



FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20463

THIS IS THE BEGINNING OF MUR # 2660

DATE FILMED 11-18-88 CAMERA NO. 3

CAMERAMAN PC.

88040723574



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 7, 1988

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF YEAR END NON-FILER UNAUTHORIZED
COMMITTEES

Attached, for referral to your office, are nine (9) unauthorized committees that failed to file the 1987 Year End Report

All nine committees were sent prior notice of the due date of the report on December 18, 1987 and were sent Non-Filer Notices on February 19, 1988 (see Attachments 1 and 2).

Included in this document is a chart which lists each committee in alphabetical order along with the address and name of treasurer, any contacts with the committees, responses and/or reports filed by the committee and the attachment number where the items can be located within the document.

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

Attachments

Attachment 1

①

93040723575

83040723576

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
8. 88NF-10: Pacific PAC (C00199851)
- 9.

8 8 0 4 0 7 2 3 5 7 7

page 2

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILER ATCH

REPORTS FILED/
RESPONSES

.....
C00199851
PACIFIC PAC
TREASURER'S NAME: CARL RHEURON
10100 SANTA MONICA BOULEVARD
LOS ANGELES CA 90067

March 14, 10a-c None
1998

.....
March 14, 11a-d None
1998

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 18, 1987

WHO MUST FILE

ALL PARTY COMMITTEES and PACs (NON-CONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) must file a Year End Report in January.

REPORTING DATES

Semiannual. The Year End Report is due January 31, 1988, and must disclose financial activity that occurred from July 1 through December 31, 1987. Committees which have previously filed 1987 reports should only report activity from the closing date of the last report filed.

Monthly. Committees that choose to file on a monthly basis must file the Year End Report due January 31, 1988. The report must disclose financial activity from December 1 through December 31, 1987. All other monthly reports are due by the 20th of each month and cover all financial activity of the previous month.

WHAT MUST BE REPORTED

A report must disclose all receipts and disbursements that occurred during the reporting period. A newly registered political committee filing its first report should also include all amounts received and expended before the committee registered. See 11 CFR 104.3. For more detailed information on reporting instructions, consult your Campaign Guide.

WHERE AND HOW TO FILE

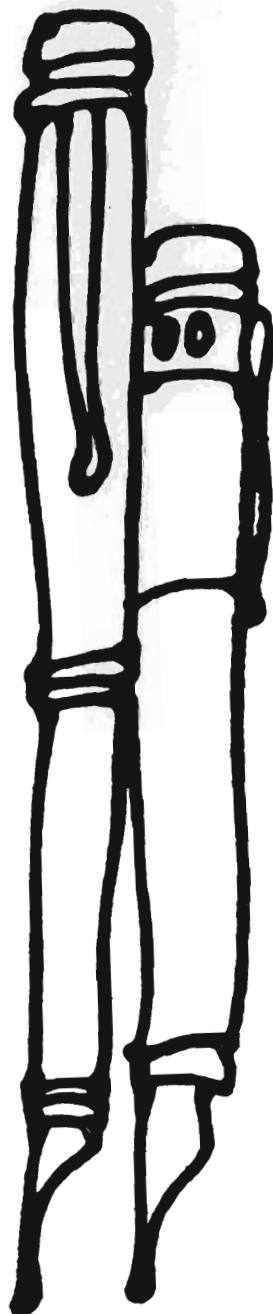
Committees should consult the instructions on the enclosed FEC Form 3X for details. Affix the peel-off label from the envelope to line 1 of the report. Any corrections in the information should be made directly on the label.

CHANGE IN FILING FREQUENCY

Committees that wish to change their reporting schedule (for example, from semiannual to monthly) must notify the Commission by sending a letter with the next report due under their current reporting schedule. Committees may change their filing frequency only once a year.

COMPLIANCE

Political committees are responsible for filing all reports required under the Act in a timely fashion. Committees and treasurers who file late reports, or fail to file reports, are subject to enforcement action. Illegible reports and reports submitted on non-FEC forms will not be accepted; committees filing such documents will be required to refile.



(6)



FEDERAL ELECTION COMMISSION

RQ-7

WASHINGTON, D.C. 20463

February 19, 1988

XX

Identification Number: XX

Reference: Year End Report (through 12/31/87)

Dear XX:

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

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

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

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

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

R 3 0 4 0 7 2 3 5 7 9

⑦

88740723590

Pacific PAC
(C00199851)

(Attachments 10a - c)

49

8 3 0 4 0 7 2 3 5 8 1

FEDERAL ELECTION COMMISSION
1987-1988
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 22MAR88

PAGE 6

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
					TYPE OF FILE	
PACIFIC PAC						
CONNECTED ORGANIZATION:	NONE					
1987 MID-YEAR REPORT		20,000	20,023	1JAN87 -30JUN87	5	87FEC/480/1240
MID-YEAR REPORT AMENDMENT		20,000	20,023	1JAN87 -30JUN87	5	88FEC/497/3711
REQUEST FOR ADDITIONAL INFORMATION				1JAN87 -30JUN87	2	87FEC/494/0791
REQUEST FOR ADDITIONAL INFORMATION AND				1JAN87 -30JUN87	3	87FEC/495/117
NOTICE OF FAILURE TO FILE				31DEC87	1	88FEC/510/1
TOTAL		20,000	0	20,023	0	16 TOTAL PAGES

ID #C00199851 NON-PARTY QUALIFIED

All reports listed have been reviewed

Ending cash on hand as of 6/30/87: \$2847.99

Outstanding debts and obligations owed by the committee as of 6/30/87: \$603

50

8 9 0 4 0 7 2 3 5 9 2

FEDERAL ELECTION COMMISSION
1985-1986
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 22MAR88

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
					TYPE OF FILER	
PACIFIC PAC						
CONNECTED ORGANIZATION:	NONE					
1985	STATEMENT OF ORGANIZATION					
	YEAR-END	20,000	0	6DEC85	2	85FEC/392/1593
	YEAR-END - AMENDMENT	20,000	0	6DEC85 -31JAN86	5	86FEC/431/1794
1986	APRIL QUARTERLY	0	0	6DEC85 -31JAN86	7	88FEC/497/3671
	APRIL QUARTERLY - AMENDMENT	0	0	31JAN86 -15APR86	3	86FEC/413/2747
	REQUEST FOR ADDITIONAL INFORMATION			31JAN86 -15APR86	3	88FEC/497/3679
	REQUEST FOR ADDITIONAL INFORMATION END			31JAN86 -15APR86	1	86FEC/428/0207
	JULY QUARTERLY	0	47	31JAN86 -15APR86	2	86FEC/430/2114
	JULY QUARTERLY - AMENDMENT	0	47	1APR86 -30JUN86	4	86FEC/448/5142
	OCTOBER QUARTERLY	27,950	37,000	1APR86 -30JUN86	3	88FEC/497/3683
	OCTOBER QUARTERLY - AMENDMENT			1JUL86 -30SEP86	13	86FEC/448/5146
	OCTOBER QUARTERLY - AMENDMENT	27,950	37,000	1JUL86 -30SEP86	2	87FEC/458/3208
	REQUEST FOR ADDITIONAL INFORMATION			1JUL86 -30SEP86	13	88FEC/497/3687
	POST-GENERAL	15,000	23,015	1JUL86 -30SEP86	3	87FEC/454/1756
	POST-GENERAL - AMENDMENT	15,000	23,015	1OCT86 -24NOV86	6	87FEC/453/5325
	NOTICE OF FAILURE TO FILE			1OCT86 -24NOV86	5	88FEC/497/3701
	YEAR-END	0	16	1OCT86 -24NOV86	1	87FEC/452/4932
	YEAR-END - AMENDMENT	0	16	25NOV86 -31DEC86	3	87FEC/457/4279
1987	MISCELLANEOUS NOTICE FROM FEC			25NOV86 -31DEC86	3	88FEC/497/3707
	MISCELLANEOUS REPORT TO FEC			2FEB87	2	87FEC/455/0248
				24FEB87	4	87FEC/461/2677
	TOTAL	62,950	0		85	TOTAL PAGES

All reports listed have been reviewed

Ending cash on hand as of 12/31/86: \$2371.19

Outstanding debts and obligations owed by the committee as of 12/31/86: \$476.50

151

MEMORANDUM TO THE FILES:

COMMITTEE: Pacific PAC
I.D. NUMBER: C00199851
CONTACT: Carl Rheuban, treasurer
DATE: March 14, 1988
ANALYST: Robert B. DiNardo
SUBJECT: 1987 Year End Report

I called Mr. Rheuban at 12:55 to notify him that the FEC has not received the Committee's 1987 Year End Report. Mr. Rheuban was not available, so I left him a message that I called.

98040723383

52

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

FIRST GENERAL COUNSEL'S REPORT

RAD Referral 38NF 3-11
Staff Member: George Rishel

SOURCE: INTERNALLY GENERATED

RESPONDENTS:

SENSITIVE

EXECUTIVE SESSION

JUN 7 1988

Pacific PAC and Carl Rheuban, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 433(c)
2 U.S.C. § 434(a)(4)(A)(iv)
11 C.F.R. § 102.2(a)(2)
11 C.F.R. § 104.5(c)(2)(i)(B)

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the above nine committees to the Office of the General Counsel on April 7,

98040723584

1988. The basis for the attached referral is the committees' failure to file the 1987 Year End Report or to do so in a timely fashion.

II. FACTUAL AND LEGAL ANALYSIS

A. Filing of Reports

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file the Year End Report for years in which no regularly scheduled elections are held no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv). Thus, the due date for the 1987 Year End Report was January 31, 1988. The following committees did not file the 1987 Year End Report by this date:

Name of Committee

Date Report Filed

9 3 0 4 0 7 2 3 5 8 3

Pacific PAC

Not Filed

Accordingly, the Office of the General Counsel recommends that the Commission open Matters Under Review and find reason to believe these nine committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(iv).

B. Changes of Treasurer and Address

88040723586

8 3 7 4 0 7 2 3 5 3 7

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

98040723588

83040723589

IV. 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)(iv):
 - a.
 - b.
 - c.
 - d.
 - e.

f.

g.

h. Pacific PAC and Carl Rheuban, as treasurer;

i.

2. Find reason to believe the following committees and their treasurers violated 2 U.S.C. § 433(c):

3.

4.

5. Enter into conciliation with the following committees and their treasurers prior to a finding of probable cause to believe:

a.

b.

c.

d.

e.

f.

8904072590


- g. Pacific PAC and Carl Rheuban, as treasurer.
6. Approve the attached letters and factual and legal analyses to the respective committees listed in recommendation 1.
7. Approve the attached proposed conciliation agreements to the respective committees listed in recommendation 5.

Lawrence M. Noble
General Counsel

Date

5/15/88

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Referral Materials
2. Report Filed After Referrals
3. Letters and Factual and Legal Analyses (9)
and Proposed Conciliation Agreements (7)

93040726591

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

RAD REFERRAL
88NF 3-11

(MURs 2623 -
2630)

Pacific PAC and Carl Rheuban, as
treasurer

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of June 7, 1988,
do hereby certify that the Commission decided by a vote of
5-0 to take the following actions with respect to the
above-captioned matters:

(continued)

83040723592

Federal Election Commission
Certification for RAD 88NF 3-11
June 7, 1988

Page 2

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)(iv):

a.

b.

c.

d.

e.

f.

g. Pacific PAC and Carl Rheuban, as treasurer;

h.

2. Find reason to believe the National Pro-Life PAC and Rev. Charles C. Fiore, as treasurer, violated 2 U.S.C. § 433(c).

(continued)

93040723593

Federal Election Commission
Certification for RAD 88NF 3-11
June 7, 1988

Page 3

3.

4. Enter into conciliation with the following committees and their treasurers prior to a finding of probable cause to believe:

a.

b.

c.

d.

e.

f.

g. Pacific PAC and Carl Rheuban, as treasurer.

5. Direct the Office of the General Counsel to send appropriate letters and factual and legal analyses pursuant to the above actions.

(continued)

83040723594

Federal Election Commission
Certification for RAD 88 NF 3-11
June 7, 1988

Page 4

6. Approve the proposed conciliation agreements,
as amended, to the respective committees
listed in action number 4 noted above.

Commissioners Aikens, Elliott, Josefiak, McDonald,
and Thomas voted affirmatively for the decision.
Commissioner McGarry was not present at the time of the
vote.

Attest:

6-9-88
Date

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

9 9 7 4 0 7 2 3 5 0 5



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 15, 1988

Carl Rheuban, Treasurer
Pacific PAC
10100 Santa Monica Boulevard
Los Angeles, CA 90067

RE: MUR 2629
Pacific PAC and Carl
Rheuban, as treasurer

Dear Mr. Rheuban:

On June 7, 1988, the Federal Election Commission found that there is reason to believe Pacific PAC ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), 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.

In order to expedite the resolution of this matter, the Commission has also decided to offer 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.

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the

2374723507

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

LEGAL AND FACTUAL ANALYSIS

MUR: 2629

Accordingly, there is reason to believe the committee and its treasurer have violated 2 U.S.C. § 434(a)(4)(A)(iv).

83040723508



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 23, 1988

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF APRIL QUARTERLY NON-FILER UNAUTHORIZED
COMMITTEES

Attached, for referral to your office, are seven (7) unauthorized committees that failed to file the 1988 April Quarterly Report

All seven committees were sent prior notice of the due date of the report on March 22, 1988 and were sent Non-Filer Notices on May 6, 1988 (see Attachments 1 and 2).

Included in this document is a chart which lists each committee in alphabetical order along with the address and name of treasurer, any contacts with the committees, responses and/or reports filed by the committee and the attachment number where the items can be located within the document.

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

Attachments

98040723599

Committees Involved in 1985-1986/1987-1988 Election Cycle OGC Referrals

1.

2.

3.

4. Pacific PAC (C00199851)
88NF-10: 1987 Year End Report Non-Filer Referral (MUR 2629)

93040723600

1.

2.

3.

4.

5. 88NF-27: Pacific PAC (C00199851)*

6.

7.

8 3 7 4 0 7 2 3 6 0 1

3 3 7 4 0 7 2 3 6 0 2

page 1

REPORTS FILED/
RESPONSES

CONTACTS
WITH FILE# AICH

COMMITTEE ID, NAME AND ADDRESS

CO0199851
PACIFIC PAC
TREASURER'S NAME: CARL RHEURAN
10100 SANTA MONICA BOULEVARD
LOS ANGELES CA 90067

Telecon
5/31/88

7a-c

Not Filed

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 22, 1988

REPORT	REPORTING PERIOD	REG./CENT. MAILING DATE*	FILING DATE
April Quarterly	01/01/88**-03/31/88	04/15/88	04/15/88

WHO MUST FILE

PARTY COMMITTEES AND PACs (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) filing on a quarterly basis must file their next report in April.

WHAT MUST BE REPORTED

All financial activity (not previously reported) that occurred during the reporting period..

REPORTING FORMS

Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE

Consult the instructions on the back of the Form 3X Summary Page. Note state filing requirements also.

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with a candidate's primary election, must also file a 12-day Pre-Election Report if the activity was not previously reported. See the January Record.

LAST-MINUTE INDEPENDENT EXPENDITURES

Committees which make an independent expenditure of \$1,000 or more, after the 20th day, but more than 24 hours before an election, must report it within 24 hours.

COMPLIANCE

TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

*Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

**From the date of registration, or the close of books of the last report filed, whichever is later.

FOR INFORMATION, Call: 202/376-3120 or 800/424-9530





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-7

May 6, 1988

**TREASURER
COMMITTEE
STREET ADDRESS
CITY STATE ZIP**

Identification Number: XX

Reference: April Quarterly Report (1/1/88-3/31/88)

Dear **TREASURER**:

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

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

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

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

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

99040723605

Pacific PAC
(C00199851)

(Attachments 7a - c)

8 9 0 4 0 7 2 3 6 0 6

FEDERAL ELECTION COMMISSION
1987-1988

DATE 21JUN88

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
PACIFIC PAC						
CONNECTED ORGANIZATION:	NONE					
1987	MID-YEAR REPORT	20,000	20,023	1JAN87 -30JUN87	5	87FEC/480/1248
	MID-YEAR REPORT - AMENDMENT	20,000	20,023	1JAN87 -30JUN87	5	88FEC/497/3711
	REQUEST FOR ADDITIONAL INFORMATION			1JAN87 -30JUN87	2	87FEC/494/0791
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN87 -30JUN87	3	87FEC/495/4577
	NOTICE OF FAILURE TO FILE			31DEC87	1	88FEC/510/2952
1988	MISCELLANEOUS NOTICE FROM FEC			7JUN88	1	88FEC/528/4385
	NOTICE OF FAILURE TO FILE			1JAN88 -31MAR88	1	88FEC/524/4878
	TOTAL	20,000	0	20,023	0	18 TOTAL PAGES

ID #C00199851 NON-PARTY QUALIFIED

All reports have been reviewed.

Ending cash-on-hand as of 06/30/87: \$2,847

Outstanding debts owed by the committee as of 6/30/87: \$603

Outstanding debts owed to the committee as of 6/30/87: \$0

Attachment 7a

88040723607

1985-1986
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES TYPE OF FILER	MICROFILM LOCATION
PACIFIC PAC						
CONNECTED ORGANIZATION:	NONE					
1985	STATEMENT OF ORGANIZATION					
	YEAR-END	20,000	0	6DEC85	2	85FEC/392/1593
	YEAR-END - AMENDMENT	20,000	0	6DEC85 -31JAN86	5	86FEC/431/1794
1986	APRIL QUARTERLY	0	0	6DEC85 -31JAN86	7	88FEC/497/3621
	APRIL QUARTERLY - AMENDMENT	0	0	31JAN86 -15APR86	3	86FEC/413/21
	REQUEST FOR ADDITIONAL INFORMATION			31JAN86 -15APR86	3	88FEC/497/3677
	REQUEST FOR ADDITIONAL INFORMATION 2ND			31JAN86 -15APR86	1	86FEC/428/0207
	JULY QUARTERLY	0	47	31JAN86 -15APR86	2	86FEC/430/2114
	JULY QUARTERLY - AMENDMENT	0	47	1APR86 -30JUN86	4	86FEC/448/5142
	OCTOBER QUARTERLY	27,950	37,000	1APR86 -30JUN86	3	88FEC/497/3683
	OCTOBER QUARTERLY - AMENDMENT			1JUL86 -30SEP86	13	86FEC/448/5146
	OCTOBER QUARTERLY - AMENDMENT	27,950	37,000	1JUL86 -30SEP86	2	87FEC/458/3208
	REQUEST FOR ADDITIONAL INFORMATION			1JUL86 -30SEP86	13	88FEC/497/3687
	POST-GENERAL	15,000	23,015	1JUL86 -30SEP86	3	87FEC/454/1756
	POST-GENERAL - AMENDMENT	15,000	23,015	1OCT86 -24NOV86	6	87FEC/453/5325
	NOTICE OF FAILURE TO FILE			1OCT86 -24NOV86	5	88FEC/497/3701
	YEAR-END	0	16	1OCT86 -24NOV86	1	87FEC/452/4932
	YEAR-END - AMENDMENT	0	16	25NOV86 -31DEC86	3	87FEC/457/4279
1987	MISCELLANEOUS NOTICE FROM FEC			25NOV86 -31DEC86	3	88FEC/497/3707
	MISCELLANEOUS REPORT TO FEC			2FEB87	2	87FEC/455/0248
				24FEB87	4	87FEC/461/2677
	TOTAL	62,950	0 60,078	0	85	TOTAL PAGES

All reports have been reviewed.

Ending cash-on-hand as of 12/31/86: \$2,871

Outstanding debts owed by the committee as of 12/31/86: \$476

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

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

83 JUL 21 PM 4:00

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral 88NF 23-29
Staff Member: Susan Beard

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

RESPONDENTS:

Pacific PAC and Carl Rheuban, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 432(e)(5)
2 U.S.C. § 433(c)
2 U.S.C. § 434(a)(4)(A)(i)

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the above seven-committees to the Office of the General Counsel on June 23, 1988. The basis for the attached referral is the committees' failure to file the 1988 April Quarterly Report or to do so in a timely fashion.

8 9 0 4 0 7 2 3 6 0 8

MEMORANDUM TO THE FILES:**COMMITTEE:** Pacific Political Action Committee**I.D. NUMBER:** C00199851**CONTACT:** Carl Rheuban, Treasurer**DATE:** May 31, 1988**ANALYST:** Robert B. DiNardo**SUBJECT:** 1988 April Quarterly Report

I called Mr. Rheuban at 4:00 P.M. Mr. Rheuban was not available, so I left a message that the Commission had not received his committee's 1988 April Quarterly Report, and to call me back if he had any questions.

83040723609

II. FACTUAL AND LEGAL ANALYSIS

A. Filing of Reports

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file quarterly reports, in a calendar year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(A)(i). Quarterly Reports are to be filed no later than the 15th day after the last day of each calendar quarter. Thus, the due date for the 1988 April Quarterly Report was April 15, 1988. The following committees did not file the 1988 April Quarterly Report by this date:

Name of Committee

Date Report Filed

Pacific PAC

Not Filed

08040723610

88040723611

Therefore, the Office of the General Counsel recommends that the Commission open Matters Under Review and find reason to believe that the

, Pacific PAC,

and their treasurers violated 2 U.S.C.
§ 434(a)(4)(A)(i).

B. Additional Violations

83040723612

referrals involving Pacific PAC and

with current open

MURs involving these committees.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

83040723613

830440723614

III. RECOMMENDATIONS

1.

2.

3. 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)(i):

a.

b.

c.

d.

4.

5.

6.

7. Merge RAD Referral 88NF-27 (Pacific PAC) with MUR 2629.

8. Enter into conciliation with the following committees -
and their treasurers prior to a finding of probable
cause to believe:

a.

b.

c. Pacific PAC and Carl Rheuban, as treasurer;

d.

e.

9. Approve the attached letters, factual and legal
analyses, and proposed conciliation agreements to the
respective committees listed in recommendation 8.

Lawrence M. Noble
General Counsel

July 21, 1988
Date

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

Attachments

1. Referral Materials
2. Proposed Conciliation Agreements (5),
Letters (5), and Factual and Legal Analyses (5)

9 8 0 4 0 7 2 3 6 1 5

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

RAD Ref. 88NF 23-29

(MURS 2658-2662)

Pacific PAC and Carl Rheuban,
as treasurer

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 27, 1988, the Commission decided by a vote of 5-1 to take the following actions in RAD Ref. 88NF 23-29:

1.

d)

2.

3. 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)(i):

a.

b.

c. Pacific PAC and Carl Rheuban, as treasurer;

d.

e.

4.

5.

6.

7. Merge RAD Referral 88NF-27 (Pacific PAC) with MUR 2629.

(Continued)

83340723617

8. Enter into conciliation with the following committees and their treasurers prior to a finding of probable cause to believe:

a.

b.

c. Pacific PAC and Carl Rheuban, as treasurer;

d.

e.

9. Approve the letters, factual and legal analyses, and proposed conciliation agreements to the respective committees listed in action 8 above.

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

Attest:

7-28-88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Thurs., 7-21-88, 4:00
Circulated on 48 hour tally basis: Fri., 7-22-88, 12:00
Deadline for vote: Tues., 7-27-88, 4:00
JMcF.

8
1
6
3
2
7
0
4
0
3
8



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 2, 1988

Carl Rheuban, Treasurer
Pacific PAC
10100 Santa Monica Boulevard
Los Angeles, CA 90067

RE: MUR 2660
Pacific PAC and Carl
Rheuban, as treasurer

Dear Mr. Rheuban:

On July 27, 1988, the Federal Election Commission found that there is reason to believe Pacific PAC ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The 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.

On July 27, 1988, the Commission also determined to merge this matter with MUR 2629. Both matters will now be known as MUR 2660. In order to expedite the resolution of this matter, the Commission has also decided to extend its offer to enter into negotiations directed towards reaching a conciliation agreement that includes both findings that the Commission has approved. The attached proposed conciliation agreement includes the factual and legal findings concerning the Committee's failure to file both the 1987 Year End and 1988 April Quarterly Reports. The agreement supersedes the proposed conciliation agreement sent to you on June 15, 1988.

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign

83040723619

Carl Rheuban
Page 2

and return the agreement, 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.

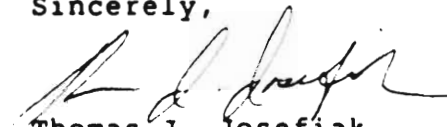
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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.

This matter will remain 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 Susan Beard, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Thomas J. Josefiak
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

03040723620



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 22, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Carl Rheuban, Treasurer
Pacific PAC
10100 Santa Monica Boulevard
Los Angeles, CA 90067

RE: MUR 2660
Pacific PAC and Carl
Rheuban, as treasurer

Dear Mr. Rheuban:

On August 2, 1988, you were notified that, the Federal Election Commission determined to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. On that same date you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that conciliation negotiations entered into prior to a finding of probable cause to believe are limited to a maximum of 30 days. To date, you have not responded to the proposed agreement. The 30 day period for negotiations will soon expire. Unless we receive a response from you within five days, this Office will consider these negotiations terminated and will proceed to the next stage of the enforcement process.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

88040723621

HAND DELIVERED 600# 339
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

CARL M. RHEUBAN
10100 Santa Monica Boulevard
Fifth Floor
Los Angeles, California 90067
(213) 551-1500

88 SEP -8 AM 9:46

88 SEP -9 PM 12:01

RECEIVED
FEDERAL ELECTION COMMISSION

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

RE: MUR 2660
MUR 2629
Pacific Pac

Dear Ms. Beard:

Enclosed please find the following documents:

- (1) Year-end filing for December 31, 1987
- (2) Quarterly filing for March 31, 1988
- (3) Quarterly filing for June 30, 1988
- (4) Executed Conciliation Agreement - MUR 2629
- (5) Executed Conciliation Agreement - MUR 2660
- (6) Check in the amount of \$4,750.00

Please call if you have any questions.

Very truly yours,

Pacific PAC

By:


CARL M. RHEUBAN

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

FEDERAL ELECTION COMMISSION

LEGAL AND FACTUAL ANALYSIS

RESPONDENTS: Pacific PAC and Carl Rheuban,
as treasurer

MUR: 2629

8 9 0 4 0 7 2 3 6 2 3

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file a Year End Report for any calendar year in which a regularly scheduled election is not held. Such report shall cover the period beginning July 1 and ending December 31. It shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv) and 11 C.F.R. § 104.5(c)(2)(i)(B). Thus, for unauthorized committees filing quarterly, the 1987 Year End Report was required to be filed no later than January 31, 1988. The committee, however, did not file the 1987 Year End Report by January 31, 1988.

Accordingly, there is reason to believe the committee and its treasurer have violated 2 U.S.C. § 434(a)(4)(A)(iv).

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Pacific PAC and Carl MUR 2660
Rheuban, as treasurer

33040723624
The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file quarterly reports, in a calendar year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(A)(i). Quarterly Reports are to be filed no later than the 15th day after the last day of each calendar quarter. Thus, the due date for the 1988 April Quarterly Report was April 15, 1988. The committee, however, did not file the 1988 April Quarterly Report by April 15, 1988.

Accordingly, there is reason to believe the committee and its treasurer have violated 2 U.S.C. § 434(a)(4)(A)(i).

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Pacific PAC and Carl MUR 2660
Rheuban, as treasurer

9 8 0 4 0 7 2 3 6 2 5

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file quarterly reports, in a calendar year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(A)(i). Quarterly Reports are to be filed no later than the 15th day after the last day of each calendar quarter. Thus, the due date for the 1988 April Quarterly Report was April 15, 1988. The committee, however, did not file the 1988 April Quarterly Report by April 15, 1988.

Accordingly, there is reason to believe the committee and its treasurer have violated 2 U.S.C. § 434(a)(4)(A)(i).

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION

88 SEP -8 AM 9:46

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) PACIFIC PAC		2. FEC IDENTIFICATION NUMBER C00199851
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 10100 Santa Monica Boulevard, Suite 500		
CITY, STATE and ZIP CODE Los Angeles, California 90067		
3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).		

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☒ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

<input type="checkbox"/> February 20	<input type="checkbox"/> June 20	<input type="checkbox"/> October 20
<input type="checkbox"/> March 20	<input type="checkbox"/> July 20	<input type="checkbox"/> November 20
<input type="checkbox"/> April 20	<input type="checkbox"/> August 20	<input type="checkbox"/> December 20
<input type="checkbox"/> May 20	<input type="checkbox"/> September 20	<input type="checkbox"/> January 31

☐ 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 _____

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

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>July 1, 1987</u> through <u>December 31, 1987</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>		\$ 2,871.19
(b) Cash on Hand at Beginning of Reporting Period	\$ 2,847.99	
(c) Total Receipts (from Line 18)	\$ 20,000.00	\$ 40,000.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 22,847.99	\$ 42,871.19
7. Total Disbursements (from Line 28)	\$ 603.00	\$ 20,626.20
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 22,244.99	\$ 22,244.99
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ -0-	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ -0-	

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

Type or Print Name of Treasurer

Carl M. Rheuban

Signature of Treasurer

Date

Sept. 2, 1988

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

FEC FORM 3X

(revised 4/87)

DETAILED SUMMARY PAGE

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

Name of Committee (in full)		Report Covering the Period		
		From: 07/01/87	To: 12/31/87	
		COLUMN A	COLUMN B	
		Total This Period	Calendar Year-To-Date	
I. RECEIPTS				
11. CONTRIBUTIONS (other than loans) FROM:				
(a) Individuals/Persons Other Than Political Committees				
(i) Itemized (use Schedule A)	20,000.00	40,000.00	11(a)(i)	
(ii) Unitemized	-0-	-0-	11(a)(ii)	
(iii) Total of contributions from individuals	-0-	-0-	11(a)(iii)	
(b) Political Party Committees	-0-	-0-	11(b)	
(c) Other Political Committees (such as PACs)	-0-	-0-	11(c)	
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	20,000.00	40,000.00	11(d)	
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, Rebates, 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.)	-0-	-0-	17	
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	20,000.00	40,000.00	18	
II. DISBURSEMENTS				
19. OPERATING EXPENDITURES	-0-	23.20	19	
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	20	
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	20,000.00	21	
22. INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-	22	
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	-0-	-0-	23	
24. LOAN REPAYMENTS MADE	603.00	603.00	24	
25. LOANS MADE	-0-	-0-	25	
26. REFUNDS OF CONTRIBUTIONS TO:				
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	26(a)	
(b) Political Party Committees	-0-	-0-	26(b)	
(c) Other Political Committees (such as PACs)	-0-	-0-	26(c)	
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	-0-	-0-	26(d)	
27. OTHER DISBURSEMENTS	-0-	-0-	27	
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	603.00	20,626.20	28	
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES				
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	20,000.00	40,000.00	29	
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	-0-	-0-	30	
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	20,000.00	40,000.00	31	
32. TOTAL OPERATING EXPENDITURES (from Line 19)	-0-	23.20	32	
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	-0-	-0-	33	
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	23.20	23.20	34	

\$20,000.00

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION

88 SEP -8 AM 9:46

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) PACIFIC PAC		2. FEC IDENTIFICATION NUMBER C00199851
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 10100 Santa Monica Blvd., Suite 500		
CITY, STATE and ZIP CODE Los Angeles, California 90067		
3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).		

4. TYPE OF REPORT

(a) ☒ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

<input type="checkbox"/> February 20	<input type="checkbox"/> June 20	<input type="checkbox"/> October 20
<input type="checkbox"/> March 20	<input type="checkbox"/> July 20	<input type="checkbox"/> November 20
<input type="checkbox"/> April 20	<input type="checkbox"/> August 20	<input type="checkbox"/> December 20
<input type="checkbox"/> May 20	<input type="checkbox"/> September 20	<input type="checkbox"/> January 31

☐ 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 _____

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

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>01/01/88</u> through <u>03/31/88</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>		\$ 22,244.99
(b) Cash on Hand at Beginning of Reporting Period	\$ 22,244.99	
(c) Total Receipts (from Line 18)	\$ 5,000.00	\$ 5,000.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 27,244.99	\$ 27,244.99
7. Total Disbursements (from Line 28)	\$ 19,000.00	\$ 19,000.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 8,244.99	\$ 8,244.99
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ -0-	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ -0-	

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

Type or Print Name of Treasurer
Carl M. Rheuban

Signature of Treasurer

Date

09/02/88

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

FEC FORM 3X
(revised 4/87)

DETAILED SUMMARY PAGE

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

Name of Committee (in full) PACIFIC PAC		Report Covering the Period	
		From: 01/01/88	To: 03/31/88
		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			
(i) Itemized (use Schedule A)		-0-	-0-
(ii) Unitemized		-0-	-0-
(iii) Total of contributions from individuals		-0-	-0-
(b) Political Party Committees		-0-	-0-
(c) Other Political Committees (such as PACs)		5,000.00	5,000.00
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))		5,000.00	5,000.00
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		-0-	-0-
13. ALL LOANS RECEIVED		-0-	-0-
14. LOAN REPAYMENTS RECEIVED		-0-	-0-
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		-0-	-0-
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		-0-	-0-
17. OTHER RECEIPTS (Dividends, Interest, etc.)		-0-	-0-
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)		5,000.00	5,000.00
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES		-0-	-0-
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		-0-	-0-
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		19,000.00	19,000.00
22. INDEPENDENT EXPENDITURES (use Schedule E)		-0-	-0-
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)		-0-	-0-
24. LOAN REPAYMENTS MADE		-0-	-0-
25. LOANS MADE		-0-	-0-
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees		-0-	-0-
(b) Political Party Committees		-0-	-0-
(c) Other Political Committees (such as PACs)		-0-	-0-
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		-0-	-0-
27. OTHER DISBURSEMENTS		-0-	-0-
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		19,000.00	19,000.00
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))		5,000.00	5,000.00
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))		-0-	-0-
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)		5,000.00	5,000.00
32. TOTAL OPERATING EXPENDITURES (from Line 19)		-0-	-0-
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)		-0-	-0-
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)		-0-	-0-

03040723630

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE	OF
11	11
FOR LINE NUMBER	

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)

PACIFIC PAC

A. Full Name, Mailing Address and ZIP Code Committe for a Democratic Consensus 1250 24Th Street Washington, D.C. 20003	Name of Employer N/A	Date (month, day, year) 02/05/88	Amount of Each Receipt this Period \$5,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): PAC	Occupation N/A	Aggregate Year-to-Date > \$ 5,000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional) \$5,000.00

TOTAL This Period (last page this line number only) \$5,000.00

1363127040723631

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1
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)

PACIFIC PAC

A. Full Name, Mailing Address and ZIP Code Cranston For President	Purpose of Disbursement 1984 Election Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 01/27/88	Amount of Each Disbursement This Period \$4,000.00
B. Full Name, Mailing Address and ZIP Code Committee to Re-Elect Edward Kennedy	Purpose of Disbursement 1988 Senatorial Election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 02/10/88	Amount of Each Disbursement This Period \$5,000.00
C. Full Name, Mailing Address and ZIP Code Committee to Re-Elect Licht	Purpose of Disbursement 1988 Senatorial Election Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 03/11/88	Amount of Each Disbursement This Period \$10,000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

\$19,000.00

TOTAL This Period (last page this line number only)

\$19,000.00

2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

FEDERAL ELECTION COMMISSION

88 SEP -8 AM 9:48

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) PACIFIC PAC		2. FEC IDENTIFICATION NUMBER C00199851
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 10100 Santa Monica Blvd., Suite 500		
CITY, STATE and ZIP CODE Los Angeles, California 90067		
3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).		

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☒ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

<input type="checkbox"/> February 20	<input type="checkbox"/> June 20	<input type="checkbox"/> October 20
<input type="checkbox"/> March 20	<input type="checkbox"/> July 20	<input type="checkbox"/> November 20
<input type="checkbox"/> April 20	<input type="checkbox"/> August 20	<input type="checkbox"/> December 20
<input type="checkbox"/> May 20	<input type="checkbox"/> September 20	<input type="checkbox"/> January 31

☐ 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 _____

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

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>04/01/88</u> through <u>06/30/88</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>		\$ 22,244.99
(b) Cash on Hand at Beginning of Reporting Period	\$ 8,244.99	
(c) Total Receipts (from Line 18)	\$ 30,000.00	\$ 35,000.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 38,244.99	\$ 57,244.99
7. Total Disbursements (from Line 28)	\$ 20,000.00	\$ 39,000.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 18,244.99	\$ 18,244.99
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ -0-	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ -0-	

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

Type or Print Name of Treasurer

Carl M. Rheuban

Signature of Treasurer

Date

09/02/88

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

FEC FORM 3X
(revised 4/87)

DETAILED SUMMARY PAGE

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

Name of Committee (in full) PACIFIC PAC		Report Covering the Period From: 04/01/88 To: 06/30/88	
		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			
(i) Itemized (use Schedule A)	30,000.00	-0-	11(a)(i)
(ii) Unitemized	-0-	-0-	11(a)(ii)
(iii) Total of contributions from individuals	-0-	-0-	11(a)(iii)
(b) Political Party Committees	-0-	-0-	11(b)
(c) Other Political Committees (such as PACs)	-0-	5,000.00	11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	30,000.00	35,000.00	11(d)
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, Rebates, 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.)	-0-	-0-	17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	30,000.00	35,000.00	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	20,000.00	39,000.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	-0-	-0-	23
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-	26(a)
(b) Political Party Committees	-0-	-0-	26(b)
(c) Other Political Committees (such as PACs)	-0-	-0-	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	-0-	-0-	26(d)
27. OTHER DISBURSEMENTS	-0-	-0-	27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	20,000.00	39,000.00	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	20,000.00	39,000.00	29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	20,000.00	39,000.00	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 (subtract Line 33 from 32)	-0-	-0-	34

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE	OF
1	1
FOR LINE NUMBER	
11	

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)

PACIFIC PAC

A. Full Name, Mailing Address and ZIP Code Robert Polluck 309 South Carmelina Ave. Los Angeles, California 90049 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): PAC	Name of Employer Self Occupation Businessman Aggregate Year-to-Date > \$ 5,000.00	Date (month, day, year) 05/03/88	Amount of Each Receipt this Period \$5,000.00
B. Full Name, Mailing Address and ZIP Code JoAnne Polluck 309 South Carmelina Ave. Los Angeles, CA 90049 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): PAC	Name of Employer Occupation Housewife Aggregate Year-to-Date > \$ 5,000.00	Date (month, day, year) 05/03/88	Amount of Each Receipt this Period \$5,000.00
C. Full Name, Mailing Address and ZIP Code Cary W. Medill 9454 Wilshire Blvd., 5th Floor Beverly Hills, California 90212 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): PAC	Name of Employer Self Occupation Attorney Aggregate Year-to-Date > \$ 5,000.00	Date (month, day, year) 05/02/88	Amount of Each Receipt this Period \$5,000.00
D. Full Name, Mailing Address and ZIP Code Marlene D. Greenly 9454 Wilshire Blvd., 5th Floor Beverly Hills, California 90212 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): PAC	Name of Employer Self Occupation Attorney Aggregate Year-to-Date > \$ 5,000.00	Date (month, day, year) 05/02/88	Amount of Each Receipt this Period \$5,000.00
E. Full Name, Mailing Address and ZIP Code Victor Fargo 7825 Fay Avenue La Jolla, California 92038 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): PAC	Name of Employer Self Occupation Real Estate Developer Aggregate Year-to-Date > \$ 5,000.00	Date (month, day, year) 06/30/88	Amount of Each Receipt this Period \$5,000.00
F. Full Name, Mailing Address and ZIP Code Jeff Fargo 7825 Fay Avenue La Jolla, California 92038 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): PAC	Name of Employer Fargo Industries Corp. Occupation Vice President Aggregate Year-to-Date > \$ 5,000.00	Date (month, day, year) 06/30/88	Amount of Each Receipt this Period \$5,000.00
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

\$30,000.00

TOTAL This Period (last page this line number only)

\$30,000.00

00040723635

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 1 OF 1
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)

PACIFIC PAC

A. Full Name, Mailing Address and ZIP Code Committee to Re-Elect Metzenbaum	Purpose of Disbursement '88 Senatorial Election Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 05/02/88	Amount of Each Disbursement This Period \$10,000.00
B. Full Name, Mailing Address and ZIP Code Committee to Re-Elect Lautenberg	Purpose of Disbursement '88 Senatorial Election Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 06/06/88	Amount of Each Disbursement This Period \$5,000.00
C. Full Name, Mailing Address and ZIP Code Committee to Re-Elect Bingaman	Purpose of Disbursement '88 Senatorial Election Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 06/06/88	Amount of Each Disbursement This Period \$5,000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

\$20,000.00

TOTAL This Period (last page this line number only)

\$20,000.00

2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36

88 SEP 23 PM 3:50

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
Pacific PAC and Carl Rheuban, as) MUR 2660
treasurer)

EXECUTIVE SESSION
OCT 04 1988

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached are two conciliation agreements which have been signed by Carl Rheuban, the treasurer of Pacific PAC (the "Committee"). On June 7, 1988, the Commission found reason to believe the Committee violated 2 U.S.C. § 434(a)(4)(A)(iv), and decided to enter into pre-probable cause conciliation. This matter became MUR 2629. Before a response was received from the Committee, the Commission found reason to believe the Committee violated 2 U.S.C. § 434(a)(4)(A)(i), on July 27, 1988. On that same date, the Commission decided to merge MUR 2629 with the new reason to believe finding and approved a conciliation agreement for both violations. This matter was designated MUR 2660.

After speaking to Mr. Rheuban, it appears that he did not understand that MUR 2629 was merged with a new reason to believe finding and became MUR 2660. He was under the impression that each of the conciliation agreements he received covered a different violation. As a result, he signed both the conciliation agreement for MUR 2660 and the conciliation agreement for MUR 2629. He also sent the Commission one check for the total of the civil penalties in both conciliation agreements.

The attached agreement for MUR 2660 contains no changes from the agreement approved by the Commission on July 27, 1988. A

99040723637

check for the civil penalty was received. However, the check received was for \$4,750, while the civil penalty approved by the Commission was \$3,250. This Office has already requested that a refund check for \$1,500 be issued, and has informed Mr. Rheuban by telephone of the overpayment.

II. RECOMMENDATIONS

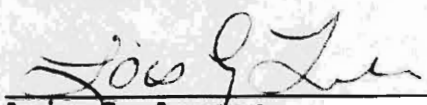
1. Accept the attached conciliation agreement in MUR 2660 with Pacific PAC and Carl Rheuban, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

Date

9/22/88

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreements in MUR 2660 and MUR 2629
2. Photocopy of civil penalty check
3. Letter to Respondent

Staff Assigned: Susan Beard

93040723638



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/CANDACE M. JONES *my*
COMMISSION SECRETARY

DATE: SEPTEMBER 27, 1988

SUBJECT: MUR 2660 - General Counsel's Report
Signed September 22, 1988

The above-captioned document was circulated to the
Commission on Monday, September 26, 1988 at 11:00 A.M..

Objection(s) have been received from the Commissioner(s)
as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	<u>XX</u>
Commissioner McGarry	_____
Commissioner Thomas	_____

This matter will be placed on the meeting agenda
for Tuesday, October 4, 1988.

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

33740726639

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Pacific PAC and Carl Rheuban,) MUR 2660
as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of October 4,
1988, do hereby certify that the Commission decided by a
vote of 6-0 to take the following actions in MUR 2660:

1. Accept the conciliation agreement with
Pacific PAC and Carl Rheuban, as treasurer.
2. Close the file.
3. Approve the letter attached to the General
Counsel's report dated September 22, 1988,
subject to the amendment agreed upon during
the meeting discussion.

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

Attest:

10-4-88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

8904072340



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 17, 1988

Carl Rheuban, Treasurer
Pacific PAC
10100 Santa Monica Blvd.
Los Angeles, CA 90067

RE: MUR 2660
Pacific PAC and Carl
Rheuban, as treasurer

Dear Mr. Rheuban:

On October 4, 1988, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. §§ 434(a)(4)(A)(i) and 434(a)(4)(A)(iv), provisions 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.

It appears that there was some confusion about the civil penalty and conciliation agreements in this matter. On June 7, 1988, the Commission found reason to believe that Pacific PAC and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), and sent a proposed conciliation agreement to you. Before a response was received from you, the Commission found reason to believe that a violation of 2 U.S.C. § 434(a)(4)(A)(i) also existed, on July 27, 1988. The Commission sent you a new proposed conciliation agreement which contained the provisions of the first conciliation agreement you received as well as the additional finding. You signed both conciliation agreements and paid a civil penalty of the amount listed in both agreements. The Commission has accepted the second conciliation agreement that was sent to you, and a refund check has been sent to you for the amount of the civil penalty that was overpaid.

93740723641

Carl Rheuban
Page 2

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

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Susan Beard, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

23040723642

6 6 0 4 0 7 2 3 6 4 3

)
) **MUR 2660**
)
)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Pacific PAC and Carl Rheuban, as treasurer, ("Respondents") violated 2 U.S.C. §§ 434(a)(4)(A)(i) and 434(a)(4)(A)(iv).

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. § 437q(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. Pacific PAC is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Carl Rheuban is the treasurer of Pacific PAC.

3. Section 434(a)(4)(A)(i) of Title 2 provides that unauthorized committees filing quarterly shall file quarterly reports in a calendar year in which a regularly scheduled election is held. Quarterly reports are to be filed no later than the 15th day after the last day of each calendar quarter.

4. Respondents were required to file the 1988 April Quarterly Report no later than April 15, 1988. Respondents have not filed the 1988 April Quarterly Report.

5. Section 434(a)(4)(A)(iv) of Title 2 provides that unauthorized committees filing quarterly shall file a Year End Report for years in which no regularly scheduled elections are held no later than January 31 of the following calendar year.

6. Respondents were required to file the 1987 Year End Report no later than January 31, 1988. Respondents have not filed the 1987 Year End Report.

V. 1. Respondents failed to file the 1988 April Quarterly Report in a timely fashion in violation of
2 U.S.C. § 434(a)(4)(A)(i).

2. Respondents failed to file the 1987 Year End Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(A)(iv).

VI. 1. Respondents will pay a civil penalty to the Federal Election Commission in the amount of three thousand two hundred and fifty dollars (\$3,250.00), pursuant to 2 U.S.C.
§ 437g(a)(5)(A).

2. Respondents will file the 1987 Year End Report and the 1988 April Quarterly Report.

8 9 0 1 2 3 4 5 6 7 8 9

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 executed same and the Commission has approved the entire agreement.

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

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is

83040723645

not contained in this written agreement shall be enforceable.

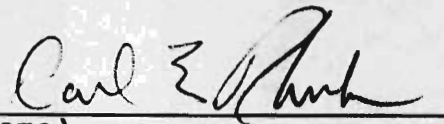
FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

10/12/88
Date

FOR THE RESPONDENTS:


(Name)
(Position)

9-2-88
Date

33040723646



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2660

DATE FILMED 11-18-88 CAMERA NO. 3

CAMERAMAN VC

93040723647