



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

THIS IS THE BEGINNING OF MUR # 3392

DATE FILMED 8/13/91 CAMERA NO. 4

CAMERAMAN AS

91040852952



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 17, 1991

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SUBINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF UNAUTHORIZED COMMITTEES FOR LATE/NON-
FILING OF THE 1990 OCTOBER QUARTERLY REPORT

Attached is a listing of thirteen (13) unauthorized committees which failed to file the 1990 October Quarterly Report by Election Day, November 6, 1990. Three (3) of the committees

failed to file the report within thirty (30) days from the date of the Non-Filer Notice.

For your information, each committee was sent prior notice of the due date of the report on September 21, 1990 (Attachment 11). Non-Filer Notices were sent to the committees on November 7, 1990 (Attachment 12).

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

Attachment

91040352953

C00101626

Virginia Bank PAC (Virginia Bankers
Association Political Action Committee)

91NF-10

91040852954

00101626
VIRGINIA BANKPAC (VIRGINIA BANKERS ASSOCIATION POLITICAL ACTION COMMITTEE)
TREASURER'S NAME: WALTER C AYERS
10 EAST MAIN ST; BOX 462
HUNTERVA VA 23203

None

.....
October Quarterly
Report filed
11/13/90
(Att. 9b)

9 1 0 4 0 8 5 2 9 5 5

91040352956

**VIRGINIA BANKPAC (VIRGINIA BANKERS ASSOCIATION POLITICAL
ACTION COMMITTEE**

(Attachments 9a - 9b)

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

ATTACHMENT 9a

DATE 17JAN91

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
					TYPE OF FILER	
VIRGINIA BANKPAC				ID 000101626	NON-PARTY QUALIFIED	
CONNECTED ORGANIZATION:	BANKERS ASS'N; AMERICAN					
1989 MID-YEAR REPORT	54,781	25	1JAN89 -30JUN89	3	89FEC/599/4576	
YEAR-END	10,934	39,000	1JUL89 -31DEC89	5	90FEC/619/2546	
1990 APRIL QUARTERLY	15,282	1,000	1JAN90 -31MAR90	5	90FEC/633/4889	
JULY QUARTERLY	20,293	28,112	1APR90 -30JUN90	5	90FEC/646/2768	
OCTOBER QUARTERLY	24,782	30,500	1JUL90 -30SEP90	6	90FEC/670/4315	
NOTICE OF FAILURE TO FILE			1JUL90 -30SEP90	1	90FEC/670/2937	
POST-GENERAL	5,965	250	1OCT90 -26NOV90	5	90FEC/671/4645	
YEAR-END	846	0	27NOV90 -31DEC90	3	91FEC/680/3775	
TOTAL	132,903	0	98,887	0	33	TOTAL PAGES

All reports except the 1990 Year End Report have been reviewed.
Ending cash-on-hand as of 12/31/90: \$178,657
Outstanding debts owed to or by the committee as of 12/31/90: \$0

91040352957

REPORT OF RECEIPTS AND DISBURSEMENTS

(For Other Than An Authorized Committee
(Summary Page)USE PREPARED LABEL
OR
TYPE OR PRINT

COC1C1626 JALTEP C AYERS VIRGINIA PARKWAY 760 EAST VASH STS BOX 462 RICHMOND VA 23203		GF3090 P 209	90 NOV 12 AMNO 55
		1. FEC IDENTIFICATION NUMBER C00101626	
		2. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on (date)	

4. TYPE OF REPORT

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

Monthly Report Due On:

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

(Type of Election)

election on

in the State of

☐ Thirtieth day report following the General Election or

in the State of

(b) Is this Report an Amendment?

☐ YES☐ NO

SUMMARY

5	Covering Period <u>7/1/90</u> through <u>9/30/90</u>	COLUMN A This Period	COLUMN B Calendar Year to-Date
6	(a) Cash on Hand January 1, 19 <u>90</u>		\$ 171,349.82
	(b) Cash on Hand at Beginning of Reporting Period	\$ 177,814.32	
	(c) Total Receipts (from Line 10)	\$ 24,782.35	\$ 60,358.85
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 202,596.67	\$ 231,708.67
7	Total Disbursements (from Line 20)	\$ 30,500.00	\$ 59,612.00
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 172,096.67	\$ 172,096.67
9	Debts and Obligations Owed TO the Committee (Report all on Schedule C and/or Schedule D)	\$ -0-	For further information contact: Federal Election Commission 950 E Street NE Washington, DC 20461 Toll Free 800 424 9641 Local 202 376 3129
10	Debts and Obligations Owed BY the Committee (Report all on Schedule C and/or Schedule D)	\$ -0-	

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

Walter C. Ayers

Signature of Treasurer

Walter C. Ayers

Date

10/1/90

NOTE: Submission of false, erroneous, or misleading information may subject the person signing this Report to the penalties of 2 U.S.C. 641.

FEC FORM 3X

Revised 6/9

91040332930
20036704316

QUARTERLY REPORT NOTICE

ATTACHMENT 11
(Page 1 of 2)

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 21, 1990

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
October Quarterly	07/01/90**-09/30/90	10/15/90	10/15/90

WHO MUST FILE

PARTY COMMITTEES AND PACs (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) filing on a quarterly basis must file a Quarterly Report in October.

WHAT MUST BE REPORTED

Disclose 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 Summary Page of Form 3X. 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.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with a candidate's primary election must also file a 12-day Pre-Election Report if the activity was not previously reported. See the January Record.

LAST-MINUTE INDEPENDENT EXPENDITURES

Committees which make an independent expenditure of \$1,000 or more, after the 20th day, but more than 24 hours before an election, must report it within 24 hours.

*Reports sent by registered or certified mail will be considered filed on the date of the U.S. postmark. Reports hand delivered or mailed first class 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.

(over)

91040352959

PARTIES AND PACS

OCTOBER QUARTERLY

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.

91040352960

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

November 7, 1990

TREASURER
COMMITTEE
STREET
CITY, STATE ZIP

Identification Number: ID NUMBER

Reference: October Quarterly Report (7/1/90-9/30/90)

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

21040852961

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral 91NF 2-14
Staff Member: Todd Hageman

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

RESPONDENTS:

Virginia Bankpac and Walter C. Ayers, as
treasurer (91NF-10)

91040852962

1991 JUN 28 10 10

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

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the above thirteen committees to the Office of the General Counsel on January 17, 1991. The basis for the attached referral is the committees' failure to file the 1990 October Quarterly Report or to do so in a timely fashion.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act, as amended, ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file quarterly reports, in a calendar year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(A)(i). Quarterly Reports are to be filed no later than the 15th day after the last day of each calendar quarter. Thus, the due date for the 1990 October Quarterly Report was October 15, 1990. Each of the respondent committees, with the exception of

has failed to file its report, filed the 1990 October Quarterly Report in an untimely manner. See attached Factual and Legal Analyses for each respective committee. On September 21, 1990 RAD sent the respondent committees and their treasurers prior notice for the October Quarterly Report due date. See Attachment 1 at pages 73 and 74. On November 7, 1990, Non-Filer

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Notices were sent to the respondent committees and their treasurers. Id. at 75.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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PAGES 4 THROUGH 14 DO NOT PERTAIN TO THESE RESPONDENTS.

91040852965

IV. RECOMMENDATIONS

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

a.

b.

c.

d.

e.

f.

g.

h.

i. Virginia Bankpac and Walter C. Ayers, as
treasurer (91NF-10)

j.

k.

91040852966

1.

m.

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

a.

b.

c.

d.

e.

f.

g.

h.

i. Virginia Bankpac and Walter C. Ayers, as treasurer (91NF-10)

j.

k.

l.

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m.

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

Lawrence M. Noble
General Counsel

5/28/91
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Referral Materials
2. Factual and Legal Analyses
3. Proposed Conciliation Agreements

91040352968

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Twelve Committees and their) RAD Referrals
treasurers) #91NF 2-14
)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on June 4, 1991, do hereby certify that the Commission decided by a vote of 4-0 to take the following actions with respect to RAD Referrals #91NF 2-14:

1. Open Matters Under Review with respect to the following committees and find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(i):
 - a.
 - b.
 - c.

(continued)

91040852969

**Federal Election Commission
Certification for RAD Referrals
91NF 2-14
June 4, 1991**

Page 2

d.

e.

f.

g. Virginia Bankpac and Walter C.
Ayers, as treasurer (91NF-10)

h.

i.

j.

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

a.

b.

(continued)

91040852970

**Federal Election Commission
Certification for RAD Referrals
91NF 2-14
June 4, 1991**

Page 3

c.

d.

e.

f.

g. Virginia Bankpac and Walter C.
Ayers, as treasurer (91NF-10)

h.

i.

j.

(continued)

91040852971

Federal Election Commission
Certification for RAD Referrals
91NF 2-14
June 4, 1991

Page 4

3.

4. Approve the Factual and Legal Analyses, proposed conciliation agreements, and appropriate letters as recommended in the General Counsel's report dated May 28, 1991, subject to any change required by the actions noted above.

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

Attest:

6/6/91
Date

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

21040852972



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

June 14, 1991

Virginia Bankpac (Virginia Bankers
Association Political Action Committee)
Mr. Walter C. Ayers, Treasurer
700 East Main St., Box 462
Richmond, VA 23203

RE: MUR 3332

Dear Mr. Ayers:

On June 4, 1991, the Federal Election Commission found that there is reason to believe Virginia Bankpac (Virginia Bankers Association Political Action Committee) ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), 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.

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.

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Mr. Ayers
Page 2

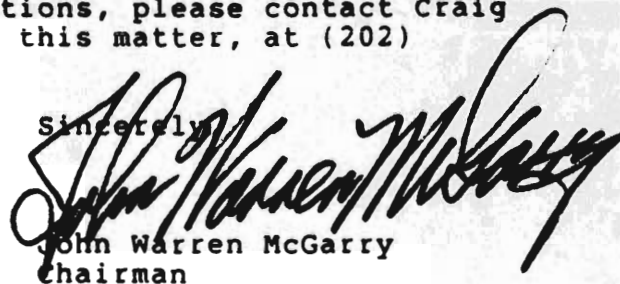
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

Sincerely,



John Warren McGarry
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

91040352974

**FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS**

RESPONDENT: Virginia Bankpac and Walter C. Ayers,
as treasurer

MUR: 3332

The Federal Election Campaign Act, as amended, ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file quarterly reports, in a calendar year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(A)(i). Quarterly Reports are to be filed no later than the 15th day after the last day of each calendar quarter. Thus, the due date for the 1990 October Quarterly Report was October 15, 1990. Virginia Bankpac and Walter C. Ayers, as treasurer, filed its 1990 October Quarterly Report on November 13, 1990, twenty-nine days late. Therefore, there is reason to believe Virginia Bankpac and Walter C. Ayers, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i).

91040352975

Virginia Bankers Association

700 EAST MAIN STREET • SUITE 1411
P.O. BOX 462 • RICHMOND, VIRGINIA 23203
(804) 643-7469

86-1689
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

91 JUN 24 PM 2:25

JUN 26 AM 11:02

June 21, 1991

Ms. Lois G. Lerner
Associate General Counsel
Federal Election Commission
Washington, DC 20463

RE: MUR 3332
Virginia Bankpac and
Walter C. Ayers, as treasurer

Dear Ms. Lerner:

First, I would like to thank you and Craig Reffner for your consideration of our circumstances which certainly indicate our intention to fully comply with reporting and filing responsibilities.

Simply for the record, I would briefly recount the circumstances of our error. You did not ask for that in your letter, but I feel that it might be of value to the Commission in closing our case. My narrative is in chronological order.

October 3, 1990 - Our Accounting Manger prepared the Quarterly filing, properly signed and dated. Inadvertently, the original was sent to the State Board of Elections, 101 Ninth Street Office Building, Richmond, VA 23219, (804) 786-6551. While they do need to get a copy, we omitted sending anything to the FEC.

October 15, 1990 - Quarterly Filing due to the FEC.

November 7, 1990 - A letter was sent from John Gibson of the FEC Reports Analysis Division, informing us of our failing to file.

November 9, 1990 - We received the above letter and immediately called Edward Ryan as indicated in the letter. He indicated that we should resign and date an original report



Serving All Virginia Banks

21040352976

Ms. Lois G. Lerner, June 21, 1991
page 2

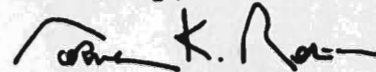
and submit it to the Commission. This was done this same day.

November 13, 1990 - The Commission received our Quarterly filing.

June 18, 1991 - We received Mr. McGarry's letter dated June 14, 1991 and called Craig Reffner the same day to resolve the issue.

Again, I appreciate your consideration of our circumstances and trust that this will resolve the issue. If you need additional information or assistance, please let me know. We will certainly make every effort to avoid this error in the future.

Sincerely,



Norman K. Robinson
Vice President

enclosure

cc: Walter C. Ayers

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91 JUL -9 PM 3:29

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Virginia Bankpac and
Walter C. Ayers, as treasurer

)
) MUR 3332
)
)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed
by the treasurer of Virginia Bankpac.

II. RECOMMENDATIONS


1. Accept the attached conciliation agreement with
Virginia Bankpac (Virginia Bankers Association Political Action
Committee) and Walter C. Ayers, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date

7/9/91

BY:


Lois G. Lerner
Associate General Counsel

Attachments

- A. Conciliation Agreement
- B. Photocopy of civil penalty check

Staff Assigned: Craig Douglas Reffner

91040352978

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3332
Virginia Bankpac and)
Walter C. Ayers, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 12, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 3332:

1. Accept the conciliation agreement with Virginia Bankpac (Virginia Bankers Association Political Action Committee) and Walter C. Ayers, as treasurer, as recommended in the General Counsel's report dated July 9, 1991.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report dated July 9, 1991.

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

Attest:

7-12-91
Date

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

Received in the Secretariat: Tuesday, July 9, 1991 3:29 p.m.
Circulated to the Commission: Wednesday, July 10, 1991 11:00 a.m.
Deadline for vote: Friday, July 12, 1991 11:00 a.m.

dh

91040352979



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 17, 1991

CLOSED

Walter C. Ayers, Treasurer
Virginia Bankpac (Virginia Bankers
Association Political Action Committee)
700 East Main Street, Box 462
Richmond, Virginia 23203

RE: MUR 3332
Virginia Bankpac and
Walter C. Ayers, as treasurer

Dear Mr. Ayers:

On July 12, 1991, the Federal Election Commission accepted the signed conciliation agreement and civil penalty which you submitted in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(i), 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 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

Enclosure
Conciliation Agreement

91040352980

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Virginia Bankpac and Walter C.)
Ayers, as treasurer)

MUR 3332

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 Virginia Bankpac and Walter C. Ayers, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i).

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. Virginia Bankpac is a political committee within the meaning of 2 U.S.C. § 431(4).

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-2-

2. Walter C. Ayers is the treasurer of Virginia Bankpac.

3. Section 434(a)(4)(A)(i) of Title 2 provides that all political committees, other than authorized committees of a candidate, filing quarterly reports shall file quarterly reports in a calendar year in which a regularly scheduled general election is held. Quarterly Reports are to be filed no later than the 15th day after the last day of each calendar quarter delineating all receipts and disbursements made during the preceding quarter and complete as of the last day of the quarter.

4. Respondents were required to file the 1990 October Quarterly Report no later than October 15, 1990. Respondents did not file the report until November 13, 1990, twenty-nine days late, disclosing \$24,782 in receipts and \$30,500 in disbursements.

V. Respondents failed to timely file the 1990 October Quarterly Report in violation of 2 U.S.C. § 434(a)(4)(A)(i).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Six Hundred dollars (\$600), 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.

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-3-

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
Associate General Counsel

Date

7/17/91

FOR THE RESPONDENTS:


Walter C. Ayers
Treasurer

Date

6-21-91

91040852983



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3332

DATE FILMED 8/13/91 CAMERA NO. 4

CAMERAMAN AS

91040852984