



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MJR # 2732

DATE FILMED 2/16/89 CAMERA NO. 3

CAMERAMAN AS

89040733421



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

16 September 1988

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

THROUGH: JOHN C. SURINA  
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF PACIFIC POLITICAL ACTION COMMITTEE

This is a combination Non-Filer/Chronic Late Filer referral of Pacific Political Action Committee ("the Committee"). The Committee has failed to file three (3) reports in a timely manner during the 1987-1988 election cycle.

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

Attachment

8 9 0 4 0 7 3 3 4 2 2

REPORTS ANALYSIS REFERRAL  
TO  
OFFICE OF GENERAL COUNSEL

DATE: 16 September 1988

ANALYST: Robert B. DiNardo

- I. COMMITTEE: Pacific Political Action Committee  
(C00199851)  
Carl Rheuban, Treasurer  
10100 Santa Monica Boulevard  
Los Angeles, CA 90067
- II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(i) and (iv)  
11 CFR 104.5(c)(1)(i)(A)  
11 CFR 104.5(c)(2)(i)(B)
- III. BACKGROUND:

Failure to File Timely Reports

The Pacific Political Action Committee ("the Committee") failed to file three (3) reports in a timely manner for the 1987-1988 election cycle (see Chart). The 1987 Year End Report was filed two-hundred and twenty-one (221) calendar days late, while the 1988 April Quarterly Report was filed one hundred and forty-six (146) days late and the 1988 July Quarterly Report was filed fifty-five (55) days late.

On March 14, 1988, the Reports Analysis Division ("RAD") analyst called the treasurer of the Committee, Mr. Carl Rheuban. Mr. Rheuban was not available so the RAD analyst left a message that the Commission had not received the Committee's 1987 Year End Report (Attachment 4).

On May 31, 1988, the RAD analyst called Mr. Rheuban. Mr. Rheuban was not available so the RAD analyst left a message that the Commission had not received the Committee's 1988 April Quarterly Report (Attachment 7).

On June 7, 1988, a Chronic Late Filer Notice was sent to the Committee for failure to file the 1987 Year End and 1988 April Quarterly Reports in a timely manner (Attachment 8). The Notice advised the Committee that any additional late filing of reports could result in legal enforcement action.

PACIFIC POLITICAL ACTION  
COMMITTEE  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2

Subsequent to the mailing of the Chronic Late Filing Notice, the Committee failed to file the 1988 July Quarterly Report. The Committee was notified on June 21, 1988 that the July Quarterly Report was due July 15, 1988 (Attachment 9). On August 5, 1988, the Committee was sent a Non-Filer Notice (Attachment 10).

On August 24, 1988, the RAD analyst again called Mr. Rheuban. Mr. Rheuban was not available so the RAD analyst left a message that the Commission had not received the Committee's 1988 July Quarterly Report (Attachment 11).

The 1987 Year End, 1988 April Quarterly and 1988 July Quarterly Reports were received on September 8, 1988 (Attachment 12).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

8 3 0 4 0 7 3 6 1 2 4

8 9 0 4 0 7 3 3 4 2 5

## LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1987 Year End Report (7/1/87-12/31/87)	12/18/87 (Attachment 2)	1/31/88	2/19/88 (Attachment 3)	9/8/88 (Attachment 12)
1988 April Quarterly (1/1/88-3/31/88)	3/22/88 (Attachment 5)	4/15/88	5/06/88 (Attachment 6)	9/8/88 (Attachment 12)
1988 July Quarterly (4/1/88-6/30/88)	6/21/88 (Attachment 9)	7/15/88	8/05/88 (Attachment 10)	9/8/88 (Attachment 12)

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

DATE 15SEP88

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
					TYPE OF FILER	
PACIFIC PAC						ID #C00199851 NON-PARTY QUALIFIED
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
	YEAR-END	20,000	603	1JUL87 -31DEC87	3	88FEC/545/3754
	NOTICE OF FAILURE TO FILE			31DEC87	1	88FEC/510/2952
1988	MISCELLANEOUS NOTICE FROM FEC			7JUN88	1	88FEC/528/4385
	APRIL QUARTERLY	5,000	19,000	1JAN88 -31MAR88	4	88FEC/545/3758
	NOTICE OF FAILURE TO FILE			1JAN88 -31MAR88	1	88FEC/524/4878
	JULY QUARTERLY	30,000	20,000	1APR88 -30JUN88	4	88FEC/545/3763
	NOTICE OF FAILURE TO FILE			1APR88 -30JUN88	1	88FEC/541/0457
	TOTAL	75,000	0 59,626 0		30	TOTAL PAGES

All reports except the last three (3) filed have been reviewed

Ending cash on hand as of 6/30/88: \$18,244.99

Debts and obligations owed by the committee as of 6/30/88: \$0

# YEAR-END 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.

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





## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

90-7

FEB 19 1988

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

Identification Number: C00199851

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

Dear Mr. Rheuban:

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 Robert DiMardo 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

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**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

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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.

8 2 0 4 0 7 3 3 4 2 9

# QUARTERLY REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 22, 1988

REPORT	REPORTING PERIOD	REG./CERT.	FILING DATE
		MAILING 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.



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

BQ-7

May 6, 1988

Carl Rheuban, Treasurer  
Pacific Political Action Committee  
10100 Santa Monica Boulevard  
Los Angeles, CA 90067

Identification Number: C00199851

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

Dear Mr. Rheuban:

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 Robert B. DiNardo on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

A handwritten signature in cursive script, reading "John D. Gibson".

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

80040733431  
33033372

**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

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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.

8 0 0 4 0 7 3 3 4 3.2



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20541

MS-L

JUL 7 1988

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

Identification Number: C00199851

References: 1987-1988 Election Cycle Reports

Dear Mr. Rheuban:

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

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
1987 Year End (7/1/87-12/31/87)	01/31/88	not filed
1988 April Quarterly (1/1/88-3/31/88)	04/15/88	not filed

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

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Robert DiNardo on our toll-free number, (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

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

89740733433

# QUARTERLY REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

June 21, 1988

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
July Quarterly	04/01/88**-06/30/88	07/15/88	07/15/88

**WHO MUST FILE**

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

**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

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FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

August 5, 1988

RQ-7

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

Identification Number: C00199851

Reference: July Quarterly Report (4/1/88-6/30/88)

Dear Mr. Rheuban:

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

Sincerely,

A handwritten signature in cursive script, reading "John D. Gibson", is positioned above the typed name and title.

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

**MEMORANDUM TO THE FILES:**

**COMMITTEE:** Pacific Political Action Committee  
**I.D. NUMBER:** C00199851  
**CONTACT:** Carl Rheuban, Treasurer  
**DATE:** August 24, 1988  
**ANALYST:** Robert B. DiNardo  
**SUBJECT:** non-filed 1988 July Quarterly Report

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I called Mr. Rheuban at 2:00. Mr. Rheuban was not available so I left a message that the Commission had not received the committee's 1988 July Quarterly Report, as well as the 1987 Year End and 1988 April Quarterly Reports. I left my phone number in case Mr. Rheuban had any questions.

89040733435



# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

Attachment 12  
RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

88 SEP -8 AM 9:46

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <b>PACIFIC PAC</b>		2. FEC IDENTIFICATION NUMBER  <b>C00199851</b>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <b>10100 Santa Monica Boulevard, Suite 500</b>		
CITY, STATE and ZIP CODE <b>Los Angeles, California 90067</b>		
		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 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

*Carl M. Rheuban*

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.

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**FEC FORM 3X**  
(revised 4/87)

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# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

2 of Attachment 12  
RECEIVED  
FEDERAL ELECTION COMMISSION  
MAR 1988

88 SEP -8 AM 9:46

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <b>PACIFIC PAC</b>		2. FEC IDENTIFICATION NUMBER <b>C00199851</b>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <b>10100 Santa Monica Blvd., Suite 500</b>		
CITY, STATE and ZIP CODE <b>Los Angeles, California 90067</b>		
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:


☐ February 20 ☐ June 20 ☐ October 20  
☐ March 20 ☐ July 20 ☐ November 20  
☐ April 20 ☐ August 20 ☐ December 20  
☐ May 20 ☐ September 20 ☐ 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 <b>Carl M. Rheuban</b>			
Signature of Treasurer 			Date <b>09/02/88</b>

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)

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

3 of Attachment 12  
FEDERAL ELECTION COMMISSION

88 SEP -8 AM 9:48

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <b>PACIFIC PAC</b>		2. FEC IDENTIFICATION NUMBER <b>C00199851</b>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <b>10100 Santa Monica Blvd., Suite 500</b>		
CITY, STATE and ZIP CODE <b>Los Angeles, California 90067</b>		
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:

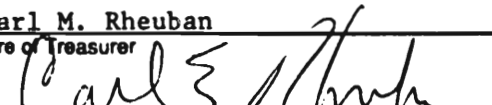
- |                                      |                                       |                                      |
|--------------------------------------|---------------------------------------|--------------------------------------|
| <input type="checkbox"/> February 20 | <input type="checkbox"/> 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 <b>Carl M. Rheuban</b>			
Signature of Treasurer 			Date <b>09/02/88</b>

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

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**FEC FORM 3X**  
(revised 4/87)

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88 OCT 13 AM 9:27

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

**SENSITIVE**

**FIRST GENERAL COUNSEL'S REPORT**

RAD Referral 88 NF-45  
Staff Member: Frania Monarski

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 STATUTE: 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 Pacific Political Action Committee ("the Committee") to the Office of the General Counsel on September 16, 1988. The basis for the attached referral is the committee's failure to file the 1988 July Quarterly Report 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 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 July Quarterly Report was July 15, 1988. The committee did not file the 1988 July Quarterly Report by July 15, 1988. On August 5, 1988, the

Committee was notified of its failure to file the required report. On September 8, 1988, fifty-five days late, the Committee filed its 1988 July Quarterly Report with the Commission.

The Committee also failed to file its 1987 Year End Report and its 1988 April Quarterly Report in a timely manner. The Committee, however, has entered into a signed conciliation agreement with the Commission, paid a \$3,250 civil penalty for these violations, and filed its 1987 Year End Report and 1988 April Quarterly Report with the Commission on September 8, 1988, the same day it filed the 1988 July Quarterly Report.

Therefore, the Office of the General Counsel recommends that the Commission open a Matter Under Review and find reason to believe that the Pacific PAC and Carl Rheuban, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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III. RECOMMENDATIONS

1. Open a Matter Under Review.
2. Find reason to believe the Pacific Political Action Committee and Carl Rheuban, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i).
3. Enter into conciliation with the Pacific PAC and Carl Rheuban, as treasurer, prior to a finding of probable cause to believe.
4. Approve the attached letter, factual and legal analysis, and proposed conciliation agreement.

Lawrence M. Noble  
General Counsel

Date

*Oct 12, 1988*

BY:

*[Signature]*  
Lois G. Lerner  
Associate General Counsel

Attachments

- A. Referral Material
- B. Proposed Conciliation Agreement
- C. Letter and Factual and Legal Analysis

Staff person: Frania Monarski

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BEFORE THE FEDERAL ELECTION COMMISSION

(Mick  
2732)

In the Matter of )

Pacific PAC and Carl Rheuban, as treasurer )

RAD Ref. 88NF-45

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 17, 1988, the Commission decided by a vote of 5-0 to take the following actions in RAD Ref. 88NF-45:

1. Open a Matter Under Review.
2. Find reason to believe the Pacific Political Action Committee and Carl Rheuban, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i).
3. Enter into conciliation with the Pacific PAC and Carl Rheuban as treasurer, prior to a finding of probable cause to believe.

(Continued)

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4. Approve the letter, factual and legal analysis, and proposed conciliation agreement, as recommended in the First General Counsel's report signed October 12, 1988.

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

Attest:

Oct. 17, 1988

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary:	Thurs.,	10-13-88,	9:27
Circulated on 48 hour tally basis:	Thurs.,	10-13-88,	4:00
Deadline for vote:	Mon.,	10-17-88,	4:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20541

October 21, 1988

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

RE: MUR 2732  
Pacific PAC and Carl  
Rheuban, as treasurer

Dear Mr. Rheuban:

On October 17, 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.

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. The attached proposed conciliation agreement includes the factual and legal findings concerning the Committee's failure to file the 1988 July Quarterly Report.

If you are interested in expediting the resolution of this matter by pursuing probable 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 Commission. In light of the fact that conciliation negotiations, prior to a finding of probable

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Carl Rheuban  
Page 2

cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

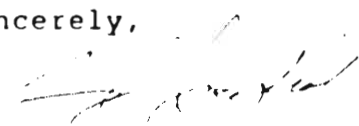
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Frania Monarski, the staff person 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

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FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20461

November 15, 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

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

RE: MUR 2732  
Pacific PAC,  
Carl Rheuban, as  
treasurer

Dear Mr. Rheuban:

On October 17, 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 Frania Monarski, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature in dark ink, appearing to be "L. G. Lerner", written over the typed name of Lois G. Lerner.

BY: Lois G. Lerner  
Associate General Counsel

88 DEC -6 AM 10:08

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Pacific PAC and ) MUR 2732  
Carl Rheuban, as treasurer )

SENSITIVE

GENERAL COUNSEL'S REPORT

On October 17, 1988, the Commission found reason to believe that Pacific PAC and Carl Rheuban, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i). On October 21, 1988, the Office of General Counsel sent the Respondents a proposed pre-probable cause conciliation agreement. The Respondents have not responded to this proposal. Furthermore, on November 15, 1988, this Office sent to the Respondents a reminder notice via certified mail requesting a response to the pre-probable cause conciliation agreement. As of this date, the Respondents have not contacted the Commission, therefore, this Office is proceeding to the next step in the enforcement process.

Lawrence M. Noble  
General Counsel

12-5-88  
Date

By:   
Lois G. Lerner  
Associate General Counsel

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FEDERAL ELECTION COMMISSION

**CARL M. RHEUBAN**  
10100 SANTA MONICA BLVD. FIFTH FLOOR  
LOS ANGELES, CALIFORNIA 90067

88 DEC -7 AM 10:36

December 6, 1988

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

Re: MUR 2732  
Pacific PAC

Dear Ms. Monarski:

Enclosed please find the following:

1. Executed Reconciliation Agreement MUR 2732; and
2. Check in the amount of \$950.00.

Please call if you have any questions.

Very truly yours,

PACIFIC PAC

By: 

Carl M. Rheuban

CMR/rob  
Enclosures

88 DEC 20 PM 4:41

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of

Pacific PAC and  
Carl M. Rheuban, as treasurer

**MUR 2732**

**SENSITIVE**

## GENERAL COUNSEL'S REPORT

## I. BACKGROUND

Attached is a conciliation agreement which has been signed by Carl M. Rheuban, the treasurer of Pacific PAC.

The attached agreement contains no changes from the agreement approved by the Commission on October 17, 1988. A check for the civil penalty of nine hundred and fifty dollars (\$950.00) was received on December 9, 1988. On December 5, 1988, this Office circulated a General Counsel's Report indicating that this Office was proceeding to the next stage in the enforcement process. Before a brief was prepared, however, Carl M. Rheuban, treasurer of Pacific PAC, submitted a signed conciliation agreement to the Commission. This Office, therefore, recommends that the Commission accept the signed conciliation agreement and close the file.

## II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Pacific PAC and Carl M. Rheuban, as treasurer.


2. Close the file.

3. Approve the attached letter.

Lawrence M. Noble  
General Counsel

12-19-88  
Date

BY:

  
Lois G. Lerner  
Associate General Counsel

Attachments

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

Staff Assigned: Frania Monarski

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

Pacific PAC and Carl M. Rheuban, )  
as treasurer )

MUR 2732

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 23, 1988, the Commission decided by a vote of 4-0 to take the following actions in MUR 2732:

1. Accept the conciliation agreement with Pacific PAC and Carl M. Rheuban, as treasurer, as recommended in the General Counsel's Report signed December 19, 1988.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report signed December 19, 1988.

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

Attest:

December 23, 1988

Date

Hilda Arnold

for Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary: Tues., 12-20-88, 4:41  
Circulated on 48 hour tally basis: Wed., 12-21-88, 11:00  
Deadline for vote: Fri., 12-23-88, 11:00





## FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20461

January 3, 1989

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

RE: MUR 2732  
Pacific PAC and  
Carl Rheuban, as  
treasurer

Dear Mr. Rheuban:

On December 23, 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), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

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

Carl M. Rheuban  
Page 2

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

Sincerely,

Lawrence M. Noble  
General Counsel

*Lois G. Lerner*

BY: Lois G. Lerner *by LGL*  
Associate General Counsel

Enclosure  
Conciliation Agreement

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**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 ) MUR 2732  
Pacific PAC and Carl Rheuban, as )  
treasurer )

**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).

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

2. Carl Rheuban is the treasurer of the 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 July Quarterly Report no later than July 15, 1988. Respondents filed the 1988 July Quarterly Report on September 8, 1988, fifty-five days late, disclosing \$30,000 in receipts and \$20,000 in disbursements.

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

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of nine hundred and fifty dollars (\$950.00), 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 executed same and the Commission has approved the entire agreement.

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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 not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner 12-30-88  
Lois G. Lerner *by LGL* Date  
Associate General Counsel

FOR THE RESPONDENTS:

Carl E. Carlson 12-5-88  
(Name) Date  
(Position)

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

THIS IS THE END OF MUR # 2732

DATE FILMED 2/16/89 CAMERA NO. 3

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