run Date: 01-01-1980

Itemized Receipts

Page 1 of 3

(PAC) A. L. I. G. N. P. A. C.

Line # 11a

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. For the period 10-01-86 thru 10-15-86 All Occupations Over \$200 YTD TYPE: I

HART, PAUL 0660 SW PALATINE HILL RD PORTLAND OR 97219- PAC-00240-I	N	MCG-NH PORTLAND OR 97201- INSURANCE AGENT Year to date: \$3,000.00	10-01-86	3,000.00
MEYERS, DAVID 1055 ST PAUL PLACE CINCINNATI OH 45202- PAC-00897-I	K	DAVID MEYERS CINCINNATI OH 45202- INSURANCE AGENT Year to date: \$1,000.00	10-01-86	1,000.00

Page Total \$4,000.00

87040564339

CAMP4IGN FINANCE SYSTEM

Run Date: 01-01-1980

Itemized Receipts

Page 2 of 3

(PAC: A. L. I. G. N. P. A. C.)

Line 8 11a

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. For the period 10-01-86 thru 10-15-86 All Occupations \$200 and Under YTD TYPE: I

ARNOLD, WILL B K WILL B ARNOLD 10-01-86 50.00
4200 E SKELLY DRIVE 8850 TULSA OK 74135-
TULSA OK 74135-
PAC-00910-I INSURANCE AGENT
Year to date: \$50.00

BROWN, ADOLPH S K ADOLPH S BROWN 10-01-86 50.00
PO BOX 2009 ADA OK 74820-
ADA OK 74820-
PAC-00900-I INSURANCE AGENT
Year to date: \$50.00

BONER, CLIFF K CLIFF BONER 10-01-86 50.00
2046 MARKET STREET PHILADELPHIA PA 19103-
PHILADELPHIA PA 19103-
PAC-00905-I INSURANCE AGENT
Year to date: \$50.00

EZELL, TOM K TOM EZELL 10-01-86 50.00
5416 SOUTH YALE 8620 TULSA OK 74135-
TULSA OK 74135-
PAC-00916-I INSURANCE AGENT
Year to date: \$50.00

FINCH, KENNETH E K KENNETH E FINCH 10-01-86 50.00
698: EAST 20TH PLACE TULSA OK 74112-
TULSA OK 74112-
PAC-00917-I INSURANCE AGENT
Year to date: \$50.00

HENDRICKS, TIM J K TIM J HENDRICKS 10-01-86 50.00
5416 SOUTH YALE 8620 TULSA OK 74134-
TULSA OK 74134-
PAC-00904-I INSURANCE AGENT
Year to date: \$50.00

HIGDON, H C K H C HIGDON 10-01-86 50.00
800 WEST OKMULGEE MUSKOGEE OK 74401-
MUSKOGEE OK 74401-
PAC-00901-I INSURANCE AGENT
Year to date: \$50.00

HOLLAR, CHARLES E K CHARLES E HOLLAR 10-01-86 50.00
PO BOX 987 PONCA CITY OK 74602-
PONCA CITY OK 74602-
PAC-00903-I INSURANCE AGENT
Year to date: \$50.00

Page Total \$400.00

5

87040564340

CAMPAIGN FINANCE SYSTEM

Run Date: 01-01-1980

Itemized Receipts

Page 3 of 3.

(PAC: A. L. I. G. N. P. A. C.)

Line 8.11a

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ICENDLE, MARK D	K	MARK D ICENDLE	10-01-86	\$0.00
551c SOUTH LEWIS OA		TULSA OK 74103-		
TULSA OK 74103-		INSURANCE AGENT		
PAC-00913-I		Year to date:	\$50.00	

KESSLER, JOHN	K	JOHN KESSLER	10-01-86	\$0.00
3033 NW 63RD 0200		OKLAHOMA CITY OK 73116-		
OKLAHOMA CITY OK 73116-		INSURANCE AGENT		
PAC-00914-I		Year to date:	\$50.00	

LIBRE, ANTHONY	K	ANTHONY LIBRE	10-01-86	\$0.00
1400 NORTH SHERIDAN 85		LANTON OK 73506-		
LANTON OK 73506-		INSURANCE AGENT		
PAC-00912-I		Year to date:	\$50.00	

MCFARLAND, G B	K	G B MCFARLAND	10-01-86	\$0.00
510 NORTHAMPTON		WATONGA OK 73772-		
WATONGA OK 73772-		INSURANCE AGENT		
PAC-00915-I		Year to date:	\$50.00	

PROVO, MARVIN	K	MARVIN PROVO	10-01-86	\$0.00
130E NE 52ND		OKLAHOMA CITY OK 73111-		
OKLAHOMA CITY OK 73111-		INSURANCE AGENT		
PAC-00918-I		Year to date:	\$50.00	

STEWART, CHARLES	O	STEWART CORPORATION	10-01-86	\$0.00
1233 W LOOP SOUTH 01215		HOUSTON TX 77027-		
HOUSTON TX 77027-		INSURANCE AGENT		
PAC-00556-I		Year to date:	\$69.26	

WIGGINS, JACK G	K	JACK G WIGGINS	10-01-86	\$0.00
1904 ELMHURST		OKLAHOMA CITY OK 73116-		
OKLAHOMA CITY OK 73116-		INSURANCE AGENT		
PAC-00911-I		Year to date:	\$50.00	

Page Total \$350.00

Report Total \$4,750.00

17 Contributors printed

8704064341

5

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

PAGE	OF
1	1
FOR LINE NUMBER	
N/A	

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

NAME OF COMMITTEE (in Full)

Associated Life Insurance Group National Policyholder Advisory Council

<p>A. Full Name, Mailing Address and ZIP Code</p> <p>Marty Layton 4640 S. W. Macadam Ave., Suite 250 Portland, Or 97201</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p> <p>10/15/86</p>	<p>Amount of Each Receipt this Period</p> <p>\$150.00 (memo)</p>
<p>B. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>C. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>D. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>E. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>F. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>G. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>

SUBTOTAL of Receipts This Page (optional)	\$300.00
TOTAL This Period (last page this line number only)	\$300.00 (memo)

87040664342

5

CAMPAIGN FINANCE SYSTEM

Run Date: 01-01-1980

Itemized Disbursements

Page 1 of 2

(PAC) A. L. I. G. M. P. A. C.

Line 0 19

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. For the period 10-01-86 thru 10-15-86 Over \$200 YTD TYPE: 0

BIT BY BIT COMPUTER EQUIPMENT PAC-00204-0 10-08-86 98.33
10220 SW NINDUS #K10

COMPUTER EXPENSE

TIGARD, OR

Year to date: \$491.67

FEDERAL EXPRESS CORPORATION PAC-00008-0 10-08-86 140.17
PO BOX 727 DEPT A 10-10-86 87.33

MAILING EXPENSE

MEMPHIS, TN 38194

Year to date: \$1,363.68

HORIZON BUSINESS FORMS PAC-00062-0 10-08-86 214.10
PO BOX 449 10-08-86 72.48

OFFICE SUPPLIES

WEST LINN, OR 97068

Year to date: \$2,111.01

KATHLEEN U HASSEY, CPA PAC-00009-0 10-08-86 879.17
3419 SW MARTINS

CONTRACT ACCOUNTING SERVICES

PORTLAND, OR 97202

Year to date: \$4,674.53

MANAGEMENT COMPENSATION GROUP PAC-00142-0 10-10-86 166.14
4640 SW MACADAM AVE #250

PAYROLL EXPENSE

PORTLAND, OR 97201

Year to date: \$8,221.94

PACIFIC NW BELL PAC-00066-0 10-08-86 43.64
PO BOX 6660

TELEPHONE EXPENSE

PORTLAND, OR 97228-6660

Year to date: \$1,060.36

PAUL HASTINGS JANDFSKY & PAC-00019-0 10-08-86 1,151.91
WALKER

LEGAL SERVICES

555 S FLOWER ST
LOS ANGELES, CA 90071

Year to date: \$16,816.95

PRO-TEM PAC-00064-0 10-08-86 65.55
1210 ORBANCO BLDG

CONTRACT CLERICAL SUPPORT

PORTLAND, OR 97204

Year to date: \$917.59

Page Total \$2,918.82

5

87040564343

CAMPAIGN FINANCE SYSTEM

Run Date: 01-01-1980

Itemized Disbursements

Page 2 of 2

(PAC) A. L. I. G. M. P. A. C.

Line 419

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AUTOMATED OFFICE SYSTEMS	PAC-00333-0	10-08-86	27.40
12100 SW GARDEN PL			

PORTLAND, OR 97223	MAINTENANCE EXPENSE
--------------------	---------------------

Year to date:	\$27.40
---------------	---------

DICTAPHONE	PAC-00334-0	10-08-86	4.67
PO BOX 38120			

LOUISVILLE, KY 40233-0120	DICTAPHONE MAINTENANCE AGREEMENT
---------------------------	----------------------------------

Year to date:	\$4.67
---------------	--------

IDM	PAC-00338-0	10-15-86	64.33
-----	-------------	----------	-------

TYPewriter MAINTENANCE AGREEMENT

Year to date:	\$64.33
---------------	---------

IMPERIAL ELECTRIC	PAC-00332-0	10-08-86	100.00
PO BOX 02517			

PORTLAND, OR 97202	LEASEHOLD IMPROVEMENT
--------------------	-----------------------

Year to date:	\$100.00
---------------	----------

SUE DEHNING	PAC-00086-0	10-14-86	28.32
1444 NE 195TH			

PORTLAND, OR 97230	OFFICE SUPPLIES
--------------------	-----------------

Year to date:	\$103.48
---------------	----------

Page Total	\$224.72
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Report Total	\$3,143.54
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13 Vendors printed

87040564344

5

CAMPAIGN FINANCE SYSTEM

Run Date: 01-01-1980

Itemized Disbursements

Page 1 of 2

(PAC) A. L. I. G. M. P. A. C.

Line # 21

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BROCK ADAMS SENATE COMMITTEE PAC-00345-C 10-10-86 5,000.00 General
717 B FEDERAL AVE EAST

SEATTLE, WASHINGTON 98102
CONTRIBUTION TO ELECT
ADAMS OF WA
Year to date: \$5,000.00

COLLINS FOR CONGRESS COMM PAC-00336-C 10-15-86 2,500.00 General
59 W CLINTON

JOLIET, IL 60431
CONT TO ELECT COLLINS OF IL
Year to date: \$5,000.00

COMM TO RE-ELECT TOM FOLEY PAC-00337-C 10-15-86 2,500.00 General
W 830 1ST AVE

SPOKANE, WA 99204
CONT TO RE-ELECT FOLEY OF WA
Year to date: \$2,500.00

DEMOCRATIC CONG CAMPAIGN COMM PAC-00335-C 10-15-86 5,000.00
430 S CAPITOL ST NE

WASHINGTON, DC 20003
CONT TO A MULTI-CANDIDATE PAC
Year to date: \$5,000.00

DSCC SOUTHERN VICTORY TOUR PAC-00344-C 10-06-86 1,000.00
500 CAMP STREET

NEW ORLEANS, LA 70130
CONTRIBUTION TO A COMMITTEE
Year to date: \$1,000.00

FRIENDS OF HARRY REID PAC-00276-C 10-15-86 1,000.00 General
900 17TH ST NW #300

WASHINGTON, DC 20006
CONTRIBUTION TO RE-ELECT
REID OF NV
Year to date: \$5,000.00

SENATOR FRITZ HOLLINGS COMM PAC-00118-C 10-15-86 4,000.00 General
1835 ASSEMBLY ST #1351

COLUMBIA, SC 29201
CONTRIBUTION TO RE-ELECT
HOLLINGS OF SC
Year to date: \$5,000.00

Page Total \$21,000.00

CAMPAIGN FINANCE SYSTEM

Run Date: 01-01-1980

Itemized Disbursements

Page 2 of 2

(PAC) A. L. I. G. N. P. A. C.

Line 21

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Page Total \$0.00

7 Vendors printed

Report Total \$21,000.00

87040664346

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Associated Life Insurance)
Group National Policyholder)
Advisory Committee)
Ellison Morgan, as treasurer)

MUR 2425

87 JUL 17 5:01

RECEIVED
FEDERAL ELECTION COMMISSION
JUL 17 1987

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On May 21, 1987, the Commission found reason to believe that the Associated Life Insurance Group National Policyholder Advisory Committee ("ALIGNPAC") and Ellison Morgan, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) by failing to file a 12 Day Pre-General Election Report in a timely manner. On June 30, 1987, this Office received a letter from counsel for ALIGNPAC responding to the allegation and requesting pre-probable cause conciliation. (See Attachment 1).

In response to the allegation, counsel enclosed a copy of a letter from ALIGNPAC's administrator sent to the Reports Analysis Division in November, 1986; this letter was part of the RAD Referral. The administrator stated that the committee, which switched to monthly filing in the spring of 1986, thought mistakenly that monthly filers were not obligated to file pre-general election reports. She also stated that ALIGNPAC "is a relatively new committee having been formed 3 years ago," and that "[t]his was the first election cycle for the current staff."

87040664347

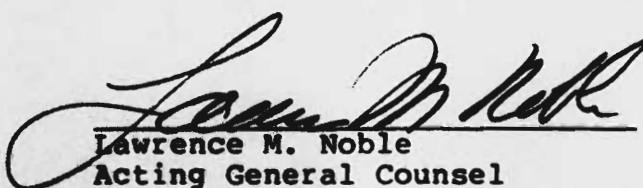
87040664348

III. RECOMMENDATIONS

1. Enter into conciliation prior to a finding of probable cause to believe with the Associated Life Insurance Group National Policyholder Advisory Committee and Ellison Morgan, as treasurer.
2. Approve the attached conciliation agreement and letter.

Date

7/17/87


Lawrence M. Noble
Acting General Counsel

Attachments

- 1-Letter from counsel for ALIGNPAC
- 2-Proposed letter and conciliation agreement

87040664349

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 5
2 8

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Associated Life Insurance
Group National Policyholder
Advisory Committee
Ellison Morgan, as treasurer

MUR 2425

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 22, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2425:

1. Enter into conciliation prior to a finding of probable cause to believe with the Associated Life Insurance Group National Policyholder Advisory Committee and Ellison Morgan, as treasurer, as recommended in the General Counsel's Report signed July 17, 1987.
2. Approve the conciliation agreement and letter, as recommended in the General Counsel's Report signed July 17, 1987.

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

Attest:

7-22-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Fri., 7-17-87, 5:01
Circulated on 48 hour tally basis: Mon., 7-20-87, 11:00
Deadline for vote: Thurs., 7-23-87, 4:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 24, 1987

John P. Carey, Esquire
Paul, Hastings, Janofsky & Walker
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036

RE: MUR 2425
Associated Life Insurance
Group National Policyholder
Advisory Committee
Ellison Morgan, as treasurer

Dear Mr. Carey:

On May 21, 1987, the Federal Election Commission found reason to believe that the Associated Life Insurance Group National Policyholder Advisory Committee and Ellison Morgan, as treasurer, violated 2 U.S.C. § 434(a)(4)(B). At your request, on July 22, 1987, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please have them 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 Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble (LZN)
Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

87040664351

plm

8

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of

Associated Life Insurance Group
National Policyholder Advisory
Committee and Ellison Morgan,
as treasurer

MUR 2425

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Ellison Morgan, the treasurer of the Associated Life Insurance Group National Policyholder Advisory Committee ("ALIGNPAC").

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Associated Life Insurance Group National Policyholder Advisory Committee and Ellison Morgan, as treasurer.
2. Close the file.
3. Approve the attached letter.

Date

8/25/87

Lawrence M. Noble (2/2)
Lawrence M. Noble
Acting General Counsel

Attachments

1. Letter from counsel for Respondents and Conciliation Agreement
2. Letter to Respondents

87040664353

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	<u>1</u>	see	<u>-</u>
	<u>2</u>		<u>11</u>
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Associated Life Insurance Group)
National Policyholder Advisory)
Committee and Ellison Morgan,)
as treasurer)

MUR 2425

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 28, 1987, the Commission decided by a vote of 4-0 to take the following actions in MUR 2425:

1. Accept the conciliation agreement with Associated Life Insurance Group National Policyholder Advisory Committee and Ellison Morgan, as treasurer, as recommended in the General Counsel's report signed August 25, 1987.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report signed August 25, 1987.

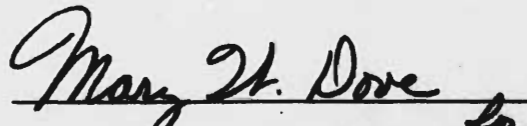
Commissioners Aikens, Elliott, McDonald, and McGarry voted affirmatively for the decision;

Commissioners Josefiak and Thomas did not cast a vote.

Attest:

8-28-87

Date



Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Wed., 8-26-87, 11:22
Circulated on 48 hour tally basis: Wed., 8-26-87, 4:00
Deadline for vote: Fri., 8-28-87, 4:00

87040664354



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 31, 1987

John P. Carey, Esquire
Paul, Hastings, Janofsky & Walker
1050 Connecticut Ave., N.W., 12th Floor
Washington, D.C. 20036

RE: MUR 2425
Associated Life Insurance
Group National
Policyholder Advisory
Committee and Ellison
Morgan, as treasurer

Dear Mr. Carey:

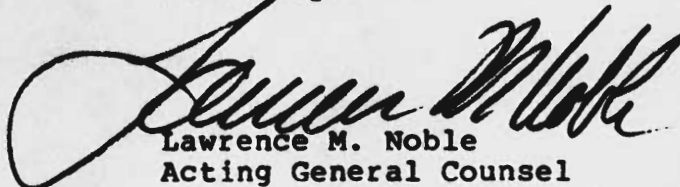
On August 28, 1987, the Federal Election Commission accepted the signed conciliation agreement submitted on your clients' behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this 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 respondents 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 Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

11

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Associated Life Insurance) MUR 2425
Group National Policyholder)
Advisory Committee)
Ellison Morgan, as treasurer)

CONCILIATION AGREEMENT

8 7 0 4 0 6 4 3 5 6
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 reason to believe that the Associated Life Insurance Group National Policyholder Advisory Committee and Ellison Morgan, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(B).

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

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

//

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent Associated Life Insurance Group National Policyholder Advisory Committee ("ALIGNPAC") is a political committee within the meaning of 2 U.S.C. § 431(4);

2. Respondent Ellison Morgan is the treasurer of ALIGNPAC;

3. Respondents did not file the 12 Day Pre-General Election Report until November 20, 1986.

4. Section 434(a)(4)(B) of Title 2 requires political committees filing monthly reports to file a pre-election report which shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) a general election, and which shall be complete as of the 20th day before such election. The 1986 12 Day Pre-General Election Report was due, therefore, on October 23, 1986.

V. Respondents failed to file the 1986 12 Day Pre-General Election Report in a timely manner in violation of 2 U.S.C. § 434(a)(4)(B).

8704064358

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Six Hundred Dollars (\$600), 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.

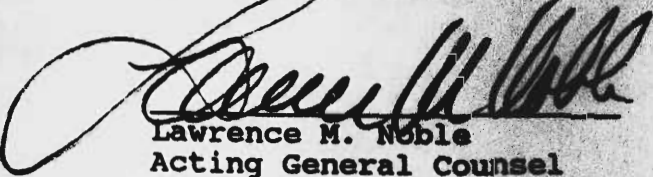
VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement 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 enforceable.

FOR THE COMMISSION:


Lawrence M. Noble
Acting General Counsel

8/31/87
Date

FOR THE RESPONDENTS:

Ellison C. Morgan
Ellison C. Morgan
Treasurer

8/14/87
Date

87040564359

6CC #9376

LAW OFFICES OF
PAUL HASTINGS, JANOFSKY & WALKER

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

TWELFTH FLOOR

1050 CONNECTICUT AVENUE, N. W.

WASHINGTON, D. C. 20036

TELEPHONE (202) 333-8000

CABLE ADDRESS: PAULHAST WSH

TWX: 710-522-3082

—

—

LEE S. PAUL
ROBERT R. HASTINGS
LEONARD S. JANOFSKY
CHARLES M. WALKER

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TWENTY-SECOND FLOOR
555 SOUTH FLOWER STREET
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TELEPHONE (203) 387-0100

NEW YORK OFFICE
EIGHTH FLOOR
290 PARK AVENUE
NEW YORK, NEW YORK 10171
TELEPHONE (212) 750-1155

OUR FILE NO:

September 15, 1987

HAND-DELIVERED

Jonathan Levin, Esquire
Office of General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2425, Associated Life Insurance Group
National Policyholder Advisory Committee

Dear Mr. Levin:

Enclosed is a check from the Associated Life Insurance Group National Policyholder Advisory Committee ("ALIGNPAC") of six-hundred dollars (\$600.00) for the fine in the above-referenced MUR.

In Lawrence Noble's letter of August 31, 1987, ALIGNPAC was requested to submit any factual or legal materials which should appear in the public record. As discussed, the letters from ALIGNPAC dated November 19, 1986, as well as my letter to you on June 29, 1987, should be included in the public record. For your convenience, I have attached copies of those letters.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

87 SEP 16 AM 10:09

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

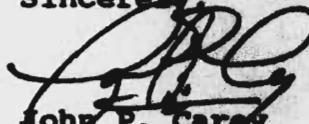
87 SEP 17 AM 10:25

87040564360

Jonathan Levin, Esquire
September 15, 1987
Page 2

I trust this closes the record for MUR 2425. Should you have any questions regarding the foregoing, please contact me directly.

Sincerely,



John P. Carey
for PAUL, HASTINGS, JANOFKY & WALKER

Enclosures

87040664361

Attachments to 9-15-67
letter

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

6004376

MEMORANDUM

TO: DEBRA A. TRIMM

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMM

CHECK NO. 1591 (A COPY OF WHICH IS ATTACHED) RELATING TO
NUMBER 2425 AND NAME Associated Life Insurance Group Nat'l.
Policyholder Advisory Cmte. (ALIGN)

WAS RECEIVED ON 9/17/87. PLEASE INDICATE THE ACCOUNT INTO
WHICH IT SHOULD BE DEPOSITED:

/ ✓ / BUDGET CLEARING ACCOUNT { 95F3875.16 }
/ / CIVIL PENALTIES ACCOUNT { 95-1077.160 }
/ / OTHER _____

SIGNATURE Debra A. Trimm DATE 9/18/87

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 SEP 17 AM 10:24

POLITICAL ACTION COMMITTEE

4840 S.W. MACADAM, SUITE 260 (503) 228-3727
PORTLAND, OREGON 97201

REMITTANCE ADVISE	

1591

**PACIFIC WESTERN BANK
EAST MORRISON OFFICE
PORTLAND, OREGON 97214**

96-201
1232

PAY Six Hundred Dollars-----

DATE	AMOUNT
September 4, 1987	\$600.00

Sam. P. Carter

THE
ORDER Federal Election Commission

0001591 1:1232020151: 23 42695 01

RE: MUR 2425 Associated Life Insurance Group Policyholder Advisory Committee

8704056436



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20543

THIS IS THE END OF MUR # 2425

DATE FILMED 11/23/87 CAMERA NO. 3

CAMERAMAN A.S.

87040664365



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

M03-14-88

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 2425

8 9 0 4 0 6 7 5 4 2 1

QCC#4190

LAW OFFICES OF
PAUL, HASTINGS, JANOFSKY & WALKER

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

TWELFTH FLOOR

1050 CONNECTICUT AVENUE, N. W.

WASHINGTON, D. C. 20036

TELEPHONE (202) 223-9000

CABLE ADDRESS: PAULHAST WSH

TWX: 710 - 822 - 9062

COUNSEL
LEE G. PAUL
ROBERT R. HASTINGS
LEONARD S. JANOFSKY
CHARLES M. WALKER

ATLANTA OFFICE
FORTY-SECOND FLOOR
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ATLANTA, GEORGIA 30303
TELEPHONE (404) 588-9900

CONNECTICUT OFFICE
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TELEPHONE (203) 357-0100

NEW YORK OFFICE
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299 PARK AVENUE
NEW YORK, NEW YORK 10171
TELEPHONE (212) 750-1166

LOS ANGELES OFFICE
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TELEPHONE (213) 489-4000

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COSTA MESA, CALIFORNIA 92626
TELEPHONE (714) 641-1100

WEST LOS ANGELES OFFICE
FIFTH FLOOR
1299 OCEAN AVENUE
SANTA MONICA, CALIFORNIA 90401
TELEPHONE (213) 481-1200

August 19, 1987

OUR NO: 12 AUG 19 P12:34

By Hand

Jonathan Levin, Esq.
Office of General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: Mur 2425 Associated Life Insurance
Company National Policyholder Advisory
Committee ("ALIGNPAC")

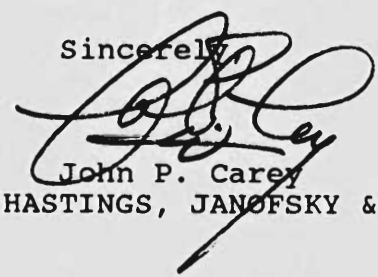
Dear Mr. Levin:

Pursuant to our conversation of July 29, 1987, we will accept the proposed conciliation agreement with the modified civil penalty reduced to \$600. We believe that this reduction is justified given ALIGNPAC's unintended failure to timely file the necessary Pre-General Election Report. Furthermore, this report was filed less than one month from the time it was originally due. Finally, as stated to you before, ALIGNPAC is in the business of winding down its affairs and closing out its political action committee affairs.

For your convenience, I have modified page 2 of the conciliation agreement to reflect the new civil penalty in the amount of \$600. No other changes have been made in this conciliation agreement. Finally, this agreement has been executed by ALIGNPAC's Treasurer, Ellison Morgan.

Should you have any questions regarding the foregoing, please contact me directly. Again, I appreciate your assistance in this matter.

Sincerely,



John P. Carey
for PAUL, HASTINGS, JANOFSKY & WALKER

23040675422

LAW OFFICES OF
PAUL, HASTINGS, JANOPSKY & WALKER

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COUNSEL
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NEW YORK OFFICE
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 299 PARK AVENUE
 NEW YORK, NEW YORK 10171
 TELEPHONE (212) 750-1166

OUR FILE NO:

September 15, 1987

HAND-DELIVERED

Jonathan Levin, Esquire
 Office of General Counsel
 Federal Election Commission
 Washington, D.C. 20463

Re: MUR 2425, Associated Life Insurance Group
National Policyholder Advisory Committee

Dear Mr. Levin:

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In Lawrence Noble's letter of August 31, 1987, ALIGNPAC was requested to submit any factual or legal materials which should appear in the public record. As discussed, the letters from ALIGNPAC dated November 19, 1986, as well as my letter to you on June 29, 1987, should be included in the public record. For your convenience, I have attached copies of those letters.

RECEIVED
 FEDERAL ELECTION COMMISSION
 OFFICE OF GENERAL COUNSEL
 87 SEP 16 AM 10:09

RECEIVED
 FEDERAL ELECTION COMMISSION
 OFFICE OF GENERAL COUNSEL
 87 SEP 17 AM 10:25

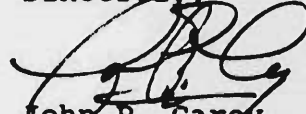
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PAUL, HASTINGS, JANOFSKY & WALKER

Jonathan Levin, Esquire
September 15, 1987
Page 2

I trust this closes the record for MUR 2425. Should you have any questions regarding the foregoing, please contact me directly.

Sincerely,



John P. Carey

for PAUL, HASTINGS, JANOFSKY & WALKER

Enclosures

330440675424

RECEIVED AT THE FEC.

87 JUN 29 P 4: 48

LAW OFFICES OF
PAUL, HASTINGS, JANOPSKY & WALKER

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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CABLE ADDRESS: PAULHAST WSH

TWX: 710-822-9082

—
COUNSEL
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899 PARK AVENUE
NEW YORK, NEW YORK 10171
TELEPHONE (212) 750-1166

OUR FILE NO:

June 29, 1987

BY HAND

Jonathan Levin, Esq.
Office of General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2425, Associated Life Insurance Group
Policyholder Advisory Committee

Dear Mr. Levin:

Pursuant to our telephone conference of today, the Associated Life Insurance Group National Policyholder Advisory Committee ("ALIGNPAC") respectfully requests, under 11 C.F.R. § 111.18(d), to enter into negotiations towards reaching a pre-probable cause conciliation agreement.

As set forth in the attached Statement of Designation of Counsel, ALIGNPAC has designated N. Beth Emery, Esq., me, and the law firm of Paul, Hastings, Janofsky & Walker as counsel for ALIGNPAC in this matter. Please direct any and all correspondence and communications regarding this matter to the undersigned.

Finally, enclosed as promised, is ALIGNPAC's letter dated November 19, 1986 to Ms. Robyn Jameson, Reports Analyst, Federal Election Commission regarding the filing of ALIGNPAC's

33040575425

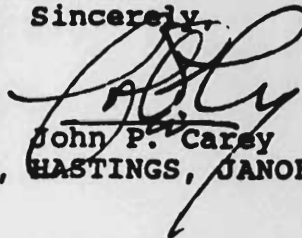
PAUL, HASTINGS, JANOFKY & WALKER

Jonathan Levin, Esq.
June 29, 1987
Page Two

Pre-General Election report. This letter explains, in some detail, some of the reasons for the delay in filing the ALIGNPAC's Pre-General Election report.

Should you have any questions regarding this matter, please contact me directly. We look forward to resolving this matter through the conciliation process in a manner mutually agreeable to both the Commission and ALIGNPAC.

Sincerely,



John P. Carey
for PAUL, HASTINGS, JANOFKY & WALKER

JPC/lg

Enclosures

cc: Mr. Eli C. Morgan

93040575426

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2425

NAME OF COUNSEL: N. Beth Emery, Esq. John P. Carey

ADDRESS: Paul, Hastings, Janofsky & Walker

1050 Connecticut Avenue, N.W.

Washington, D.C. 20036

TELEPHONE: (202) 223-9000

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.

6/26/87

Date

EC Morgan

Signature

RESPONDENT'S NAME:

Ellison Morgan, Treasurer
Associated Life Insurance Group National
Policyholder Advisory Committee

ADDRESS:

5200 S.W. Macadam Avenue, Suite 580

Portland, Or. 97201

HOME PHONE:

BUSINESS PHONE:

(503) 226-1421

23040675427

ALIGNPAC

November 19, 1986

4640 S W Macadam Ave
Suite 250
Portland Oregon 97201
503 226-1421

Ms. Robyn Jameson
Reports Analyst
Federal Election Commission
Reports Analysis Division, Rm. 701
999 E Street, N.W.
Washington, DC 20463

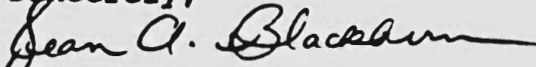
Dear Ms. Jameson,

Enclosed for filing is Alignpac's Pre-General Report. Simply put, the committee was under the mistaken impression that by filing monthly reports, rather than quarterly reports, we were not required to file pre-election reports. In fact, our monthly report for October (due November 20) was ready for filing when the notice was received from the Commission regarding the missed report. This mistake was the result of misunderstanding our counsel's advice last spring to convert to monthly filing to avoid having to file pre-primary reports.

Alignpac is a relatively new committee, having been formed 3 years ago. During the last election cycle, a volunteer handled reporting. This was the first election cycle for the current staff; thus, we had no prior experience with the special rules for pre- and post-election reports. The committee has expended substantial time and expense to reorganize our reporting procedures to assure full compliance with the law. For example, recent amendments to prior reports were filed to reflect adjustments necessary after a complete audit was performed by a certified public accountant. The committee has also recently obtained approval to file computer-generated reports to assure further the accuracy and timeliness of reports.

We recognize the public interest in providing information on campaign finance in a timely fashion and have always intended to comply fully with the letter and spirit of the law. We will be happy to provide any further information you request. Please contact me or our Washington counsel, Beth Emery of Paul, Hastings, Janofsky & Walker, (202) 457-9424.

Sincerely,



Jean A. Blackburn
Administrator

JB:sd

Encl. .

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