



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 1255

DATE SCANNED 9-18-06

SCANNER NO. 2

SCAN OPERATOR Jm v

26092591527



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEDERAL ELECTION
COMMISSION
SECRETARIAT

2005 JAN 19 A 9:03

January 18, 2005

SENSITIVE

MEMORANDUM

TO: THE COMMISSION

THROUGH: JAMES A. PEHRKON
STAFF DIRECTOR

ROBERT J. COSTA
DEPUTY STAFF DIRECTOR

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

SUBJECT: REASON TO BELIEVE RECOMMENDATION -
12 DAY PRE-GENERAL REPORT FOR THE
ADMINISTRATIVE FINES PROGRAM

Attached is a list of political committees and their treasurers who failed to file or timely file the 2004 12 Day Pre-General Report in accordance with 2 U.S.C. 434(a). The list is comprised of unauthorized committees that file monthly and authorized committees whose candidates sought election in the November 2nd General Election. The filing of the 12 Day Pre-General Report is mandatory in both cases.

On September 27, 2004, Prior Notice was sent to the political committees and their treasurers, informing them that the report was due on October 21, 2004 and should cover the period from October 1, 2004 through October 13, 2004.

The committees appearing on the list either filed the report more than five (5) days after the due date, failed to file the report or failed to file the report prior to four (4) days before the general election (considered a non-filed report). In accordance with the schedule of civil money penalties at 11 CFR 111.43, these committees should be assessed the civil money penalties included on the attached list.

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Similarly, the Sparta Inc Employees' PAC (AF 1262) filed the 2004 November Monthly Report in lieu of the 12 Day Pre-General Report. RAD calculated a proposed civil money penalty based on a prorated activity level of 41.9%. This figured was determined based on the percentage of the November Monthly Report that comprised the 12 Day Pre-General Report, i.e. while only 13 days were required for the 12G, 31 days were actually reported in the M11.

As stated at the outset, this RTB circulation only includes unauthorized committees filing monthly reports and authorized committees supporting candidates who were in the general election. An unauthorized committee that files on a quarterly basis must file the 12 Day Pre-General Report only if it makes a contribution to, or an expenditure on behalf of, a candidate in the general election between the dates of October 1, 2004 and October 13, 2004. The universe of quarterly filers required to file this report cannot be determined with any certainty until we are able to review the activity disclosed in the 30 Day Post-General Report submitted by quarterly filers. Once this research is completed, we will circulate the RTB recommendations for the failure to file or failure to timely file the 12 Day Pre-General Report by unauthorized quarterly filers.

Recommendation

1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Report violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate mailgrams.

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AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF01240	FRIENDS OF RICHARD HOFFMAN	C00397836	GREY C HARRIS	10/28/2004	\$2,350	\$113,881	NY	HOFFMAN, RICHARD A	Yes	0	\$120
AF01241	PAUL VAN DAM FOR US SENATE	C00393124	SHANE NATHAN GIDDINGS	10/28/2004	\$7,409	\$233,939	UT	VAN DAM, PAUL	Yes	0	\$170
AF01242	RANDY CAMACHO FOR CONGRESS 2004	C00380832	STEPHEN L BOYD	Not Filed	\$13,707 (est)	\$190,256	AZ	CAMACHO, RANDY ROBERT	Yes	0	\$900
AF01244	BYRON FOR CONGRESS	C00382135	RAMONA BYRON	11/10/2004	\$3,672	\$134,835	CA	BYRON, MICHAEL	Yes	0	\$500
AF01246	LOTT FOR CONGRESS COMMITTEE	C00397943	JERRY DEAS	11/04/2004	\$9,116	\$177,986	MS	LOTT, MICHAEL A	Yes	0	\$600
AF01248	HONEST ABE HIRSCHFELD FOR UNITED STATES SENATE	C00393538	GEORGE L ESPADA	Not Filed	\$789,293 (est)	\$789,293	NY	HIRSCHFELD, ABRAHAM	Yes	2	\$21,000
AF01249	FRIENDS OF JEFF SEEMANN FOR CONGRESS	C00399808	Chaney, Michael	Not Filed	\$67,936 (est)	\$135,872	OH	SEEMANN, JEFF	Yes	0	\$3,000

AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF01251	CODY ROBERT JUDY US SENATE LOOKING GOOD CAMPAIGN 2004, THE	C00400150	CODY ROBERT JUDY	Not Filed	\$48,338	\$203,380	UT	JUDY, CODY ROBERT	Yes	0	\$1,400
AF01252	SYNGENTA CORPORATION POLITICAL ACTION COMMITTEE	C00363945	Detwiler, Mark	7	\$500	(SYNGENTA PA \$169,980	DC		Yes	0	\$120
AF01253	THE NEW DEMOCRAT NETWORK - PAC (NDN PAC)	C00385401	Rosenberg, Simon	7	\$10,126	\$462,812	DC		Yes	0	\$220
AF01254	AIR TRANSPORT ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE:	C00114694	PAUL ARCHAMBEAULT	Not Filed	\$20,000	\$164,836	DC		Yes	0	\$900
AF01255	AMERICAN PILOTS' ASSOCIATION POLITICAL ACTION COMMITTEE	C00041061	CAPTAIN MICHAEL R WATSON	Not Filed	\$17,000	\$283,578	DC		Yes	0	\$900
AF01256	AMERICANS FOR DEMOCRATIC ACTION INC POLITICAL ACTION COMMITTEE	C00112680	Dulk Jacobs, Valerie	Not Filed	\$5,089 (est)	\$101,795	DC		Yes	0	\$600
AF01257	ARENT FOX PLLC PAC (AFPAC)	C00241380	ENGLE, CRAIG	Not Filed	\$6,000	\$458,299	DC		Yes	0	\$600
AF01258	AXA EQUITABLE LIFE INSURANCE COMPANY POLITICAL ACTION COMMITTEE (C00161901	Flora, Paul J.	Not Filed	\$59,665	\$352,291	NY		Yes	0	\$3,000

FEDERAL ELECTION COMMISSION 2005-2006 32
Reason to Believe Circulation Report
2004 12 DAY PRE-GENERAL

AF #	COMMITTEE NAME	COMMITTEE ID	RECEIPT DATE	TREASURER	DAYS LATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF01260	METRO-GOLDWYN-MAYER POLITICAL ACTION COMMITTEE	C00207589	11/22/2004	DEBORAH J ARVESEN	Not Filed	\$503	\$113,289	CA	Yes	0		\$500
AF01262	SPARTA INC EMPLOYEES' POLITICAL ACTION COMMITTEE	C00347401	11/22/2004	WILLIAM D GOODNER	Not Filed	\$3,487 (est)	\$102,263	AL	Yes	0		\$500
AF01263	SUGAR CANE GROWERS COOPERATIVE OF FLORIDA (PAC)	C00254656	11/15/2004	JOHN W GRAY	Not Filed	\$2,000	\$157,014	FL	Yes	0		\$500
AF01264	TEAM AMERICA POLITICAL ACTION COMMITTEE INC	C00396291	10/29/2004	Sharon Korchmak	Not Filed	\$13,999	\$456,295	VA	Yes	0		\$900



FEDERAL ELECTION COMMISSION

Washington, DC 20463

SENSITIVE

DATE & TIME OF TRANSMITTAL: Wednesday, January 19, 2005 11:00

BALLOT DEADLINE: Tuesday, January 25, 2005 4:00

COMMISSIONER: MASON, McDONALD, SMITH, THOMAS, TONER, WEINTRAUB

SUBJECT: Reason to Believe Recommendation – 12 Day Pre-General Report
for the Administrative Fines Program. Memorandum from the
Assistant Staff Director Reports Analysis Division dated
January 18, 2005.

- () I approve the recommendation(s)
- () I object to the recommendation(s)
- () I approve the recommendations except those following
to which I object (please insert AF#)

- () I approve the recommendations except those following
in which I abstain (please insert AF#)

- () I approve the recommendations except those following
in which I am recused (please insert AF#)

- () I am not voting on this tally.

A definite vote is required. All ballots must be signed and dated. Please return
ONLY THE BALLOT to the Commission Secretary. Please return ballot no later
than date and time shown above.

DATE: _____

SIGNATURE: _____

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION

26092591633

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation - 12)
Day Pre-General Report for the)
Administrative Fines Program:)
FRIENDS OF RICHARD HOFFMAN, and) AF# 1240
GREY C HARRIS as treasurer;)
PAUL VAN DAM FOR US SENATE, and) AF# 1241
SHANE NATHAN GIDDINGS as)
treasurer;)
RANDY CAMACHO FOR CONGRESS) AF# 1242
2004, and STEPHEN L BOYD as treasurer;)

BYRON FOR CONGRESS, and RAMONA) AF# 1244
BYRON as treasurer;)

LOTT FOR CONGRESS COMMITTEE,) AF# 1246
and JERRY DEAS as treasurer;)

HONEST ABE HIRSCHFELD FOR) AF# 1248
UNITED STATES SENATE, and)
GEORGE L ESPADA as treasurer;)
FRIENDS OF JEFF SEEMANN FOR) AF# 1249
CONGRESS, and Chaney, Michael as)
treasurer;)

CODY ROBERT JUDY US SENATE) AF# 1251
LOOKING GOOD CAMPAIGN 2004,)
THE, and CODY ROBERT JUDY as)
treasurer;)
SYNGENTA CORPORATION) AF# 1252
POLITICAL ACTION COMMITTEE
(SYNGENTA PAC), and Detwiler, Mark as
treasurer;

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THE NEW DEMOCRAT NETWORK -) AF# 1253
PAC (NDN PAC), and Rosenberg, Simon)
as treasurer;)
AIR TRANSPORT ASSOCIATION OF) AF# 1254
AMERICA POLITICAL ACTION)
COMMITTEE; THE, and PAUL)
ARCHAMBEAULT as treasurer;)
AMERICAN PILOTS' ASSOCIATION) AF# 1255
POLITICAL ACTION COMMITTEE, and)
CAPTAIN MICHAEL R WATSON as)
treasurer;)
AMERICANS FOR DEMOCRATIC) AF# 1256
ACTION INC POLITICAL ACTION)
COMMITTEE, and Dulk Jacobs, Valerie as)
treasurer;)
ARENT FOX PLLC PAC (AFPAC), and) AF# 1257
ENGLE, CRAIG as treasurer;)
AXA EQUITABLE LIFE INSURANCE) AF# 1258
COMPANY POLITICAL ACTION)
COMMITTEE (AXA EQUITABLE PAC),)
and Flora, Paul J. as treasurer;)

METRO-GOLDWYN-MAYER) AF# 1260
POLITICAL ACTION COMMITTEE, and)
DEBORAH J ARVESEN as treasurer;)

SPARTA INC EMPLOYEES' POLITICAL) AF# 1262
ACTION COMMITTEE, and WILLIAM D)
GOODNER as treasurer;)
SUGAR CANE GROWERS) AF# 1263
COOPERATIVE OF FLORIDA (PAC),)
and JOHN W GRAY as treasurer;)
TEAM AMERICA POLITICAL ACTION) AF# 1264
COMMITTEE INC, and Sharon Korchnak)
as treasurer;)

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CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby certify that on January 25, 2005 the Commission took the following actions on the Reason To Believe Recommendation - 12 Day Pre-General Report for the Administrative Fines Program as recommended in the Reports Analysis Division's Memorandum dated January 18, 2005, on the following committees:

AF#1240 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF RICHARD HOFFMAN, and GREY C HARRIS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1241 Decided by a vote of 6-0 to: (1) find reason to believe that PAUL VAN DAM FOR US SENATE, and SHANE NATHAN GIDDINGS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1242 Decided by a vote of 6-0 to: (1) find reason to believe that RANDY CAMACHO FOR CONGRESS 2004, and STEPHEN L BOYD as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

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AF#1244 Decided by a vote of 6-0 to: (1) find reason to believe that BYRON FOR CONGRESS, and RAMONA BYRON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1246 Decided by a vote of 6-0 to: (1) find reason to believe that LOTT FOR CONGRESS COMMITTEE, and JERRY DEAS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1248 Decided by a vote of 6-0 to: (1) find reason to believe that HONEST ABE HIRSCHFELD FOR UNITED STATES SENATE, and GEORGE L ESPADA as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1249 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF JEFF SEEMANN FOR CONGRESS, and Chaney, Michael as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

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AF#1251 Decided by a vote of 6-0 to: (1) find reason to believe that CODY ROBERT JUDY US SENATE LOOKING GOOD CAMPAIGN 2004, THE, and CODY ROBERT JUDY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1252 Decided by a vote of 6-0 to: (1) find reason to believe that SYNGENTA CORPORATION POLITICAL ACTION COMMITTEE (SYNGENTA PAC), and Detwiler, Mark as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1253 Decided by a vote of 6-0 to: (1) find reason to believe that THE NEW DEMOCRAT NETWORK - PAC (NDN PAC), and Rosenberg, Simon as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1254 Decided by a vote of 6-0 to: (1) find reason to believe that AIR TRANSPORT ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE; THE, and PAUL ARCHAMBEAULT as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1255 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN PILOTS' ASSOCIATION POLITICAL ACTION COMMITTEE, and CAPTAIN MICHAEL R WATSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

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AF#1256 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICANS FOR DEMOCRATIC ACTION INC POLITICAL ACTION COMMITTEE, and Dulk Jacobs, Valerie as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1257 Decided by a vote of 6-0 to: (1) find reason to believe that ARENT FOX PLLC PAC (AFPAC), and ENGLE, CRAIG as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1258 Decided by a vote of 6-0 to: (1) find reason to believe that AXA EQUITABLE LIFE INSURANCE COMPANY POLITICAL ACTION COMMITTEE (AXA EQUITABLE PAC), and Flora, Paul J. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1260 Decided by a vote of 6-0 to: (1) find reason to believe that METRO-GOLDWYN-MAYER POLITICAL ACTION COMMITTEE, and DEBORAH J ARVESEN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

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AF#1262 Decided by a vote of 6-0 to: (1) find reason to believe that SPARTA INC EMPLOYEES' POLITICAL ACTION COMMITTEE, and WILLIAM D GOODNER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1263 Decided by a vote of 6-0 to: (1) find reason to believe that SUGAR CANE GROWERS COOPERATIVE OF FLORIDA (PAC), and JOHN W GRAY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1264 Decided by a vote of 6-0 to: (1) find reason to believe that TEAM AMERICA POLITICAL ACTION COMMITTEE INC, and Sharon Korchnak as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

Attest:

January 25, 2005
Date

Mary W. Dove
Mary W. Dove
Secretary of the Commission

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**WESTERN
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CONFIRMATION OF CMGM

WESTERN UNION COMMERCIAL SERVICES
TO: CAPTAIN MICHAEL R WATSON
AMERICAN PILOTS' ASSOCIATION PAC
499 S CAPITOL ST SW STE 409
WASHINGTON DC 20003-4023

FEDERAL ELECTION COMMISSION
DAYNA BROWN
999 E ST NW # 709
WASHINGTON DC 20463

JANUARY 26, 2005

CAPTAIN MICHAEL R WATSON
AMERICAN PILOTS' ASSOCIATION PAC
499 SOUTH CAPITOL STREET SW #409
WASHINGTON DC 20003

C00041061
AF#: 1255

DEAR CAPTAIN MICHAEL R WATSON:

THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED ("THE ACT"), REQUIRES THAT YOUR COMMITTEE FILE A 12 DAY PRE-GENERAL REPORT OF RECEIPTS AND DISBURSEMENTS IN A CALENDAR YEAR DURING WHICH THERE IS A REGULARLY SCHEDULED ELECTION. THIS REPORT, COVERING THE PERIOD THROUGH OCTOBER 13TH, SHALL BE FILED NO LATER THAN OCTOBER 21ST. 2 U.S.C. 434(A). YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT. RECORDS AT THE FEDERAL ELECTION COMMISSION ("FEC") INDICATE THAT THIS REPORT WAS NOT FILED PRIOR TO FOUR (4) DAYS BEFORE THE GENERAL ELECTION HELD ON NOVEMBER 2ND. YOU SHOULD FILE THE REPORT IF YOU HAVE NOT ALREADY DONE SO.

THE ACT WAS FURTHER AMENDED IN 1999 TO PERMIT THE FEC TO IMPOSE CIVIL MONEY PENALTIES FOR VIOLATIONS OF THE REPORTING REQUIREMENTS OF 2 U.S.C. 434(A). 2 U.S.C. 437G(A)(4). ON 01/25/2005, THE FEC FOUND THAT THERE IS REASON TO BELIEVE ("RTB") THAT AMERICAN PILOTS' ASSOCIATION PAC AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) BY FAILING TO FILE TIMELY THIS REPORT ON OR BEFORE OCTOBER 21ST. BASED ON THE FEC'S SCHEDULES OF CIVIL MONEY PENALTIES AT 11 C.F.R. 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT THE RTB STAGE IS \$900. IT IS DUE BY 03/06/2005 AND IS BASED ON THESE FACTORS:

ELECTION SENSITIVITY OF REPORT: ELECTION SENSITIVE
LEVEL OF ACTIVITY: \$17000
NUMBER OF DAYS LATE: NOT FILED
NUMBER OF PREVIOUS CIVIL MONEY PENALTIES ASSESSED: 0

TO PAY THE CALCULATED CIVIL MONEY PENALTY
TO PAY THE CALCULATED CIVIL MONEY PENALTY, SEND THE ENCLOSED

20050126 09:16:41


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REMITTANCE AND YOUR PAYMENT TO THE FEC AT THE ADDRESS ON PAGE 3.
UPON RECEIPT OF YOUR PAYMENT, THE FEC WILL SEND YOU A FINAL
DETERMINATION LETTER.

TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY
TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY
PENALTY, YOU MUST SUBMIT A WRITTEN RESPONSE, INCLUDING THE AF# FOUND
ON PAGE ONE, TO THE FEC'S OFFICE OF ADMINISTRATIVE REVIEW, 999 E
STREET, NW, WASHINGTON, DC 20463. YOUR RESPONSE MUST BE RECEIVED
BY 03/06/2005. YOUR WRITTEN RESPONSE MUST INCLUDE THE REASON(S) WHY
YOU ARE CHALLENGING THE RTB FINDING AND/OR CALCULATED CIVIL MONEY
PENALTY. THE FEC WILL ONLY CONSIDER CHALLENGES THAT ARE BASED ON A
FACTUAL ERROR, MISCALCULATION OF THE CALCULATED CIVIL MONEY PENALTY
BY THE FEC, OR THE EXISTENCE OF EXTRAORDINARY CIRCUMSTANCES THAT
PERSISTED FOR MORE THAN 48 HOURS THAT WERE BEYOND YOUR CONTROL AND
PREVENTED YOU FROM FILING THE REPORT IN A TIMELY MANNER. YOUR
RESPONSE MUST INCLUDE THE FACTUAL BASIS SUPPORTING THE REASON(S) AND
SUPPORTING DOCUMENTATION. THE FEC STRONGLY ENCOURAGES THAT DOCUMENTS
BE SUBMITTED IN THE FORM OF AFFIDAVITS OR DECLARATIONS. EXAMPLES OF
CIRCUMSTANCES THAT WILL NOT BE CONSIDERED EXTRAORDINARY INCLUDE, BUT
ARE NOT LIMITED TO, NEGLIGENCE, PROBLEMS WITH VENDORS OR
CONTRACTORS, STAFF ILLNESS, COMPUTER FAILURES AND SIMILAR
CIRCUMSTANCES. 11 C.F.R. 111.35(b)(1)(iii) AND (4).

YOUR FAILURE TO RAISE AN ARGUMENT IN A TIMELY FASHION DURING THE
ADMINISTRATIVE PROCESS SHALL BE DEEMED A WAIVER OF YOUR RIGHT TO
PRESENT SUCH ARGUMENT IN A PETITION TO THE DISTRICT COURT UNDER 2
U.S.C. 437G. 11 C.F.R. 111.38.

IF YOU INTEND TO BE REPRESENTED BY COUNSEL, PLEASE ADVISE THE
OFFICE OF ADMINISTRATIVE REVIEW. YOU SHOULD PROVIDE, IN WRITING,
THE NAME, ADDRESS AND TELEPHONE NUMBER OF YOUR COUNSEL AND AUTHORIZE
COUNSEL TO RECEIVE NOTIFICATIONS AND COMMUNICATIONS RELATING TO THIS
CHALLENGE AND IMPOSITION OF THE CALCULATED CIVIL MONEY PENALTY.

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A
CHALLENGE

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A
WRITTEN RESPONSE, THE FEC WILL ASSUME THAT THE PRECEDING FACTUAL
ALLEGATIONS ARE TRUE AND MAKE A FINAL DETERMINATION THAT AMERICAN
PILOTS' ASSOCIATION PAC AND YOU, AS TREASURER, VIOLATED 2 U.S.C.
434(A) AND ASSESS A CIVIL MONEY PENALTY.

UNPAID CIVIL MONEY PENALTIES ASSESSED THROUGH THE ADMINISTRATIVE
FINE REGULATIONS WILL BE SUBJECT TO THE DEBT COLLECTION ACT OF
1992("DCA") AS AMENDED BY THE DEBT COLLECTION IMPROVEMENT ACT OF
1996, 31 U.S.C. 3701 ET SEQ. THE FEC MAY TAKE ANY AND ALL
APPROPRIATE ACTION AUTHORIZED AND REQUIRED BY THE DCA, AS AMENDED,
INCLUDING TRANSFER TO THE U.S. DEPARTMENT OF THE TREASURY FOR
COLLECTION. 11 C.F.R. 111.45.

THIS MATTER WAS GENERATED BASED ON INFORMATION ASCERTAINED BY
THE FEC IN THE NORMAL COURSE OF CARRYING OUT ITS SUPERVISORY
RESPONSIBILITIES. 2 U.S.C. 437G(A)(2). IT WILL REMAIN CONFIDENTIAL
IN ACCORDANCE WITH 2 U.S.C. 437G(A)(4)(B) AND 437G(A)(12)(A) UNTIL
IT IS PLACED ON THE PUBLIC RECORD IN ACCORDANCE WITH 11 C.F.R.
111.42, UNLESS YOU NOTIFY THE FEC IN WRITING THAT YOU WISH THE
MATTER TO BE MADE PUBLIC.

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ADDITIONAL INFORMATION ON THE FEC'S ADMINISTRATIVE FINE PROGRAM, INCLUDING THE FINAL REGULATIONS, IS LOCATED AT THE FEC'S WEBSITE AT WWW.FEC.GOV. IF YOU HAVE QUESTIONS REGARDING THE PAYMENT OF THE CALCULATED CIVIL MONEY PENALTY, PLEASE CONTACT DAYNA C. BROWN IN THE REPORTS ANALYSIS DIVISION AT OUR TOLL FREE NUMBER (800)424-9530 (AT THE PROMPT, PRESS 5) OR (202)694-1130. IF YOU HAVE QUESTIONS REGARDING THE SUBMISSION OF A CHALLENGE, PLEASE CONTACT THE OFFICE OF ADMINISTRATIVE REVIEW AT OUR TOLL FREE NUMBER (800)424-9530 (PRESS 0, THEN EXT. 1660) OR (202)694-1660.

SINCERELY,

SCOTT E. THOMAS
CHAIRMAN

* * * * *
ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R. 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT RT8 IS \$900 FOR THE 2004 12 DAY PRE-GENERAL REPORT.

PLEASE MAIL THIS REMITTANCE WITH A CHECK OR MONEY ORDER MADE PAYABLE TO THE FEDERAL ELECTION COMMISSION TO THE FOLLOWING ADDRESS:
FEDERAL ELECTION COMMISSION
P.O. BOX 952182
ST. LOUIS, MO 63195-2182

IF YOU CHOOSE TO SEND YOUR REMITTANCE AND PAYMENT BY COURIER OR OVERNIGHT DELIVERY, PLEASE USE THIS ADDRESS:
U.S. BANK - GOVERNMENT LOCKBOX
FEC #952182
1005 CONVENTION PLAZA
ST. LOUIS, MO 63101

THE REMITTANCE AND YOUR PAYMENT ARE DUE BY 03/06/2005. UPON RECEIPT OF YOUR REMITTANCE AND PAYMENT, THE FEC WILL SEND YOU A FINAL DETERMINATION LETTER.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: AMERICAN PILOTS' ASSOCIATION PAC

FEC ID#: C00041061

AF#: 1255

PAYMENT DUE DATE: 03/06/2005

PAYMENT AMOUNT DUE: \$900



FEC OFFICE OF
ADMIN REVIEW

2005 FEB -4 A 9: 26

AMERICAN PILOTS' ASSOCIATION

INCORPORATED

499 SOUTH CAPITOL STREET, S.W., SUITE 409

WASHINGTON, D.C. 20003

PHONE: 202-484-0700

FAX: 202-484-9320

CAPTAIN MICHAEL R. WATSON
PRESIDENT

CAPTAIN WHIT SMITH
SECRETARY-TREASURER

PAUL G. KIRCHNER
EXECUTIVE DIRECTOR-GENERAL COUNSEL

J. SCOTT RAINEY
DEPUTY DIRECTOR

LISA P. KATES
EXECUTIVE ASSISTANT

January 31, 2005

F.E.C.'s Office of Administrative Review
999 E Street, NW
Washington, DC 20463

Re: C00041061
AF#: 1255

Dear Sirs:

I am in receipt of your Western Union Mailgram dated January 26, 2005.

I am enclosing a copy of the FEC Form 3X, Report of Receipts and Disbursements for the period October 1 – October 13, 2004, Pre-Election Report. This report was filed in a timely manner on October 21, 2004. A copy of the Disclosure Filing Acknowledgement and FECFILE Validation Summary is also included.

Please review these documents and let me know if there is any further information that I can provide to clear this matter up. Please confirm when this has been resolved. You may contact Ms. Lisa Kates in this office concerning this matter.

Sincerely,

Captain Michael R. Watson,
APA PAC Treasurer

CAPTAIN RICHARD L. BEEBE
REGIONAL VICE PRESIDENT
NORTH ATLANTIC STATES

CAPTAIN GARY MADDOX
REGIONAL VICE PRESIDENT
SOUTH ATLANTIC STATES

CAPTAIN J. FRED WILKERSON, JR.
REGIONAL VICE PRESIDENT
GULF STATES

CAPTAIN STEVEN D. BROWN
REGIONAL VICE PRESIDENT
PACIFIC COAST STATES

CAPTAIN DONALD K. WILLECKE
REGIONAL VICE PRESIDENT
GREAT LAKES

26092591644

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF
COMMITTEE (in full)

USE FEC MAILING LABEL
OR TYPE OR PRINT

Example: If typing, type
over the lines

American Pilots' Association INC PAC

ADDRESS (number and street)

499 South Capitol St. SW #409

☐

Check if different
than previously
reported. (ACC)

Washington

DC

20003

2. FEC IDENTIFICATION NUMBER

CITY

STATE

ZIPCODE

C00041061

3. IS THIS
REPORT

☒

NEW
(N)

OR

☐

AMENDED
(A)

4. TYPE OF REPORT

(Choose One)

(a) Quarterly Reports:

☐

April 15
Quarterly Report(Q1)

☐

July 15
Quarterly Report(Q2)

☐

October 15
Quarterly Report(Q3)

☐

January 31
Quarterly Report(YE)

☐

July 31 Mid-Year
Report(Non-election
Year Only) (MY)

☐

Termination Report
(TER)

(b) Monthly
Report
Due On:

☐

Feb 20 (M2)

☐

May 20 (M5)

☐

Aug 20 (M8)

☐

Nov 20 (M11)
(Non-Election
Year Only)

☐

Mar 20 (M3)

☐

Jun 20 (M6)

☐

Sep 20 (M9)

☐

Dec 20 (M12)
(Non-Election
Year Only)

☐

Apr 20 (M4)

☐

Jul 20 (M7)

☐

Oct 20 (M10)

☐

Jan 31 (YE)

(c) 12-Day
PRE-Election
Report for the:

☐

Primary (12P)

☒

General (12G)

☐

Runoff (12R)

☐

Convention (12C)

☐

Special (12G)

Election on

11

02

2004

in the
State of

DC

(d) 30-Day
Post -Election
Report for the:

☐

General (30G)

☐

Runoff (30R)

☐

Special (30S)

Election on

in the
State of

5. Covering Period

10

01

2004

through

10

13

2004

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

Captain Michael R. Watson

Signature of Treasurer

Electronically Filed by Captain Michael R. Watson

Date

10

21

2004

NOTE : Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office
Use
Only

FEC FORM 3X
(Rev. 02/2003)

26092591645

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name
American Pilots' Association INC PAC

Report Covering the Period: From:

M	M
1	0

D	D
0	1

Y	Y	Y	Y
2	0	0	4

 To:

M	M
1	0

D	D
1	3

Y	Y	Y	Y
2	0	0	4

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1	<div>Y Y Y Y 2004</div>	<div>38630.72</div>
(b) Cash on Hand at Beginning of Reporting Period	<div>42525.72</div>	
(c) Total Receipts (from Line 19)	<div>13000.00</div>	<div>75145.00</div>
(d) Subtotal (add lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	<div>55525.72</div>	<div>113775.72</div>
7. Total Disbursements (from Line 31)	<div>4000.00</div>	<div>62250.00</div>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	<div>51525.72</div>	<div>51525.72</div>
9. Debts and Obligations owed TO the committee (Itemize all on Schedule C and/or Schedule D)	<div>0.00</div>	
10. Debts and Obligations owed BY the committee (Itemize all on Schedule C and/or Schedule D)	<div>0.00</div>	

☐ This Committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
999 E street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

26092591046

DETAILED SUMMARY PAGE OF RECEIPTS

FEC Form 3X (Rev. 02/2003)

Page 3

Write or Type Committee Name

American Pilots' Association INC PAC

Report Covering the Period:

From:

MM
10

DD
01

YYYY
2004

To:

MM
10

DD
13

YYYY
2004

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	1400.00	
(ii) Unitemized	6600.00	
(iii) TOTAL (add Lines 11(a)(i) and (ii))	8000.00	60145.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs)	5000.00	15000.00
(d) Total Contributions (add Lines 11(a)(iii), (b) and (c)) (Carry Totals to Line 33, page 5)	13000.00	75145.00
12. Transfers From Affiliated/Other Party Committees	0.00	0.00
13. All Loans Received	0.00	0.00
14. Loan Repayments Received	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5)	0.00	0.00
16. Refunds of Contributions Made to Federal candidates and Other Political Committees	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.)	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3)	0.00	0.00
(b) Levin Funds (from Schedule H5)	0.00	0.00
(c) Total Transfer (add 18(a) and 18(b))	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))	13000.00	75145.00
20. Total Federal Receipts (subtract Line 18(c) from Line 19)	13000.00	75145.00

26092591647

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

II. DISBURSEMENTS		COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:			
(a) Shared Federal/Non-Federal Activity (from Schedule H4)			
(i) Federal Share.....	0.00	0.00	
(ii) Non-Federal Share.....	0.00	0.00	
(b) Other Federal Operating Expenditures.....	0.00	0.00	
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii) and (b)).....	0.00	0.00	
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00	
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	4000.00	62250.00	
24. Independent Expenditure (use Schedule E).....	0.00	0.00	
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F).....	0.00	0.00	
26. Loan Repayments Made.....	0.00	0.00	
27. Loans Made.....	0.00	0.00	
28. Refunds of Contributions To:			
(a) Individuals/Persons Other Than Political Committees.....	0.00	0.00	
(b) Political Party Committees.....	0.00	0.00	
(c) Other Political Committees (such as PACs).....	0.00	0.00	
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)).....	0.00	0.00	
29. Other Disbursements.....	0.00	0.00	
30. Federal Election Activity (2 U.S.C 431(20))			
(a) Shared Federal Election Activity (from Schedule H6)			
(i) Federal Share.....	0.00	0.00	
(ii) "Levin" Share.....	0.00	0.00	
(b) Federal Election Activity Paid Entirely With Federal Funds.....	0.00	0.00	
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))....	0.00	0.00	
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))..	4000.00	62250.00	
32. Total Federal Disbursements (subtract Line 21(a)(ii) from Line 30(a)(ii) from Line 31).....	4000.00	62250.00	

26092591648

DETAILED SUMMARY PAGE

of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

III. Net Contributions/Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) from Line 11(d), page 3)	13000.00	75145.00
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	13000.00	75145.00
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b)).....	0.00	0.00
37. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	0.00	0.00

26092591649

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 6 / 9

☒ 11a ☐ 11b ☐ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

American Pilots' Association INC PAC

Full Name (Last, First, Middle Initial)

A. Capt. Ellsworth F. Hoburg

Mailing Address 1695 8th Ave.

City

San Francisco

State

CA

Zip Code

94122

FEC ID number of contributing
federal political committee.

C

Name of Employer
self

Occupation
maritime pilot

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

250.00

Date of Receipt

MM / DD / YYYY
10 / 08 / 2004

Transaction ID: SA11A1.5949

Amount of Each Receipt this Period

250.00

contribution

Full Name (Last, First, Middle Initial)

B. Capt. Terrence B. Jednaszewski

Mailing Address 1575 Owls Retreat

City

Tarpon Springs

State

FL

Zip Code

34688

FEC ID number of contributing
federal political committee.

C

Name of Employer
self

Occupation
maritime pilot

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

250.00

Date of Receipt

MM / DD / YYYY
10 / 01 / 2004

Transaction ID: SA11A1.5892

Amount of Each Receipt this Period

250.00

contribution

Full Name (Last, First, Middle Initial)

C. Capt. Matthew Kehoe

Mailing Address 1001 4th St.

City

Rehoboth Beach.

State

DE

Zip Code

19971

FEC ID number of contributing
federal political committee.

C

Name of Employer
self

Occupation
maritime pilot

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

400.00

Date of Receipt

MM / DD / YYYY
10 / 01 / 2004

Transaction ID: SA11A1.5938

Amount of Each Receipt this Period

400.00

contribution

SUBTOTAL of Receipts This Page (optional)

900.00

TOTAL This Period (last page this line number only)

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 7 / 9

(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17			

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

American Pilots' Association INC PAC

Full Name (Last, First, Middle Initial)

A. Captain Nancy L. Wagner

Mailing Address Post Office Box 618

City

Tahoe City

State

NV

Zip Code

96145

FEC ID number of contributing
federal political committee.

C

Name of Employer
Self

Occupation

Maritime Pilot

Receipt For:

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Primary

General

Other (specify) ▼

Aggregate Year-to-Date ▼

500.00

Date of Receipt

MM / DD / YYYY
10 / 01 / 2004

Transaction ID: SA11A1.5931

Amount of Each Receipt this Period

500.00

contribution

SUBTOTAL of Receipts This Page (optional)

500.00

TOTAL This Period (last page this line number only)

1400.00

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 8 / 9

(check only one)

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input checked="" type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17
------------------------------	------------------------------	---	-----------------------------	-----------------------------	-----------------------------	-----------------------------	-----------------------------	-----------------------------

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NAME OF COMMITTEE (In Full)

American Pilots' Association INC PAC

Full Name (Last, First, Middle Initial)

A. CRESCENT RIVER PORT PILOTS ASSOCIATION FEDERAL POLITICAL ACTION COMMITTEE/CRPPA INC PAC Receipt

Mailing Address 8712 HWY 23

City

State

Zip Code

BELLE CHASSE

LA

70037

FEC ID number of contributing
federal political committee.

C

C00221077

Name of Employer

Occupation

Receipt For:

☐

Primary

☐

General

Other (specify) ▼

Aggregate Year-to-Date ▼

5000.00

MM / DD / YYYY
10 / 01 / 2004

Transaction ID: SA11C.5897

Amount of Each Receipt this Period

5000.00

contribution

SUBTOTAL of Receipts This Page (optional)

5000.00

TOTAL This Period (last page this line number only)

5000.00

26092591652

SCHEDULE B (FEC Form 3X) **ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 9 / 9

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

Any Information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (In Full)

American Pilots' Association INC PAC

Full Name (Last, First, Middle Initial)

A. LISA MURKOWSKI - U S SENATE

Mailing Address PO BOX 100847

City
ANCHORAGE

State
AK

Zip Code
99510

Purpose of Disbursement
campaign contribution

Candidate Name
LISA MURKOWSKI - U S SENATE

Category/
Type

Office Sought:

☒ House
☒ Senate
☐ President

Disbursement For:

2004

☐ Primary ☒ General
☐ Other (specify) ▼

State: AK

District: 00

Transaction ID: SB23.5955

Date of Disbursement

MM / DD / YYYY
10 / 04 / 2004

Amount of Each Disbursement this Period

1000.00

B. LOBIONDO FOR CONGRESS

Mailing Address PO BOX 775

City
MARMORA

State
NJ

Zip Code
08223

Purpose of Disbursement
campaign contribution

Candidate Name
LOBIONDO FOR CONGRESS

Category/
Type

Office Sought:

☒ House
☐ Senate
☐ President

Disbursement For:

2004

☐ Primary ☒ General
☐ Other (specify) ▼

State: NJ

District: 02

Transaction ID: SB23.5961

Date of Disbursement

MM / DD / YYYY
10 / 06 / 2004

Amount of Each Disbursement this Period

2000.00

C. RODNEY ALEXANDER FOR CONGRESS INC.

Mailing Address PO Box 367
319 NANCY ROAD

City
Quitman

State
LA

Zip Code
71268

Purpose of Disbursement
campaign contribution

Candidate Name
RODNEY ALEXANDER FOR CONGRESS INC.

Category/
Type

Office Sought:

☒ House
☐ Senate
☐ President

Disbursement For:

2004

☐ Primary ☒ General
☐ Other (specify) ▼

State: LA

District: 05

Transaction ID: SB23.5957

Date of Disbursement

MM / DD / YYYY
10 / 04 / 2004

Amount of Each Disbursement this Period

1000.00

SUBTOTAL of Disbursements This Page (optional)

4000.00

TOTAL This Period (last page this line number only)

4000.00

Validation summary : 0 error(s), error level = 0

[MD5 checksum = 2d9d7f4b3c4b42306ffdd55de7a4]

FEC File Validator

Version 5.1.2.0

Developed for the Federal Election Commission
by NIC Technologies, Inc. 1996-2004

=== Identification Section ===

Committee ID: C00041061
Committee Name: American Pilots' Association INC PAC
Filing Type: F3XN
From/Through: 20041001 - 20041013

Software/Ver#: FECfile / Ver# 5.1.2.0(f10)

=== Results Section ===

>>>----> FEC data file PASSED validation! <----<<<

=== Summary Page Totals Section ===

Cover/Summary Page Totals for Form: F3X

Line No.	Column A	Column B
6A 2004		38,630.72
6B	42,525.72	
6C	13,000.00	75,145.00
6D	55,525.72	113,775.72
7	4,000.00	62,250.00
8	51,525.72	51,525.72
9	0.00	
10	0.00	
11A1	1,400.00	21,395.00
11A2	6,600.00	38,750.00
11A3	8,000.00	60,145.00
11B	0.00	0.00
11C	5,000.00	15,000.00
11D	13,000.00	75,145.00
12	0.00	0.00
13	0.00	0.00
14	0.00	0.00
15	0.00	0.00
16	0.00	0.00
17	0.00	0.00
18A	0.00	0.00
19	13,000.00	75,145.00
20	13,000.00	75,145.00
21A1	0.00	0.00
21A2	0.00	0.00
21B	0.00	0.00
21C	0.00	0.00
22	0.00	0.00
23	4,000.00	62,250.00
24	0.00	0.00
25	0.00	0.00
26	0.00	0.00
27	0.00	0.00
28A	0.00	0.00
28B	0.00	0.00
28C	0.00	0.00
28D	0.00	0.00
29	0.00	0.00
31	4,000.00	62,250.00
32	4,000.00	62,250.00
33	13,000.00	75,145.00
34	0.00	0.00
35	13,000.00	75,145.00
36	0.00	0.00
37	0.00	0.00
38	0.00	0.00
18B	0.00	0.00

20092591654

18C	0.00	0.00
30A1	0.00	0.00
30A2	0.00	0.00
30B	0.00	0.00
30C	0.00	0.00

Filing PASSED validation.

Checking receipt/expenditure limits for the 12G(10/01/2004 - 10/13/2004)

None found.

*

26092591655

DISCLOSE -- FEC Financial Disclosure Filing Acknowledgement

This is to acknowledge the receipt and acceptance of your electronic filing via the DISCLOSE protocol.

Your filing was received and accepted by our system at 11/04/2004 - 12:35:32, and was assigned the Filing ID of: FEC-150376

Please make a note of this, as it will be necessary to refer to this information in the future.

Thank you for using DISCLOSE.

Do not reply to this notice. It is sent from an unattended account that cannot receive email.

For your reference, the output of the validation check was as follows:

FEC File Validator Version 5.1.2.0

Developed for the Federal Election Commission
by NIC Technologies, Inc. 1996-2004

=== Identification Section ===

Committee ID: C00041061
Committee Name: American Pilots' Association INC PAC
Filing Type: F3XN
From/Through: 20041001 - 20041013

Software/Ver#: FECfile / Ver# 5.1.2.0(f10)

=== Results Section ===

>>>----> FEC data file PASSED validation! <----<<<

=== Summary Page Totals Section ===

Cover/Summary Page Totals for Form: F3X

Line No.	Column A	Column B
6A 2004		38,630.72
6B	42,525.72	
6C	13,000.00	75,145.00
6D	55,525.72	113,775.72
7	4,000.00	62,250.00
8	51,525.72	51,525.72

9	0.00	
10	0.00	
11A1	1,400.00	21,395.00
11A2	6,600.00	38,750.00
11A3	8,000.00	60,145.00
11B	0.00	0.00
11C	5,000.00	15,000.00
11D	13,000.00	75,145.00
12	0.00	0.00
13	0.00	0.00
14	0.00	0.00
15	0.00	0.00
16	0.00	0.00
17	0.00	0.00
18A	0.00	0.00
19	13,000.00	75,145.00
20	13,000.00	75,145.00
21A1	0.00	0.00
21A2	0.00	0.00
21B	0.00	0.00
21C	0.00	0.00
22	0.00	0.00
23	4,000.00	62,250.00
24	0.00	0.00
25	0.00	0.00
26	0.00	0.00
27	0.00	0.00
28A	0.00	0.00
28B	0.00	0.00
28C	0.00	0.00
28D	0.00	0.00
29	0.00	0.00
31	4,000.00	62,250.00
32	4,000.00	62,250.00
33	13,000.00	75,145.00
34	0.00	0.00
35	13,000.00	75,145.00
36	0.00	0.00
37	0.00	0.00
38	0.00	0.00
18B	0.00	0.00
18C	0.00	0.00
30A1	0.00	0.00
30A2	0.00	0.00
30B	0.00	0.00
30C	0.00	0.00

MD5 checksum:

2d9d7f4b3c4b42306ffddac8955de7a4

26092591657



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Via First Class Mail

February 7, 2005

Captain Michael R. Watson, as Treasurer
American Pilots' Association Political Action Committee
499 South Capitol Street, S.W., Suite 409
Washington, D.C. 20003

C00041061
AF# 1255

Dear Captain Watson:

On February 4, 2005, the Commission received your written response and supporting documentation ("challenge") which is being reviewed by the Office of Administrative Review. If you have any questions regarding the challenge, please contact this Office on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,

A handwritten signature in black ink that reads "Shawn Woodhead Werth". The signature is written in a cursive, flowing style.

Shawn Woodhead Werth
Reviewing Officer
Office of Administrative Review

26092591658

FEC OFFICE OF
ADMIN REVIEW

2005 FEB -4 P 2:45

Date: February 4, 2005

**REFERRAL TO OFFICE OF ADMINISTRATIVE REVIEW
CHALLENGE RECEIVED**

AF#: 1255

Committee Name: American Pilots' Association

Committee ID#: C00041061

Committee Address (if different than in RTB mailgram): N/A

Treasurer Name (if different than in RTB finding): N/A

Attachments:

**Copy of RTB Circulation Report Dated January 15, 2004 and RTB
Certification Dated January 25, 2005 – previously forwarded**

Copy of RTB Mailgram: See Declaration

**Certified Return Receipt (to be forwarded at later date if not yet received) -
Attachment #: N/A**

**Original Correspondence Received by RAD in Response to
RTB Mailgram (Y/N): N**

Attachment # : N/A

RAD Staff Declaration - Attachment # : 1

26092591659

DECLARATION OF PATRICIA CARMONA

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the research conducted with regard to the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to the American Pilots' Association PAC:
 - A) Prior Notice dated August 27, 2004 referencing the 2004 12 Day Pre-General Report;
 - B) Reason-to-Believe Mailgram dated January 26, 2005, referencing the 2004 12 Day Pre-General Report.
3. I hereby certify that I have searched the Commission's public records and find that the American Pilots' Association PAC electronically filed the 2004 12 Day Pre-General Report with the Commission on November 4, 2004.
4. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 4th day of February, 2005.



Patricia Carmona
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission

MONTHLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

August 27, 2004

REPORTING DATES FOR REMAINDER OF 2004

REPORT	REPORTING PERIOD ¹	REG./CERT. & OVERNIGHT MAILING DATE ²	FILING DATE
September	08/01/04 - 08/31/04	09/20/04	09/20/04
October	09/01/04 - 09/30/04	10/20/04	10/20/04
Pre-General	10/01/04 - 10/13/04	10/18/04	10/21/04
Post-General	10/14/04 - 11/22/04	12/02/04	12/02/04
Year-End	11/23/04 - 12/31/04	01/31/05	01/31/05

WHO MUST FILE

Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) filing on a monthly basis must file Monthly Reports in 2004. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

In an election year, the 12-Day Pre-General and 30-Day Post-General Election Reports are filed in lieu of the November and December Monthly Reports.

NOTE: A recent legislative change allows committees to file reports using overnight mail on the same terms as registered/certified mail. (See footnote 2).

¹These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

²Monthly reports sent by registered or certified mail must be postmarked by the mailing date. Committees should keep the mailing receipt with its postmark as proof of filing. If using overnight mail, the delivery service must receive the report by the mailing date. "Overnight mail" means an overnight service with an on-line tracking system. Monthly reports filed by any other means must be received by the Commission (or Secretary of the Senate for committees supporting only Senate candidates) by the filing date.

(over)

16916526092

ELECTRONIC FILING

Political committees that receive contributions or make expenditures in excess of \$50,000 in a calendar year, or that expect to do so, must submit their reports electronically. For additional information, review the enclosed handout entitled "Electronic Filing," call the FEC's Electronic Filing office at (800) 424-9530 or (202) 694-1642, and visit our web site at <http://www.fec.gov/electfil/electron.html>.

48- AND 24-HOUR REPORTS ON INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in connection with an election may also have to file 48-hour or 24-hour reports. The 48-hour reporting requirement will be triggered each time the committee makes independent expenditures aggregating \$10,000 or more between January 1st and the 20th day before the election. The 24-hour reporting requirement will be triggered each time the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election. See 11 CFR 104.4.

These reports are *not* required when a Party Committee or PAC makes a contribution directly to a candidate. Visit the FEC web site at http://www.fec.gov/pages/charts_ie_dates.htm for a state-by-state chart of 48- and 24-hour reporting periods.

COMPLIANCE

- Treasurers of political committees are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time.
- Under the Administrative Fine Program, political committees and their treasurers who fail to file their reports on time may be subject to civil money penalties up to \$16,000 (or more for repeat late- and non-filers). For additional information, see the enclosed handout entitled, "Administrative Fine Program," and visit our web site at <http://www.fec.gov/adminfines1.html>.
- In addition, political committees that file illegible reports or use non-FEC forms (except for FEC-approved, computer-generated forms) will be required to refile their reports.
- Electronic filers who instead file on paper or submit an electronic report (either by direct transmission or on 3.5" diskette) that does not pass the validation test will be considered non-filers and may be subject to enforcement actions (including administrative fines).

CHANGE IN FILING FREQUENCY

Committees able to change their reporting schedule (for example, from monthly to quarterly) who wish to do so must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequency no more than once per calendar year.

FEC OFFICE OF
ADMIN REVIEW

2005 FEB -4 P 2:45

Date: February 4, 2005

**REFERRAL TO OFFICE OF ADMINISTRATIVE REVIEW
CHALLENGE RECEIVED**

AF#: 1255

Committee Name: American Pilots' Association

Committee ID#: C00041061

Committee Address (if different than in RTB mailgram): N/A

Treasurer Name (if different than in RTB finding): N/A

Attachments:

**Copy of RTB Circulation Report Dated January 15, 2004 and RTB
Certification Dated January 25, 2005 – previously forwarded**

Copy of RTB Mailgram: See Declaration

Certified Return Receipt (to be forwarded at later date if not yet received) -

Attachment #: N/A

**Original Correspondence Received by RAD in Response to
RTB Mailgram (Y/N): N**

Attachment # : N/A

RAD Staff Declaration - Attachment # : 1

26092591653

26092591664

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none">■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.■ Print your name and address on the reverse so that we can return the card to you.■ Attach this card to the back of the mailpiece, or on the front if space permits.	<p>A. Signature <input checked="" type="checkbox"/> X <i>Lisa P. Kates</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>LISA KATES</i> C. Date of Delivery <i>1/28/05</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p> <p>1. Article Addressed to: <i>Captain Michael R Watson</i> <i>American PILOTS</i> <i>Association PAC</i> <i>499 S Capitol ST SW</i> <i>4009 Washington</i></p> <p>2. Article Number (Transfer from service label)</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
7001 0360 0003 8189 0419	
PS Form 3811, August 2001 Domestic Return Receipt 102595-01-M-2509	



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEDERAL ELECTION
COMMISSION
SECRETARIAT

2006 JUL -7 P 1:38

July 7, 2006

MEMORANDUM

TO: THE COMMISSION

THROUGH: ROBERT J. COSTA *RJC*
ACTING STAFF DIRECTOR

JOHN D. GIBSON *JG*
ACTING DEPUTY STAFF DIRECTOR

FROM: SHAWN WOODHEAD WERTH *SW*
REVIEWING OFFICER
OFFICE OF ADMINISTRATIVE REVIEW

SUBJECT: AF# 1255 – AMERICAN PILOTS' ASSOCIATION POLITICAL
ACTION COMMITTEE AND CAPTAIN MICHAEL R.
WATSON, AS TREASURER (C00041061)

SENSITIVE

The attached Reviewing Officer Recommendation is being circulated on an informational basis. A copy was also sent to respondents in accordance with 11 C.F.R. § 111.36(f). The respondents may file with the Commission Secretary a written response within 10 days of transmittal of the recommendation.

After the 10 day period, the Reviewing Officer Recommendation and the respondents' written response, if any, will be circulated to the Commission to make a final determination.

Attachment

26092591605



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 2006

**REVIEWING OFFICER RECOMMENDATION
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 1255 – American Pilots' Association Political Action Committee and Captain Michael R. Watson, as Treasurer (C00041061)

On January 25, 2005, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that the American Pilots' Association Political Action Committee and Captain Michael R. Watson, as Treasurer ("the respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2004 12 Day Pre-General Report, an election sensitive report. The Commission also made a preliminary determination that the civil money penalty was \$900 based on the schedule of civil money penalties at 11 C.F.R. § 111.43. The respondents were notified by the Reports Analysis Division via mailgram on January 26, 2005 of the Commission's finding and the civil money penalty calculated at RTB.

Respondents' Response

On February 4, 2005, the Commission received the written response and supporting documentation ("challenge") from Captain Watson who states that "[t]his report was filed in a timely manner on October 21, 2004" and asks that the Commission "[p]lease review these documents." Included with the challenge are copies of the "Disclosure Filing Acknowledgement and FECFILE Validation Summary" as well as the "Report of Receipts and Disbursements for the period October 1 – October 13, 2004."

Supplemental Request and Response

Because the respondents filed the report electronically and Captain Watson believed the report was filed timely, OAR sent a request for supplemental information to the Information Technology Division ("ITD") on July 25, 2005. OAR asked ITD to provide any information about the issue raised in the challenge.

In his August 15, 2005 response, the Manager of ITD's Systems Analysis and Design Branch states that, "[o]n October 11, 2004, [t]he FEC received electronically from the committee the 2004 October Monthly Report" and "[t]he filing receipt was emailed to apasec@aol.com." On "October 22, 2004," he says that the "EFO notified the committee by email that they had failed to file their 2004 12 Day Pre-General Report. The FEC server mail log, which stores the email address provided by the filer, shows that the email was sent to apasec@aol.com." He also notes that "[t]he EFO shows no record of any electronic filing received from the committee on October 21, 2004" and "no conversations occurred ... regarding the filing of their 2004 12 Day Pre-General Report."

Analysis of Challenge

The 12 Day Pre-General Report was filed on November 4, 2004, 14 days late.

The Federal Election Campaign Act ("Act") requires that, in lieu of filing the report due in November of any year in which a regularly scheduled general election is held, the treasurer of

200902550002

a political committee shall file a 12 day pre-election report no later than the 12th day before the election. 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. § 104.5(c)(3)(ii). Reports electronically filed must be received and validated at or before 11:59 p.m., Eastern Standard/Daylight Time on the prescribed filing date to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

Prior Notice for the 12 Day Pre-General Report, which was sent to them on August 27, states that the filing date is October 21, 2004. It also informs them that treasurers are responsible for the timeliness of their reports.

The respondents state that they filed the report timely on October 21. They provide copies of the report, the FECFILE Validator, and the FEC Financial Disclosure Filing Acknowledgement as proof of this filing.

According to the respondents' documentation, they used the Commission's FECFile software, "Version 5.1.2.0," to file the report. On page 9-G of the FECFile User's Manual for Unauthorized Committees, it tells users that if their electronic filing is accepted, they "receive[] a fax or email within a few minutes notifying them that [it] was accepted," that they "will recognize [the notification] as the same printout that the validator provided," and that the "MD5 Checksum number should match exactly." That is what occurred in this case: they successfully uploaded the 12 Day Pre-General Report on November 4, they received the Filing Acknowledgement showing that the "filing was received and accepted by our system at 11/04/2004 - 12:35:32, and was assigned the Filing ID of: FEC-150376," and the MD5 checksum number on their validation summary, "2d9d7f4b3c4b42306ffddac8955de7a4," matches the MD5 checksum number on the Commission's Filing Acknowledgement.

The respondents' challenge presented no evidence that a factual error was made, that the civil money penalty was miscalculated at RTB or that extraordinary circumstances existed which prevented them from filing the 12 Day Pre-General Report in a timely manner. The Reviewing Officer, therefore, recommends that the Commission make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$900.

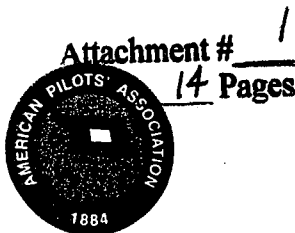
OAR Recommendations

- (1) Make a final determination in AF# 1255 that the American Pilots' Association Political Action Committee and Captain Michael R. Watson, as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$900; and
- (2) Send the appropriate letter.

Reviewing Analyst: Dayna C. Brown

Attachments

- Attachment 1 - Challenge Received from Respondents
- Attachment 2 -
- Attachment 3 - Declaration from the Reports Analysis Division
- Attachment 4 - Declaration from OAR



FEC OFFICE OF
ADMIN REVIEW

2005 FEB -4 A 9:26

AMERICAN PILOTS' ASSOCIATION

INCORPORATED

499 SOUTH CAPITOL STREET, S.W., SUITE 409

WASHINGTON, D.C. 20003

PHONE: 202-484-0700

FAX: 202-484-9320

CAPTAIN MICHAEL R. WATSON
PRESIDENT

CAPTAIN WHIT SMITH
SECRETARY-TREASURER

PAUL G. KIRCHNER
EXECUTIVE DIRECTOR-GENERAL COUNSEL

J. SCOTT RAINEY
DEPUTY DIRECTOR

LISA P. KATES
EXECUTIVE ASSISTANT

January 31, 2005

F.E.C.'s Office of Administrative Review
999 E Street, NW
Washington, DC 20463

Re: C00041061
AF#: 1255

Dear Sirs:

I am in receipt of your Western Union Mailgram dated January 26, 2005.

I am enclosing a copy of the FEC Form 3X, Report of Receipts and Disbursements for the period October 1 – October 13, 2004, Pre-Election Report. This report was filed in a timely manner on October 21, 2004. A copy of the Disclosure Filing Acknowledgement and FECFILE Validation Summary is also included.

Please review these documents and let me know if there is any further information that I can provide to clear this matter up. Please confirm when this has been resolved. You may contact Ms. Lisa Kates in this office concerning this matter.

Sincerely,

Captain Michael R. Watson,
APA PAC Treasurer

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS For Other Than An Authorized Committee

Office Use Only

1. NAME OF
COMMITTEE (in full)

USE FEC MAILING LABEL
OR TYPE OR PRINT

Example: If typing, type
over the lines

American Pilots' Association INC PAC

ADDRESS (number and street)

499 South Capitol St. SW #409

Check if different
than previously
reported. (ACC)

Washington

DC

20003

2. FEC IDENTIFICATION NUMBER

CITY

STATE

ZIP CODE

C00041061

3. IS THIS
REPORT

☒ NEW
(N)

OR

☐ AMENDED
(A)

4. TYPE OF REPORT
(Choose One)

(a) Quarterly Reports:

☐ April 15
Quarterly Report (Q1)
☐ July 15
Quarterly Report (Q2)
☐ October 15
Quarterly Report (Q3)
☐ January 31
Quarterly Report (YE)
☐ July 31 Mid-Year
Report (Non-election
Year Only) (MY)
☐ Termination Report
(TER)

(b) Monthly
Report
Due On:

☐ Feb 20 (M2)

☐ May 20 (M5)

☐ Aug 20 (M8)

☐ Nov 20 (M11)
(Non-Election
Year Only)

☐ Mar 20 (M3)

☐ Jun 20 (M6)

☐ Sep 20 (M9)

☐ Dec 20 (M12)
(Non-Election
Year Only)

☐ Apr 20 (M4)

☐ Jul 20 (M7)

☐ Oct 20 (M10)

☐ Jan 31 (YE)

(c) 12-Day
PRE-Election
Report for the:

☐ Primary (12P)

☒ General (12G)

☐ Runoff (12R)

☐ Convention (12C)

☐ Special (12G)

Election on

11

02

2004

in the
State of

DC

(d) 30-Day
Post-Election
Report for the:

☐ General (30G)

☐ Runoff (30R)

☐ Special (30S)

Election on

in the
State of

5. Covering Period

10

01

2004

through

10

13

2004

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 Captain Michael R. Watson

Signature of Treasurer Electronically Filed by Captain Michael R. Watson

Date

10

21

2004

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g.

Office
Use
Only

FEC FORM 3X
(Rev. 02/2003)

2609259169

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name
American Pilots' Association INC PAC

Report Covering the Period:

From:

M M
1 0

D D
0 1

Y Y Y Y
2 0 0 4

To:

M M
1 0

D D
1 3

Y Y Y Y
2 0 0 4

**COLUMN A
This Period**

**COLUMN B
Calendar Year-to-Date**

6. (a) Cash on Hand
January 1

Y Y Y Y
2 0 0 4

38630.72

(b) Cash on Hand at
Beginning of Reporting Period

42525.72

(c) Total Receipts (from Line 19)

13000.00

75145.00

(d) Subtotal (add lines 6(b) and
6(c) for Column A and Lines
6(a) and 6(c) for Column B)

55525.72

113775.72

7. Total Disbursements (from Line 31)

4000.00

62250.00

8. Cash on Hand at Close of
Reporting Period
(subtract Line 7 from Line 6(d))

51525.72

51525.72

9. Debts and Obligations owed TO
the committee (Itemize all on
Schedule C and/or Schedule D)

0.00

10. Debts and Obligations owed BY
the committee (Itemize all on
Schedule C and/or Schedule D)

0.00

☐ This Committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
999 E street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

20092591670

DETAILED SUMMARY PAGE OF RECEIPTS

FEC Form 3X (Rev. 02/2003)

Page 3

Write or Type Committee Name
American Pilots' Association INC PAC

Report Covering the Period: From:

MM	DD	YY
10	01	2004

 To:

MM	DD	YY
10	13	2004

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees	1400.00	
(i) Itemized (use Schedule A)	6600.00	
(ii) Unitemized	8000.00	60145.00
(iii) TOTAL (add Lines 11(a)(i) and (ii)	0.00	0.00
(b) Political Party Committees	5000.00	15000.00
(c) Other Political Committees (such as PACs)		
(d) Total Contributions (add Lines 11(a)(iii), (b) and (c)) (Carry Totals to Line 33, page 5)	13000.00	75145.00
12. Transfers From Affiliated/Other Party Committees	0.00	0.00
13. All Loans Received	0.00	0.00
14. Loan Repayments Received	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5)	0.00	0.00
16. Refunds of Contributions Made to Federal candidates and Other Political Committees	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.)	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3)	0.00	0.00
(b) Levin Funds (from Schedule H5)	0.00	0.00
(c) Total Transfer (add 18(a) and 18(b)).	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))	13000.00	75145.00
20. Total Federal Receipts (subtract Line 18(c) from Line 19)	13000.00	75145.00

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DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

II. DISBURSEMENTS	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Shared Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share.....	0.00	0.00
(ii) Non-Federal Share.....	0.00	0.00
(b) Other Federal Operating Expenditures.....	0.00	0.00
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii) and (b)).....	0.00	0.00
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	4000.00	62250.00
24. Independent Expenditure (use Schedule E).....	0.00	0.00
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F).....	0.00	0.00
26. Loan Repayments Made.....	0.00	0.00
27. Loans Made.....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees	0.00	0.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs)	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c))	0.00	0.00
29. Other Disbursements.....	0.00	0.00
30. Federal Election Activity (2 U.S.C 431(20))		
(a) Shared Federal Election Activity (from Schedule H6)		
(i) Federal Share	0.00	0.00
(ii) "Levin" Share	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))....	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))..	4000.00	62250.00
32. Total Federal Disbursements (subtract Line 21(a)(ii) from Line 30(a)(ii) from Line 31).....	4000.00	62250.00

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DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

III. Net Contributions/Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) from Line 11(d), page 3)	13000.00	75145.00
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	13000.00	75145.00
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b)).....	0.00	0.00
37. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	0.00	0.00

26092591073

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS

Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER:		PAGE 6 / 9	
(check only one)			
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
		<input type="checkbox"/> 17	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full) American Pilots' Association INC PAC

Full Name (Last, First, Middle Initial) A. Capt. Ellsworth F. Hoburg		Date of Receipt 10 / 08 / 2004
Mailing Address 1695 8th Ave.		Transaction ID: SA11A1.5949
City San Francisco	State CA	Zip Code 94122
FEC ID number of contributing federal political committee. C	Amount of Each Receipt this Period 250.00	
Name of Employer self	Occupation maritime pilot	contribution
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 250.00	

Full Name (Last, First, Middle Initial) B. Capt. Terrence B. Jednaszewski		Date of Receipt 10 / 01 / 2004
Mailing Address 1575 Owls Retreat		Transaction ID: SA11A1.5892
City Tarpon Springs	State FL	Zip Code 34688
FEC ID number of contributing federal political committee. C	Amount of Each Receipt this Period 250.00	
Name of Employer self	Occupation maritime pilot	contribution
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 250.00	

Full Name (Last, First, Middle Initial) C. Capt. Matthew Kehoe		Date of Receipt 10 / 01 / 2004
Mailing Address 1001 4th St.		Transaction ID: SA11A1.5938
City Rehoboth Beach,	State DE	Zip Code 19971
FEC ID number of contributing federal political committee. C	Amount of Each Receipt this Period 400.00	
Name of Employer self	Occupation maritime pilot	contribution
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 400.00	

SUBTOTAL of Receipts This Page (optional)	900.00
TOTAL This Period (last page this line number only)	

26092591674

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER:		PAGE 7 / 9	
(check only one)			
<input checked="" type="checkbox"/>	11a	<input type="checkbox"/>	11b
<input type="checkbox"/>	13	<input type="checkbox"/>	14
<input type="checkbox"/>	15	<input type="checkbox"/>	16
<input type="checkbox"/>	17	<input type="checkbox"/>	18

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full) American Pilots' Association INC PAC			
Full Name (Last, First, Middle Initial) A. Captain Nancy L. Wagner		Date of Receipt M M / D D / Y Y Y Y 10 / 01 / 2004	
Mailing Address Post Office Box 618		Transaction ID: SA11A1.5931	
City Tahoe City	State NV	Zip Code 96145	Amount of Each Receipt this Period 500.00
FEC ID number of contributing federal political committee. C		contribution	
Name of Employer Self	Occupation Maritime Pilot	Aggregate Year-to-Date ▼ 500.00	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼			

SUBTOTAL of Receipts This Page (optional) ►
TOTAL This Period (last page this line number only) ►

500.00
1400.00

26092591675

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 8 / 9

(check only one)

☐ 11a ☐ 11b ☒ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

American Pilots' Association INC PAC

Full Name (Last, First, Middle Initial)

A. CRESCENT RIVER PORT PILOTS ASSOCIATION FEDERAL POLITICAL ACTION COMMITTEE/CRPPA **State Receipt**

Mailing Address 8712 HWY 23

M / M / D / D / Y / Y / Y / Y
10 / 01 / 2004

Transaction ID: SA11C.5897

City State Zip Code
BELLE CHASSE LA 70037

Amount of Each Receipt this Period

FEC ID number of contributing
federal political committee.

C C00221077

5000.00

contribution

Name of Employer

Occupation

Receipt For:

Aggregate Year-to-Date ▼

☐ Primary ☐ General
☐ Other (specify) ▼

5000.00

SUBTOTAL of Receipts This Page (optional)

5000.00

TOTAL This Period (last page this line number only)

5000.00

26092591676

SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 9/9

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (In Full)

American Pilots' Association INC PAC

Full Name (Last, First, Middle Initial)

A. LISA MURKOWSKI - U S SENATE

Mailing Address PO BOX 100847

City ANCHORAGE State AK Zip Code 99510

Purpose of Disbursement
campaign contribution

Candidate Name
LISA MURKOWSKI - U S SENATE

Office Sought: ☒ House ☐ Senate ☐ President
Disbursement For: 2004
☐ Primary ☒ General
☐ Other (specify) ▼

State: AK District: 00

Transaction ID: SB23.5955

Date of Disbursement

10 / 04 / 2004

Amount of Each Disbursement this Period

1000.00

B. LOBIONDO FOR CONGRESS

Mailing Address PO BOX 775

City MARMORA State NJ Zip Code 08223

Purpose of Disbursement
campaign contribution

Candidate Name
LOBIONDO FOR CONGRESS

Office Sought: ☒ House ☐ Senate ☐ President
Disbursement For: 2004
☐ Primary ☒ General
☐ Other (specify) ▼

State: NJ District: 02

Transaction ID: SB23.5961

Date of Disbursement

10 / 06 / 2004

Amount of Each Disbursement this Period

2000.00

C. RODNEY ALEXANDER FOR CONGRESS INC.

Mailing Address PO Box 367
319 NANCY ROAD

City Quitman State LA Zip Code 71268

Purpose of Disbursement
campaign contribution

Candidate Name
RODNEY ALEXANDER FOR CONGRESS INC.

Office Sought: ☒ House ☐ Senate ☐ President
Disbursement For: 2004
☐ Primary ☒ General
☐ Other (specify) ▼

State: LA District: 05

Transaction ID: SB23.5957

Date of Disbursement

10 / 04 / 2004

Amount of Each Disbursement this Period

1000.00

SUBTOTAL of Disbursements This Page (optional) ▶

4000.00

TOTAL This Period (last page this line number only) ▶

4000.00

Validation summary : 0 error(s), error level = 0
[MD5 checksum = 2d9d7f4b3c4b42306ffddab55de7a4]

FEC File Validator Version 5.1.2.0
Developed for the Federal Election Commission
by NIC Technologies, Inc. 1996-2004

=== Identification Section ===

Committee ID: C00041061
Committee Name: American Pilots' Association INC PAC
Filing Type: F3XN
From/Through: 20041001 - 20041013

Software/Ver#: FECfile / Ver# 5.1.2.0(f10)

=== Results Section ===

>>>----> FEC data file PASSED validation! <----<<<

=== Summary Page Totals Section ===

Cover/Summary Page Totals for Form: F3X

Line No.	Column A	Column B
=====	=====	=====
6A 2004		38,630.72
6B	42,525.72	
6C	13,000.00	75,145.00
6D	55,525.72	113,775.72
7	4,000.00	62,250.00
8	51,525.72	51,525.72
9	0.00	
10	0.00	
11A1	1,400.00	21,395.00
11A2	6,600.00	38,750.00
11A3	8,000.00	60,145.00
11B	0.00	0.00
11C	5,000.00	15,000.00
11D	13,000.00	75,145.00
12	0.00	0.00
13	0.00	0.00
14	0.00	0.00
15	0.00	0.00
16	0.00	0.00
17	0.00	0.00
18A	0.00	0.00
19	13,000.00	75,145.00
20	13,000.00	75,145.00
21A1	0.00	0.00
21A2	0.00	0.00
21B	0.00	0.00
21C	0.00	0.00
22	0.00	0.00
23	4,000.00	62,250.00
24	0.00	0.00
25	0.00	0.00
26	0.00	0.00
27	0.00	0.00
28A	0.00	0.00
28B	0.00	0.00
28C	0.00	0.00
28D	0.00	0.00
29	0.00	0.00
31	4,000.00	62,250.00
32	4,000.00	62,250.00
33	13,000.00	75,145.00
34	0.00	0.00
35	13,000.00	75,145.00
36	0.00	0.00
37	0.00	0.00
38	0.00	0.00
18B	0.00	0.00

18C	0.00	0.00
30A1	0.00	0.00
30A2	0.00	0.00
30B	0.00	0.00
30C	0.00	0.00

Filing PASSED validation.

Checking receipt/expenditure limits for the 12G(10/01/2004 - 10/13/2004)

None found.

*
26092591679

DISCLOSE -- FEC Financial Disclosure Filing Acknowledgement

This is to acknowledge the receipt and acceptance of your electronic filing via the DISCLOSE protocol.

Your filing was received and accepted by our system at 11/04/2004 - 12:35:32, and was assigned the Filing ID of: FEC-150376

Please make a note of this, as it will be necessary to refer to this information in the future.

Thank you for using DISCLOSE.

Do not reply to this notice. It is sent from an unattended account that cannot receive email.

For your reference, the output of the validation check was as follows:

FEC File Validator Version 5.1.2.0

Developed for the Federal Election Commission
by NIC Technologies, Inc. 1996-2004

==== Identification Section =====

Committee ID: C00041061
Committee Name: American Pilots' Association INC PAC
Filing Type: F3XN
From/Through: 20041001 - 20041013

Software/Ver#: FECfile / Ver# 5.1.2.0(f10)

==== Results Section =====

>>>----> FEC data file PASSED validation! <----<<<

==== Summary Page Totals Section =====

Cover/Summary Page Totals for Form: F3X

Line No.	Column A	Column B
6A 2004		38,630.72
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6D	55,525.72	113,775.72
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9	0.00	
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11A2	6,600.00	38,750.00
11A3	8,000.00	60,145.00
11B	0.00	0.00
11C	5,000.00	15,000.00
11D	13,000.00	75,145.00
12	0.00	0.00
13	0.00	0.00
14	0.00	0.00
15	0.00	0.00
16	0.00	0.00
17	0.00	0.00
18A	0.00	0.00
19	13,000.00	75,145.00
20	13,000.00	75,145.00
21A1	0.00	0.00
21A2	0.00	0.00
21B	0.00	0.00
21C	0.00	0.00
22	0.00	0.00
23	4,000.00	62,250.00
24	0.00	0.00
25	0.00	0.00
26	0.00	0.00
27	0.00	0.00
28A	0.00	0.00
28B	0.00	0.00
28C	0.00	0.00
28D	0.00	0.00
29	0.00	0.00
31	4,000.00	62,250.00
32	4,000.00	62,250.00
33	13,000.00	75,145.00
34	0.00	0.00
35	13,000.00	75,145.00
36	0.00	0.00
37	0.00	0.00
38	0.00	0.00
18B	0.00	0.00
18C	0.00	0.00
30A1	0.00	0.00
30A2	0.00	0.00
30B	0.00	0.00
30C	0.00	0.00

MD5 checksum:

2d9d7f4b3c4b42306ffddac8955de7a4

26092591681

DECLARATION OF PATRICIA CARMONA

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the research conducted with regard to the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to the American Pilots' Association PAC:
 - A) Prior Notice dated August 27, 2004 referencing the 2004 12 Day Pre-General Report;
 - B) Reason-to-Believe Mailgram dated January 26, 2005, referencing the 2004 12 Day Pre-General Report.
3. I hereby certify that I have searched the Commission's public records and find that the American Pilots' Association PAC electronically filed the 2004 12 Day Pre-General Report with the Commission on November 4, 2004.
4. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 4th day of February, 2005.



Patricia Carmona
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission

26092501582

MONTHLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

August 27, 2004

REPORTING DATES FOR REMAINDER OF 2004

REPORT	REPORTING PERIOD ¹	REG./CERT. & OVERNIGHT MAILING DATE ²	FILING DATE
September	08/01/04 - 08/31/04	09/20/04	09/20/04
October	09/01/04 - 09/30/04	10/20/04	10/20/04
Pre-General	10/01/04 - 10/13/04	10/18/04	10/21/04
Post-General	10/14/04 - 11/22/04	12/02/04	12/02/04
Year-End	11/23/04 - 12/31/04	01/31/05	01/31/05

WHO MUST FILE

Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) filing on a monthly basis must file Monthly Reports in 2004. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

In an election year, the 12-Day Pre-General and 30-Day Post-General Election Reports are filed in lieu of the November and December Monthly Reports.

NOTE: A recent legislative change allows committees to file reports using overnight mail on the same terms as registered/certified mail. (See footnote 2).

¹These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

²Monthly reports sent by registered or certified mail must be postmarked by the mailing date. Committees should keep the mailing receipt with its postmark as proof of filing. If using overnight mail, the delivery service must receive the report by the mailing date. "Overnight mail" means an overnight service with an on-line tracking system. Monthly reports filed by any other means must be received by the Commission (or Secretary of the Senate for committees supporting only Senate candidates by the filing date.

(over)

ELECTRONIC FILING

Political committees that receive contributions or make expenditures in excess of \$50,000 in a calendar year, or that expect to do so, must submit their reports electronically. For additional information, review the enclosed handout entitled "Electronic Filing," call the FEC's Electronic Filing office at (800) 424-9530 or (202) 694-1642, and visit our web site at <http://www.fec.gov/electfil/electron.html>.

48- AND 24-HOUR REPORTS ON INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in connection with an election may also have to file 48-hour or 24-hour reports. The 48-hour reporting requirement will be triggered each time the committee makes independent expenditures aggregating \$10,000 or more between January 1st and the 20th day before the election. The 24-hour reporting requirement will be triggered each time the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election. See 11 CFR 104.4.

These reports are *not* required when a Party Committee or PAC makes a contribution directly to a candidate. Visit the FEC web site at http://www.fec.gov/pages/charts_ie_dates.htm for a state-by-state chart of 48- and 24-hour reporting periods.

COMPLIANCE

- Treasurers of political committees are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time.
- Under the Administrative Fine Program, political committees and their treasurers who fail to file their reports on time may be subject to civil money penalties up to \$16,000 (or more for repeat late- and non-filers). For additional information, see the enclosed handout entitled, "Administrative Fine Program," and visit our web site at <http://www.fec.gov/adminfines1.html>.
- In addition, political committees that file illegible reports or use non-FEC forms (except for FEC-approved, computer-generated forms) will be required to refile their reports.
- Electronic filers who instead file on paper or submit an electronic report (either by direct transmission or on 3.5" diskette) that does not pass the validation test will be considered non-filers and may be subject to enforcement actions (including administrative fines).

CHANGE IN FILING FREQUENCY

Committees able to change their reporting schedule (for example, from monthly to quarterly) who wish to do so must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequency no more than once per calendar year.

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CONFIRMATION OF CMGM

WESTERN UNION COMMERCIAL SERVICES
TC: CAPTAIN MICHAEL R WATSON
AMERICAN PILOTS' ASSOCIATION PAC
499 S CAPITOL ST SW STE 409
WASHINGTON DC 20003-4023

FEDERAL ELECTION COMMISSION
DAYNA BROWN
999 E ST NW # 709
WASHINGTON DC 20463

JANUARY 26, 2005

CAPTAIN MICHAEL R WATSON
AMERICAN PILOTS' ASSOCIATION PAC
499 SOUTH CAPITOL STREET SW #409
WASHINGTON DC 20003

C00041061
AF#: 1255

DEAR CAPTAIN MICHAEL R WATSON:

THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED ("THE ACT"), REQUIRES THAT YOUR COMMITTEE FILE A 12 DAY PRE-GENERAL REPORT OF RECEIPTS AND DISBURSEMENTS IN A CALENDAR YEAR DURING WHICH THERE IS A REGULARLY SCHEDULED ELECTION. THIS REPORT, COVERING THE PERIOD THROUGH OCTOBER 13TH, SHALL BE FILED NO LATER THAN OCTOBER 21ST. 2 U.S.C. 434(A). YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT. RECORDS AT THE FEDERAL ELECTION COMMISSION ("FEC") INDICATE THAT THIS REPORT WAS NOT FILED PRIOR TO FOUR (4) DAYS BEFORE THE GENERAL ELECTION HELD ON NOVEMBER 2ND. YOU SHOULD FILE THE REPORT IF YOU HAVE NOT ALREADY DONE SO.

THE ACT WAS FURTHER AMENDED IN 1999 TO PERMIT THE FEC TO IMPOSE CIVIL MONEY PENALTIES FOR VIOLATIONS OF THE REPORTING REQUIREMENTS OF 2 U.S.C. 434(A). 2 U.S.C. 437G(A)(4). ON 01/25/2005, THE FEC FOUND THAT THERE IS REASON TO BELIEVE ("RTB") THAT AMERICAN PILOTS' ASSOCIATION PAC AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) BY FAILING TO FILE TIMELY THIS REPORT ON OR BEFORE OCTOBER 21ST. BASED ON THE FEC'S SCHEDULES OF CIVIL MONEY PENALTIES AT 11 C.F.R. 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT THE RTB STAGE IS \$900. IT IS DUE BY 03/06/2005 AND IS BASED ON THESE FACTORS:

ELECTION SENSITIVITY OF REPORT: ELECTION SENSITIVE
LEVEL OF ACTIVITY: \$17000
NUMBER OF DAYS LATE: NOT FILED
NUMBER OF PREVIOUS CIVIL MONEY PENALTIES ASSESSED: 0

TO PAY THE CALCULATED CIVIL MONEY PENALTY
TO PAY THE CALCULATED CIVIL MONEY PENALTY, SEND THE ENCLOSED

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REMITTANCE AND YOUR PAYMENT TO THE FEC AT THE ADDRESS ON PAGE 3.
UPON RECEIPT OF YOUR PAYMENT, THE FEC WILL SEND YOU A FINAL
DETERMINATION LETTER.

TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY
TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY
PENALTY, YOU MUST SUBMIT A WRITTEN RESPONSE, INCLUDING THE AF# FOUND
ON PAGE ONE, TO THE FEC'S OFFICE OF ADMINISTRATIVE REVIEW, 999 E
STREET, NW, WASHINGTON, DC 20463. YOUR RESPONSE MUST BE RECEIVED
BY 03/06/2005. YOUR WRITTEN RESPONSE MUST INCLUDE THE REASON(S) WHY
YOU ARE CHALLENGING THE RTB FINDING AND/OR CALCULATED CIVIL MONEY
PENALTY. THE FEC WILL ONLY CONSIDER CHALLENGES THAT ARE BASED ON A
FACTUAL ERROR, MISCALCULATION OF THE CALCULATED CIVIL MONEY PENALTY
BY THE FEC, OR THE EXISTENCE OF EXTRAORDINARY CIRCUMSTANCES THAT
PERSISTED FOR MORE THAN 48 HOURS THAT WERE BEYOND YOUR CONTROL AND
PREVENTED YOU FROM FILING THE REPORT IN A TIMELY MANNER. YOUR
RESPONSE MUST INCLUDE THE FACTUAL BASIS SUPPORTING THE REASON(S) AND
SUPPORTING DOCUMENTATION. THE FEC STRONGLY ENCOURAGES THAT DOCUMENTS
BE SUBMITTED IN THE FORM OF AFFIDAVITS OR DECLARATIONS. EXAMPLES OF
CIRCUMSTANCES THAT WILL NOT BE CONSIDERED EXTRAORDINARY INCLUDE, BUT
ARE NOT LIMITED TO, NEGLIGENCE, PROBLEMS WITH VENDORS OR
CONTRACTORS, STAFF ILLNESS, COMPUTER FAILURES AND SIMILAR
CIRCUMSTANCES. 11 C.F.R. 111.35(b)(1)(iii) AND (4).

YOUR FAILURE TO RAISE AN ARGUMENT IN A TIMELY FASHION DURING THE
ADMINISTRATIVE PROCESS SHALL BE DEEMED A WAIVER OF YOUR RIGHT TO
PRESENT SUCH ARGUMENT IN A PETITION TO THE DISTRICT COURT UNDER 2
U.S.C. 437G. 11 C.F.R. 111.38.

IF YOU INTEND TO BE REPRESENTED BY COUNSEL, PLEASE ADVISE THE
OFFICE OF ADMINISTRATIVE REVIEW. YOU SHOULD PROVIDE, IN WRITING,
THE NAME, ADDRESS AND TELEPHONE NUMBER OF YOUR COUNSEL AND AUTHORIZE
COUNSEL TO RECEIVE NOTIFICATIONS AND COMMUNICATIONS RELATING TO THIS
CHALLENGE AND IMPOSITION OF THE CALCULATED CIVIL MONEY PENALTY.

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A
CHALLENGE

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A
WRITTEN RESPONSE, THE FEC WILL ASSUME THAT THE PRECEDING FACTUAL
ALLEGATIONS ARE TRUE AND MAKE A FINAL DETERMINATION THAT AMERICAN
PILOTS' ASSOCIATION PAC AND YOU, AS TREASURER, VIOLATED 2 U.S.C.
434(A) AND ASSESS A CIVIL MONEY PENALTY.

UNPAID CIVIL MONEY PENALTIES ASSESSED THROUGH THE ADMINISTRATIVE
FINE REGULATIONS WILL BE SUBJECT TO THE DEBT COLLECTION ACT OF
1982("DCA")AS AMENDED BY THE DEBT COLLECTION IMPROVEMENT ACT OF
1996, 31 U.S.C. 3701 ET SEQ. THE FEC MAY TAKE ANY AND ALL
APPROPRIATE ACTION AUTHORIZED AND REQUIRED BY THE DCA, AS AMENDED,
INCLUDING TRANSFER TO THE U.S. DEPARTMENT OF THE TREASURY FOR
COLLECTION. 11 C.F.R. 111.45.

THIS MATTER WAS GENERATED BASED ON INFORMATION ASCERTAINED BY
THE FEC IN THE NORMAL COURSE OF CARRYING OUT ITS SUPERVISORY
RESPONSIBILITIES. 2 U.S.C. 437G(A)(2). IT WILL REMAIN CONFIDENTIAL
IN ACCORDANCE WITH 2 U.S.C. 437G(A)(4)(B) AND 437G(A)(12)(A) UNTIL
IT IS PLACED ON THE PUBLIC RECORD IN ACCORDANCE WITH 11 C.F.R.
111.42, UNLESS YOU NOTIFY THE FEC IN WRITING THAT YOU WISH THE
MATTER TO BE MADE PUBLIC.


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ADDITIONAL INFORMATION ON THE FEC'S ADMINISTRATIVE FINE PROGRAM, INCLUDING THE FINAL REGULATIONS, IS LOCATED AT THE FEC'S WEBSITE AT WWW.FEC.GOV. IF YOU HAVE QUESTIONS REGARDING THE PAYMENT OF THE CALCULATED CIVIL MONEY PENALTY, PLEASE CONTACT DAYNA C. BROWN IN THE REPORTS ANALYSIS DIVISION AT OUR TOLL FREE NUMBER (800)424-9530 (AT THE PROMPT, PRESS 5) OR (202)694-1130. IF YOU HAVE QUESTIONS REGARDING THE SUBMISSION OF A CHALLENGE, PLEASE CONTACT THE OFFICE OF ADMINISTRATIVE REVIEW AT OUR TOLL FREE NUMBER (800)424-9530 (PRESS 0, THEN EXT. 1660) OR (202)694-1660.

SINCERELY,

SCOTT E. THOMAS
CHAIRMAN

* * * * *

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R. 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT RTB IS \$900 FOR THE 2004 12 DAY PRE-GENERAL REPORT.

PLEASE MAIL THIS REMITTANCE WITH A CHECK OR MONEY ORDER MADE PAYABLE TO THE FEDERAL ELECTION COMMISSION TO THE FOLLOWING ADDRESS:
FEDERAL ELECTION COMMISSION
P.O. BOX 952182
ST. LOUIS, MO 63195-2182

IF YOU CHOOSE TO SEND YOUR REMITTANCE AND PAYMENT BY COURIER OR OVERNIGHT DELIVERY, PLEASE USE THIS ADDRESS:
U.S. BANK - GOVERNMENT LOCKBOX
FEC #952182
1005 CONVENTION PLAZA
ST. LOUIS, MO 63101

THE REMITTANCE AND YOUR PAYMENT ARE DUE BY 03/06/2005. UPON RECEIPT OF YOUR REMITTANCE AND PAYMENT, THE FEC WILL SEND YOU A FINAL DETERMINATION LETTER.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: AMERICAN PILOTS' ASSOCIATION PAC

FEC ID#: C00041061

AF#: 1255

PAYMENT DUE DATE: 03/06/2005

PAYMENT AMOUNT DUE: \$900

26002591087

DECLARATION OF DAYNA C. BROWN

1. I am the Reviewing Analyst in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Analyst, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
2. The 2004 12 Day Pre-General Report, covering the period from October 1 through October 13, 2004, is due October 21. If electronically filed, it must be received and validated by the Commission at or before 11:59 p.m., Eastern Standard/Daylight Time on October 21 to be timely filed.
3. It is the practice of the Commission's Electronic Filing Office to send an electronic notice acknowledging the receipt and acceptance of electronic filings and to maintain the FECFile Electronic Filing Software User's Manual for unauthorized committees on the website at http://www.fec.gov/electfil/unauthorized_manual/manual.shtml (formerly located at <http://www.fec.gov/electfil/electron>) for the use of committees and treasurers who are electronic filers.
4. I hereby certify that I have searched the Commission's public records and that the document identified herein is the true and accurate copy of Page 1 of the Summary Page for the 2004 12 Day Pre-General Report filed electronically by the American Pilots' Association Political Action Committee and Captain Michael R. Watson, as Treasurer. According to the Commission's records, the report covers the period from October 1 through October 13, 2004 and was received on November 4, 2004.
5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington on the 7th of July, 2006.



Dayna C. Brown
Reviewing Analyst
Office of Administrative Review
Federal Election Commission

200902501588

**FEC
FORM 3X**
**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

American Pilots' Association INC PAC

ADDRESS (number and street)

498 South Capitol St. SW #408

Check if different
than previously
reported. (ACC)

Washington

DC

20003

2. FEC IDENTIFICATION NUMBER CITY STATE ZIP CODE

C00041061

3. IS THIS REPORT X NEW OR AMENDED (A)

4. TYPE OF REPORT
(Choose One)

(a) Quarterly Reports:

April 15
Quarterly Report (Q1)
July 15
Quarterly Report (Q2)
October 15
Quarterly Report (Q3)
January 31
Quarterly Report (YE)

July 31 Mid-Year
Report (Non-election
Year Only) (MY)

Termination Report
(TER)

(b) Monthly
Report
Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

Nov 20 (M11)
(Non-Election
Year Only)

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

Dec 20 (M12)
(Non-Election
Year Only)

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(c) 12-Day
PRE-Election
Report for the:

Primary (12P)

X

General (12G)

Runoff (12R)

Convention (12C)

Special (12G)

Election on

11

02

2004

in the
State of

DC

(d) 30-Day
Post-Election
Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the
State of

5. Covering Period 10 01 2004 through 10 13 2004

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 Captain Michael R. Watson

Signature of Treasurer Electronically Filed by Captain Michael R. Watson Date 10 21 2004

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office
Use
Only
FEC FORM 3X
(Rev. 02/2003)

2009020910000



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

VIA OVERNIGHT DELIVERY

July 10, 2006

Captain Michael R. Watson, as Treasurer
American Pilots' Association Political Action Committee
499 South Capitol Street, SW, Suite 409
Washington, D.C. 20003

C00041061
AF# 1255

Dear Captain Watson:

On January 25, 2005, the Federal Election Commission ("Commission") found reason to believe ("RTB") that the American Pilots' Association Political Action Committee and you, as Treasurer ("respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2004 12 Day Pre-General Report, an election sensitive report. The Commission also made a preliminary determination that the civil money penalty was \$900 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination in this matter. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463. As a result of the anthrax threat in the Washington, DC area, US Postal Service mail delivery to federal agencies, including the Commission, has been interrupted. Until regular mail delivery resumes, you may also file your written response with the Commission Secretary via facsimile (202-208-3333) or by courier at the same address (if you use an overnight delivery service, please use zip code 20004 instead of zip code 20463). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1660 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Dayna C. Brown".

Dayna C. Brown
Reviewing Analyst
Office of Administrative Review

Attachment

**AMERICAN PILOTS' ASSOCIATION**

INCORPORATED

499 SOUTH CAPITOL STREET, S.W., SUITE 409

WASHINGTON, D.C. 20003

PHONE: 202-484-0700

FAX: 202-484-9320

www.americanpilots.org**CAPTAIN MICHAEL R. WATSON**
PRESIDENT**CAPTAIN WHIT SMITH**
SECRETARY-TREASURER**CAPTAIN GARY MADDOX**
SENIOR VICE PRESIDENT
SOUTH ATLANTIC STATES**PAUL G. KIRCHNER**
EXECUTIVE DIRECTOR-GENERAL COUNSEL**LISA P. KATES**
EXECUTIVE ASSISTANT

July 17, 2006

Commission Secretary
Federal Election Commission
999 E St., NW
Washington, DC 20463

Re: C000041061
AF #1255

Dear FEC Commission Secretary:

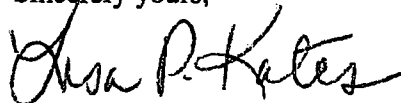
Pursuant to our telephone conversation on July 11, 2006, I am responding to the correspondence from the FEC, dated July 10, 2006 concerning the filing of the 2004 12-Day Pre-General Report.

I am the person, on behalf of Captain Michael R. Watson, APA PAC Treasurer, that actually files the PAC reports electronically. After receiving the above-mentioned correspondence, I delved further back into the APA records and determined the cause of the late filing. The American Pilots' Association holds a Biennial Convention on even numbered years. In 2004, our Association held it's convention in San Francisco, California, October 15 – 24. The entire staff (3, including Captain Watson, myself, and one other) of the American Pilots' Association office was in attendance at that meeting. I was the first to arrive back into DC on October 26th. During the period that the report was due, the office was completely closed down because we were all in attendance at the convention. I apparently didn't realize until November 4th that the 12-day Pre-General Report had yet to be filed and did it on that day.

Unfortunately, the situation will occur again this year as the American Pilots' Association's Biennial Convention will be held in Orlando, Florida, October 20 – 28. Is it possible to file this report before we leave on October 18th?

I apologize for the oversight and will avoid this situation in the future. Any consideration you could give to the American Pilots' Association regarding the \$900 penalty would be greatly appreciated.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Lisa P. Kates". The signature is fluid and cursive, with the first name "Lisa" being the most prominent.

Lisa P. Kates, Executive Assistant

26092591692



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2006 AUG -1 P 4: 23

August 1, 2006

MEMORANDUM

SENSITIVE

TO: THE COMMISSION

THROUGH: PATRINA M. CLARK *pmc*
STAFF DIRECTOR

JOHN D. GIBSON *JDG*
ACTING DEPUTY STAFF DIRECTOR

FROM: SHAWN WOODHEAD WERTH *SWW*
REVIEWING OFFICER
OFFICE OF ADMINISTRATIVE REVIEW

SUBJECT: FINAL DETERMINATION RECOMMENDATION IN AF# 1255 -
AMERICAN PILOTS' ASSOCIATION POLITICAL ACTION
COMMITTEE AND CAPTAIN MICHAEL R. WATSON, AS
TREASURER (C00041061)

On January 25, 2005, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that the American Pilots' Association Political Action Committee and Michael R. Watson, as Treasurer ("the respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2004 12 Day Pre-General Report, an election sensitive report. The report was filed on November 4, 2004, 14 days late and is considered not filed for purposes of the civil money penalty calculation. As a result, on January 25, 2005, the Commission also made a preliminary determination that the civil money penalty was \$900 based on the schedule of penalties at 11 C.F.R. § 111.43.

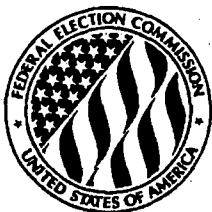
On February 4, 2005, the Commission received the respondents' written response and supporting documentation ("challenge"). After reviewing the challenge, the Reviewing Officer's recommendation dated July 7, 2006, was forwarded to the Commission. A copy was simultaneously forwarded to the respondents. The Reviewing Officer recommended that the Commission make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$900 because the respondents submitted no evidence that a factual error was made, that the civil money penalty was miscalculated at RTB or that extraordinary circumstances existed which prevented them from filing the 12 Day Pre-General Report in a timely manner.

Within 10 days of transmittal of the recommendation, the respondents may file a written response with the Commission Secretary which may not raise any arguments not raised in the respondents' challenge or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The written response was received via facsimile from Lisa P. Kates, Executive Assistant, on July 17, 2006, and is attached for your review.

OAR Recommendations

- (1) Make a final determination in AF# 1255 that the American Pilots' Association Political Action Committee and Captain Michael R. Watson, as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$900; and
- (2) Send the appropriate letter.

Attachment



FEDERAL ELECTION COMMISSION

Washington, DC 20463

SENSITIVE

DATE & TIME OF TRANSMITTAL: Wednesday, August 02, 2006 11:00

BALLOT DEADLINE: Monday, August 07, 2006 4:00

COMMISSIONER: LENHARD, MASON, TONER, von SPAKOVSKY, WALTHER, WEINTRAUB

SUBJECT: **Final Determination Recommendation in AF #1255 –
American Pilots Association PAC and Captain Michael R. Watson,
as Treasurer (C00041061) Memorandum from the Reviewing
Officer dated August 1, 2006.**

- () I approve the recommendation(s)
- () I object to the recommendation(s)
- () I am recused from voting
- () No vote by ballot

COMMENTS: _____

DATE: _____

SIGNATURE: _____

A definite vote is required. All ballots must be signed and dated. Please return **ONLY THE BALLOT** to the Commission Secretary. Please return ballot no later than date and time shown above.

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION

26092591695

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Final Determination Recommendation -) AF 1255
American Pilots' Association Political)
Action Committee and Captain Michael)
R. Watson, as treasurer. (C00041061))

CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby
certify that on August 07, 2006, the Commission decided by a vote of 6-0 to take
the following actions in AF 1255:

1. Make a final determination in AF #1255 that the American Pilots' Association Political Action Committee and Captain Michael R. Watson, as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$900.
2. Send the appropriate letter.

Commissioners Lenhard, Mason, Toner, von Spakovsky, Walther, and
Weintraub voted affirmatively for the decision.

Attest:

August 7, 2006
Date

Darlene Harris
for Mary W. Dove
Secretary of the Commission

26092591595



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 9, 2006

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Captain Michael R. Watson, as Treasurer
American Pilots' Association Political Action Committee
499 South Capitol Street SW, #409
Washington, DC 20003

ID# C00041061
AF# 1255

Dear Captain Watson:

On January 25, 2005, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that the American Pilots' Association Political Action Committee and you, as Treasurer, violated 2 U.S.C. § 434(a) for failing to file the 2004 12 Day Pre-General Report, an election sensitive report. By mailgram dated January 26, 2005, the Commission sent you notification of the RTB finding that included a civil money penalty calculated at RTB of \$900 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On February 4, 2005, the Office of Administrative Review received your written response and supporting documentation ("challenge") challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that the American Pilots' Association Political Action Committee and you, as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty in the amount of \$900 in accordance with 11 C.F.R. § 111.43. The basis for the Reviewing Officer's recommendation was included in the Final Determination Report, a copy of which was sent to you on July 10, 2006. The Commission Secretary received the written response from Lisa P. Kates on July 17, and a copy was forwarded to the Commission.

On August 7, 2006, the Commission adopted the Reviewing Officer's recommendation and made a final determination that the American Pilots' Association Political Action Committee and you, as Treasurer, violated 2 U.S.C. § 434(a) and assessed a civil money penalty of \$900. It is based on the same factors used to calculate the civil money penalty at RTB.

To Pay the Civil Money Penalty

To pay the civil money penalty, send the enclosed form and your payment to the address on page 3 within 30 days of receipt of this letter.

If You Do Not Pay the Civil Money Penalty

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 et seq. If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact the debtor and request payment. Treasury currently charges a fee of 28% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

If You Choose to Appeal the Final Determination and/or Civil Money Penalty

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the district court of the United States for the district in which the committee or you reside, or transact business, requesting that the final determination be modified or set aside. See 2 U.S.C. § 437g(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 2 U.S.C. § 437g. 11 C.F.R. § 111.38.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 C.F.R. § 111.42(b). Although the file must be placed on the public record within 30 days from the date of the Commission's notification, this could occur at any time following certification of the Commission's vote.

If you have any questions regarding the payment of the civil money penalty, please contact Dayna C. Brown on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,



Michael E. Toner
Chairman

ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the civil money penalty is \$900 for the 2004 12 Day Pre-General Report.

This penalty should be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
PO Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox
FEC # 979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

The form and payment are due within 30 days of receipt of this letter.

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: American Pilots' Association Political Action Committee

FEC ID#: C00041061

AF#: 1255

PAYMENT AMOUNT DUE: \$900

25092591699

FOR: American Pilots' Association Political Action Committee

FEC ID#: C00041061

AF#: 1255

PAYMENT AMOUNT DUE: \$900

3

QUALITY IS OUR PRIORITY FOR LOCKBOX 9058
SEQ# 001 \$ 000090000 BA# 1 08-23-06 20 4



26092591700

us bancorp.
The SunTrust Company

AMERICAN PILOTS' ASSOCIATION
INCORPORATED

SUNTRUST SUNTRUST BANK

24209

65-270680

8/21/2006

PAY TO THE ORDER OF Federal Election Commission

\$ **900.00

Nine Hundred and 00/100 DOLLARS

Federal Election Commission
US Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
SL Louis, MO 63101
MEMO
FEC IC#C00041061 - AF# 1255

Paul P. Kuchner

US BANK



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 1255

DATE SCANNED 9-18-05

SCANNER NO. 2

SCAN OPERATOR Jm N

26092591701