



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3284

DATE FILMED 3/13/72 CAMERA NO. 3

CAMERAMAN Tom



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

4 February 1991

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 FAILING TO FILE THE 1990 12 DAY PRE-GENERAL
REPORT BY ELECTION DAY

Attached is a listing of thirty-five (35) monthly unauthorized committees which failed to file the 1990 12 Day Pre-General Report by Election Day, November 6, 1990.

For your information, each committee was sent Prior Notice of the due date of the report on October 1, 1990 (Attachment 36). Twenty-nine (29) of the committees were sent Non-Filer Notices on November 15, 1990 (Attachment 37). Six (6) of the committees

were not sent Non-Filer Notices because their 12 Day Pre-General Reports were filed by November 15, 1990.

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

Attachment

C00141002 Corporate Citizenship Committee (ITT)

91NF-26

001-1000
BROOKLYN DISTRICT OFFICE
100-100000-100000-100000
NEW YORK

None

Letter and 12 Day Pre-
General Report filed
11/28/90 (10b-c)

*The Non-Filer Notice was sent to the former address of record -- 320 Park Avenue, New York, New York 10022. The new address was effective November 28, 1990.

CORPORATE CITIZENSHIP COMMITTEE (ITT)

(Attachment 10a - 10c)

ALL REPORTS HAVE BEEN REVIEWED EXCEPT YEAR END
ENDING CASH ON HAND AS OF 12/31/90: 24,912.00
OUTSTANDING DEBTS OWED BY THE COMMITTEE AS OF 12/31/90: 0.00

Comerica Bank Detroit
Detroit, Michigan 48275

9311.25 PM12:58

Comerica Bank Detroit

November 21, 1990

Federal Election Commission
c/o Mr. John D. Gibson
Reports Analysis Division
999 E Street, NW
Washington, DC 20463

Re: Corporate Citizenship Committee (ITT)
12 Day Pre-General Report (10-1-90 - 10-17-90)

Dear Mr. John Gibson:

With this letter I enclose the Federal Election Commission
Pre-General Report, for the periods of October 1, 1990
through October 17, 1990.

I am truly very sorry for the omission of this report.
I was out ill during this period and this was overlooked.

Please except my apology for any inconvenience this
may have caused the commission.

If you have any questions about this report, please
call me (313) 370-7270.

Very truly yours,



Louise O'Dell
PAC Accountant

Enclosures
Certified Mail

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1 NAME OF COMMITTEE (in full) CORPORATE CITIZENSHIP COMMITTEE (LIT)		2 FEC IDENTIFICATION NUMBER 00141002
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 1330 AVENUE OF THE AMERICAS		3 <input type="checkbox"/> The committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)
CITY, STATE AND ZIP CODE NEW YORK, NEW YORK 10019-5490		

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report☐ July 15 Quarterly Report☐ October 15 Quarterly Report☐ January 31 Year End Report☐ July 31 Mid Year Report (Non-election Year Only)☐ Termination Report

Monthly Report Due On:

☐ February 20☐ June 20☐ October 20☐ March 20☐ July 20☐ November 20☐ April 20☐ August 20☐ December 20☐ May 20☐ September 20☐ January 31☒ Twelfth day report preceding **GENERAL**

(Type of Election)

election on **November 6** in the State of **OH**☐ Thirtieth day report following the General Election on _____

in the State of _____

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

SUMMARY

5	Covering Period <u>10-1-90</u> through <u>10-17-90</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6	(a) Cash on Hand January 1, 19 <u>90</u>		\$ 32,053.72
	(b) Cash on Hand at Beginning of Reporting Period	\$ 27,505.25	
	(c) Total Receipts (from Line 18)	\$ 300.48	\$ 36,010.58
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6-a and 6(c) for Column B)	\$ 27,805.73	\$ 68,064.30
7	Total Disbursements (from Line 28)	\$ 800.00	\$ 41,058.57
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 27,005.73	\$ 27,005.73
9	Debts and Obligations Owed TO the Committee (Remove all on Schedule C and/or Schedule D)	\$ 0.00	For further information contact:
10	Debts and Obligations Owed BY the Committee (Remove all on Schedule C and/or Schedule D)	\$ 0.00	Federal Election Commission 999 E Street, NW Washington DC 20463 Toll Free 800 424 9530 Local 202-376-3120

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

Type or Print Name of Treasurer

Charles M. Hurst

Signature of Treasurer

Charles M. Hurst

Date

11/26/90

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to a penalty of 2 U.S.C. 8477c

FEC FORM 3X
(REVISED 4-8)

GENERAL ELECTION REPORT NOTICE

ATTACHMENT 36
(Page 1 of 2)

FEDERAL ELECTION COMMISSION

PARTIES AND PACs

October 1, 1990

I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
Pre-General	10/01/90**-10/17/90	10/22/90	10/25/90
Post-General	10/18/90 - 11/26/90	12/06/90	12/06/90

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 17***

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
Pre-General	10/01/90**-10/17/90	10/22/90	10/25/90
Post-General	10/18/90 - 11/26/90	12/06/90	12/06/90

III. QUARTERLY FILERS WHICH DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 17***

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
Post-General	10/01/90**-11/26/90	12/06/90	12/06/90

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) 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.

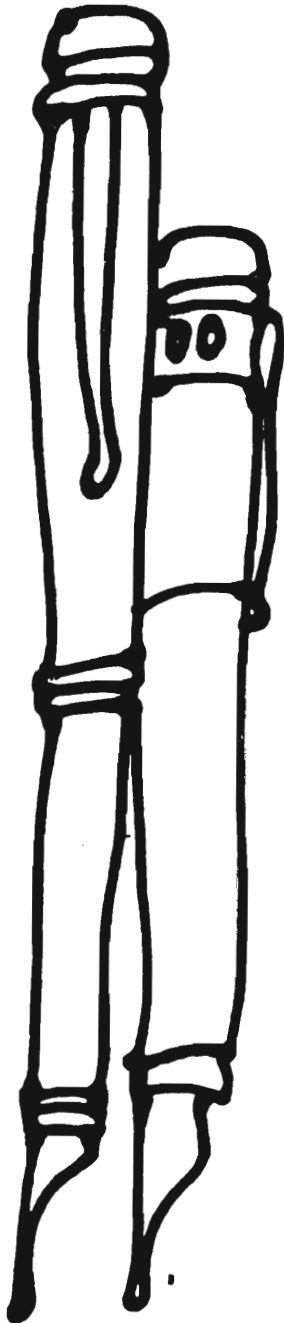
WHAT MUST BE REPORTED

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.

**The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

***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.



PARTIES AND PACs

GENERAL ELECTION

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 18 and ending November 4 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.

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



FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

RQ-7

November 15, 1990

**TREASURER
COMMITTEE
STREET
CITY, STATE ZIP**

Identification Number: ID NUMBER

Reference: 12 Day Pre-General Report (10/1/90-10/17/90)

Dear **TREASURER**:

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 previously notified 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 its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§108.2, 108.3, 108.4).

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 **ANALYST** 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

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

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD Referral: 91NF 17 - 51
Staff Member: Noriega E. James

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

RESPONDENTS:

Corporate Citizenship Committee (ITT) and
Charles M. Wurst, as treasurer (91NF-26)

RELEVANT STATUTES: 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 thirty-five (35) committees and their treasurers to the Office of the General Counsel on February 5, 1991. The basis of the attached RAD referral is the committees' failure to file the

1990 12 Day Pre-General Report in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(B).

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that all unauthorized political committees that file monthly reports, shall file a pre-general election report in lieu of filing the report otherwise due in November of any year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(B). According to Section 434(a)(2)(A)(i) the pre-election report must be filed no later than the 12th day before any election, and should be complete as of the 20th day before the election.

With regard to the 1990 general election, unauthorized committees were required to file a 12 Day Pre-General Election Report, covering the pre-election period of October 1 through October 17, by October 25, 1990. The committees referred by RAD failed to file the 1990 Pre-General Report or a report covering the pre-election period by the required deadline. However, seven of the committees filed 1990 November Monthly Reports with coverage dates of October 1 through 31, 1990. These reports

were received after the due date for the 12 Day Pre-General Report.

On October 1, 1990, prior notification was sent to all unauthorized committees which specifically informed monthly filers of the requirement to file a 12 Day Pre-General Report by October 25, 1990 (Attachment 1, pages 177 - 178). Each committee which failed to submit either a 12 Day Pre-General Report or a November Monthly Report was sent a Non-Filer Notice on November 15, 1990 (Attachment 1, page 179).

Accordingly, the Office of the General Counsel recommends that the Commission open Matters Under Review and find reason to believe that 34 of the 35 previously referenced committees and their treasurers (See Recommendation I) violated 2 U.S.C. § 434(a)(4)(B) by failing to file timely the 1990 12 Day Pre-General Report.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

This Office also recommends that the Commission offer to enter into conciliation with the respondents prior to a finding of probable cause to believe.

PAGES 7 THROUGH 27 DO NOT PERTAIN TO THESE RESPONDENTS.

IV. RECOMMENDATIONS

1. Open Matters Under Review, find reason to believe that the following committees and their treasurer violated 2 U.S.C. § 434(a)(4)(B) and enter into conciliation prior to a finding of probable cause to believe:

A.

B.

C.

D.

E.

F.

G.

H.

I.

J. Corporate Citizenship Committee (ITT) and Charles
M. Wurst, as treasurer (91NF-26)

K.

L.

M.

N.

O.

P.

Q.

R.

S.

T.

U.

V.

W.

X.

Y.

Z.

AA.

BB.

CC.

DD.

EE.

FF.

GG.

HH.


2.

3. Approve the attached Factual and Legal Analyses and proposed conciliation agreements and the appropriate letters.

Lawrence M. Noble
General Counsel

Date 5/2/91

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

1. RAD Referral
2. Factual and Legal Analysis (34)
3. Conciliation Agreement (34)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	RAD Referrals
Thirty-five (35) Committees and)	#91NF 17-51
their treasurers)	

CERTIFICATION

I, Marjorie W. Emmons, do hereby certify that
the Commission took the following actions with respect
to the above-captioned referrals:

1. Decided by a vote of 6-0 to

- a) Open Matters Under Review, find reason
to believe that the following committees
and their treasurer violated 2 U.S.C.
§ 434(a)(4)(B) and enter into concili-
ation prior to a finding of probable
cause to believe:

A.

B.

C.

(continued)

Federal Election Commission
Certification: RAD 91NF 17-51
May 14, 1991

Page 2

D.

E.

F.

G.

H.

I. Corporate Citizenship Committee
(ITT) and Charles M. Wurst, as
treasurer (91NF-26)

J.

K.

(continued)

Federation Election Commission
Certification: RAD 91NF 17-51
May 14, 1991

Page 3

L.

M.

N.

Q.

P.

Q.

R.

S.

(continued)

Federal Election Commission
Certification: RAD 91NF 17-51
May 14, 1991

Page 4

T.

U.

V.

W.

X.

Y.

Z.

AA.

(continued)

BB.

CC.

DD.

EE.

FF.

GG.

b)

- c) Approve the Factual and Legal Analyses and proposed conciliation agreements and the appropriate letters as recommended in the General Counsel's Report dated May 2, 1991.

(continued)

Federal Election Commission
Certification: RAD 91NF 17-51
May 14, 1991

Page 6

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

Attest:

5-17-91
Date

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



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

May 28, 1991

Charles M. Wurst, Treasurer
Corporate Citizenship Committee (ITT)
1330 Avenue of the Americas
New York, NY 10019

RE: MUR 3284
Corporate Citizenship Committee
(ITT) and
Charles M. Wurst, as treasurer

Dear Mr. Wurst:

On May 14, 1991, the Federal Election Commission found that there is reason to believe Corporate Citizenship Committee (ITT) ("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 of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

Charles M. Wurst, Treasurer
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 Deborah Curry, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Vice Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 3284

RESPONDENTS: Corporate Citizenship Committee (ITT) and
Charles M. Wurst, as treasurer

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that all unauthorized political committees that file monthly reports, shall file a pre-general election report in lieu of filing the report otherwise due in November of any year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(B). According to Section 434(a)(2)(A)(i) the pre-election report must be filed no later than the 12th day before any election, and should be complete as of the 20th day before the election.

With regard to the 1990 general election, unauthorized committees were required to file a 12 Day Pre-General Election Report, covering the pre-election period of October 1 through October 17, by October 25, 1990. The above referenced committee failed to file the 1990 Pre-General Report or a report covering the pre-election period by the required deadline. Therefore, there is reason to believe the Corporate Citizenship Committee (ITT) and Charles M. Wurst, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) by failing to timely file the 1990 12 Day Pre-General Report.



OL-C 1614
ITT Corporation

World Headquarters

June 18, 1991

Ms. Joan D. Aikens
Vice Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

91 JUN 19 PM 4:21

RECEIVED
FEDERAL ELECTION COMMISSION
JUN 19 1991

RE: MUR 3284
Corporate Citizenship Committee (ITT)
and Charles M. Wurst, as treasurer

Dear Ms. Aikens:

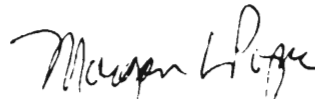
On behalf of the Corporate Citizenship Committee (ITT) ("Committee") and Mr. Charles M. Wurst, as treasurer, I would like to take this opportunity to demonstrate that no action should be taken against the Committee and Mr. Wurst, as treasurer. I submit factual and legal materials which the Committee believes are relevant to the Commission's consideration of this matter.

ITT's Corporate Citizenship Committee was founded in 1981. Mr. Wurst, first as assistant treasurer and, since 1986, as treasurer, has been responsible for overseeing the filing of all Commission reports. Comerica Bank-Detroit, since 1982, has been the Committee's agent for filing reports required by the Federal Election Commission including the "12 Day Pre-general Report" that was due to be filed on October 25, 1990. Mr. Wurst has set up policies and procedures with Comerica to assure that the Committee's required filings were accurate and timely. Since 1982, the procedures set up by Mr. Wurst have worked flawlessly. There was no reason for Mr. Wurst to believe that the "12 Day Pre-general Report" had not been filed. It was not until the Commission letter of November 15, 1990 that Mr. Wurst realized that the required report had not been filed. Mr. Wurst and Comerica responded immediately and the report was forwarded to the Commission on November 21, 1990. The delay in filing the report was due to the serious illness of the Comerica employee responsible for filing this report (see Attachment I).

I submit that the Committee and Mr. Wurst have acted in accordance with the spirit of the Federal Election Campaign Act and within the letter (2 U.S.C. 432 (i)(a) Best Efforts). In as much as Mr. Wurst showed that "best efforts were used to obtain, maintain and submit information required by the act for the Political Committee" and therefore this "report... should be considered in compliance with the Act". Additionally, Mr. Wurst has discussed new procedures with Comerica to assure that this type of incident would not occur again.

If I may be of any further assistance or if any additional information is required, please call me at (212) 258-1787.

Sincerely,

A handwritten signature in dark ink, appearing to read "Morgan L. Pape", written in a cursive style.

Morgan L. Pape

/attachment

cc: C. M. Wurst

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3284

NAME OF COUNSEL: Morgan L. Pape

ADDRESS: 1330 Avenue of the Americas
New York, NY 10019

TELEPHONE: (212) 258-1787

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.

6/18/91
Date

Charles M. Wurst
Signature

RESPONDENT'S NAME: Corporate Citizenship Committee (ITT) and
Charles M. Wurst, as treasurer

ADDRESS: 1330 Avenue of the Americas
New York, NY 10019

HOME PHONE: _____

BUSINESS PHONE: (212) 258-1846

ITT

Doc 3687
ITT Corporation

World Headquarters

91 DEC -6 AM 11:00

**REGISTERED MAIL
RETURN RECEIPT REQUESTED**

December 4, 1991

91 DEC -9 AM 3:47

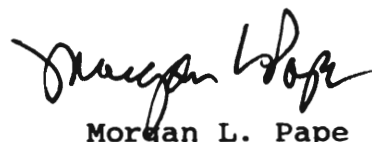
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Lawrence M. Noble
General Counsel
Federal Election Commission
Washington, DC 20463

Dear Mr. Noble:

Enclosed please find a signed copy of the conciliation agreement between the Federal Election Commission and the Corporate Citizenship Committee (ITT) and a check in the amount of \$275.00. If you have any further questions, please contact me at 212-258-1787.

Sincerely,



Morgan L. Pape

MLP:cw
Enclosures

CORPORATE CITIZENSHIP COMMITTEE (ITT)

1330 AVENUE OF THE AMERICAS
NEW YORK, NEW YORK 10019-5490

1648

9-9
720

DECEMBER 3 19 91

PAY TWO HUNDRED SEVENTY-FIVE DOLLARS AND 00/100----- \$ 275.00

TO
THE
ORDER
OF

FEDERAL ELECTION COMMISSION

Charles M. Hest
[Signature]

FORT WASHINGTON—42
COMERICA BANK—DETROIT
DETROIT, MICHIGAN

⑈001648⑈ ⑆072000096⑆ 0421051020⑈

RECEIVED
F.E.C.
JAN 10 1982
BEFORE THE FEDERAL ELECTION COMMISSION 3:56

In the Matter of)
Corporate Citizen Committee (ITT))
and Charles M. Wurst, as treasurer)

MUR 3284

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Charles M. Wurst, the treasurer of Corporate Citizen Committee (ITT).

A check for the civil penalty has been received in the amount of \$275.00.

II. RECOMMENDATIONS


1. Accept the attached conciliation agreement with Corporate Citizen Committee (ITT) and Charles M. Wurst, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date

1/8/92

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check

Staff Assigned: Debby Curry

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Corporate Citizen Committee (ITT)) MUR 3284
and Charles M. Wurst, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 13, 1992, the Commission decided by a vote of 6-0 to take the following actions in MUR 3284:

1. Accept the conciliation agreement with Corporate Citizen Committee (ITT) and Charles M. Wurst, as treasurer, as recommended in the General Counsel's Report dated January 8, 1992.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated January 8, 1992.

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

Attest:

1-13-92
Date

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

Received in the Secretariat:	Wed., Jan. 8, 1992	3:56 p.m.
Circulated to the Commission:	Thurs., Jan. 9, 1992	11:00 a.m.
Deadline for vote:	Mon., Jan. 13, 1992	11:00 a.m.

dr



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 22, 1992

RECEIVED
JAN 23 1992

Morgan L. Pape, Esquire
ITT Corporation
1330 Avenue of the Americas
New York, NY 10019

RE: MUR 3284
Corporate Citizenship Committee
(ITT) and Charles M. Wurst,
as treasurer

Dear Mr. Pape:

On January 13, 1992, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Deborah Curry
Deborah Curry
Attorney

Enclosure
Conciliation Agreement

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
91 DEC -6 AM 11:01

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Corporate Citizenship Committee (ITT))
and Charles M. Wurst, as treasurer)

MUR 3284

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 the Corporate Citizenship Committee (ITT) and Charles M. Wurst, 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.

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

1. Corporate Citizenship Committee (ITT) is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Charles M. Wurst is the treasurer of Corporation Citizenship Committee (ITT).

3. Section 434(a)(4)(B) of the Federal Election Campaign Act

of 1971, as amended ("the Act"), provides that all unauthorized political committees, that file monthly reports, shall file a pre-general election report in lieu of filing the report otherwise due in November of any year in which a regularly scheduled general election is held. According to Section 434(a)(2)(A)(i) the pre-election report must be filed no later than the 12th day before any election, and should be complete as of the 20th day before the election.

4. Respondents were required to file the 12 Day Pre-General Election Report, covering the pre-election period of October 1 through October 17, by October 25, 1990. Respondents failed to file the Committee's 1990 12 Day Pre-General Report or a report covering the pre-election period until November 28, 1990, 34 days late, disclosing \$300 in receipts and \$800 in disbursements for the relevant reporting period.

V. Respondents failed to file the Committee's 1990 12 Day Pre-General Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(B).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Two Hundred and Seventy-Five Dollars (\$275), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

IX. Respondents shall have no more than 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
Lois G. Lerner
Associate General Counsel

1/22/92
Date

FOR THE RESPONDENTS:

Charles M. Wurst
(Name)
(Position)
Treasurer, Corporate Citizenship
Committee

December 3, 1991
Date



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3284

DATE FILMED 2/13/72 CAMERA NO. 3

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