



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2488

DATE FILMED 3/25/88 CAMERA NO. 4

CAMERAMAN GRC

88040584071



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

May 22, 1987

MEMORANDUM

TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: QUARTERLY FILERS (UNAUTHORIZED COMMITTEES) WHICH
FAILED TO FILE THE 1986 12 DAY PRE-GENERAL REPORT
BY ELECTION DAY

The attached list of unauthorized committees consists of forty-nine (49) quarterly filers which failed to file a 1986 12 Day Pre-General Report by Election Day, November 4, 1986. In accordance with Standard 3 of the RAB Review and Referral Procedures, further examination is required by your office.

Unlike the mandatory reporting requirement placed upon monthly filers, 2 U.S.C. §434(a)(4)(A)(ii) requires quarterly filers to submit 12 Day Pre-General Reports only if the committees make contributions to or expenditures on behalf of federal candidates involved in the general election. All unauthorized committees were sent prior notification regarding the pre- and post-general filing requirements on September 29, 1986 (Attachment 50).

The Party/Non-Party Branch conducted a thorough examination to identify quarterly filers disclosing contributions or expenditures between October 1 and October 15, 1986. The research revealed committees that submitted:

- a) 12 Day Pre-General Reports in an untimely manner;
- b) 30 Day Post-General Reports indicating that 12 Day Pre-General Reports should have been filed; and
- c) Year End Reports indicating that 12 Day Pre-General Reports should have been filed.

ATTACHMENT 1

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For your information, the pertinent supporting documentation on each committee has been arranged in alphabetical order. Statistics on all C indices only reflect activity through December 31, 1986. Any reports disclosing activity in 1987 have not been reviewed.

The following committees were previously referred either to your office or to the Audit Division for a possible 2. U.S.C. §438(b) audit.

(1)

(2)

(3)

(4)

(5)

(6)

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

Attachments

88040684073

C00002677

J.G. Boswell Company Employees'
Political Action Committee

87HF-107

88040584074

**J.G. BOSWELL COMPANY EMPLOYEES'
POLITICAL ACTION COMMITTEE**

(Attachments 22a - 22e)

88040684075

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
J.G. BOSWELL COMPANY EMPLOYEES' POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: J G BOSWELL COMPANY				NON-PARTY QUALIFIED	ID 0C00002677	
1985	MID-YEAR REPORT	28,687	39,385	1JAN85 -30JUN85	14	05FEC/382/0269
	YEAR-END	10,802	9,691	1JUL85 -31DEC85	9	06FEC/398/3087
1986	STATEMENT OF ORGANIZATION - AMENDMENT			15MAY86	2	06FEC/414/0873
	APRIL QUARTERLY	493	5,309	1JAN86 -31MAR86	6	06FEC/408/0781
	PRE-PRIMARY	0	2,960	1APR86 -14MAY86	5	06FEC/414/3318
	JULY QUARTERLY	14,470	16,000	15MAY86 -30JUN86	7	06FEC/422/4078
	OCTOBER QUARTERLY	4,316	13,675	1JUL86 -30SEP86	10	06FEC/435/1499
	POST-GENERAL	6,650	15,000	1OCT86 -24NOV86	7	06FEC/449/4551
	YEAR-END	127	0	25NOV86 -31DEC86	5	07FEC/457/4938
TOTAL		65,545	0 101,920	0	65	TOTAL PAGES

All reports have been reviewed.

Ending cash-on-hand as of 12/31/86: \$11,986

Outstanding debts owed by the committee as of 12/31/86: \$0

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

RECEIVED AT THE FBI

06 DEC 81 PB: 23

[REDACTED]

<p>1. Name of Committee (in Full)</p> <p>J. S. Boswell Company Employees' Political Action Committee</p> <hr/> <p>Address (Number and Street)</p> <p>333 South Hope Street Suite 4600</p> <hr/> <p>City, State and ZIP Code</p> <p>Los Angeles, CA 90071</p> <hr/> <p><input type="checkbox"/> Check here if address is different than previously reported.</p> <hr/> <p>2. FEC Identification Number</p> <p>C00082677 (95-3250468)</p> <hr/> <p>3. <input type="checkbox"/> This committee qualified as a multi-candidate 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 <input checked="" type="checkbox"/> October 15 Quarterly Report</p> <p><input type="checkbox"/> July 15 Quarterly Report <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 _____</p> <p><input type="checkbox"/> Twelfth day report preceding _____ (Name of Election)</p> <p>election on _____ in the State of _____</p> <p><input checked="" type="checkbox"/> Twelfth day report following the General Election</p> <p>on <u>November 4</u> in the State of <u>California</u></p> <p><input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment?</p> <p style="text-align: center;"><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
6. Covering Period <u>October 1, 1986</u> through <u>November 24, 1986</u>			
6. (a) Cash on hand January 1, 19 <u>86</u>			\$ 38,872.50
(b) Cash on Hand at Beginning of Reporting Period		\$ 20,209.00	
(c) Total Receipts (From Line 10)		\$ 6,650.00	\$ 25,930.53
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(c) and 6(d) for Column B)		\$ 26,859.00	\$ 64,803.03
7. Total Disbursements (From Line 20)		\$ 18,000.00	\$ 52,944.03
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 11,859.00	\$ 11,859.00
9. Debts and Obligations Owed TO The Committee (Provide all on Schedule C or Schedule D)		\$ - 0 -	
10. Debts and Obligations Owed BY the Committee (Provide all on Schedule C or Schedule D)		\$ - 0 -	

THIS DOCUMENT CONTAINS NEITHER RECOMMENDATIONS NOR
CONCLUSIONS OF THE NATIONAL BUREAU OF STANDARDS
IT IS THE PROPERTY OF THE NATIONAL BUREAU OF STANDARDS
AND IS LOANED TO YOUR ORGANIZATION

For Further Information:

Poland Election Commission
500 E Street, N.W.
Washington, D.C. 20002
Toll Free (800) 454-6550
Long (202) 576-6700

1997

~~November 26, 1996~~

Submission of false, erroneous, or incomplete information may subject the person giving this report to the penalties of 18 U.S.C. § 1001.

All previous versions of PHS FORM 1 and PHS FORM 2 are obsolete and should no longer be used.

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FPC FORM 21 (1969)

8860340584077

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
Form 2, FES FORM 200**

Committee Name J. G. Boswell, Co. Employees Political Action Committee		Reporting Period From: 10/1/86 To: 11/24/86	
		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
I. RECEIPTS			
11. CONTRIBUTIONS (other than from 1161)			
(a) Individuals/Persons Other Than Political Committees	6,650.00	24,750.00	1161
(b) Political Party Committees	-0-	-0-	1161
(c) Other Political Committees	-0-	-0-	1161
1162 TOTAL CONTRIBUTIONS (other than from 1161, 1163 and 1164)	6,650.00	24,750.00	1162
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	12
13. ALL LOANS RECEIVED	-0-	-0-	13
14. LOAN REPAYMENTS RECEIVED	-0-	-0-	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Returns, etc.)	-0-	-0-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.) Savings Acct. 4455-981		1,180.53	17
18. TOTAL RECEIPTS (Add 1162, 12, 13, 14, 15, 16 and 17)	6,650.00	25,930.53	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	-0-	-0-	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	15,000.00	51,925.00	21
22. INDEPENDENT EXPENDITURES (see Schedule B)	-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES	-0-	-0-	23
(U.S.C. 1641 (d)(1) Run Schedule F)			
24. LOAN REPAYMENTS MADE	-0-	-0-	24
25. LOANS MADE	-0-	-0-	25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	26a
(b) Political Party Committees	-0-	-0-	26b
(c) Other Political Committees	-0-	-0-	26c
262 TOTAL CONTRIBUTION REFUNDS (Add 26a, 26b and 26c)	-0-	-0-	262
27. OTHER DISBURSEMENTS Federal & California Taxes - Plus CA penalty & estimated taxes for 1986	-0-	1,014.03	27
28. TOTAL DISBURSEMENTS (Add 19, 20, 21, 22, 23, 24, 25, 262 and 27)	15,000.00	52,939.03	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than from Line 1161)	6,650.00	24,750.00	29
30. TOTAL CONTRIBUTION REFUNDS from Line 262	-0-	-0-	30
31. NET CONTRIBUTIONS (other than from Subpart Line 29 from Line 28)	6,650.00	24,750.00	31
32. TOTAL OPERATING EXPENDITURES from Line 19	-0-	-0-	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-0-	-0-	33
34. NET OPERATING EXPENDITURES (Subpart Line 32 from Line 33)	-0-	-0-	34

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use amounts calculated for each category of the Detailed Summary Page

PAGE 1 OF 2
FOR LINE NUMBER 21

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)

J. S. Boswell Company Employees' Political Action Committee

A. Full Name, Mailing Address and ZIP Code Friends of Mattingly P. O. Box 23412, LeEnfant Plaza Washington, D.C. 20026	Purpose of Disbursement Nack Mattingly - R Statewide Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/6/86	Amount of Cash Disbursement This Period \$ 1,000.00
B. Full Name, Mailing Address and ZIP Code Congressman Fazio Campaign Com. 954 Greenstar Way Sacramento, CA 95831	Purpose of Disbursement Vic Fazio - D 4th District Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/6/86	Amount of Cash Disbursement This Period \$ 500.00
C. Full Name, Mailing Address and ZIP Code Henson Moore Election Committee Post Office Box 6 Baton Rouge, LA 70821	Purpose of Disbursement Henson Moore - R Statewide Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/10/86	Amount of Cash Disbursement This Period \$ 1,000.00
D. Full Name, Mailing Address and ZIP Code Henson Moore Election Committee Post Office Box 6 Baton Rouge, LA 70821	Purpose of Disbursement Henson Moore - R Statewide Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/24/86	Amount of Cash Disbursement This Period \$ 2,000.00
E. Full Name, Mailing Address and ZIP Code Sentinel For Senate Post Office Box 15230 Las Vegas, NV 89114-5230	Purpose of Disbursement Jim Sentinel - R Statewide Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/24/86	Amount of Cash Disbursement This Period \$ 2,000.00
F. Full Name, Mailing Address and ZIP Code Kramer For U. S. Senate Committee 101 University Blvd., Suite 330 Denver, CO 80206	Purpose of Disbursement Ken Kramer - R Statewide Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/24/86	Amount of Cash Disbursement This Period \$ 2,000.00
G. Full Name, Mailing Address and ZIP Code Bryant For Senate Committee 1401 Battleground Ave., Suite 100 Greensboro, NC 27408	Purpose of Disbursement JAMES BRYANT - R Statewide Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/24/86	Amount of Cash Disbursement This Period \$ 2,000.00
H. Full Name, Mailing Address and ZIP Code ATLANTA FOR KYE BOND 8600 Ward Parkway, Suite 205 Kansas City, MO 64114	Purpose of Disbursement KYE BOND - R Statewide Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/24/86	Amount of Cash Disbursement This Period \$ 2,000.00
I. Full Name, Mailing Address and ZIP Code Senator Stede Lorton - DC Committee 900 Wall Street, Suite 421 Seattle, WA 98121	Purpose of Disbursement Stede Lorton - R Statewide Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/24/86	Amount of Cash Disbursement This Period \$ 2,000.00

SUBTOTAL of Disbursements This Page (optional)

\$14,500.00

TOTAL This Period (use page and line number only)

BOSPAC

+ G. Bennett Company
Employees' Political Action Committee
SUITE 1000, SECURITY PACIFIC PLAZA
100 SOUTH HOPE STREET
LOS ANGELES, CALIFORNIA 90071

1 2 4 5

CERTIFIED

P25 1687874

MAIL

Federal Election Commission
999 E Street N.W.
Washington, D.C. 20463



86DEC 8 P6:29

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

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRALS: 87NF-88-134
STAFF MEMBER: George F. Rishel

SOURCE OF NUM: INTERNALLY GENERATED

88040584081

- 2 -

J.G. Boswell Company Employees' Political Action
Committee and James A. Henry, as treasurer

88040584082

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

INTERNAL REPORTS

CHECKED: Referral Materials

FEDERAL AGENCIES

CHECKED: None

I. GENERATION OF MATTER

The Report Analysis Division ("RAD") referred the above-listed 49 committees to the Office of the General Counsel on May 22, 1987. The basis of the attached referrals is their failure to either file a 12-day Pre-Election Report or file such report in a timely fashion.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file a Pre-Election Report before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. Such report shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) such election and shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii).

The 1986 Pre-Election Report for the 1986 General Election was due on October 23, 1986, complete as of October 15, 1986. Quarterly

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filers were notified on September 29, 1986, of the requirement for filing the Pre-Election Report.

The following committees filed a 12-Day Pre-Election Report, but did not file it in a timely fashion:

Committee

Date Filed

Pre-Election Activity

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disclosed activity indicating a 12-Day Pre-Election Report should have been filed:

Committee

Date Filed^{1/}

Pre-Election Activity

88040684085

^{1/} The date filed is that on which the Post-General Election Report was filed. The number of days late is that for the filing of the 12-Day Pre-Election Report. In some cases, the Post-General Election Report was filed after December 4, 1986. The late filings of such reports, however, were not included as a basis for these referrals. Therefore, no recommendations have been made with respect to the late filing of any Post-General Election Report.

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J.G. Boswell Co.
Employees' PAC

12-4-86
(42 days late)

\$2,500 in contributions
to three candidates

The following committees filed a Year End Report disclosing activity indicating that 12-Day Pre-Election Report should have been filed:

COMMITTEE

Date Filed^{4/}

Pre-Election Activity

Accordingly, with regard to 48 of these 49 committees, the Office of the General Counsel recommends that the Commission open Matter Under Review and find reason to believe these committees

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and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii). This Office recommends that the Commission decline to open a Matter Under Review [REDACTED]

III. RECOMMENDATIONS


1. Open Matters Under Review with respect to the following committees and find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii):

8804048888

J.G. Boswell Company Employees' Political Action Committee and
James A. Henry, as treasurer

2. Approve and send the attached letters and factual and legal analyses to the respective committees listed in recommendation 1.
- 3.

6/10/57
Date


Lawrence M. Noble
Acting General Counsel

Attachments

1. Referral Materials
2. Letters and Factual and Legal Analyses (48)

88040584089

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

RAD Ref.'s
87NF-86
THROUGH
87NF-134

88040584090

J.G. Boswell Company Employees' Political Action
Committee and James A. Henry, as treasurer

(continued)

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15, 1987

Page 3

CERTIFICATION

I. Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 15, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref.'s 87NF-86 through 87NF-134:

1. Open Matters Under Review with respect to the following committees and find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii):

(continued)

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15, 1987

Page 4

88040684092

J.G. Boswell Company Employees' Political Action Committee
and James A. Henry, as treasurer

(continued)

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15, 1987

Page 6

2. Approve and send the letters and factual and legal analyses to the respective committees listed in recommendation 1.

3

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

Attest:

6-16-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: Thurs., 6-11-87, 12:34
Circulated on 48 hour tally basis: Thurs., 6-11-87, 4:00
Deadline for vote: Mon., 6-15-87, 4:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 29, 1987

James A. Henry, Treasurer
J. G. Boswell Company
Employees' Political Action Committee
333 S. Hope Street, Suite 4600
Los Angeles, CA 90071

RE: MUR 2488
J. G. Boswell Company
Employees' Political Action
Committee and James A. Henry,
as treasurer

Dear Mr. Henry:

On June 15, 1987, the Federal Election Commission found that there is reason to believe J. G. Boswell Company Employees Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), 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 that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating 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 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

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

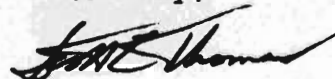
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel will not ordinarily give extensions beyond 20 days.

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 Deborah Curry, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form

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88040584096

MUR: 248B

A Political Action Committee
for Stockholders and Employees
of J. G. Boswell Company

BOSPAC

J. G. Boswell Company Employees' Political Action Committee

SUITE 4800, SECURITY PACIFIC PLAZA
333 SOUTH HOPE STREET
LOS ANGELES, CALIFORNIA 90071

6CC 3979 RECEIVED AT THE FEC
87 JUL 21 P 1: 43
Chairman
James A. Henry
Treasurer

July 13, 1987

Federal Election Commission
Attention: Mr. Scott E. Thomas
Office of General Counsel
Washington, D. C. 20463

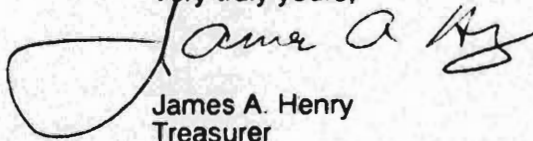
Re: **MUR 2488**
J. G. Boswell Company Employees'
Political Action Committee and
James A. Henry, as Treasurer

Gentlemen:

In accordance with the provisions of 11 C.F.R. Sec. 111.18 (d), we hereby request pre-probable cause conciliation in the above matter.

There was never any intent on the part of the Committee or myself to conceal any contributions to candidates and, in fact, such contributions were duly reported, although such reporting may have been a bit late. Therefore, it is our opinion a conciliation agreement can readily be reached in this matter.

Very truly yours,


James A. Henry
Treasurer

JAH:se

87 JUL 21 P 3: 21
RECEIVED
OFFICE OF THE
GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

J. G. Boswell Company Employees')
Political Action Committee and)
James A. Henry, as treasurer)

MUR 2488

SENSITIVE

07 SEP 14 PM 4:19

RECEIVED
FEDERAL ELECTION COMMISSION
SEP 14 1987

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 15, 1987, the Commission found reason to believe J. G. Boswell Company Employees' Political Action Committee ("Boswell PAC") and James A. Henry, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file the 1986 Pre-General Election Report in a timely manner. On July 21, 1987, the Office of the General Counsel received a response from Respondents requesting settlement of the matter prior to a finding of probable cause to believe. (Attachment 1)

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

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III. RECOMMENDATIONS

1. Enter into conciliation with J. G. Boswell Company Employees' Political Action Committee and James A. Henry, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Date

9/14/87

BY:

Lawrence M. Noble
Acting General Counsel

Attachments

1. Response of Boswell PAC
2. Proposed Conciliation Agreement
3. Letter to Respondents

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
J. G. Boswell Company Employees') MUR 2488
Political Action Committee and)
James A. Henry, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on Sept. 17, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2488:

1. Enter into conciliation with J. G. Boswell Company Employees' Political Action Committee and James A. Henry, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter, as recommended in the General Counsel's Report signed September 14, 1987.

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

Attest:

9-17-87

Date

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

Received in the Office of Commission Secretary: Mon., 9-14-87, 4:18
Circulated on 48 hour tally basis: Tues., 9-15-87, 11:00
Deadline for vote: Thurs., 9-17-87, 11:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 21, 1987

James A. Henry, Treasurer
J. G. Boswell Company Employees' Political
Action Committee
333 South Hope Street, Suite 4600
Los Angeles, CA 90071

RE: MUR 2488
J. G. Boswell Company
Employees' Political Action
Committee and James A. Henry,
as treasurer

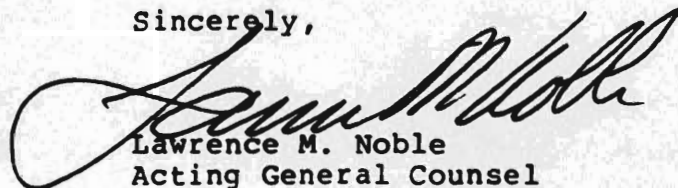
Dear Mr. Henry:

On June 15, 1987, the Federal Election Commission found reason to believe that J. G. Boswell Company Employees' Political Action Committee and James A. Henry, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii). At your request, on September 17, 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 you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

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

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

98040584101

A Political Action Committee
for Stockholders and Employees
of J. G. Boswell Company

BOSPAC

J. G. Boswell Company Employees' Political Action Committee

SUITE 4001, SECURITY PACIFIC PLAZA
333 SOUTH HOPE STREET
LOS ANGELES, CALIFORNIA 90071

John C. Sterling
Chairman
James A. Henry
Treasurer

CCC#4553

October 5, 1987

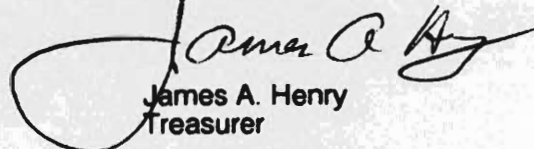
Federal Election Commission
Attention: Mr. Lawrence M. Noble
Acting General Counsel
Washington, D. C. 20463

Re: **MUR 2488**
J. G. Boswell Company Employees'
Political Action Committee and
James A. Henry, as Treasurer

Gentlemen:

Enclosed is the signed conciliation agreement and our check in the amount
of \$500.00 to cover the civil penalty in the above matter.

Very truly yours,


James A. Henry
Treasurer

JAH:se

Enclosures

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 OCT 14 AM 10:31

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
87 OCT -9 AM 11:46

88040584102

A Political Action Committee
for Stockholders and Employees
of J. G. Boswell Company

BOSPAC

18-4
1220

J.G. BOSWELL COMPANY EMPLOYEES' POLITICAL ACTION COMMITTEE
SUITE 4800, SECURITY PACIFIC PLAZA
333 SOUTH HOPE STREET
LOS ANGELES, CALIFORNIA 90071

No. 0795

October 5, 1987

PAY

BOSWELL 500000cts

\$ 500.00

TO THE
ORDER OF

FEDERAL ELECTION COMMISSION
Office of General Counsel
Washington, D.C. 20463

BOSPAC

ONLY ONE SIGNATURE REQUIRED

BY 

0000795

1220000431001-125092

HEADQUARTERS OFFICE

SECURITY PACIFIC NATIONAL BANK

LOS ANGELES, CALIFORNIA

DETACH STATEMENT BEFORE DEPOSITING

DATE	DESCRIPTION	DISTRIBUTION	AMOUNT
10/5/87	Civil Penalty - MUR 2488		\$500.00

BOSPAC

J.G. BOSWELL COMPANY EMPLOYEES' POLITICAL ACTION COMMITTEE
LOS ANGELES, CALIFORNIA

A Copy of our report is filed with the Federal Election Commission and is available for purchase from
the Federal Election Commission, Washington, D.C. Our FEC identification number is C00082677

FORM JG 48-1

QCC#4553

MEMORANDUM

TO: DEBRA A. TRIMIER

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMIER

87 OCT 14 AM 10:21

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

CHECK NO. 0795 (A COPY OF WHICH IS ATTACHED) RELATING TO
FOR 2488 AND NAME J.G. Boswell Company Employees' PAC
(Curry) and James A. Henry, as treas.

WAS RECEIVED ON 10/14/87. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

- | | | | |
|---|---|-------------------------|-----------------|
| / | / | BUDGET CLEARING ACCOUNT | { 95F3875.16 } |
| / | / | CIVIL PENALTIES ACCOUNT | { 95-1099.160 } |
| / | / | OTHER | |

SIGNATURE Debra A. Trimier DATE 10/14/87

BEFORE THE FEDERAL ELECTION COMMISSION

87 NOV 24 AM 10:46

In the Matter of)

J.G. Boswell Company Employees'
Political Action Committee and
James A. Henry, as treasurer)

MUR 2488

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by James A. Henry, treasurer, of the J.G. Boswell Company Employees' Political Action Committee.

The attached agreement contains no changes from the agreement approved by the Commission on September 17, 1987. A check for the civil penalty (\$500) has been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with J.G. Boswell Employees' Political Action Committee and James A. Henry, as treasurer.
2. Close the file.
3. Approve the attached letter.

Date

11/23/87

Lawrence M. Noble
General Counsel

Attachments

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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

J.G. Boswell Company Employees'
Political Action Committee and
James A. Henry, as treasurer

MUR 2488

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 27, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2488:

1. Accept the conciliation agreement with J.G. Boswell Employees' Political Action Committee and James A. Henry, as treasurer, as recommended in the General Counsel's report signed November 23, 1987.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report signed November 23, 1987.

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

Attest:

11-27-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Tues.,	11-24-87,	10:4
Circulated on 48 hour tally basis:	Tues.,	11-24-87,	4:0
Deadline for vote:	Fri.,	11-27-87,	4:0

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

02 December 1987

James A. Henry, Treasurer
J.G. Boswell Company Employees'
Political Action Committee
333 South Hope Street, Suite 4600
Los Angeles, CA 90071

RE: MUR 2488
J.G. Boswell Company
Employees' Political
Action Committee and
James A. Henry, as
treasurer

Dear Mr. Henry:

On November 27, 1987, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted by you and your committee in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your committee and you, as treasurer. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

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

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

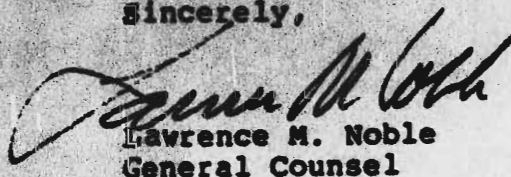
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plan

Letter to James A. Henry
Page 2

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

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

8 9 0 4 0 6 8 4 1 0 8

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
J. G. Boswell Company Employees') MUR 2488
Political Action Committee and)
James A. Henry, as treasurer)

CONCILIATION AGREEMENT

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 J. G. Boswell Company Employees' Political Action Committee and James A. Henry, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file the 1986 Pre-General Election Report in a timely manner.

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. J. G. Boswell Company Employees' Political Action Committee is the separate segregated fund of J. G. Boswell

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Company. James A. Henry is the treasurer of J. G. Boswell Company Employees' Political Action Committee.

2. Respondents were required by 2 U.S.C.

§ 434(a)(4)(A)(ii) to file the 1986 Pre-General Election Report on October 23, 1986.

3. Respondents failed to file the 1986 Pre-General Election Report until December 4, 1986. The 30 Day Post General Election Report filed on December 4, 1986 contained the 1986 Pre-General Election activity. The 1986 Pre-General Election Report activity was filed 43 days late.

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

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Five Hundred dollars (\$500), 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

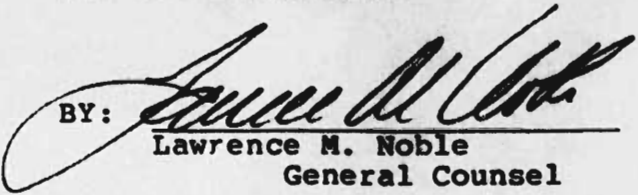
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implement the requirements contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

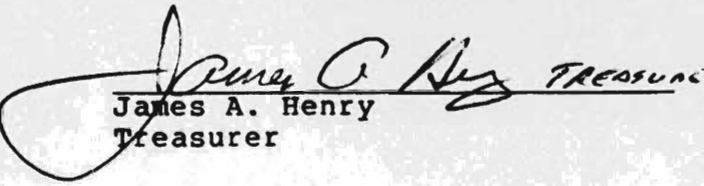
BY:


Lawrence M. Noble
General Counsel

Date

12/2/87

FOR THE RESPONDENTS:


James A. Henry
Treasurer

Date

10/5/87

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR #

2488

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