



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC RECORD IN (CLOSED) MUR 2851

8 3 0 4 0 7 5 2 2 3 6



RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

89 JUN 13 AM 10:42

MUR2851

Jack Hughes
Senior Vice President and Treasurer

12 June 1989

CLOSED

Federal Election Commission
Office of General Council
Washington, D.C. 20463

Attn: Ms. Lois G. Lerner
Associate General Council

Dear Ms. Lerner:

Let this letter confirm that the ManTech International Corporation Political Action Committee has received the fully executed Conciliation Agreement and understands that the file on this matter is now closed. As further clarification of our position in this matter, we wish to have the following factual information appear on the public record:

Respondents failed to timely file the Mid-Year and Year-End reports due to continuing difficulty throughout 1987 in transitioning from manual to automated reporting of receipts and disbursements. This automation process required the maintenance of dual systems, one manual and one computerized, which gave rise to continuing reconciliation problems as the new automated system was debugged and validated. This resulted in very short-term delays in submission of these reports motivated by the respondents strong desire to submit complete and accurate information.

In addition, respondents failed to timely file the Pre-General Report due to a misunderstanding on the part of the Respondents as to the special nature of this report. Respondents had filed a report on 13 October 1988 just prior to the general election, and believed that this would fulfill the pre-election reporting requirement. Respondents were not made aware of the requirement for a separate and distinct Pre-General Report until after the due date and immediately filed the report. It should be noted that Respondents filed the Post-General Report in a timely manner.

In any event, Respondents did not knowingly and willfully violate applicable law.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

89 JUN 13 AM 11:11

89040752237

We thank you for this opportunity to provide the additional information.
We look forward to continuing our good working relationship with the FEC in the future.

Sincerely,

ManTech International Corporation


J. M. Hughes
Sr. Vice President

JMH:taws

8 9 0 4 0 7 5 2 2 3 8



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE BEGINNING OF MUR # 2251

DATE FILMED 7/7/89 CAMERA NO. 4

CAMERAMAN AS

89040753903

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 24 March 1989

ANALYST: Andrew Dodson

I. COMMITTEE: Mantech International Corp. Political
Action Committee (C00208983)
John M. Hughes, Treasurer
2121 Eisenhower Avenue
Alexandria, VA 22314

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(ii) and (iv)
11 CFR 104.5(c)(1)(ii)
11 CFR 104.5(c)(2)(i)(A) and (B)

III. BACKGROUND:

Chronic Late Filing of Reports and Failure to File the 1988
12 Day Pre-General Report by Election Day

The Mantech International Corp. Political Action
Committee ("the Committee") failed to file three (3) Reports
of Receipts and Disbursements in a timely manner during the
1987-1988 election cycle (see Late Filing History Chart).
The reports were filed between seven (7) and forty (40)
calendar days late. In addition, one of the late filings,
the 1988 12 Day Pre-General Report, was not filed by
Election Day, November 8, 1988.

On April 15, 1988, a Chronic Late Filer Notice was sent
to the Committee for failing to file the 1987 Mid-Year and
1987 Year End Reports in a timely manner (Attachment 6).

A response to the Notice was received by the Commission
on April 21, 1988 (Attachment 7). In the letter, Mr. John
Hughes, the Committee treasurer, stated "that the
circumstances surrounding the delayed submission of our Mid-
Year and Year End Reports were one-time anomalies...which
have been corrected."

Subsequent to sending the Chronic Late Filer Notice, the
Committee failed to timely file the 1988 12 Day Pre-General
Report.

The Committee was notified on October 3, 1988, that all
committees that have made contributions or expenditures in

89040753904

**MANTECH INTERNATIONAL CORP.
POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2**

connection with the general election during the period ending October 19, 1988, must file a pre-election report by October 27, 1988, if such activity has not previously been reported (Attachment 8).

The Committee filed the 1988 12 Day Pre-General Report on December 6, 1988 (Attachment 9). The report disclosed four (4) contributions totalling \$3,800 made to four (4) different federal candidates during the period of October 3, 1988 through October 19, 1988. Mr. Hughes stated in a cover letter to the report that he was unaware of the necessity of filing a 12 Day Pre-General Report.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

89040753905

8 7 0 4 0 7 5 3 9 0 6

LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1987 Mid-Year*/ (1/1/87-6/30/87)	7/7/87 (Attachment 2)	7/31/87	N/A	8/7/87 (Attachment 3)
1987 Year End (7/1/87-12/31/87)	12/18/87 (Attachment 4)	1/31/88	N/A	2/10/88 (Attachment 5)
1988 12 Day Pre-General (10/1/88-10/19/88)	10/3/88 (Attachment 8)	10/27/88	N/A	12/6/88 (Attachment 9)

MANTECH INTERNATIONAL, INC.
POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 3

*/ A quarterly report was filed in lieu of the Mid-Year.

8 9 0 4 0 7 5 3 9 0 7

FEDERAL ELECTION COMMISSION
1987-1988

DATE 14MAR89

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES TYPE OF FILER	# OF PAGES	MICROFILM LOCATION
MANTECH INTERNATIONAL CORP POLITICAL ACTION COMMITTEE						
CONNECTED ORGANIZATION: MANTECH INTERNATIONAL CORPORATION						
1987	APRIL QUARTERLY	8,245	2,250	1JAN87 -31MAR87	27	87FEC/465/1363
	APRIL QUARTERLY - AMENDMENT	8,245	2,250	1JAN87 -31MAR87	15	87FEC/495/1633
	REQUEST FOR ADDITIONAL INFORMATION			1JAN87 -31MAR87	1	87FEC/493/1746
	JULY QUARTERLY	9,349	2,700	1APR87 -30JUN87	17	87FEC/482/3247
	YEAR-END	18,630	5,770	1JUL87 -31DEC87	16	88FEC/508/5343
	YEAR-END - AMENDMENT	18,630	5,770	1JUL87 -31DEC87	16	88FEC/512/4940
	REQUEST FOR ADDITIONAL INFORMATION			1JUL87 -31DEC87	1	88FEC/512/0984
1988	MISCELLANEOUS NOTICE FROM FEC			15APR88	1	88FEC/520/1162
	MISCELLANEOUS REPORT TO FEC			21APR88	3	88FEC/523/0379
	MISCELLANEOUS REPORT TO FEC			22APR88	3	88FEC/523/2458
	APRIL QUARTERLY	4,709	18,000	1JAN88 -31MAR88	17	88FEC/518/4332
	JULY QUARTERLY	10,390	9,300	1APR88 -30JUN88	13	88FEC/533/5514
	JULY QUARTERLY - AMENDMENT	10,390	9,300	1APR88 -30JUN88	15	88FEC/541/1005
	REQUEST FOR ADDITIONAL INFORMATION			1APR88 -30JUN88	1	88FEC/540/4800
	OCTOBER QUARTERLY	6,265	17,950	1JUL88 -30SEP88	14	88FEC/551/4139
	PRE-GENERAL	913	4,300	1OCT88 -19OCT88	13	88FEC/567/2187
	POST-GENERAL	1,103	1,100	20OCT88 -28NOV88	12	88FEC/567/2201
	YEAR-END	2,646	500	29NOV88 -31DEC88	12	89FEC/579/4970
TOTAL		62,250	0 61,870	0	197	TOTAL PAGES

All reports have been reviewed

Debts and obligations owed to the committee as of 12/31/88 : -0-

Debts and obligations owed by the committee as of 12/31/88 : -0-

Cash on hand as of 12/31/88 : \$5,712

Attachment 1

SEMI-ANNUAL REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

July 7, 1987

WHO MUST FILE

ALL PARTY COMMITTEES AND PACS (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) must file a report in July.

REPORTING DATES

Semiannual. The Mid-Year Report is due July 31 and must disclose financial activity that occurred from January 1 through June 30, 1987. Committees which have previously filed 1987 reports should only report activity from the closing date of the last report filed.

Monthly. If the committee chooses to file on a monthly basis, the next monthly report is due July 20 and must disclose financial activity from June 1 through June 30, 1987. 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 (not previously reported) 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 should be made directly on the label.

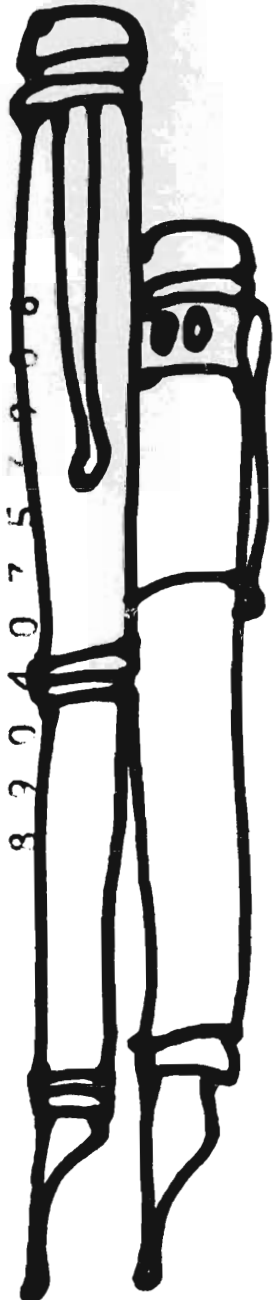
CHANGE IN FILING FREQUENCY

Committees that wish to change their reporting schedule (for example, from monthly to semiannual) 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.

(over)



**1987 UPCOMING FILING SCHEDULE
PARTIES AND PACS**

Retain this report notice for future reference. The next notice will be sent December 18, 1987. Also, see the January 1987 issue of the FEC Record, which lists 1987 reporting dates.

SEMIANNUAL FILERS

Report	Period Covered 1/	Reg./Cert.	Filing
		Mailing Date 2/	Date 2/ ..
Mid-Year	01/01 - 06/30	07/31/87	07/31/87
Year-End	07/01 - 12/31	01/31/88	01/31/88

MONTHLY FILERS

Report	Period Covered 1/	Reg./Cert.	Filing
		Mailing Date 2/	Date 2/
July	06/01 - 06/30	07/20/87	07/20/87
August	07/01 - 07/31	08/20/87	08/20/87
September	08/01 - 08/31	09/20/87	09/20/87
October	09/01 - 09/30	10/20/87	10/20/87
November	10/01 - 10/31	11/20/87	11/20/87
December	11/01 - 11/30	12/20/87	12/20/87
Year-End	12/01 - 12/31	01/31/88	01/31/88

1/ A newly registered committee should refer to "WHAT MUST BE REPORTED," on the reverse side.

2/ Reports sent by certified or registered mail must be postmarked by the mailing date. Reports mailed first class or hand delivered must be received by the filing date.

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

39040753909

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED AT THE PEC

07 AUG 7 40:48

USE PREVIOUS EDITION

NAME OF CANDIDATE

1. NAME
Last
First
Middle
212
ON
Also:

COO208983
JOHN M. HUGHES
MANTECH INTERNATIONAL CORP FOR
POLITICAL ACTION COMMITTEE
2929 EISENHOWER AVE
ALEXANDRIA VA 22304

CP 257

2. IDENTIFICATION NUMBER

COO208983

3. The committee qualified as a multicandidate committee DURING THIS Reporting Period on (date)

4. TYPE OF REPORT

☐ 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 _____

☐ Twelfth day report following the General Election on _____ in the State of _____

6. Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>1 April 1987</u> through <u>30 June 1987</u>		
6. (a) Cash on Hand January 1, 1987		\$ 5,332.00
(b) Cash on Hand at Beginning of Reporting Period	\$ 11,327.00	
(c) Total Receipts (from Line 1b)	\$ 9,349.00	\$ 17,594.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(b) and 6(c) for Column B)	\$ 20,676.00	\$ 22,926.00
7. Total Disbursements (from Line 2b)	\$ 2,700.00	\$ 4,950.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 17,976.00	\$ 17,976.00
9. Debts and Obligations Owed TO the Committee (summed all on Schedule C under Schedule B)	\$ 0.00	
10. Debts and Obligations Owed BY the Committee (summed all on Schedule C under Schedule B)	\$ 0.00	

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

Name or Print Name of Treasurer

John M. Hughes
Signature of Treasurer

Date

28 July 1987

NOTE: Submission of this information or completion of this report may subject the person signing this Report to the provisions of 2 U.S.C. 4379g

PEC FORM 5X

Revised 6/87

89370145018532170

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.

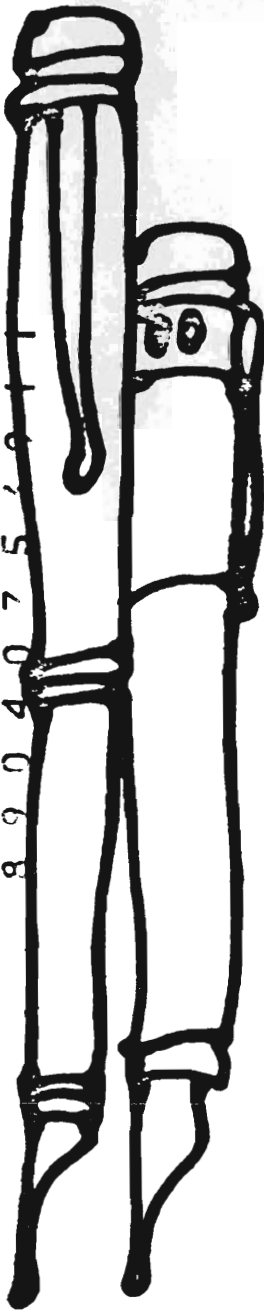
CHANGE IN FILING FREQUENCY

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



REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page) FCC 10-1

FEC FORM 3X

1. NAME OF COMMITTEE (Print)
ManTech International Corporation
Political Action Committee

2. ADDRESS (Number and street)
☐ Check if address has previously reported
2121 Eisenhower Ave.

3. CITY, STATE and ZIP CODE
Alexandria, VA 22314

4. FEC IDENTIFICATION NUMBER
C00308983

5. ☐ This committee qualified as a multicandidate committee during THIS Reporting Period (State)

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 28☐ March 30☐ April 30☐ May 30☐ June 30☐ July 30☐ August 30☐ September 30☐ October 30☐ November 30☐ December 30☐ 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>1 July 1987</u> through <u>31 December 1987</u>		
6. (a) Cash on Hand January 1, 19 <u>87</u>		\$ 5,332.00
(b) Cash on Hand at Beginning of Reporting Period	\$ 17,976.00	
(c) Total Receipts (from Line 18)	\$ 18,630.00	\$ 36,224.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 36,606.00	\$ 41,556.00
7. Total Disbursements (from Line 28)	\$ 5,770.00	\$ 10,720.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 30,836.00	\$ 30,836.00
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0.00	For further information contact:
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0.00	Federal Election Commission 988 E Street, NW Washington, DC 20463 Toll Free 800-424-9630 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

John W. Hughes
Signature of Treasurer

Date

29 January 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)

83787430539432



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20461

MS-2

APR 15 1988

John M. Hughes, Treasurer
Shantech International Corporation
Political Action Committee
2121 Eisenhower Avenue
Alexandria, VA 22314

Identification Number: C00208983

Reference: 1987-1988 Election Cycle Reports

Dear Mr. Hughes:

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>
Mid-Year Report ^{*/} (1/1/87-6/30/87)	07/31/87	08/07/87
Year End Report (7/1/87-12/31/87)	01/31/88	02/10/88

^{*/} Quarterly Reports 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 Andrew Dodson on our toll-free number, (800) 426-9530. Our local number is (202) 376-2400.

Sincerely,

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

890407531913



MANTECH INTERNATIONAL CORPORATION

JACK BURNES
SENIOR VICE PRESIDENT

200 SHENANDOAH AVENUE
ALEXANDRIA, VIRGINIA 22304
(703) 630-6410

19 April 1988

Federal Election Commission
Washington, D.C. 20463

Attn: Ms. Lisa J. Stolaruk

Subj: Timely Filing of Reports

Ref: Identification Number C00208963

Dear Ms. Stolaruk:

In response to your letter of 15 April 1988, the ManTech International Corporation Political Action Committee has reviewed its records relative to the filing dates for the Mid-year and Year End Reports noted in your letter. It is apparent from our review that these reports were submitted a bit later than intended. We would like to offer an explanation for our tardiness.

Upon first establishing the PAC, we began to file manually-prepared reports on a quarterly basis. Given the significant amount of information required for each report, we automated our collection and reporting system to facilitate these quarterly filings. Subsequently, we were informed that our automated report format was not acceptable to the Commission because it was not identical to the pre-printed forms supplied by the Commission. Upon receipt of this notification, we immediately corrected the previously-submitted, automated reports and reverted to manual preparation of future reports. This resulted in an unanticipated delay in filing the Mid-year Report.

With respect to the Year End Report, the delay in submission of this report resulted from a major reorganization and consolidation of ManTech International Corporation during the last quarter of 1987 and the first quarter of 1988. This reorganization created several alterations in the collection and reporting system for our PAC. Additional time was required to validate that the year end results produced by the system were one-hundred percent accurate before submission of our Year End Report.

Based upon our review of the information provided above, we are convinced that the circumstances surrounding the delayed submission of our Mid-year and Year End Reports were one-time anomalies in the reporting system which have been corrected. We are mindful of the requirement for timely filing of the reports and do not take that responsibility lightly. We will strive to improve the

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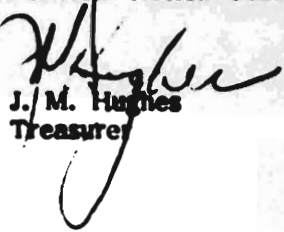


timeliness of our reports in the future. You should note that our quarterly report for the period ending 31 March 1988 was hand carried to your offices on 18 April 1988 to ensure that it was timely submitted.

We appreciate your patience and apologize for any inconvenience which our actions may have caused. If we can provide any additional information, please feel free to call on me.

Sincerely,

ManTech International Corporation
Political Action Committee


J. M. Hughes
Treasurer

JMH:taws

cc: Mr. Andrew Dodson
Federal Election Commission

Mr. Richard Gregory
ManTech International Corporation
Political Action Committee
Chairman

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.

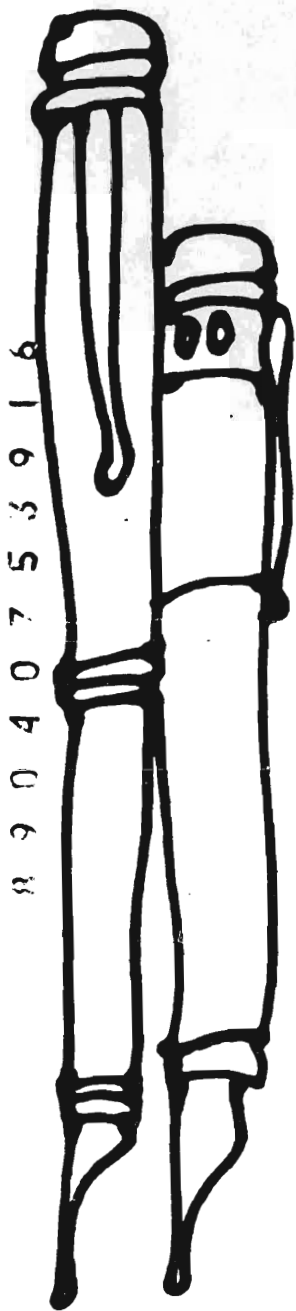
*Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

**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)



8 9 0 4 0 7 5 3 9 1 6

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.

89040753917

RECEIVED
FEDERAL ELECTION COMMISSION
FAN ROOM

Attachment 9
Page 1 of 3



MANTECH INTERNATIONAL CORPORATION

JACK HUGHES
SENIOR VICE PRESIDENT

200 HUNTERDOWNS AVENUE
ALEXANDRIA, VIRGINIA 22304
(703) 836-6600

5 December 1988

Federal Election Commission
Washington, D.C. 20463

Subj: Timely Filing of Pre-General Election Report

Ref: Identification Number C00200003

Gentlemen:

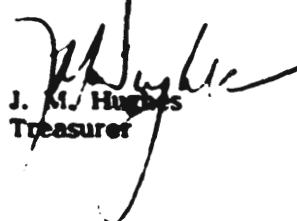
Enclosed you will find the ManTech International Corporation Political Action Committee's Pre and Post-General Election Reports. Due to this being the first election year that our PAC has been active, we were unaware of the necessity to file a Pre-General Election Report.

We regret the circumstances surrounding the delayed submission of our Pre-General Election Report and are mindful of the requirement for timely filing of such reports. ManTech does not take that responsibility lightly. We will strive to improve the timeliness of our reports in the future. You should note that our Post-General Election Report for the period 20 October 1988 through 28 November 1988 is timely submitted.

We appreciate your patience and apologize for any inconvenience which our actions may have caused. If we can provide any additional information, please feel free to call on me.

Sincerely,

ManTech International Corporation
Political Action Committee


J. M. Hughes
Treasurer

JMH:taws

cc: Mr. Richard Gregory
ManTech International Corporation
Political Action Committee
Chairman

RECEIVED
FEDERAL ELECTION COMMISSION
JAN 6 1969

Page 2 of

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000208983 P 210 040688
JOHN W HUGHES
NANTECH INTERNATIONAL CORP POL
ITICAL ACTION COMMITTEE
2121 EISENHOWER AVE
ALEXANDRIA VA 22314

1. FEE IDENTIFICATION NUMBER

2. ☐ This committee qualified as a noncandidate committee during this reporting period on _____.

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 28 ☐ June 30 ☐ October 30
☐ March 31 ☐ July 31 ☐ November 30
☐ April 30 ☐ August 31 ☐ December 31
☐ May 31 ☐ September 30 ☐ January 31

☒ Twelfth day report preceding PRE-GENERAL

(Type of Election)

election on 11/8/86 in the State of VA☐ Twelfth day report following the General Election on

_____ in the State of _____

(b) Is this Report an Amendment?

☐ YES ☒ NO

SUMMARY

5.	Covering Period <u>10/01/68</u> through <u>10/19/68</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6.	(a) Cash on Hand January 1, 19 <u>80</u>		\$ 30,836.00
	(b) Cash on Hand at Beginning of Reporting Period	\$ 6,950.00	
	(c) Total Receipts (from Line 18)	\$ 913.00	\$ 22,277.00
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 7,863.00	\$ 53,113.00
7.	Total Disbursements (from Line 28)	\$ 4,300.00	\$ 49,550.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 3,563.00	\$ 3,563.00
9.	Debits and Obligations Owed TO the Committee (Name(s) all on Schedule C and/or Schedule D)	\$ 0.00	
10.	Debits and Obligations Owed BY the Committee (Name(s) all on Schedule C and/or Schedule D)	\$ 0.00	

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

John M. Hughes

Signature of Treasurer

Date

11. 5. 80

NOTE: Submission of false, inaccurate, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. (a)(3)(g)

FEC FORM 3X

(revised 6/87)

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

NanTech International Corporation Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dyson for Congress C/O Ms. Marion Pecos 518 N. Paradise Road Baltimore, MD 21001	Dyson for Congress Maryland Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/3/88	\$1,800.00
B. Full Name, Mailing Address and ZIP Code Larkin Smith for US Congress 1809 Pass Road, P.O. Box 1842 Gulfport, MI 39502	Purpose of Disbursement Smith for Congress Mississippi Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/88	\$ 500.00
C. Full Name, Mailing Address and ZIP Code Re-Elect Thurman Committee Senate Russell Office Building 218 Washington, D.C. 20510	Purpose of Disbursement Thurman for Senate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/12/86	\$1,000.00
D. Full Name, Mailing Address and ZIP Code Campaign America P.O. Box 1300 Merrifield, VA 22116	Purpose of Disbursement Senator Bob Dole Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/19/88	\$ 500.00
E. Full Name, Mailing Address and ZIP Code Pallon for Congress P.O. Box 3176, 540 Broadway Long Branch, NJ 07740	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/19/88	\$ 500.00
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)

TOTAL This Period (at page this line number on)

89 APR 17 PM 4:19

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral # 89NF-53
Staff Member: Colleen Miller

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

RESPONDENTS: Mantech International Corporation PAC, and
John M. Hughes, as treasurer

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

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the Mantech International Corporation PAC, and John M. Hughes, as treasurer ("Mantech") to the Office of the General Counsel on March 27, 1989. Mantech was referred as a chronic late filer for the late filing of the 1987 Mid-Year and 1987 Year End Reports, as well as the 1988 12 Day Pre-General Report, which was not filed by Election Day, November 8, 1988. See Referral materials, Attachment 1.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended, ("the Act"), provides that all political committees which are not the authorized committees of a candidate must, in calendar years in which no regularly scheduled general election is held, file a report covering the period beginning January 1 and

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ending June 30 and a report covering the period beginning July 1 and ending December 31. Such reports must be filed no later than July 31 and January 31, respectively. 2 U.S.C. § 434(a)(4)(A)(iv). Additionally, committees must file pre-election reports no later than the 12th day prior to any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. 2 U.S.C. § 434(a)(4)(A)(ii).

Mantech did not file the 1987 Mid-Year Report, due July 31 1987, until August 7, 1987. Mantech did not file the 1987 Year End Report, due January 31, 1988, until February 10, 1988. Finally, Mantech did not file the 12 Day Pre-General Report, due October 27, 1988, until December 6, 1988. Therefore, this Office recommends that the Commission open a Matter Under Review and find reason to believe that Mantech International Corporation PAC violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 434(a)(4)(A)(ii).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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III. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe Mantech International Corporation PAC and John M. Hughes, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 434(a)(4)(A)(ii), 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

April 17, 1989
Date

BY:

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

Attachments

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

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Mantech International Corporation PAC,
and John M. Hughes, as treasurer

RAD Ref. 89NF-53

(Mark)
2851)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 20, 1989, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 89NF-53:

1. Open a MUR.
2. Find reason to believe Mantech International Corporation PAC and John M. Hughes, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 434(a)(4)(A)(ii), 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 April 17, 1989.

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

Attest:

April 20, 1989

Date

Hilda Arnold

for Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Mon., 4-17-89, 4:19
Circulated on 48 hour tally basis: Tues., 4-18-89, 11:00
Deadline for vote: Thurs., 4-20-89, 11:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 25, 1989

Mantech International Corporation
Political Action Committee
John M. Hughes, as treasurer
2121 Eisenhower Avenue
Alexandria, Virginia 22314

RE: MUR 2851
Mantech International
Corporation PAC, and
John M. Hughes, as treasurer

Dear Mr. Hughes:

On April 20, 1989, the Federal Election Commission found that there is reason to believe Mantech International Corporation Political Action Committee and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 434(a)(4)(A)(ii), provisions 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 Mantech International Corporation PAC 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 Mantech International Corporation PAC 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.

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John M. Hughes
page 2

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.

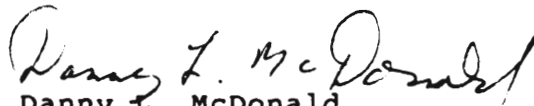
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Colleen Miller, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

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89 MAY 26 AM 11:18

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Mantech International Corporation) MUR 2851
Political Action Committee, and)
John M. Hughes, as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On April 20, 1989, the Commission found reason to believe that Mantech International Corporation Political Action Committee ("Mantech") violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 434(a)(4)(A)(ii) for the late filing of three reports.

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II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Mantech International Corporation Political Action Committee and John M. Hughes, as treasurer.

2. Close the file.

3. Approve the attached letter.

Lawrence M. Noble
General Counsel

Date 5/25/89

BY:


Lois G. Lerner
Associate General Counsel

Attachments

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

Staff Assigned: C. Miller

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Mantech International Corporation) MUR 2851
Political Action Committee, and)
John M. Hughes, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 1, 1989, the Commission decided by a vote of 5-0 to take the following actions in MUR 2851:

1. Accept the conciliation agreement with Mantech International Corporation Political Action Committee and John M. Hughes, as treasurer, as recommended in the General Counsel's Report dated May 25, 1989.
2. Close the file.
3. Approve the letter as recommended in the General Counsel's Report dated May 25, 1989.

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

Attest:

June 1, 1989
Date

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

Received in the Office of Commission Secretary:	Fri. 5-26-89	11:18
Circulated on 48 hour tally basis:	Tues. 5-30-89	11:00
Deadline for vote:	Thurs. 6-1-89	11:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 7, 1989

John M. Hughes, as treasurer
Mantech International Corporation
Political Action Committee
2121 Eisenhower Avenue
Alexandria, Virginia 22314

RE: MUR 2851
Mantech International
Corporation Political
Action Committee, and
John M. Hughes, as treasurer

Dear Mr. Hughes:

On June 1, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted by you in settlement of violations of 2 U.S.C. §§ 434(a)(4)(A)(iv) and 434(a)(4)(A)(ii), 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.

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 Colleen Miller, 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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Mantech International Corporation PAC, and) MUR 2851
John M. Hughes, 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 Mantech International Corporation PAC and John M. Hughes, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(iv) and 2 U.S.C. § 434(a)(4)(A)(ii).

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.

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

1. Mantech International Corporation Political Action Committee is a political committee within the meaning of 2 U.S.C. § 431(4).

2. John M. Hughes is the treasurer of Mantech International Corporation Political Action Committee.

3. Mantech International Corporation Political Action Committee is not an authorized committee of any candidate.

4. Section 434(a)(4)(A)(iv) of Title 2 provides that an unauthorized committee must file a report covering the period beginning January 1 and ending June 30 and a report covering the period beginning July 1 and ending December 31 of any year in which no regularly scheduled general election is held. Such reports must be filed no later than July 31 and January 31 of the following year, respectively, pursuant to 2 U.S.C. § 434(a)(4)(A)(iv).

5. Section 434(a)(4)(A)(ii) of Title 2 provides that committees must file pre-election reports no later than the 12th day prior to any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election.

6. Respondents were required to file the 1987 Mid-Year Report by July 31, 1987. Respondents filed the 1987 Mid-Year Report on August 7, 1987, seven days late, disclosing \$9349 in receipts and \$2700 in disbursements.

7. Respondents were required to file the 1987 Year

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End Report by January 31, 1988. Respondents filed the 1987 Year End Report on February 10, 1988, ten days late, disclosing \$18,630 in receipts and \$5770 in disbursements.

8. Respondents were required to file the 1988 12 Day Pre-General Report by October 27, 1988. Respondents filed the 1988 12 Day Pre-General Report on December 6, 1988, forty days late, disclosing \$913 in receipts and \$4300 in disbursements.

9. Respondents contend that they did not knowingly and willfully violate 2 U.S.C. §434(a)(4)(iv) or 434(a)(4)(ii).

V. 1. Respondents failed to file the 1987 Mid-Year Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(A)(iv).

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).

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

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of six hundred dollars (\$600.00), 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

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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 not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

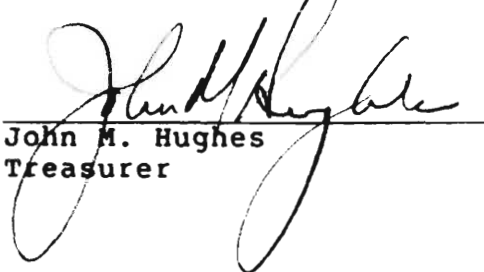
BY:


Lois G. Lerner
Associate General Counsel

Date

4/6/88

FOR THE RESPONDENTS:


John M. Hughes
Treasurer

Date

5/17/89

8204075335



89 JUN 13 AM 10:42

DEC 3041
Miller

MUR 2851

Jack Hughes
Senior Vice President and Treasurer

12 June 1989

Federal Election Commission
Office of General Council
Washington, D.C. 20463

Attn: Ms. Lois G. Lerner
Associate General Council

Dear Ms. Lerner:

Let this letter confirm that the ManTech International Corporation Political Action Committee has received the fully executed Conciliation Agreement and understands that the file on this matter is now closed. As further clarification of our position in this matter, we wish to have the following factual information appear on the public record:

Respondents failed to timely file the Mid-Year and Year-End reports due to continuing difficulty throughout 1987 in transitioning from manual to automated reporting of receipts and disbursements. This automation process required the maintenance of dual systems, one manual and one computerized, which gave rise to continuing reconciliation problems as the new automated system was debugged and validated. This resulted in very short-term delays in submission of these reports motivated by the respondents strong desire to submit complete and accurate information.

In addition, respondents failed to timely file the Pre-General Report due to a misunderstanding on the part of the Respondents as to the special nature of this report. Respondents had filed a report on 13 October 1988 just prior to the general election, and believed that this would fulfill the pre-election reporting requirement. Respondents were not made aware of the requirement for a separate and distinct Pre-General Report until after the due date and immediately filed the report. It should be noted that Respondents filed the Post-General Report in a timely manner.

In any event, Respondents did not knowingly and willfully violate applicable law.

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FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNCIL
JUN 13 1989

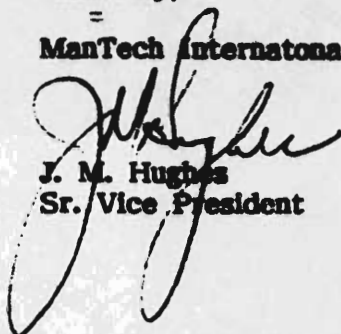
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We thank you for this opportunity to provide the additional information.
We look forward to continuing our good working relationship with the FEC in the future.

Sincerely,

ManTech International Corporation


J. M. Hughes
Sr. Vice President

JMH:taws

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2851

DATE FILMED 7/7/89 CAMERA NO. 4

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