



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3005

DATE FILMED 10/17/50 CAMERA NO. 2

CAMERAMAN AS

20040802242

REPORTS ANALYSIS REFERRAL**TO****OFFICE OF GENERAL COUNSEL****DATE:** October 10, 1989**ANALYST:** Edward D. Ryan

I. COMMITTEE: Americans United
(C00222554)
Robert G. Stuber, Treasurer
3819 Plaza Drive
Fairfax, VA 22030

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

III. BACKGROUND:**Failure to File the 1989 Mid-Year Report**

Americans United ("the Committee") has failed to file the 1989 Mid-Year Report of Receipts and Disbursements covering the period from January 1, 1989 to June 30, 1989. The Committee was notified on June 26, 1989 that the report was due on July 31, 1989 (Attachment 2). A Non-Filer Notice was sent to the Committee on August 23, 1989 (Attachment 3).

On September 15, 1989, the Reports Analysis Division ("RAD") analyst called the treasurer of the Committee, Mr. Robert G. Stuber. Mr. Stuber was not available so the RAD analyst left a message that the Commission had not received the Committee's 1989 Mid-Year Report (Attachment 4).

As of this date, the 1989 Mid-Year Report has not been filed.

IV. OTHER PENDING MATTERS INIATED BY RAD:

None.

20040003243

9 0 0 4 0 3 0 2 2 4 4

FEDERAL ELECTION COMMISSION
1989 1990
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 20SEP89

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
AMERICANS UNITED				ID #C00222554	NON-PARTY NON-QUALIFIED	
CONNECTED ORGANIZATION: NONE				1JAN89 -30JUN89	1	89FEC/608/12
1989 NOTICE OF FAILURE TO FILE						
TOTAL		0	0	0	0	1 TOTAL PAGES

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

DATE 28SEP88

PAGE 2

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
AMERICANS UNITED				ID #C00222554	NON-PARTY NON-QUALIFIED	
CONNECTED ORGANIZATION:	NONE					
1988 STATEMENT OF ORGANIZATION				10FEB88	1	88FEC/509/0278
REQUEST FOR ADDITIONAL INFORMATION				2MAR88	1	88FEC/512/1028
STATEMENT OF ORGANIZATION - AMENDMENT				7MAR88	2	88FEC/512/2071
MISCELLANEOUS REPORT TO FEC				8SEP88	2	88FEC/545/3040
24 HOUR CONTRIBUTION NOTICE				7NOV88	4	88SEN/022/1744
24 HOUR CONTRIBUTION NOTICE				7NOV88	3	88SEN/022/1745
24 HOUR CONTRIBUTION NOTICE				9NOV88	3	88SEN/022/2077
APRIL QUARTERLY	20,456	19,516		1JAN88 -31MAR88	6	88FEC/520/0155
REQUEST FOR ADDITIONAL INFORMATION				1JAN88 -31MAR88	2	88FEC/543/4931
JULY QUARTERLY	53,145	53,761		1APR88 -30JUN88	9	88FEC/536/1904
REQUEST FOR ADDITIONAL INFORMATION				1APR88 -30JUN88	2	88FEC/543/4930
OCTOBER QUARTERLY	182,755	185,493		1JUL88 -30SEP88	13	88FEC/554/5070
OCTOBER QUARTERLY - AMENDMENT	-	-		1JUL88 -30SEP88	4	88FEC/575/3649
1ST LETTER INFORMATIONAL NOTICE				1JUL88 -30SEP88	3	88FEC/565/2768
PRE-GENERAL	31,493	29,142		1OCT88 -19OCT88	11	88FEC/563/2047
PRE-GENERAL - AMENDMENT	31,496	30,203		1OCT88 -19OCT88	6	88FEC/575/3647
PRE-GENERAL - AMENDMENT	31,493	30,203		1OCT88 -19OCT88	5	88FEC/564/5031
REQUEST FOR ADDITIONAL INFORMATION				1OCT88 -19OCT88	3	88FEC/565/4179
REQUEST FOR ADDITIONAL INFORMATION 2ND				1OCT88 -19OCT88	4	88FEC/574/5430
REQUEST FOR ADDITIONAL INFORMATION				1OCT88 -19OCT88	2	88FEC/577/0284
REQUEST FOR ADDITIONAL INFORMATION 2ND				1OCT88 -19OCT88	3	88FEC/587/1008
POST-GENERAL	55,839	61,405		20OCT88 -28NOV88	19	88FEC/592/0700
POST-GENERAL - AMENDMENT	55,839	61,405		20OCT88 -28NOV88	20	88FEC/597/1121
POST-GENERAL - AMENDMENT	55,839	61,405		20OCT88 -28NOV88	7	88FEC/594/1541
NOTICE OF FAILURE TO FILE				28NOV88	1	88FEC/578/1999
REQUEST FOR ADDITIONAL INFORMATION				20OCT88 -28NOV88	2	88FEC/558/0055
REQUEST FOR ADDITIONAL INFORMATION 2ND				20OCT88 -28NOV88	5	88FEC/590/0927
YEAR-END	9,236	9,478		29NOV88 -31DEC88	15	88FEC/592/0704
YEAR-END - AMENDMENT	9,236	9,478		29NOV88 -31DEC88	7	88FEC/594/1549
REQUEST FOR ADDITIONAL INFORMATION				29NOV88 -31DEC88	2	88FEC/598/0050
REQUEST FOR ADDITIONAL INFORMATION 2ND				29NOV88 -31DEC88	5	88FEC/590/0920
TOTAL	358,924	0	359,856	0	184	TOTAL PAGES

All reports listed have been reviewed.

Cash-on-hand as of 12/31/88: \$127.65

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: \$80,480.89

SEMI-ANNUAL REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

June 26, 1989

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
Mid-Year	01/01/89**-06/30/89	07/31/89	07/31/89

WHO MUST FILE

PARTY COMMITTEES AND PACs (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) which normally file on a quarterly basis must file a Mid-Year Report in July.

WHAT MUST BE REPORTED

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

REPORTING FORMS

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

WHERE TO FILE

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

LABEL

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

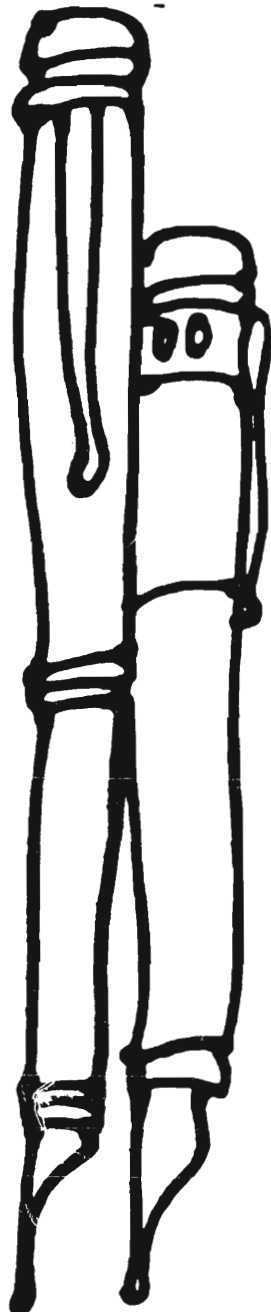
COMPLIANCE

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 OR UNAPPROVED SCHEDULES 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.

**Or from the close of books of the last report filed. If no previous reports filed, the date of the committee's first activity.

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



400302246

**FEDERAL ELECTION COMMISSION**

WASHINGTON, DC 20543

EQ-7

August 23, 1989

Robert G. Stuber, Treasurer
Americans United
3819 Plaza Drive
Fairfax, VA 22030

Identification Number: C00222554

Reference: Mid-Year Report (1/1/89-6/30/89)

Dear Mr. Stuber:

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

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

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

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

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

3036081264

ANALYST: Ed Ryan

CONVERSATION WITH: The office of Robert G. Stuber, Treasurer-591-1188

COMMITTEE: AMERICANS UNITED(C00222554)

DATE: 9/15/89

SUBJECT(S): 1989 Mid Year Non-Filer

I placed a phone call to the office of Mr. Robert G. Stuber, Treasurer of Americans United (the committee). Mr. Stuber was unavailable to take the phone call, so I spoke with his receptionist/secretary. I told her that the reason I called was because the Commission had not received a 1989 Mid Year Report from the committee. I told her that we had to have the report in as soon as possible or they would be referred to our General Counsel's office for failure to file. She understood and said she would relay the message to Mr. Stuber.

20040302243

89 NOV -8 AM 11:14

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral: 89NF-112
Staff Member: Craig Douglas Reffner

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENTS: Americans United and Ruth M. Stormant,
as treasurer

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

INTERNAL REPORTS
CHECKED: Referral Matters

FEDERAL AGENCIES
CHECKED: None

I. GENERATION OF MATTER

On October 10, 1989, the Reports Analysis Division ("RAD") referred Americans United (the "Committee") and Ruth M. Stormant, as treasurer,¹ to this Office for failing to timely file the 1989 Mid-Year Report, covering the period from January 1, 1989 to June 30, 1989.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended (the "Act"), provides that in any calendar year, other than an election year, all political committees, other than authorized committees of a candidate, which choose not to file on a monthly

1. The RAD referral originally stated that Robert G. Stuber was the Committee's treasurer. However, subsequent correspondence from the Committee reveals that Ruth M. Stormant became the treasurer as of May 15, 1989.

20040002242

basis, shall file a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31. 2 U.S.C. § 434(a)(4)(A)(iv). The Committee, which does not file on a monthly basis, was notified on June 26, 1989, that the 1989 Mid-Year report was due on July 31, 1989. The Committee filed the 1989 Mid-Year Report on October 10, 1989, seventy-one (71) days late.

Accordingly, the Office of General Counsel recommends that the Commission open a MUR and find reason to believe that the Committee and Ruth M. Stormant, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

93040802250

IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that Americans United and Ruth M. Stormant, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).
3. Approve the attached letter, Factual and Legal Analysis, and proposed Conciliation Agreement.

Lawrence M. Noble
General Counsel

11-7-89
Date

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Referral Materials
2. The 1989 Mid-Year Report
3. Proposed Conciliation Agreement
4. Letter and Factual and Legal Analysis

Staff Person: Craig Douglas Reffner

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Americans United and Ruth M.
Stormant, as treasurer

)
)
) RAD Referral 89-NF-112
)

(MUR)
3005

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 13, 1989, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral 89-NF-112:

1. Open a MUR.
2. Find reason to believe that Americans United and Ruth M. Stormant, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).
3. Approve the letter, Factual and Legal Analysis, and proposed Conciliation Agreement as recommended in the General Counsel's Report dated November 7, 1989.

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

Attest:

Nov. 14, 1989

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Wednesday, November 8, 1989 11:14 a.m.
Circulated to the Commission: Wednesday, November 8, 1989 4:00 p.m.
Deadline for vote: Monday, November 13, 1989 4:00 p.m.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 17, 1989

Ruth M. Stormant, as treasurer
Americans United
3819 Plaza Drive
Fairfax, Virginia 22030

RE: MUR 3005
Americans United and
Ruth M. Stormant,
as treasurer

Dear Ms. Stormant:

On November 14, 1989, the Federal Election Commission found that there is reason to believe Americans United (the "Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

Ruth M. Stormant
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 Craig Douglas Reffner, 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

20040802254

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Americans United and
Ruth M. Stormant, as treasurer

MUR: 3005

900040802255
The Federal Election Campaign Act of 1971, as amended (the "Act"), provides that in any calendar year, other than an election year, all political committees, other than authorized committees of a candidate, which choose not to file on a monthly basis shall file a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31. 2 U.S.C. § 434(a)(4)(A)(iv). The Committee filed the 1989 Mid-Year Report on October 10, 1989, seventy-one (71) days late.

Failure to file a Mid-Year Report by July 31, 1989 is in violation of 2 U.S.C. § 434(a)(4)(A)(iv). Therefore, there is reason to believe that the Committee and Ruth M. Stormant, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).

89 DEC 11 AM 11:32

Americans United
Ruth M. Stormant, Treasurer
3478 Mildred Dr.
Falls Church, VA 22042
December 3, 1989

89 DEC 11 PM 1:04

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK

Federal Election Commission
Washington, D.C. 20463
Attention: Craig D. Reffner Esq.

Dear Mr. Reffner:

In Re: MUR 3005
Americans United And
Ruth Stormant

In response to your correspondence dated November 17, 1989 and received by me on November 24, 1989, I indeed desire to avoid any action on the part of the Commission regarding the alleged late filing of the Mid Year Report. Upon review of the evidence I am sure the Commission will agree to forego further action.

At the time of the filing of the report, an intern, Nancy Milburn of Falls Church, VA was assisting me and in fact participated in the preparation of the report. She was present when the report was notarized at CrossLand Savings Bank on June 18, 1989. After the report was notarized, it was placed in an envelope and sent by Certified Mail from the Merrifield Post Office on June 21, 1989. In due course a receipt was received. The report was processed early because the Pac had no new business in June and I was eager to get the report in to you.

I spoke with David Blakley in your office in mid-September 1989 and a copy was then sent out. It is this document which seems to be the subject matter of the Commission's complaint. A further search will be made for the original receipt for the June filing and in the meantime I will forward to you affidavits and documents supporting the facts above.

I will greatly appreciate your assistance in resolving this unfortunate situation which grows out of no fault on the part of Americans United or me. Please note the above change in address for future correspondence.

Thanking you in advance, I am.

Ruth M. Stormant



Attachment - Statement of Designation of Counsel

cc: William L. Millwood, Esq.

93040802258

STATEMENT OF DESIGNATION OF COUNSEL

NR 3005
NAME OF COUNSEL: Wm. L. Millwood, Jr.
ADDRESS: Attorney at Law
40 Oak Knoll
Berwyn, PA 19312
TELEPHONE: 215-296-4613 (Home)
215-977-5369 (Work)

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf Before the Commission.

November 29, 1989
Date

Ruth M. Stormant
Signature

RESPONDENT'S NAME: Ruth M. Stormant
ADDRESS: 3478 Mildred Drive
Falls Church, VA 22042
HOME PHONE: 703-241-8002
BUSINESS PHONE: _____

90040802257

RECEIVED
FEDERAL ELECTION COMMISSION

90 FEB 15 PM 2:03

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Americans United and
Ruth Stormant, as treasurer

)
)
)
)

MUR 3005

SENSITIVE

GENERAL COUNSEL'S REPORT

On November 14, 1989, the Commission found reason to believe that Americans United and Ruth Stormant, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv). On November 17, 1989, the Office of General Counsel sent the Respondents a proposed pre-probable cause conciliation agreement. On December 11, 1989, this Office received a letter from the Committee's treasurer outlining the circumstances surrounding the alleged mailing of this report. In particular, Ms. Stormant stated that affidavits and documents supporting the timely mailing of the report would be forthcoming. However, no such submissions have been received from Ms. Stormant or her designated counsel, who has similarly promised to produce such affidavits. Therefore, this Office is proceeding to the next step in the enforcement process.

Lawrence M. Noble
General Counsel

Date

2/14/90

BY:

Lois G. Lerner
Lois G. Lerner
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 FEB 15 PM 1:04

SENSITIVE

February 15, 1990

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel *[Signature]*

SUBJECT: MUR 3005

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe were mailed on February 15, 1990. Following receipt of the respondents' reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to respondents

90040002209



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 15, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William L. Millwood, Jr., Esq.
40 Oak Knoll
Berwyn, PA 19312

RE: MUR 3005
Americans United and
Ruth Stormant, as treasurer

Dear Mr. Millwood:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on November 14, 1989, the Federal Election Commission found reason to believe that your clients, Americans United and Ruth Stormant, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

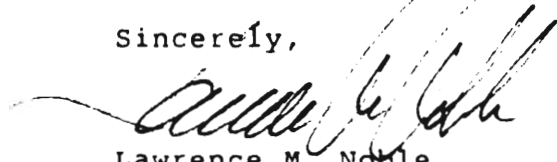
William L. Millwood, Jr., Esq.
Page 2

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Craig Douglas Reffner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

0040302261

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Americans United and) MUR 3005
Ruth Stormant, as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On November 14, 1989, the Federal Election Commission (the "Commission") found reason to believe that Americans United (the "Committee") and Ruth Stormant, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv) by failing to file the 1989 Mid-Year Report in a timely fashion. By same date, the Commission approved a proposed pre-probable cause conciliation agreement which the Office of the General Counsel sent to the respondents on November 17, 1989. On December 11, 1989, this Office received a letter from the Committee's treasurer outlining the circumstances surrounding the alleged mailing of this report. In particular, Ms. Stormant stated that affidavits and documents supporting the timely mailing of the report would be forthcoming. However, no such submissions have been received from Ms. Stormant or her designated counsel, who has similarly promised to produce such affidavits.

II. ANALYSIS


The Federal Election Campaign Act of 1971, as amended (the "Act"), provides that all political committees, other than authorized committees of a candidate, which choose not to file on a monthly basis, shall file a report, covering the period

beginning January 1 and ending June 30, no later than July 31 of the calendar year for the period covered. 2 U.S.C. § 434(a)(4)(A)(iv). Such report is known as a Mid-Year Report. The due date for the 1989 Mid-Year Report was July 31, 1989. The Committee did not file the 1989 Mid-Year Report until October 10, 1989, in violation of the Act. Therefore, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that the Committee and its treasurer violated 2 U.S.C. § 434(a)(4)(A)(iv).

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that Americans United and Ruth Stormant, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).

2 14 90
Date


Lawrence M. Noble
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 19, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William L. Millwood, Jr., Esq.
40 Oak Knoll
Berwyn, Pennsylvania 19312

RE: MUR 3005
Americans United and
Ruth M. Stormant, as treasurer


Dear Mr. Millwood:

On February 15, 1990, the Office of the General Counsel notified you that it is prepared to recommend that the Federal Election Commission (the "Commission") find probable cause to believe that your clients, Americans United and Ruth M. Stormant, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv). Your response to the General Counsel's brief was expected within 15 days after you received this notice. To date, this Office has not received a response from you on behalf of your clients. Given the delay already incurred, this Office requests your immediate attention in this matter. If this Office does not receive a response to the General Counsel's brief by March 26, 1990, this Office will recommend that the Commission find probable cause to believe that a violation has occurred.

Should you have any questions, please contact Craig Douglas Reffner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

APR -2 AM 11:47

In the Matter of)

Americans United and)
Ruth M. Stormant)

MUR 3005

SENSITIVE

COMPREHENSIVE INVESTIGATIVE REPORT

On November 14, 1989, the Commission found reason to believe that Americans United and Ruth M. Stormant, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv) and approved a proposed conciliation agreement. On December 11, 1989, this Office received a response from the Committee which did not address the Commission's offer to enter into pre-probable cause conciliation. On February 15, 1990, this Office notified the respondents that the General Counsel was prepared to recommend that the Commission find probable cause to believe that Americans United and Ruth M. Stormant, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv). On March 19, 1990, the General Counsel's Brief was returned to this Office, undelivered. Pursuant to a request made by respondents' attorney in a subsequent telephone conversation, the General Counsel's Brief was remailed on March 21, 1990. After responses to the General Counsel's Brief are received, this Office will prepare a report for the Commission with appropriate recommendations.

Lawrence M. Noble
General Counsel

Date 3/30/90

BY:

Lois G. Werner
Associate General Counsel

Staff assigned: Craig Douglas Reffner



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

MEMORANDUM

TO: LAWRENCE NOBLE
GENERAL COUNSEL

FROM: *mlw* MARJORIE W. EMMONS
SECRETARY OF THE COMMISSION

DATE: APRIL 3, 1990

SUBJECT: MUR 3005 - COMPREHENSIVE INVESTIGATIVE REPORT
GENERAL COUNSEL'S REPORT DATED
MARCH 30, 1990

90040802266

The above-captioned matter was received in the Commission Secretariat at 11:47 a.m. on Monday, April 2, 1990 and circulated on a 24-hour no-objection basis at 4:00 p.m. on Monday, April 2, 1990.

There were no objections to the above-captioned matter.

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RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

90 APR 18 AM 11:09

Ms. Lois G. Lerner, Esq.
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

In Re MUR 3005
American United
and Ruth Stormant

Dear Ms. Lerner;

Your registered letter and brief were received by me on
March 27, 1990.

Enclosed you will find my response brief with supporting
affidavits.

I am positive you will concur that no violation has occurred and
that no further action is proper.

Thanking you in advance, I am



W.L. Millwood Jr.
Attorney for
Ruth Millwood Stormant
215-296-4613

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FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 APR 19 AM 12:59

79220804006

In Re MUR 3005

Response Brief

American United and Ruth M. Stormant respectfully declare that no violation of 2 USC-434 or any other provision of the law can be demonstrated.

To the contrary, the evidence clearly indicates the required report, better know as the Mid Year Report was in fact mailed with sufficient postage and properly addressed on June 18, 1989.

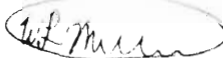
Such facts are clearly supported by the sworn evidence of Ruth M. Stormant, Nancy Milburn as well as the notary's record and the cancelled check for required postage.

After being advised of the FEC's inability to properly locate and account for the report mailed to the proper address on June 18, 1989 a true and correct copy was forwarded.

In support of American United and Ruth M. Stormant's contentions annexed are affidavits and other documentary evidence.

In light of the foregoing, the Commission is strongly urged to review the evidence and dismiss any pending action and find in favor of American United and Ruth M. Stormant.

Respectfully submitted,



W.L. Millwood Jr.
Attorney at Law
40 Oak Knoll
Berwyn, Pa 19312

Enclosures.

20040802268

In Re MUR 3005
American United
and Ruth Millwood Stormant

State of Virginia
County of Fairfax

Before me, the undersigned officer, personally appeared Nancy Milburn who after being duly sworn, deposes and says:

I reside at 6409 Eppard Street, Falls Church, Va. 22044.

In mid-April 1989, I started a period of internship with American United, working with Ruth Stormant at her home in Falls Church.

My responsibilities included opening correspondence, fund raising responses, bookkeeping and report preparation. This internship was intended to prepare me for entering the caging profession.

In mid June 1989 under the direction and supervision of Ruth Stormant I assisted her in the preparation of a report of debts and cash required by the F.E.C. and known as the Mid Year Report.

When this report was completed and checked, I accompanied Mrs. Stormant to Crosslands Savings Bank at 6201 Arlington Blvd., Falls Church, Va. where Mrs. Stormant's signature was notarized by one Laura Kaff, a duly appointed notary.

I drove Mrs. Stormant to the U.S. Post Office where the necessary postage was purchased and the report mailed.

The notary's record as well as Mrs. Stormant's cancelled check indicated this was accomplished on June 18, 1989.

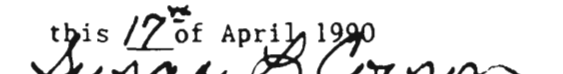

Nancy T. Milburn

Sworn to and Subscribed to

My Commission expires:

this 17th of April, 1990

May 14, 1993


Notary Public - State of Va.

In Re MUR 3005
American United
and Ruth Millwood Stormant

State of Virginia
County of Fairfax

Before me the undersigned officer, personally appeared Ruth Millwood Stormant, who after being duly sworn, deposes and says:

I reside at 3478 Mildred Drive, Falls Church, Virginia and was employed as bookkeeper and caging agent for American United on August 1, 1988 and assumed the responsibility of treasurer on May 1, 1989.

In my capacity as bookkeeper I had prepared previous reports but encountered delay in getting the necessary signatures from American United and for that reason assumed the position of treasurer.

At that time the address of American United was 3819 Plaza Drive, Fairfax, Va. 22030, mine was 3478 Mildred Drive, Falls Church, Va. 22042. This address change was not made by the F.E.C.

The required Mid Year Report was due July 31, 1989.

This report was prepared by me and a student intern, Nancy Milburn, 6409 Eppard Street, Falls Church, Va. 22044 on or about June 18, 1989. This report indicated a very low cash reserve and outstanding debts of a significant amount.

This completed report was notarized by a duly appointed Notary on June 18, 1989 and on the same day was mailed with sufficient postage at the Merrifield Virginia post office, a fact verified by the intern, Nancy Milburn.

The postage was purchased by personal check - \$2.80, photocopy of check attached. Receipt was received in approximately 2 weeks.

On September 28, 1989, I received a letter from one David Blakely at the F.E.C. The letter was dated in late August but received by me later due to an incorrect address.

A copy was forwarded to said Blakely the next week after telephone conversation with David Blakely who was advised of the previous mailing.

Ruth Millwood Stormant
Ruth Millwood Stormant

Sworn to and subscribed to
this 17th of April 1990

Susan H. Carson
Notary Public - State of Va.

My commission Expires:
May 14, 1993

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MAY 1989

NOTARY LOG

Page 3

Date	Name	Address	Type of Document	Type of ID & #
5/11/89	Finnegan		notary seal	V+02 →
5/12/89	Mohammad Afzal		App for VA license	VA 113023 9916
5/16/89	Tony		notary seal	
5/16/89	Tony		notary seal 7753124	
5/16/89	Tony		notary seal	
5/16/89	Tony		notary seal	
6/5/89	Tony Warrandy Deale	AFFIDAVIT/Non foreign cert	citizen / Unit 18 of Explorados	
6/9/89	Karen Jones		Assignment of claim	empl.
6/13/89	Ruth Stomant	Affidavit for FEC		ok
6/13/89	Erin Fern	Affidavit / Sponsor letter	customer	ok
6/20/89	KATHLEEN GADSBY	For some guy whose been harassing her		ok been before
6/24/89	Carpenter Arpa II	Application for machine gun registration		ok - Maricopa pro in case
6/30/89	Harriet Gilbert	Affidavit For Ann Hpts		B Parrish
	Harriet - for Ann Hpts			
7/6/89	Mary Ann Ogilinski	304 Kentucky Ave 22300	notary seal	VA DL 1124331
7/6/89	Kathleen Gadsby		notary seal	
7/7/89	Ann Marie Madco	3321 Glenmore Dr 22041	Parallel Bd of NYC	12491 VA DC 15836
7/11/89	Shir N. SING / Ann Annet Singh	601 N Hampshire Ave NW Wash DC 20037	Deed	5048 PID Rome Georgia DC DL 57168111 10/90
8/1/89	Owner's Affidavit	Tony Starinieri / Richardson / 4	Crossland	
8/24/89	Richard D Cicco	3935 N Highland St Arlington 22207	Unit claim	VADL 194207
8/24/89	William THEIS	3214 HALLMAN RD FC 18 2001	IDENTITY FOR BOMB	6/90 VA DC 3914023 3/01 VA DC 2271111



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 14, 1990

William L. Millwood, Jr., Esq.
3179 Summit Square Drive
Oakton, Virginia 22124

RE: MUR 3005
Americans United and
Ruth M. Stormant, as treasurer

Dear Mr. Millwood:

On April 18, 1990, this Office received your response to the General Counsel's Brief recommending probable cause to believe in this matter. It appears that an attachment referenced in your response may have been inadvertently omitted. In particular, your response did not include the photocopy of the personal check as stated in the affidavit of Ruth Millwood Stormant, paragraph 7, line 1-2. Please provide us with a copy of this check as expeditiously as possible.

If you have any questions, please contact Craig Douglas Reffner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

93040802272

90 JUN 14 AM 10:59

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Americans United and) MUR 3005
Ruth M. Stormant, as treasurer)

JUN 26 1990

EXECUTIVE SESSION
SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On November 14, 1989, the Commission found reason to believe that Americans United and Ruth M. Stormant, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv) for failing to file the 1989 Mid-Year Report in a timely fashion. By same date, the Commission approved a conciliation agreement in this matter prior to a finding a probable cause to believe. The Respondents were notified of the Commission's finding on November 17, 1989.

On December 11, 1989, this Office received a response from the Committee's treasurer, which addressed the Commission's finding but failed to address the proposed conciliation agreement. After repeated contacts with counsel for Respondents, this Office notified counsel on February 15, 1990, that the General Counsel was prepared to recommend that the Commission find probable cause to believe that American's United and Ruth M. Stormant, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).¹ On April 19, 1990, this Office received a response to the General Counsel's brief.

1. The General Counsel's brief recommending probable cause was returned to this Office, undelivered, and remailed to the Respondents' attorney on March 21, 1990. See Comprehensive Investigative Report dated March 30, 1990.

II. ANALYSIS

This Office's analysis of the issues in this matter is contained in the General Counsel's Brief. As set forth below, this Office recommends that the Commission find probable cause to believe that Americans United and Ruth M. Stormant, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv) and approve the attached conciliation proposal.

In their reply brief, Respondents assert that the 1989 Mid-Year Report was timely filed with the Commission. In support of their position, the Respondents rely upon affidavits from Ruth M. Stormant, the Committee's treasurer, and Nancy T. Milburn, an intern who worked for the Committee during 1989. In her affidavit, Ms. Stormant states that she completed the 1989 Mid-Year Report, had the completed Report notarized on June 18, 1989, and then mailed it from the post office in Merrifield, Virginia on that same day. See Attachment 1 at 3. In her affidavit, Nancy T. Milburn, states that she assisted Ms. Stormant in the preparation of the 1989 Mid-Year Report and, on June 18, 1989, accompanied Ms. Stormant to the Crossland Savings Bank in Falls Church, Virginia, where the Report was notarized, and then to a post office, where the Report was mailed. Ms. Milburn further states that the postage for mailing the report, which totaled two dollars and eighty cents (\$2.80), was purchased with a personal check. See Attachment 1 at 3. The Respondents provided a copy of a Notary's log, which contains a handwritten entry, dated June 18, 1989, that states: "Ruth Stormant affidavit for the FEC." A copy of the check, allegedly used to purchase the postage

to mail the report, was not provided nor have Respondents produced a certified mail receipt verifying the date the Report was mailed. See Attachment 1.

While the Respondents' submissions present possible mitigating circumstances, Respondents have not produced evidence that would vitiate the Commission's finding of a statutory violation. In light of the Respondents' failure to file timely the 1989 Mid-Year Report, this Office recommends that the Commission find probable cause to believe that Americans United and Ruth M. Stormant, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

IV. RECOMMENDATIONS

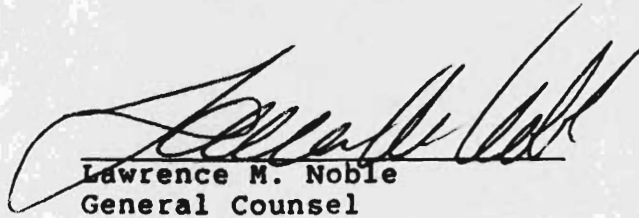
1. Find probable cause to believe that Americans Untied and Ruth M. Stormant, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).

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2. Approve the attached conciliation agreement and appropriate letter.

Date

6/13/90


Lawrence M. Noble
General Counsel

Attachments

1. Response received on April 19, 1990
2. Proposed conciliation agreement

Staff Assigned: Craig Douglas Reffner

90040802276

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3005
Americans United and)
Ruth M. Stormant, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on June 26, 1990, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 3005:

1. Find probable cause to believe that Americans United and Ruth M. Stormant, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).
2. Approve the conciliation agreement and letter attached to the General Counsel's report dated June 13, 1990.

Commissioners Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision; Commissioner Aikens was not present.

Attest:

6-27-90
Date

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 2, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William L. Millwood, Jr., Esq.
3179 Summit Square Drive
Oakton, Virginia 22124

RE: MUR 3005
Americans United and
Ruth M. Stormant, as treasurer

Dear Mr. Millwood:

On June 26, 1990, the Federal Election Commission found that there is probable cause to believe your clients violated 2 U.S.C. § 434(a)(4)(A)(iv), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with the Committee's late filing of the 1989 Mid-Year Report.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

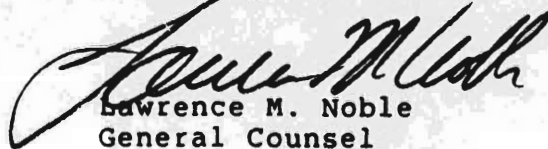
Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

200408022 / 3

William L. Millwood, Jr., Esq.
Page 2

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Craig Douglas Reffner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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97 SEP -5 10:35

In the Matter of)
) MUR 3005
Americans United and)
Ruth M. Stormant, as treasurer)

SENSITIVE

I. BACKGROUND

Attached is a conciliation agreement which has been signed by William L. Millwood, the designated counsel of Americans United and Ruth M. Stormant, as treasurer.

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II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Americans United and Ruth M. Stormant as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

9/5/90
Date

BY:

[Signature]
Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check

Staff Assigned: Craig Douglas Reffner

20040802281

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Americans United and Ruth M.) MUR 3005
Stormant, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 19, 1990, the Commission decided by a vote of 6-0 to take the following actions in MUR 3005:

1. Accept the conciliation agreement with Americans United and Ruth M. Stormant as treasurer, as recommended in the September 5, 1990 General Counsel's Report.
2. Close the file.
3. Approve the appropriate letter, as recommended in the September 5, 1990 General Counsel's Report.

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

Attest:

9-19-90
Date

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

Received in the Secretariat: Wednesday, Sept. 5, 1990 4:33
Circulated to the Commission: Thursday, Sept. 6, 1990 11:00
Deadline for vote: Thursday, Sept. 20, 1990 4:00

ha



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

September 24, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William L. Millwood, Jr., Esq.
3179 Summit Square Drive
Oakton, Virginia 22124

RE: MUR 3005
Americans United and
Ruth M. Stormant, as treasurer

Dear Mr. Millwood:

On September 19, 1990, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(iv), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your clients.

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 Craig Douglas Reffner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner JTL

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

20040802283

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Americans United and
Ruth M. Stormant, as treasurer

MUR 3005

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (the "Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probbale cause to believe that Americans United and Ruth M. Stormant, as treasurer (the "Respondents"), violated 2 U.S.C. § 434(a)(4)(A)(iv).

NOW, THEREFORE, the Commission and the Respondents, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding.

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

III. Respondents enter voluntarily into this agreement with the Commission.

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

1. Respondent Americans United is a political committee within the meaning of 2 U.S.C. § 431(4).
2. Respondent Ruth M. Stormant is the treasurer of Americans United.
3. Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv),

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OFFICE OF THE CLERK
WASHINGTON, D.C. 20543

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Respondents were required to file the 1989 Mid-Year Report no later than July 31, 1989.

4. Respondents did not file the 1989 Mid-Year Report until October 10, 1989, seventy-one (71) days late, disclosing \$9,099.58 in receipts and \$9,186.91 in disbursements for the reporting period.

V. Respondents failed to file the 1989 Mid-Year Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(A)(iv).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of one hundred and twenty-five dollars (\$125.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VI. 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 Court of Columbia.

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

VIII. 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.

IX. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and

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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
Lois G. Lerner
Associate General Counsel

9/24/90
Date

FOR THE RESPONDENTS:

W L M. Ilwood
(Name and Position)
W L M. Ilwood
Attorney for
Ruth M. Stornant

7-17-90
Date

\$ 125.00 agreed to in conference with
Mr. Craig Reffner 7-17-90



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3005

DATE FILMED 10/17/90 CAMERA NO. 2

CAMERAMAN AS

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