



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2817

DATE FILMED 4/26/89 CAMERA NO. 2

CAMERAMAN AS

89040745404



ELECTION COMMISSION
D.C. 20463

March 29, 1989

Mr. Kobes, Treasurer
De Leuw, Cather & Company
Political Action Committee,
POB Corporation PAC
25th Street, N.W., 8th Floor
Washington, D.C. 20005

Re: MUR 2814
De Leuw, Cather & Company
Political Action Committee,
a Subcommittee of the Parsons
Corporation PAC, and Zigmund
Kobes, as treasurer

Dear Mr. Kobes:

On March 24, 1989, 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)(B), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

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

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



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 29, 1989

Mr. Zigmund Kobes, Treasurer
De Leuw, Cather & Company
Political Action Committee,
a Subcommittee of the
Parsons Corporation PAC
1133 15th Street, N.W., 8th Floor
Washington, D.C. 20005

Re: MUR 2814
De Leuw, Cather & Company
Political Action Committee,
a Subcommittee of the Parsons
Corporation PAC, and Zigmund
Kobes, as treasurer

Dear Mr. Kobes:

On March 24, 1989, 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)(B), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

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

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

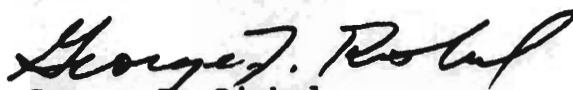
93804040745406

Zigmund Kobes
Page 2

questions, please contact Janice Lacy, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
George F. Rishel
Acting Associate
General Counsel

Enclosure
Conciliation Agreement

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MUR 2814

CONCILIATION AGREEMENT

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:

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

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

1. De Leuw, Cather & Company Political Action Committee, a subcommittee of the Parsons Corporation PAC, is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent, Zigmund Kobes, is the treasurer of De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parson Corporation PAC.

3. Section 434(a)(4)(B) of Title 2 provides that all political committees other than authorized committees of a candidate shall file monthly reports in all calendar years which shall be filed no later than the 20th day after the last day of the month.

4. Respondents were required to file the 1988 October Monthly Report no later than October 20, 1988. Respondents filed the 1988 October Monthly Report on November 23, 1988, thirty-four days late. The total amount of financial activity disclosed was \$4,267.

5. Section 434(a)(4)(B) of Title 2 also provides that in lieu of filing the reports otherwise due in November of any year in which a regularly scheduled general election is held, a pre-general election report shall be filed in accordance with Section 434(a)(2)(A)(i), which requires the report to be filed no later than the twelfth day before any election.

6. Respondents were required to file the 1988 12 Day Pre-General Election Report on October 27, 1988. Respondents filed the 1988 12 Day Pre-General Election Report on November 23, 1988, twenty-seven days late. The total amount of financial activity disclosed was \$1,363.

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V. 1. Respondents failed to file the 1988 October Monthly Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(B).

2. Respondents failed to file the 1988 12 Day Pre-General Election Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(B).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of seven hundred fifty dollars (\$750.00), 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 have executed same and the Commission has approved the entire agreement.

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

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY:

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

March 29, 1989
Date

FOR THE RESPONDENTS:

Richard A. Kolba
(Name)
(Position) TREASURER

2-9-89
Date

33040745411

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

De Leuw, Cather & Company Political Action)
Committee, a Subcommittee of the Parsons)
Corporation PAC, and Zigmund Kobes, as)
treasurer)

MUR 2814

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on March 24,
1989, the Commission decided by a vote of 6-0 to take
the following actions in MUR 2814:

1. Accept the conciliation agreement with De Leuw,
Cather & Company Political Action Committee, a
Subcommittee of the Parsons Corporation PAC, and
Zigmund Kobes, as treasurer, as recommended in the
General Counsel's Report signed March 21, 1989.
2. Close the file.
3. Approve the letter, as recommended in the General
Counsel's Report signed March 21, 1989.

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

Attest:

3-24-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Wed., 3-22-89, 11:04
Circulated on 48 hour tally basis: Wed., 3-22-89, 4:00
Deadline for vote: Fri., 3-24-89, 4:00

BEFORE THE FEDERAL ELECTION COMMISSION

89 MAR 22 AM 11:05

In the Matter of)

De Leuw, Cather & Company Political Action)
Committee, a Subcommittee of the Parsons)
Corporation PAC, and Zigmund Kobes, as)
treasurer)

MUR 2814

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Zigmund G. Kobes, the treasurer of De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parsons Corporation PAC.

The attached agreement contains no changes from the agreement approved by the Commission on January 30, 1989. The Commission has received a check for the civil penalty.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parsons Corporation PAC, and Zigmund Kobes, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

March 21, 1989
Date

BY:

George F. Rishel
George F. Rishel
Acting Associate
General Counsel

Attachments

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

Staff Assigned: Janice Lacy

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 6, 1989

Zigmund Kobes, Treasurer
De Leuw, Cather & Company
Political Action Committee,
a Subcommittee of the
Parsons Corporation PAC
1133 15th Street, NW, 8th Floor
Washington, D.C. 20005

RE: MUR 2814
De Leuw, Cather & Company
Political Action
Committee, a Subcommittee
of the Parsons Corporation
PAC, and Zigmund Kobes,
as treasurer

Dear Mr. Kobes:

On January 30, 1989, the Federal Election Commission found that there is reason to believe De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parsons Corporation PAC, ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's findings, 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

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Zigmund Kobes, Treasurer
Page 2

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 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 Janice Lacy, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Danny L. McDonald
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

(MUR
2814)

In the Matter of)

De Leuw, Cather & Company Political Action)
Committee, a Subcommittee of the Parsons)
Corporation PAC)
Zigmund Kobes, as treasurer)

RAD Referral 88NF-61

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 30, 1989, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 88NF-61:

1. Open a MUR.
2. Find reason to believe that the De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parsons Corporation PAC, and Zigmund Kobes, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the letter, factual and legal analysis, and proposed conciliation agreement, as recommended in the First General Counsel's Report signed January 25, 1989.

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

Attest:

Jan. 31, 1989
Date

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

Received in the Office of Commission Secretary: Thurs., 01-26-89, 10:36
Circulated on 48 hour tally basis: Thurs., 01-26-89, 4:00
Deadline for vote: Mon., 01-30-89, 4:00

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

RECEIVED
FEDERAL ELECTION COMMISSION
89 JAN 26 AM 10:36

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD REFERRAL: 88NF-61
STAFF MEMBER: Janice Lacy

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

RESPONDENTS: De Leuw, Cather & Company Political Action
Committee, a Subcommittee of the Parsons
Corporation PAC
Zigmund Kobes, as treasurer

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

INTERNAL REPORTS
CHECKED: Referral Materials

FEDERAL AGENCIES
CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parsons Corporation PAC, ("the Committee") to the Office of the General Counsel on December 22, 1988. The basis for the attached referral is the Committee's failure to file the 1988 October Monthly and 12 Day Pre-General Reports in a timely manner.

II. FACTUAL AND LEGAL ANALYSIS

Filing of Report

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that all political committees other than authorized committees of a candidate have the option of filing monthly reports in all calendar years, which shall be filed no

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later than the 20th day after the last day of the month.

2 U.S.C. § 434(a)(4)(B). See also 11 C.F.R. § 104.5(c)(3)(i).

The committee elected to file reports on a monthly basis. Thus, the due date for the 1988 October Monthly Report was October 20, 1988.

Section 434(a)(4)(B) also provides that in lieu of filing the report otherwise due in November of any year in which a regularly scheduled general election is held, a pre-general election report shall be filed in accordance with Section 434(a)(2)(A)(i), which requires the report to be filed no later than the twelfth day before any election. See also 11 C.F.R. § 104.5(c)(3)(ii). Thus, the due date for the 1988 12 Day Pre-General Election Report was October 27, 1988.

The Committee did not file its 1988 October Monthly Report until November 23, 1988, thirty-four (34) days late. Additionally, the Committee did not file its 12 Day Pre-General Election Report until November 23, 1988, twenty-seven (27) days late. Accordingly, the Office of the General Counsel recommends that the Commission open a Matter Under Review and find reason to believe that the Committee and its treasurer violated 2 U.S.C. § 434(a)(4)(B).

B. Merger

This Office further notes that the referred Committee and its treasurer are currently respondents in an open matter (MUR 2746). That MUR is now at the preprobable cause conciliation enforcement stage, and this Office anticipates that

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preprobable cause conciliation will be successfully completed in the near future. Accordingly, merger of the present referral with MUR 2746 would not be appropriate at this time.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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IV. RECOMMENDATIONS

1. Open a MUR.

2. Find reason to believe that the De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parsons Corporation PAC, and Zigmund Kobes, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached letter, factual and legal analysis, and proposed conciliation agreement.

Lawrence M. Noble
General Counsel

1/25/89
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Referral Materials
2. Proposed Conciliation Agreement
3. Letter and Factual and Legal Analysis

Staff Person: Janice Lacy

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REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 22 DECEMBER 1988

ANALYST: Elizabeth Jones

I. COMMITTEE: DeLeuw, Cather & Co. Political Action Committee, A Subcommittee of the Parsons Corp. PAC (C00119784)
Zigmund G. Kobes, Treasurer
(September 13, 1988 - Present)
Linda M. Perras, Treasurer
(July 18, 1986 - September 12, 1988)
1133 15th Street, NW, 8th Floor
Washington, DC 20005

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

III. BACKGROUND:

Failure to File Reports by Election Day

DeLeuw, Cather & Co. Political Action Committee, A Subcommittee of the Parsons Corp. PAC (the "Committee") failed to file the 1988 October Monthly and 12 Day Pre-General Reports of Receipts and Disbursements by Election Day, November 8, 1988.

Prior Notices were sent to the Committee on August 20, 1988 for the October Monthly Report and on October 3, 1988, for the 12 Day Pre-General Report (Attachments 2 and 3).

A Non-Filer Notice was sent for the October Monthly and 12 Day Pre-General Reports on November 15, 1988 (Attachment 4).

Zigmund Kobes, treasurer for the Committee, called the Reports Analysis Division analyst on November 17, 1988, and said that he would be filing the reports soon (Attachment 5). He explained that the employee who had been filing the reports had left the company unexpectedly, and he was not aware that the reports had not been filed.

The reports were filed on November 23, 1988 (Attachments 6 and 7).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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

DATE 21DEC88

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
					TYPE OF FILER	
DE LEUW, CATHER & CO, POLITICAL ACTION CMTE, A SUBCOMMITTEE OF THE PARSONS CORP PAC				ID #C00119784	NON-PARTY QUALIFIED	
CONNECTED ORGANIZATION: RALPH M PARSONS COMPANY						
1987	FEBRUARY MONTHLY	1,885	1,900	1JAN87 -31JAN87	5	87FEC/461/0894
	FEBRUARY MONTHLY - AMENDMENT	1,885	1,900	1JAN87 -31JAN87	3	87FEC/493/1888
	REQUEST FOR ADDITIONAL INFORMATION			1JAN87 -31JAN87	1	87FEC/492/3605
	MARCH MONTHLY	1,246	0	1FEB87 -28FEB87	3	87FEC/463/3262
	MARCH MONTHLY - AMENDMENT	1,246	0	1FEB87 -28FEB87	2	87FEC/493/1885
	REQUEST FOR ADDITIONAL INFORMATION			1FEB87 -28FEB87	1	87FEC/492/3604
	APRIL MONTHLY	1,255	2,833	1MAR87 -31MAR87	7	87FEC/465/5268
	APRIL MONTHLY - AMENDMENT	1,255	2,833	1MAR87 -31MAR87	2	87FEC/493/1882
	REQUEST FOR ADDITIONAL INFORMATION			1MAR87 -31MAR87	1	87FEC/492/3603
	MAY MONTHLY	1,357	61	1APR87 -30APR87	3	87FEC/467/4913
	MAY MONTHLY - AMENDMENT	1,357	61	1APR87 -30APR87	2	87FEC/493/1879
	REQUEST FOR ADDITIONAL INFORMATION			1APR87 -30APR87	1	87FEC/492/3602
	JUNE MONTHLY	1,269	3,000	1MAY87 -31MAY87	6	87FEC/469/5342
	JULY MONTHLY	3,347	1,087	1JUN87 -30JUN87	8	87FEC/478/4278
	AUGUST MONTHLY	1,870	1,272	1JUL87 -31JUL87	6	87FEC/483/4921
	SEPTEMBER MONTHLY	1,223	258	1AUG87 -31AUG87	5	87FEC/486/0965
	OCTOBER MONTHLY	1,244	758	1SEP87 -30SEP87	6	87FEC/492/0953
	NOVEMBER MONTHLY	1,238	1,507	1OCT87 -31OCT87	10	87FEC/494/3197
	DECEMBER MONTHLY	1,242	7	1NOV87 -30NOV87	8	88FEC/497/3502
	YEAR-END	1,222	608	1DEC87 -31DEC87	13	88FEC/501/3613
1988	STATEMENT OF ORGANIZATION - AMENDMENT			15SEP88	2	88FEC/545/4915
	MISCELLANEOUS NOTICE FROM FEC			30NOV88	2	88FEC/566/1012
	FEBRUARY MONTHLY	1,458	8	1JAN88 -31JAN88	8	88FEC/509/4612
	MARCH MONTHLY	1,906	612	1FEB88 -29FEB88	6	88FEC/512/5329
	APRIL MONTHLY	6,119	393	1MAR88 -31MAR88	9	88FEC/521/3471
	MAY MONTHLY	1,512	3,447	1APR88 -30APR88	11	88FEC/526/0751
	JUNE MONTHLY	1,833	1,307	1MAY88 -31MAY88	10	88FEC/530/2172
	JUNE MONTHLY - AMENDMENT	1,833	1,307	1MAY88 -31MAY88	11	88FEC/545/2803
	REQUEST FOR ADDITIONAL INFORMATION			1MAY88 -31MAY88	1	88FEC/533/5357
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAY88 -31MAY88	2	88FEC/541/0216
	1ST LETTER INFORMATIONAL NOTICE			1MAY88 -31MAY88	1	88FEC/549/2439
	JULY MONTHLY	1,223	1,758	1JUN88 -30JUN88	11	88FEC/545/2792
	NOTICE OF FAILURE TO FILE			1JUN88 -30JUN88	1	88FEC/541/1790
	1ST LETTER INFORMATIONAL NOTICE			1JUN88 -30JUN88	1	88FEC/549/2438
	AUGUST MONTHLY	1,789	7	1JUL88 -31JUL88	9	88FEC/545/2814
	1ST LETTER INFORMATIONAL NOTICE			1JUL88 -31JUL88	1	88FEC/549/2437
	SEPTEMBER MONTHLY	66	0	1AUG88 -30AUG88	9	88FEC/547/0802
	OCTOBER MONTHLY	2,359	1,908	1SEP88 -30SEP88	9	88FEC/565/5012
	NOTICE OF FAILURE TO FILE			1SEP88 -30SEP88	1	88FEC/565/2015
	PRE-GENERAL	606	757	1OCT88 -19OCT88	8	88FEC/565/5022
	NOTICE OF FAILURE TO FILE			1OCT88 -19OCT88	1	88FEC/565/2016
	POST-GENERAL	2,235	1,987	20OCT88 -28NOV88	10	88FEC/573/2446
TOTAL		39,504	0	25,475	0	217 TOTAL PAGES

-All reports through the 1988 12 Day Pre-General Report have been reviewed.

-Outstanding debts and obligations owed to committee as of 11/28/88: \$0

-Outstanding debts and obligations owed by committee as of 11/28/88: \$0

-Ending cash on hand balance as of 11/28/88: \$15,716.09



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

August 20, 1988

REPORTING NOTICE FOR MONTHLY FILERS
ELECTION YEAR 1988

The Commission's records indicate that your committee is filing monthly reports during 1988. This notice will assist you in complying with the monthly filing requirements.

* * * *

MONTHLY REPORTS

Monthly reports must be filed no later than the 20th day of each month. 11 CFR 104.5(c)(3). Each report must include all financial activity that occurred during the previous month. The next monthly report due in 1988 should be filed by September 20, 1988, and should include all activity between August 1 and August 31, 1988.

NOTE: During November, December and January, monthly filers must file Pre- and Post-General election reports and a Year-End report instead of their Monthly reports. (See chart on reverse side.)

You are required to use FEC Form 3X to file each report. Two of them have been enclosed for your use. You may duplicate these forms, or you may call the Information Services Division for additional copies (800/424-9530 or 202/376-3120).

(over)

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FUTURE REPORTS FOR 1988 MONTHLY FILERS

Report	Period Covered	Reg./Cert. Mailing Date*	Filing Date
September	08/01 - 08/31	09/20/88	09/20/88
October	09/01 - 09/30	10/20/88	10/20/88
Pre-General	10/01 - 10/19	10/24/88	10/27/88
Post-General	10/20 - 11/28	12/08/88	12/08/88
Year-End	11/29 - 12/31	01/31/89	01/31/89

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.

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GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACs

October 3, 1988

I. ALL MONTHLY FILERS

Report	Reporting Period	Reg./Cert. Mailing Date*	Filing Date
Pre-General	10/01/88**-10/19/88	10/24/88	10/27/88
Post-General	10/20/88 -11/28/88	12/08/88	12/08/88

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 19***

Report	Reporting period	Reg./Cert. Mailing Date*	Filing Date
Pre-General	10/01/88**-10/19/88	10/24/88	10/27/88
Post-General	10/20/88 -11/28/88	12/08/88	12/08/88

III. QUARTERLY FILERS WHICH DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 19***

Report	Reporting Period	Reg./Cert. Mailing Date*	Filing Date
Post-General	10/01/88**-11/28/88	12/08/88	12/08/88

WHO MUST FILE

Party committees and PACs must follow the above charts in order to determine whether they must file the pre-general election report. All Party committees and PACs, regardless of financial activity, must file the post-general election report.

WHAT MUST BE REPORTED

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

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

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

***Committees that made general election contributions or expenditures prior to October 1 which have not been previously reported must also follow the Chart II reporting requirements.

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

(over)

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.

LAST-MINUTE INDEPENDENT EXPENDITURES

Any PAC which makes any independent expenditures aggregating \$1,000 or more during the period beginning October 20 and ending November 6 must report them within 24 hours. Call the FEC for more information.

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.

8 9 0 4 0 7 4 5 4 2 7



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

November 15, 1988

Zigmund G. Kobes, Treasurer
De Leuw, Cather & Co., Political
Action Cmte, A Subcommittee of
the Parsons Corp PAC
1133 15th Street, NW, 8th Floor
Washington, DC 20005

Identification Number: C00119784

Reference: October Monthly (9/1/88-9/30/88) and 12 Day Pre-General (10/1/88-10/19/88) Reports

Dear Mr. Kobes:

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 Reports of Receipts and Disbursements. You were notified previously of the due dates for these reports.

It is important that you file these reports 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). Copies of the reports 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 regarding this matter, please contact Elizabeth Jones 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

TELECON

ANALYST: ELIZABETH JONES

COMMITTEE: DE LEUW, CATHER & CO. PAC

SPOKE WITH: ZIGMUND KOBES

DATE: 11/17/88

SUBJECT: NON-FILING OF M10 & 126

Mr. Kobes called and said the person who filed their reports, Barbara Thomas, had left the company unexpectedly, and in going through her things found that she had not filed the M10 and 126. He said that he did not realize that the reports had not been filed, but took full responsibility for this. He said he would try to get the reports to us by the beginning of next week.

3 2 7 4 0 7 4 5 4 2 9

**DeLEW
CATHER**

De Leuw, Cather & Company
Engineers and Planners

1133 16th Street, N.W.
Washington, D.C. 20006-2701
(202) 778-3300

Attachment 6
Page 1 of 2

RECEIVED
FEDERAL ELECTION COMMISSION
REPORTS ANALYSIS DIVISION

NOV 23 AM 9:49

Our Ref:

November 22, 1988

Ms. Elizabeth Jones
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

- Re: (1) October Monthly (9/1/88 - 9/30/88) and Twelve
Day Pre-General (10/1/88 - 10/19/88) Reports
- (2) Letter of November 15, 1988 from John D.
Gibson, Assistant Staff Director, Reports
Analysis Division

Dear Ms. Jones:

Please find enclosed the reports in reference to item (1)
above.

As I discussed with you last week, our failure to make a timely filing of these reports relates directly to a failure to perform by the employee assigned the responsibility for record-keeping and preparation of FEC forms. After twelve years with our organization, that employee has ended her employment without any notice in the middle of last week. I have since assumed direct responsibility for preparation of these reports. This has taken a great deal of time since, despite the employee's past assurances to the contrary, most of our records had been improperly filed, or not filed at all. As treasurer of De Leuw, Cather's Political Action Committee, I accept full responsibility for compliance with the election laws. However, I request that the delay in filing these reports be excused as reasonable and necessary given the need to rectify the consequences of several months of deficient record-keeping.

Please accept my assurances that future filings will be timely.

Sincerely yours,

Zygmund G. Kobes
Zygmund G. Kobes

Treasurer

De Leuw, Cather Political Action Committee

cc: M. R. Sproles

For Other Than An Authorized Committee
(Summary Page)

HAND DELIVERED

RECEIVED
FEDERAL ELECTION COMMISSION
REPORTS ANALYSIS SECTION

88 NOV 23 AM 9:49

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1 NAME OF COMMITTEE (in full)
De Law, Cather & Company Political Action Committee
A Subcommittee of The Parsons Corporation PAC
ADDRESS (number and street) ☐ Check if different than previously reported
1133 15th Street, NW
CITY, STATE and ZIP CODE
Washington, D.C. 20005

2 FEC IDENTIFICATION NUMBER
C00-119784

3 ☐ 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>9-1-88</u> through <u>9-30-88</u>		
6	(a) Cash on Hand January 1, 19 <u>88</u>		\$6,791.80
	(b) Cash on Hand at Beginning of Reporting Period	\$ 15,167.64	
	(c) Total Receipts (from Line 18)	\$ 2,359.28	\$18,270.97
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 17,526.92	\$ 25,062.77
7	Total Disbursements (from Line 28)	\$ 1,908.18	\$ 9,443.21
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 15,618.74	\$15,618.74
9	Debt and Obligations Owed TO the Committee (itemize on Schedule C and or Schedule D)	\$	
10	Debt and Obligations Owed BY the Committee (itemize on Schedule C and or Schedule D)	\$	

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

Type or Print Name of Treasurer

Sigmund G. Kobes

Signature of Treasurer

Sigmund G. Kobes

Date

11/22/88

For further information
contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-576-3120

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

FEC FORM 3X
(revised 4/87)

8373355013

For Other Than An Authorized Committee
(Summary Page)

HAND DELIVERED
FEDERAL ELECTION COMMISSION
REPORTS AND DISBURSEMENTS

08 NOV 23 AM 9:49

1. NAME OF COMMITTEE (in full) De Lew, Cather & Company Political Action Committee A Subcommittee of The Parsons Corporation PAC		2. FEC IDENTIFICATION NUMBER C00-119784
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 1133 15th Street, NW		
CITY, STATE and ZIP CODE Washington, D.C. 20005		
3. <input type="checkbox"/> The 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 General/Federalelection on November 8, 1988 (Type of Election)☐ 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>October 1, 1988</u> through <u>October 19, 1988</u>		
6 (a) Cash on Hand January 1, 19 <u>88</u>		\$ 6,791.80
(b) Cash on Hand at Beginning of Reporting Period	\$ 15,618.74	
(c) Total Receipts (from Line 18)	\$ 606.08	\$ 18,876.20
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 16,224.82	\$ 25,668.00
7 Total Disbursements (from Line 28)	\$ 757.03	\$ 10,200.21
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 15,467.79	\$ 15,467.79
9 Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	\$	For further information contact:
10 Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)	\$	Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800 424 9530 Local 202 376 3120

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:

Signature of Treasurer:

James A. Kuhn

Date:

11/22/88

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)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2814

DATE FILMED 4/26/89 CAMERA NO. 2

CAMERAMAN AS

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