



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2906

DATE FILMED 9-12-89 CAMERA NO. 4

CAMERAMAN AS

33040765448



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 15, 1989

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 MONTHLY UNAUTHORIZED COMMITTEES FOR
FAILURE TO FILE THE 1988 12 DAY PRE-GENERAL REPORT
BY ELECTION DAY

Attached are referrals of thirteen (13) monthly unauthorized committees that failed to file the 1988 12 Day Pre-General Report by Election Day, November 8, 1988.

Each monthly filer was sent prior notice of the due date of the report on October 3, 1988 (Attachment 14). Additionally, each committee being referred, were sent a Non-Filer Notice on November 15, 1988 (Attachment 15).

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

Attachment

C00196618: Association of Independent Colleges and
Schools Political Action Committee

89NF-29

37040768150

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILER ATCH

REPORTS FILED/
RESPONSES

.....
C00196618
ASSOCIATION OF INDEPENDENT COLLEGES AND SCHOOLS POLITICAL ACTION COMMITTEE
TREASURER'S NAME: CHARLES E PALMER SR
ONE DUPONT CIRCLE, N W SUITE 350
WASHINGTON DC 20036

None

12 Day Pre-General
Report filed
11/14/88 (Summary
Page Only) 1b
Amended report filed
12/15/88 1c

.....

Association of Independent Colleges and Schools Political
Action Committee

(Attachments 1a - 1d)

3 1 1 9 0 7 6 0 4 5 2

Attachment 1(6)

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

DATE 03FEB89

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
ASSOCIATION OF INDEPENDENT COLLEGES AND SCHOOLS POLITICAL ACTION COMMITTEE						
CONNECTED ORGANIZATION: COLLEGES & SCHOOLS; ASS'N OF INDEP						
1987	FEBRUARY MONTHLY	136	0	1JAN87 -31JAN87	4	87FEC/461/0049
	MARCH MONTHLY	3,248	1,000	1FEB87 -28FEB87	7	87FEC/463/0432
	APRIL MONTHLY	3,277	1,100	1MAR87 -31MAR87	5	87FEC/465/5215
	MAY MONTHLY	736	0	1APR87 -30APR87	3	87FEC/467/4130
	JUNE MONTHLY	163	0	1MAY87 -31MAY87	4	87FEC/469/4274
	JULY MONTHLY	1,457	2,700	1JUN87 -30JUN87	5	87FEC/474/4669
	AUGUST MONTHLY	165	550	1JUL87 -31JUL87	5	87FEC/483/4482
	SEPTEMBER MONTHLY	266	0	1AUG87 -31AUG87	4	87FEC/485/3678
	OCTOBER MONTHLY	1,222	0	1SEP87 -30SEP87	4	87FEC/492/2673
	NOVEMBER MONTHLY	156	2,590	1OCT87 -31OCT87	5	87FEC/494/3035
	DECEMBER MONTHLY	35,416	775	1NOV87 -30NOV87	16	87FEC/496/4059
	DECEMBER MONTHLY - AMENDMENT	35,416	775	1NOV87 -30NOV87	16	88FEC/497/3534
	1 ST LETTER INFORMATIONAL NOTICE			1NOV87 -30NOV87	2	88FEC/497/3398
	YEAR-END	10,991	1,150	1DEC87 -31DEC87	12	88FEC/507/2820
1988	FEBRUARY MONTHLY	1,948	1,123	1JAN88 -31JAN88	6	88FEC/510/1714
	MARCH MONTHLY	549	0	1FEB88 -29FEB88	4	88FEC/515/0546
	APRIL MONTHLY	369	0	1MAR88 -31MAR88	3	88FEC/523/2709
	APRIL MONTHLY - AMENDMENT	369	6,200	1MAR88 -31MAR88	3	88FEC/525/5476
	MAY MONTHLY	411	2,150	1APR88 -30APR88	3	88FEC/525/5480
	JUNE MONTHLY	477	2,000	1MAY88 -31MAY88	3	88FEC/530/4057
	JUNE MONTHLY - AMENDMENT	-	-	1MAY88 -31MAY88	2	88FEC/541/4416
	1 ST LETTER INFORMATIONAL NOTICE			1MAY88 -31MAY88	1	88FEC/540/3352
	JULY MONTHLY	324	4,580	1JUN88 -30JUN88	5	88FEC/540/2186
	AUGUST MONTHLY	319	250	1JUL88 -31JUL88	4	88FEC/542/3375
	SEPTEMBER MONTHLY	316	4,300	1AUG88 -31AUG88	5	88FEC/546/4065
	OCTOBER MONTHLY	295	3,100	1SEP88 -30SEP88	4	88FEC/561/2485
	PRE-GENERAL	-	-	1OCT88 -19OCT88	2	88FEC/565/1279
	PRE-GENERAL - AMENDMENT	-	-	1OCT88 -19OCT88	3	88FEC/574/4752
	PRE-GENERAL - AMENDMENT	0	0	1OCT88 -19OCT88	3	88FEC/575/4580
	NOTICE OF FAILURE TO FILE			1OCT88 -19OCT88	1	88FEC/565/2034
	REQUEST FOR ADDITIONAL INFORMATION			1OCT88 -19OCT88	1	88FEC/574/4217
	NOVEMBER MONTHLY	871	3,200	1OCT88 -31OCT88	5	88FEC/565/2941
	NOVEMBER MONTHLY - AMENDMENT	871	3,200	1OCT88 -31OCT88	5	88FEC/575/4580
	REQUEST FOR ADDITIONAL INFORMATION			1OCT88 -31OCT88	1	88FEC/574/4201
	POST-GENERAL	871	3,700	20OCT88 -29NOV88	5	88FEC/566/4306
TOTAL		63,983	0	40,468	0	161 TOTAL PAGES

All reports except the amended 12 Day Pre-General and amended 30 Day Post-General Reports have been reviewed.
Ending cash-on-hand as of 11/29/88: \$52,317
Outstanding debts owed by/to the committee as of 11/29/88: \$0

Attachment 1 (7)

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Primary Page)

FEDERAL ELECTION COMMISSION

NOV 14 PM 12:50

1. NAME OF COMMITTEE OR ASSOCIATION
Colleges and Schools Political Action Committee

ADDRESS (number and street) ☐ Check if different than previously reported

One Dupont Circle, Suite 250

CITY, STATE AND ZIP CODE

Washington, DC 20036

2. FEC IDENTIFICATION NUMBER

C 00196618

3. ☐ This committee qualified as a noncandidate committee during this reporting period

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 General
(Type of Election)
election on 11/9/88 in the State of National

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

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

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
<u>10/1/88</u> through <u>10/19/88</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>		\$ 73,836.41
(b) Cash on Hand at Beginning of Reporting Period	\$ 55,145.67	
(c) Total Receipts (from Line 18)	\$	\$ 5,013.01
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$	\$ 78,849.42
7. Total Disbursements (from Line 28)	\$	\$ 23,703.75
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 55,145.67	\$ 55,145.67
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all 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

Charles E Palmer

Signature of Treasurer

Charles E Palmer, Treasurer

Date

11-9-88

For further information contact:
Federal Election Commission
900 E Street, NW
Washington, DC 20463
Toll Free 800-424-9630
Local 202-376-3180

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 SX
(revised 4/87)

Attachment 1(8)

26

93035651279

USE PRE-PAID LABEL OR POSTAGE

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

00 DEC 15 AM 10:46



Association of Independent Colleges and Schools
One Lafayette Circle Suite 350 Washington, D.C. 20036 (202) 689-2400

November 16, 1988

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Re: C00196615

Dear Mr. Gibson:

AICSPAC's 12 Day Pre-General Report (10/01/88 - 10/19/88) was filed on 11/9/88. It was inadvertently filed late. AICSPAC did not have any financial activity during that period. Enclosed is a copy for your information.

Sincerely,


Shelley F. Mitek
AICS Controller

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

ATTACHMENT 1d

FEDERAL ELECTION COMMISSION

88 DEC 15 AM 10

1. NAME OF COMMITTEE (In full, Association of Independent Colleges and Schools Political Action Committee)		2. FEC IDENTIFICATION NUMBER C 00196618
ADDRESS (number and street) [] <i>One Dupont Circle, Suite 350</i>		3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)
CITY, STATE and ZIP CODE Washington, DC 20036		

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)

Monthly, Quarterly or

- ☐ 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 primary General
(Type of Election)
election on 11/9/88 in the State of National

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

☐ Termination Report

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
Covering Period <u>12/1/88</u> through <u>10/19/88</u>			
6	(a) Cash on Hand January 1, 1988	\$ 55,145.67	\$ 73,836.41
	(b) Cash on Hand at beginning of Reporting Period	\$ 55,145.67	
	(c) Total Receipts (from Line 18)	\$	\$ 5,013.01
	(d) Subtotals (add lines 6, 7, 8, 9, 10 to Column A and 6, 7, 8, 9, 10 to Column B)	\$	\$ 78,849.42
7	Total Disbursements (from Line 28)	\$	\$ 23,703.75
8	Cash on Hand at end of Reporting Period (subtract Line 7 from Line 6(d))	\$ 55,145.67	\$ 55,145.67
9	Debits and Credits owed TO the Committee (Remains as on Schedule C and/or Schedule D)	\$	
10	Debits and Credits owed BY the Committee (Remains as 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.		For further information contact: Federal Election Commission 900 E Street, NW Washington, DC 20463 Toll Free 800-424-9630 Local 202-376-3120	
Signature of Treasurer		Date 11-9-88	

If this report contains false or incomplete information, the subject of the person signing this Report is the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(Revised 4/87)

Attachment 1 (10)

RECEIVED
FEDERAL ELECTION COMMISSION

FEDERAL ELECTION COMMISSION

999 E Street, N.W.
Washington, D.C. 20463

89 JUN -9 AM 10:16

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD Referral #89NF-29
thru 89NF-41
Staff Member Ivonne Cotto

SOURCE:

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

RESPONDENTS:

Association of Independent Colleges and
Schools Political Action Committee and
Charles E. Palmer, Sr., as treasurer
(89NF-29)

10040760451

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

INTERNAL REPORTS
CHECKED: Referral Materials

FEDERAL AGENCIES
CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the above thirteen (13) committees to the Office of the General Counsel on February 16, 1989. (Attachment 1). The basis for the attached referral is the committees' failure to file the 1988 12 Day Pre-General Report in a timely manner.

II. FACTUAL AND LEGAL ANALYSIS

A. Filing of Reports

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that unauthorized committees which file on a monthly basis shall file a pre-election report, which shall be filed no later than the 12th day before such election, and which should be complete as of the 20th day before the election.

2 U.S.C. § 434(a)(4)(B). The committees were notified on October 3, 1988, that the report was due on October 27, 1988.

The committees filed the information required to be in the 1988 12 Day Pre-General Report as follows:

A. 12 Day Report filed late

Name of Committee
Association of Independent^{1/}
Colleges and Schools Political
Action Committee

Date Report Filed

November 14, 1988

1890

✓

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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3-17-01-450

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3 3 0 4 9 7 6 0 1 5 4

00040761470

3 3 3 4 0 7 6 4 7 1

III. RECOMMENDATIONS

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

Association of Independent Colleges and
Schools Political Action Committee and
Charles E. Palmer, Sr., as treasurer

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

Association of Independent Colleges and
Schools Political Action Committee and
Charles E. Palmer, Sr., as treasurer

3. Approve the attached letters, Factual and Legal Analyses, and proposed conciliation agreements to be sent to the respective committees listed in recommendation 2.

Lawrence M. Noble
General Counsel

6-8-89
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Referral Materials
2. Proposed Conciliation Agreements (13)
3. Letters and Factual and Legal Analyses (13)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Association of Independent Colleges and
Schools Political Action Committee and
Charles E. Palmer, Sr., as treasurer
(89NF-29)

RAD REFERRALS
#89NF 29-41

(continued)

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0 1 2 3 4 5 6 7 8

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

(continued)

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

Association of Independent Colleges and
Schools Political Action Committee and
Charles E. Palmer, Sr., as treasurer

(continued)

Federal Election Commission
Certification for RAD Referrals 89NF 29-41
June 19, 1989

Page 4

2 2 3 4 0 7 6 1 4 7 8

(continued)

3. Approve the letters, Factual and Legal Analyses, and proposed conciliation agreements to be sent to the respective committees listed in action 2, as recommended in the First General Counsel's Report signed June 8, 1989.

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

Attest:

6-19-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 28, 1989

Charles E. Palmer, Sr., Treasurer
Association of Independent
Colleges and Schools Political
Action Committee
One Dupont Circle, N.W.
Suite 350
Washington, D.C. 20036

RE: MUR 2906

Association of Independent
Colleges and Schools Political
Action Committee and
Charles E. Palmer, Sr., as
treasurer

Dear Mr. Palmer:

On June 19, 1989, the Federal Election Commission found that there is reason to believe the Association of Independent Colleges and Schools Political Action Committee ("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 finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement

Charles E. Palmer, Sr.
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 pre-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 cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

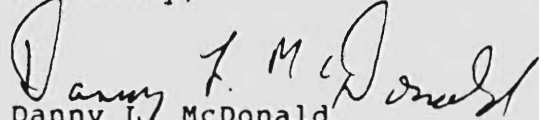
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Robert Raich, 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



KACH 06C 3455
Association of Independent Colleges and Schools
Political Action Committee

National Center for Higher Education

One Dupont Circle, N.W., Suite 350, Washington, DC 20036 (202) 659-2460

89 JUL 17 PM 4:06

July 13, 1989

Mr. Danny L. McDonald
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: MUR 2906

Dear Mr. McDonald,

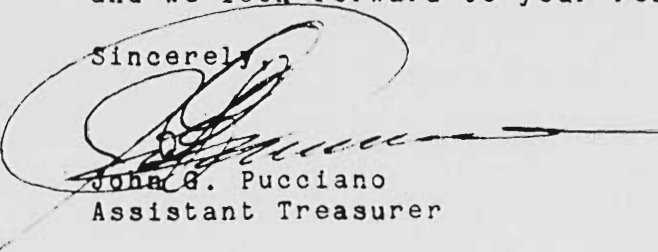
We are in receipt of the above notification of our committee's failure to file a timely pre-election report. We feel that at the time we filed the report, the explanation provided did not contain enough details about the reason for the lateness. We would like to take this opportunity to provide those details.

During October when the report was due, the person responsible for filing FEC reports was unexpectedly no longer with the organization. The person who took over the duties was also responsible for the annual convention, which took place exactly when the report notification would have arrived, the organization's budget and a board of directors meeting.

In addition, the committee had no activity during the pre-election period. Therefore, when the individual discovered the report was late, she may have assumed that it was not as critical as it really is.

We feel there is sufficient cause for you to review this case, and we look forward to your response.

Sincerely,


John G. Pucciano
Assistant Treasurer

JGP:rrb

RECEIVED
FEDERAL ELECTION COMMISSION
89 JUL 18 AM 11:54

89 AUG -7 PM 1:09

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Association of Independent)
Colleges and Schools Political)
Action Committee and Charles E.)
Palmer, Sr., as treasurer)

MUR 2906

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 19, 1989, the Commission found reason to believe the respondents violated 2 U.S.C. § 434(a)(4)(B) by filing their 1988 Pre-General Election Report 18 days late. On that date the Commission also approved a conciliation agreement in settlement of this matter.

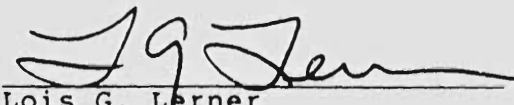
II. DISCUSSION OF CONCILIATION PROVISIONS

III. RECOMMENDATIONS

1. Accept the respondents' counterproposal.
2. Close the file.
3. Approve and send the attached letter.

Lawrence M. Noble
General Counsel

8/4/89
Date

By: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Response
2. Counterproposal
3. Letter

Staff Member: R. Raich

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Association of Independent Colleges)
and Schools Political Action Committee) MUR 2906
and Charles E. Palmer, Sr., as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 10, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 2906:

1. Accept the respondents' counterproposal, as recommended in the General Counsel's Report to the Commission dated August 4, 1989.
2. Close the file.
3. Approve and send the letter, as recommended in the General Counsel's Report to the Commission dated August 4, 1989.

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

Attest:

8-11-89
Date

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

Received in the Secretariat: Monday, August 7, 1989 at 1:09 p.m.
Circulated to the Commission: Wednesday, August 9, 1989 at 11:00 a.m.
Deadline for vote: Friday, August 11, 1989 at 11:00 a.m.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 17, 1989

John G. Pucciano
Assistant Treasurer
Association of Independent Colleges
and Schools Political Action Committee
One Dupont Circle, N.W., Suite 350
Washington, D.C. 20036

RE: MUR 2906
Association of Independent
Colleges and Schools
Political Action Committee
and Charles E. Palmer, Sr.,
as treasurer

Dear Mr. Pucciano:

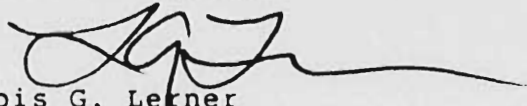
On August 10, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty you submitted in settlement of a violation of 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. 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 questions, please contact Robert Raich, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel


By: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

89 JUL 28 AM 11:38

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Association of Independent) MUR 2906
Colleges and Schools Political)
Action Committee, and)
Charles E. Palmer, Sr.,)
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 Association of Independent Colleges and Schools Political Action Committee and Charles E. Palmer, Sr., as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(B).

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.

89 JUL 31 PM 4:05
RECEIVED
FEDERAL ELECTION COMMISSION

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

1. Association of Independent Colleges and Schools

Political Action Committee is a political committee within the meaning of 2 U.S.C. Section 431 (4).

2. Charles E. Palmer, Sr. is the treasurer of

Association of Independent Colleges and Schools Political Action Committee.

3. Section 434 (a)(4)(B) of Title 2 provides that

unauthorized committees which file on a monthly basis shall file a pre-election report, which shall be filed no later than the 12th day before such election, and which shall be complete as of the 20th day before the election.

4. Respondents filed the 1988 12 Day Pre-General

Report on November 14, 1988, eighteen days after the October 27 deadline. The total amount of financial activity disclosed was -0-.

V. Respondents failed to file the 1988 12 Day Pre-General

Report in a timely manner, in violation of 2 U.S.C. Section 434 (a)(4)(B).

VI. Respondents will pay a civil penalty to the Federal

Election Commission in the amount of Two Hundred Fifty Dollars (\$250.00), pursuant to 2 U.S.C. Section 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint

under 2 U.S.C. Section 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil

action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto executed same and the Commission has approved the entire agreement.

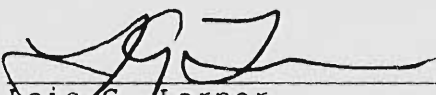
IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

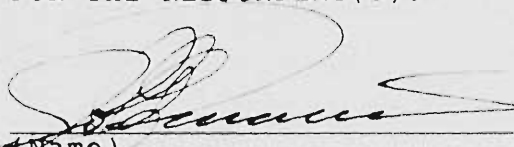
BY:


Lois G. Lerner
Associate General Counsel

Date

8/16/89

FOR THE RESPONDENT(S):


(Name)
(Position)

Date

July 25, 1989



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE END OF MUR # 2906

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