

THIS IS THE BEGINNING OF ADMINSTRATIVE FINE CASE
890

DATE FILMED 7-9-04 CAMERA NO. 3

CAMERAMAN JMP



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2003 APR 23 P 3: 58

April 23, 2003

SENSITIVE

MEMORANDUM

TO: THE COMMISSION

THROUGH: JAMES A. PEHRKON *JP*
STAFF DIRECTOR

ROBERT J. COSTA *AK*
DEPUTY STAFF DIRECTOR

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

SUBJECT: REASON TO BELIEVE RECOMMENDATION -
12 DAY PRE-GENERAL AND 30 DAY POST-GENERAL
REPORTS FOR THE ADMINISTRATIVE FINES
PROGRAM

Attached are two lists of political committees and their treasurers who failed to file or timely file the 2002 12 Day Pre-General and/or the 2002 30 Day Post-General Reports in accordance with 2 U.S.C. 434(a). The 12 Day Pre-General list is comprised of unauthorized committees filing quarterly that made general election contributions or expenditures from October 1, 2002 through October 16, 2002. The 30 Day Post-General list is comprised of authorized committees whose candidates sought election in the November 5th General Election, as well as unauthorized committees filing either quarterly or monthly.

On September 30, 2002, Prior Notice was sent to the political committees and their treasurers, informing them that the 12 Day Pre-General Report was due on October 24, 2002 and should cover the period from October 1, 2002 through October 16, 2002. The same Prior Notice informed the committees that the 30 Day Post-General Report was due on December 5, 2002 and should cover the period

from October 17, 2002 to November 25, 2002 or from October 1, 2002 through November 25, 2002, if the 12 Day Pre-General Report was not required. On November 8, 2002, a reminder notice was sent to the committees.

The committees appearing on the 12 Day Pre-General Report list either filed the report more than five (5) days after the due date or failed to file the report prior to four (4) days before the General Election (considered a non-filed report). The committees appearing on the 30 Day Post-General Report list either failed to file the report, filed the report more than five (5) days after the due date or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with 11 C.F.R. 111.43, these committees should be assessed the civil money penalties included on the attached lists.

As noted above, this circulation includes unauthorized committees filing quarterly that failed to file or failed to timely file the 12 Day Pre-General Report. Unlike unauthorized committees that file on a monthly basis, a quarterly filer need only file this report if it made general election contributions or expenditures between the dates of October 1, 2002 and October 16, 2002. In order to accurately identify the committees for administrative fines purposes, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 12 Day Pre-General Report (12 Day Report) submitted by an unauthorized quarterly filer was reviewed to ensure that it disclosed general election contributions or expenditures made during the coverage dates of the report. Any report meeting this definition that was filed late is included in the list. Any report not disclosing general election contributions or expenditures during this period is not included in the list, as it is not a required filing.
- Every 30 Day Post-General Report (30 Day Report) submitted by an unauthorized quarterly filer that covered the period from October 1, 2002 through November 25, 2002 (56 days), was reviewed for activity which would have required the filing of a 12 Day Report. If our research indicated that the 12 Day Report was required, we utilized a two-step method to arrive at the estimated level of activity on which to base the fine amount. First, we found the per diem level of activity by dividing the total amount of activity on the report by 56 days; second, we multiplied that quotient by 16 days. If the same committee also failed to file the 30 Day Report in a timely manner, we based the 30 Day Report fine on the amount of the remaining level of activity. We arrived at this amount by subtracting the estimated level of activity for the 12 Day Report from the total amount of activity on the 30 Day Report. In these cases, the committees will appear on both lists and will be assessed a fine for

both the 12 Day and 30 Day Reports based on the estimated levels of activity described above.

- We discovered several instances of overlapping reporting periods which resulted in duplicate activity. This was most prevalent with unauthorized monthly filers that submitted monthly reports in addition to the 30 Day Reports. For example, a committee files its November Monthly Report on November 20, 2002, covering October 1, 2002 through October 31, 2002. It then files its 30 Day Report on January 4, 2003, thirty days late. Its 30 Day Report covers part of its previously-filed November Report (October 17 through October 31) which was actually filed before the due date of the 30 Day Report. In such instances, we excluded the amount of previously-disclosed activity and based the civil money penalty on the estimated level of per diem activity that was not disclosed timely. We applied this same logic where a monthly filer failed to file the 30 Day Report altogether, but filed monthly reports covering the activity of the 30 Day reporting period.
- Rather than filing a 12 Day Report or a 30 Day Report, some committees filed a Year End Report covering October 1, 2002 through December 31, 2002. Here, we based the fine on the estimated level of per diem activity occurring within the dates of the 12 Day Report, if required, and/or the 30 Day Report.
- In instances where committees used improper coverage dates which extended into the next reporting period, we excluded this activity before calculating the civil money penalty. For example, if a committee filed an October Quarterly Report but improperly extended the coverage period into the month of October, RAD excluded the estimated amount of per diem activity when calculating the fine amount for the 30 Day Report, because that portion of activity was timely reported.

Recommendation

1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Reports 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 Reports.
2. Send the appropriate letters.

12 DAY PRE-GENERAL REPORT

2003-2004

DATE 04/23/2003
PAGE: 1

FEDERAL ELECTION COMMISSION 2003-2004
Reason to Believe Circulation Report
2002 12 DAY PRE-GENERAL

AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF00839	COUNTRYWIDE CREDIT INDUSTRIES INC PAC (COUNTRYWIDE PAC)										
		C00282731	Sidney Lenz			\$259,365			Yes	1	\$406
		10/31/2002			\$19,198						
AF00840	U.S. BANCORP POLITICAL PARTICIPATION PROGRAM										
		C0018036	Michele G Johnson			\$1,019,239	MN		Yes	0	\$650
		10/31/2002			\$30,437						
AF00841	ACAP ACA INTERNATIONAL POLITICAL ACTION COMMITTEE										
		C00034785	THOMAS CIESLUKOWSKI			\$191,704	MN		Yes	0	\$1,000
		01/02/2003	Not Filed		\$7,600						
AF00842	AMERICAN ASSOCIATION OF PHYSICIAN SPECIALIST INC POLITICAL ACTION										
		C00331017	STEPHEN A MONTES			\$126,348	GA		Yes	0	\$1,000
		11/26/2002	Not Filed		\$1,192 (est)						
AF00843	AMERICAN CENTURY CO INC POLITICAL ACTION CMTE (AKA AMERICAN CENTU										
		C00338012	WILLIAM B BATES			\$142,111	MO		Yes	0	\$1,000
		12/05/2002	Not Filed		\$8,429						
AF00844	AMERICAN NURSERY AND LANDSCAPE ASSOCIATION - POLITICAL ACTION COM										
		C00022988	Meredith, John Mr.			\$213,894	DC		Yes	0	\$1,000
		12/30/2002	Not Filed		\$14,650						
AF00845	AMERICAN SOCIETY OF CATARACT & REFRACTIVE SURGERY POLITICAL ACTIO										
		C00171504	BERNARD J DELLARIO			\$156,289	VA		Yes	1	\$1,250
		11/18/2002	Not Filed		\$7,250						
AF00846	AMERICAN SPEECH-LANGUAGE-HEARING ASSOCIATION POLITICAL ACTION COM										
		C00210666	FREDERICK T SPAHR			\$411,408	MD		Yes	0	\$1,000
		01/21/2003	Not Filed		\$19,936 (est)						
AF00847	BI-COUNTY POLITICAL ACTION COMMITTEE (FKA SUFFOLK PAC)										
		C00204388	IRA LAMEL			\$195,447	NY		Yes	1	\$1,250
		01/31/2003	Not Filed		\$14,551 (est)						
AF00848	CABLEVISION SYSTEMS CORPORATION POLITICAL ACTION COMMITTEE										
		C00197863	SHEILA MAHONY			\$352,186	NY		Yes	0	\$1,000
		01/02/2003	Not Filed		\$15,029 (est)						

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DATE 04/23/2003
PAGE: 2

FEDERAL ELECTION COMMISSION 2003-2004
Reason to Believe Circulation Report
2002 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
AF00849	COLONIAL BANCORP INC FED.	C00309526	11/01/2002	GLENDIA ALLRED	Not Filed	\$2,745	\$134,807	AL	COLONI	Yes	0	\$1,000
AF00850	CONGRESSIONAL BLACK CAUCUS POLITICAL ACTION COMMITTEE(CBC-PAC)	C00147512	12/06/2002	Arthur R. Collins	Not Filed	\$35,359	\$514,144	DC		Yes	1	\$2,500
AF00851	DAVITA PAC	C00340943	11/22/2002	Udicious, Steven	Not Filed	\$4,250	\$139,085	CA		Yes	0	\$1,000
AF00852	DEWEY BALLANTINE LLP POLITICAL ACTION COMMITTEE	C00330258	12/09/2002	Dowley, Joseph Mr.	Not Filed	\$2,002	\$120,017	DC		Yes	0	\$1,000
AF00853	DORSEY NATIONAL FUND	C00018945	11/22/2002	SCOTT COTIE	Not Filed	\$3,000	\$169,153	MN		Yes	1	\$1,250
AF00854	FLORIDA SUGAR CANE LEAGUE PAC	C00012328	01/09/2003	Yancey III, F. D.	Not Filed	\$500	\$299,780	DC		Yes	3	\$1,750
AF00855	FOREST LANDOWNERS ASSOCIATION INC. POLITICAL ACTION COMMITTEE	C00242040	11/01/2002	Sumner, Robert D.	Not Filed	\$11,800	\$214,330	GA		Yes	0	\$1,000
AF00856	GLASS, MOLDERS, POTTERY, PLASTICS & ALLIED WORKERS INTERNATIONAL	C00011189	11/20/2002	JOSEPH MITCHELL, SR.	Not Filed	\$4,195	\$111,230	PA		Yes	0	\$1,000
AF00857	GOOD GOVERNMENT FOR AMERICA	C00317479	12/04/2002	Thomson, Gary Mr.	Not Filed	\$129,607	\$700,626	VA		Yes	0	\$5,000
AF00858	HEARTLAND PAC FKA: YOUNGSTOWN	C00131557	12/05/2002	DAVID B. ORLEAN	Not Filed	\$5,571 (est)	\$128,776	OH		Yes	0	\$1,000

FEDERAL ELECTION COMMISSION 2003-2004
Reason to Believe Circulation Report
2002 12 DAY PRE-GENERAL

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AF00869	NATIONAL PROPANE GAS ASSOCIATION		POLITICAL ACTION COMMITTEE	-PROP	DC						
	C00079681	Roldan, Richard			\$178,241						
	01/31/2003	Not Filed			\$7,400			Yes	0		\$1,000
AF00870	NEW JERSEY STATE CARPENTERS NON PARTISAN POLITICAL EDUCATION		COMM	NJ							
	C00332593	Patricia Mueller			\$380,096			Yes	0		\$1,000
	12/05/2002	Not Filed			\$5,125						
AF00871	SOCIETY OF THORACIC SURGEONS POLITICAL ACTION COMMITTEE; THE		(STS)	DC							
	C00325936	ROBERT WILBUR			\$203,000			Yes	1		\$1,250
	01/09/2003	Not Filed			\$11,000						
AF00872	SOUTHERN STATES POLICE BENEVOLENT ASSOC PAC FUND			GA							
	C00265546	JACK L ROBERTS			\$323,240			Yes	0		\$1,000
	11/06/2002	Not Filed			\$16,065						
AF00873	ST LOUISIANS FOR BETTER GOVERNMENT			MO							
	C00148155	BERNARD PASTERNAK			\$157,069			Yes	0		\$1,000
	11/05/2002	Not Filed			\$19,500						
AF00874	THRIVENT FINANCIAL FOR LUTHERANS-EMPLOYEE POLITICAL ACTION COMMITTEE		WI								
	C00121319	Marsha J. Mahan			\$172,969			Yes	0		\$1,000
	11/08/2002	Not Filed			\$7,964						
AF00875	UNITED ASSOC OF JOURNEYMEN & APPRENTICES/PLUMBING & PIPE FITTING		MI								
	C00232835	RICHARD G FRANTZ			\$145,449			Yes	0		\$1,000
	11/01/2002	Not Filed			\$16,095						
AF00876	UNITED BROTHERHOOD OF CARPENTERS/JOINERS OF AMER NEW ENGLAND REG		CT								
	C00150045	GLENN MARSHALL			\$231,053			Yes	0		\$1,000
	12/05/2002	Not Filed			\$6,001 (est)						
AF00877	UNITED STATES MARINE REPAIR INC POLITICAL ACTION COMMITTEE		CA								
	C00342170	KENNETH BATSON			\$368,305			Yes	0		\$1,000
	12/03/2002	Not Filed			\$19,160 (est)						
AF00878	VOLUNTEER PAC			TN							
	C00341743	Dawn Perkerson			\$1,919,105			Yes	1		\$3,750
	12/05/2002	Not Filed			\$74,591 (est)						

FEDERAL ELECTION COMMISSION 2003-2004
Reason to Believe Circulation Report
2002 12 DAY PRE-GENERAL

AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	DAYS LATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF00879	WHITE & CASE POLITICAL ACTION COMMITTEE	C00302059	OWEN J GAUVIN	12/08/2002	Not Filed	\$9,000	\$101,555	DC		Yes	0	\$1,000
AF00880	WOMEN'S PRO-ISRAEL NATIONAL POLITICAL ACTION COMMITTEE	C00203182	JOYCE ULLMAN	12/16/2002	Not Filed	\$1,670 (est)	\$102,705	DC		Yes	0	\$1,000
AF00881	DEMOCRATIC PARTY OF ORANGE COUNTY FED PAC	C00321943	JAMES PANTONE	11/12/2002	Not Filed	\$9,039	\$254,650	CA		Yes	1	\$1,250
AF00882	NEW YORK STATE CONSERVATIVE PARTY	C00282343	GERARD KASSAR	11/22/2002	Not Filed	\$2,300	\$162,445	NY		Yes	2	\$1,500

30 DAY POST-GENERAL REPORT

DATE 04/23/2003
PAGE: 1

FEDERAL ELECTION COMMISSION 2003-2004
Reason to Believe Circulation Report
2002 30 DAY POST-GENERAL

AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF00883	LAWRENCE R WIESNER FOR CONGRESS COMMITTEE	C00368100	LAWRENCE R WIESNER	12/13/2002	\$7,690	\$151,508	CA	WIESNER, LAWRENCE R	No	0	\$300
AF00884	STRICKLAND FOR CONGRESS INC	C00368175	ALAN SCHWARTZ	12/12/2002	\$1,857,549	\$10,212,900	CO	STRICKLAND, THOMAS LEE	No	0	\$6,400
AF00886	COMMITTEE TO ELECT CLINTON B LESUEUR	C00373811	LEE R BUSH	01/01/2003	\$46,215	\$145,345	MS	LESUEUR, CLINTON B	No	0	\$1,550
AF00887	COMMITTEE TO ELECT FRANK W BALLANCE JR	C00372300	JOYCE L BULLOCK	12/13/2002	\$279,156	\$1,429,009	NC	BALLANCE, FRANK W JR	No	0	\$3,100
AF00888	MEL WATT FOR CONGRESS COMMITTEE	C00260604	BOBBY T MARTIN	12/15/2002	\$142,312	\$609,675	NC	WATT, MELVIN LUTHER	No	0	\$1,850
AF00889	FRIENDS OF JIM FARRIN	C00379206	JULIAN H GINGOLD	12/23/2002	\$29,890	\$139,007	NY	FARRIN, JAMES	No	0	\$1,100
AF00890	BUCKLEY02	C00375410	GREGORY J LAYTON	12/12/2002	\$23,546	\$137,111	OR	BUCKLEY, PETER	No	0	\$275
AF00891	ROB BISHOP FOR CONGRESS	C00374231	CHRISTOPHER LARRY BROWN	01/02/2003	\$393,652	\$1,323,521	UT	BISHOP, ROBERT	No	0	\$7,600
AF00892	SYED MAHMOOD FOR CONGRESS	C00374629	IMTIAZ AHMAD	Not Filed	\$25,227 (est)	\$101,008	CA	MAHMOOD, SYED R	No	0	\$1,800

FEDERAL ELECTION COMMISSION 2003-2004
Reason to Believe Circulation Report
2002 30 DAY POST-GENERAL

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AF00893	COMMITTEE TO ELECT ROSS MOEN	C00371252	01/29/2003	PHILIP M PARLETT	Not Filed	\$45,978	\$104,608	CA	MOEN, ROSS	No	0	\$1,800
AF00894	COMMITTEE TO ELECT MADELEINE Z BORDALLO 2002	C00369686	03/12/2003	P JUNE TERLAJE	Not Filed	\$46,587	\$171,364	NY	BORDALLO, MADELEINE Z	No	0	\$1,800
AF00895	COMMITTEE TO ELECT KUTSCH	C00374553	Not Filed	MICHAEL J KOLAN		\$38,963 (est)	\$116,690	IL	KUTSCH, JOHN	No	0	\$1,800
AF00897	JOE FINLEY FOR CONGRESS	C00378596	01/30/2003	SAL PERROTTA	Not Filed	\$55,129	\$243,777	NY	FINLEY, JOSEPH P	No	0	\$2,700
AF00898	AMERICANS FOR COMMON SENSE GOVERNMENT	C00379057	12/25/2002	JOHN A MARSALISI	20	\$80,348	\$181,411	NY		No	0	\$2,400
AF00899	BUILD AMERICA PAC	C00377143	12/20/2002	JOAN FLOWERS	15	\$10,000	\$104,872	NY		No	0	\$475
AF00900	FUND FOR A BETTER FUTURE	C00372755	01/03/2003	STEPHEN J KAUFMAN	29	\$4,011	\$331,571	CA		No	0	\$825
AF00901	PRAIRIE LEADERSHIP COMMITTEE	C00351049	12/11/2002	PAM TERRELL	6	\$15,163	\$138,278	DC		No	3	\$437
AF00902	SUMMIT PAC	C00382333	12/18/2002	JOHN DOUGLAS HARDESTY JR	13	\$258,239	\$212,078	DC		No	0	\$4,100

FEDERAL ELECTION COMMISSION 2003-2004
Reason to Believe Circulation Report
2002 30 DAY POST-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
AF00903	WHITE MOUNTAIN PAC C00370932 12/30/2002	H SCOTT FLEGAL 25	\$186,327		NH	No	0	\$4,550
AF00904	3M COMPANY C00084475 12/17/2002	Karen K. Martodam 12	\$8,285 (est)		MN	No	0	\$400
AF00905	ACPAC ACA INTERNATIONAL POLITICAL ACTION COMMITTEE C00034785 01/02/2003	THOMAS CIESLUKOWSKI 28	\$84,770		MN	No	0	\$3,200
AF00906	AMERICAN NURSERY AND LANDSCAPE ASSOCIATION - POLITICAL ACTION COM C00022988 12/30/2002	Meredith, John Mr. 25	\$6,560 (est)		DC	No	1	\$906
AF00907	CABLEVISION SYSTEMS CORPORATION POLITICAL ACTION COMMITTEE C00197863 01/02/2003	SHEILA MAHONY 28	\$37,571 (est)		NY	No	0	\$1,600
AF00908	CAMPAIN FOR U N REFORM POLITICAL ACTION COMMITTEE C00043992 01/03/2003	HOWARD L TAYLOR 29	\$8,524		OH	No	0	\$825
AF00909	DICKSTEIN SHAPIRO MORIN & OSHINSKY LLP POLITICAL ACTION COMMITTEE C00110197 12/12/2002	L ANDREW ZAUSNER 7	\$10,287		DC	No	0	\$275
AF00910	GAY AND LESBIAN VICTORY FUND C00251835 12/13/2002	Wolfe, Charles A. 8	\$328,615		DC	No	0	\$3,100
AF00911	KPAC C00365551 01/01/2003	JILL MELLINGER 27	\$92,732		TX	No	0	\$3,100
AF00912	NATIONAL BANK OF COMMERCE COMMITTEE ON POLITICAL AFFAIRS C00095786 12/27/2002	CHARLES A NEALE 22	\$5,978		TN	No	0	\$650

FEDERAL ELECTION COMMISSION 2003-2004
Reason to Believe Circulation Report
2002 30 DAY POST-GENERAL

AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF00913	NEWSTAR PAC (FKA NEW CENTURY FEDERAL PAC; THE		J KAREN BUTLER	12/31/2002	\$13,028	\$105,844	IL		No	0	\$750
AF00914	OFFICE AND PROFESSIONAL EMPLOYEES INTERNATIONAL UNION-VOICE OF TH		Wohlforth, Nancy	12/11/2002	\$7,306	\$491,292	DC		No	1	\$312
AF00915	OFFICE OF THE COMMISSIONER OF MAJOR LEAGUE BASEBALL POLITICAL ACT		Schweitzer, William	12/17/2002	\$2,083 (est)	\$336,528	DC		No	0	\$400
AF00916	PLUMBERS UNION LOCAL 690.. PLUMBING & PIPE FITTING IND US & CAN LO		EDWARD C KEENAN	01/02/2003	\$58,678	\$455,368	PA		No	0	\$2,400
AF00917	PRAIRIE POLITICAL ACTION COMMITTEE		MICHAEL EDWARD DALY	12/12/2002	\$34,250	\$299,458	IL		No	0	\$550
AF00918	SALEM COMMUNICATIONS CORPORATION POLITICAL ACTION COMMITTEE		RUSSELL R HAUTH	12/23/2002	\$38,912	\$136,312	CA		No	0	\$1,100
AF00919	SALTCHUK RESOURCES INC POLITICAL ACTION COMMITTEE (AKA SALTCHUK P		ALAN A BUTCHMAN	01/03/2003	\$8,799	\$189,309	WA		No	0	\$825
AF00920	SELECT MILK PRODUCERS PAC		RANCE MILES	12/31/2002	\$72,211	\$118,873	NM		No	0	\$2,250
AF00921	SHEET METAL WORKERS INTERNATIONAL ASSOCIATION LOCAL 28 POLITICAL		FRED ANATO	12/30/2002	\$51,884	\$530,125	NY		No	0	\$2,175
AF00922	SHEET METAL WORKERS LOCAL 100 POLITICAL ACTION COMMITTEE (100 PAC		ROBERT A WALSH	12/26/2002	\$10,028	\$115,339	MD		No	0	\$625

DATE 04/23/2003
PAGE: 5

FEDERAL ELECTION COMMISSION 2003-2004
Reason to Believe Circulation Report
2002 30 DAY POST-GENERAL

AF #	COMMITTEE NAME	STATE	CANDIDATE NAME	THRESHOLD AMOUNT	LEVEL OF ACTIVITY	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
COMMITTEE ID	RECEIPT DATE	THRESHOLD AMOUNT	LEVEL OF ACTIVITY	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY		
AF00923	UNITED ASSOC OF JOURNEYMEN & APPRENTICES/PLUMBING & PIPE FITTING MI	MI						
C00232835	RICHARD G FRANTZ	\$154,404		No	0	\$475		
12/20/2002	15	\$7,236 (est)						
AF00924	UNITED EMP PAC, CENTRAL LOUISIANA ELECTRIC CO INC LA	LA						
C00165878	MELISSA HENRY	\$220,508		No	0	\$300		
12/13/2002	8	\$13,090						
AF00925	WOMEN'S PRO-ISRAEL NATIONAL POLITICAL ACTION COMMITTEE ("WIN PAC") NC	NC						
C00203182	JOYCE ULLMAN	\$106,854		No	0	\$375		
12/16/2002	11	\$4,175 (est)						
AF00927	LOUISVILLE & JEFFERSON COUNTY REPUBLICAN EXECUTIVE COMMITTEE KY	KY						
C00015594	Bachelder, Chris	\$249,019		No	0	\$2,850		
12/23/2002	18	\$145,812						
AF00928	MISSISSIPPI DEMOCRATIC PARTY POLITICAL ACTION COMMITTEE MS	MS						
C00149641	Seale, Audrey Mrs.	\$950,719		No	0	\$7,200		
12/31/2002	26	\$392,808						
AF00929	BRICKLAYERS AND ALLIED CRAFTWORKERS LOCAL NO 3 NEW YORK NIAGARA F NY	NY						
C00373423	DANIEL ROSE	\$126,003		No	0	\$900		
01/08/2003	Not Filed	\$9,262						
AF00931	NATIONAL ITALIAN AMERICAN POLITICAL ACTION COMMITTEE PA	PA						
C00355388	VINCENT M LASORSA CPA MBA	\$104,565		No	4	\$3,600		
Not Filed		\$26,141 (est)						
AF00932	PATRIOT PAC DC	DC						
C00364422	Mullen, Audrey	\$581,781		No	2	\$1,350		
01/30/2003	Not Filed	\$20,606 (est)						

AF #	COMMITTEE NAME COMMITTEE ID RECEIPT DATE	TREASURER DAYS LATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	CANDIDATE NAME SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF00933	S C JOHNSON & SON INC POLITICAL ACTION COMMITTEE (SCJPAC) C00342246 01/23/2003	WILLIAM H VAN LOPIK Not Filed	\$11,250	\$142,056	No	0	\$900
AF00934	AMERICAN BAKERS ASSOCIATION BREAD POLITICAL ACTION COMMITTEE C00016386 01/14/2003	PAUL C ABENANTE Not Filed	\$7,100	\$126,777	No	0	\$900
AF00935	AMERICAN FURNITURE MANUFACTURERS ASSOCIATION POLITICAL ACTION COM C00077362 01/30/2003	MR RUSSELL B BATSON Not Filed	\$10,365	\$160,619	No	0	\$900
AF00936	AMERICAN SPEECH-HEARING ASSOCIATION POLITICAL ACTION COM C00210666 01/21/2003	FREDERICK T SPAHR Not Filed	\$49,841 (est)	\$460,949	No	0	\$1,800
AF00937	BANK OF NEW YORK COMPANY POLITICAL ACTION COMMITTEE-BNY PAC C00185884 02/07/2003	MR THOMAS J MASTRO Not Filed	\$46,937 (est)	\$119,715	No	0	\$1,800
AF00938	BANKERS UNITE IN LEGISLATIVE DECISIONS AKA BUILD (FKA IOWA BANKER C00085977 Not Filed	JOHN SORENSEN	\$1,010	\$101,958	No	0	\$900
AF00939	BI-COUNTY POLITICAL ACTION COMMITTEE (FKA SUFFOLK PAC) C00204388 01/31/2003	IRA LABEL Not Filed	\$36,376 (est)	\$231,705	No	1	\$2,250
AF00940	BIG TENT PAC; THE C00285098 01/14/2003	MS SYLVIA L NOLDE Not Filed	\$11,529	\$127,529	No	0	\$900
AF00942	DISTILLED SPIRITS COUNCIL OF THE UNITED STATES INC POLITICAL ACTI C00030734 01/14/2003	MS NICHELE FAMIGLIETTI Not Filed	\$46,123	\$169,391	No	2	\$2,700

FEDERAL ELECTION COMMISSION 2003-2004
Reason to Believe Circulation Report
2002 30 DAY POST-GENERAL

AF #	COMMITTEE NAME	COMMITTEE ID	COMMITTEE NAME	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
RECEIPT DATE	TREASURER	DAYS LATE	LEVEL OF ACTIVITY			SENSITIVE		
AF000943	ELECT LIFE				NY			
	C00339481		\$971,714 (est)	\$3,886,856		No	0	\$12,000
	Not Filed							
AF000944	FLORIDA ROCK INDUSTRIES INC GOOD GOVERNMENT COMMITTEE				FL			
	C00125716		\$3,267	\$103,346		No	0	\$900
	03/10/2003	JOHN D MILTON JR						
	Not Filed							
AF000945	FLORIDA SUGAR CANE LEAGUE PAC				DC			
	C00012328		\$4,510	\$304,290		No	3	\$1,575
	01/09/2003	Yancey III, F. D.						
	Not Filed							
AF000946	INDIANA DENTAL PAC				IN			
	C00082636		\$1,231 (est)	\$120,611		No	1	\$1,125
	01/31/2003	RAYMOND M MADDOX						
	Not Filed							
AF000947	IUOE LOCAL 542 OPERATING ENGINEERS POLITICAL ACTION FUND				PA			
	C00136739		\$24,088	\$264,577		No	1	\$1,125
	01/07/2003	ROBERT T HEENAN						
	Not Filed							
AF000948	KEYSPAN ENERGY POLITICAL ACTION COMMITTEE (KEYPAC)				NY			
	C00343988		\$22,268	\$136,440		No	0	\$900
	01/31/2003	Cart. Ed Mr.						
	Not Filed							
AF000949	LABORER'S INTERNATIONAL UNION OF NO AMERICA LOCAL NO 17 POLITICAL				NY			
	C00233049		\$4,341	\$168,079		No	0	\$900
	01/30/2003	JOSEPH R LIBONATI						
	Not Filed							
AF000950	LOCAL 617 COPE COMMITTEE				NJ			
	C00305227		\$42,224 (est)	\$147,083		No	0	\$1,800
	Not Filed	MINNIE MCELROY						
AF000951	MARYLAND ASSOCIATION FOR CONCERNED CITIZENS POLITICAL ACTION				MD			
	C00195024		\$2,810 (est)	\$108,376		No	0	\$900
	Not Filed	MR JAMES BERG						
AF000952	NATIONAL PROPANE GAS ASSOCIATION POLITICAL ACTION COMMITTEE -PROP				DC			
	C00079681		\$102,337	\$280,578		No	0	\$4,500
	01/31/2003	Roldan, Richard						
	Not Filed							

FEDERAL ELECTION COMMISSION 2003-2004
Reason to Believe Circulation Report
2002 30 DAY POST-GENERAL

AF #	COMMITTEE NAME	STATE	CANDIDATE NAME	THRESHOLD AMOUNT	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
COMMITTEE ID	TREASURER						
RECEIPT DATE	DAYS LATE	LEVEL OF ACTIVITY					
AF00953	OLD NATIONAL BANK IN EVANSVILLE OLBANK PAC	IN		\$125,065	No	0	\$900
C00155282	Dan Sauls						
01/14/2003	Not Filed	\$18,263					
AF00954	POLITICAL ACTION COMMITTEE OF FOCAL COMMUNICATIONS CORPORATION	IL		\$149,574	No	0	\$1,800
C00360719	ROBERT M JUNKROSKI			\$29,914 (est)			
Not Filed							
AF00955	PRO - LIFE CAMPAIGN COMMITTEE	VA		\$8,098,428	No	0	\$12,000
C00355958	Gersten, Pablo						
02/10/2003	Not Filed	\$1,309,358					
AF00956	REPUBLICANS FOR CHOICE	VA		\$1,234,878	No	0	\$4,500
C00241083	ANN E W STONE			\$102,906 (est)			
Not Filed							
AF00957	SUPPORTERS OF ENGINEERS LOCAL 3 ENDORSED CANDIDATES (SELEC)	CA		\$132,455	No	0	\$900
C00024422	GARLAND ROSAURO			\$7,052			
01/13/2003	Not Filed						
AF00958	TECO ENERGY INC EMPLOYEES' PAC	FL		\$168,840	No	1	\$1,125
C00161422	ROBIN J HASTING			\$18,340			
Not Filed							
AF00959	THELEN REID & PRIEST POLITICAL ACTION COMMITTEE	DC		\$157,299	No	0	\$900
C00248641	WILLIAM A KIRK			\$16,398			
Not Filed							
AF00960	15TH DISTRICT DEMOCRATIC PARTY	MI		\$309,831	No	0	\$1,800
C00362772	PATRICIA A FEDEWA			\$40,027			
03/26/2003	Not Filed						
AF00961	MINNESOTA DFL HOUSE CAUCUS	MN		\$870,717	No	0	\$4,500
C00361139	PAUL ROGOSHESKE			\$127,176 (est)			
03/03/2003	Not Filed						
AF00962	RHODE ISLAND REPUBLICAN STATE CENTRAL COMMITTEE	RI		\$975,530	No	2	\$15,000
C00078196	Drew, Merrill C.			\$637,097 (est)			
02/13/2003	Not Filed						

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Reason To Believe Recommendation - 30)

Day Post-General Report For The)

Administrative Fines Program:)

LAWRENCE R WIESNER FOR CONGRESS) AF# 883

COMMITTEE, and LAWRENCE R WIESNER as)

treasurer;)

STRICKLAND FOR COLORADO INC, and ALAN) AF# 884

SCHWARTZ as treasurer;)

COMMITTEE TO ELECT CLINTON B LESUEUR,) AF# 886

and LEE R BUSH as treasurer;)

COMMITTEE TO ELECT FRANK W BALLANCE) AF# 887

JR, and JOYCE L BULLOCK as treasurer;)

MEL WATT FOR CONGRESS COMMITTEE, and) AF# 888

BOBBY T MARTIN as treasurer;)

FRIENDS OF JIM FARRIN, and JULIAN H) AF# 889

GINGOLD as treasurer;)

BUCKLEY02, and GREGORY J LAYTON as) AF# 890

treasurer;)

ROB BISHOP FOR CONGRESS, and) AF# 891

CHRISTOPHER LARRY BROWN as treasurer;)

SYED MAHMOOD FOR CONGRESS, and IMTIAZ) AF# 892

AHMAD as treasurer;)

COMMITTEE TO ELECT ROSS MOEN, and) AF# 893

PHILIP M PARLETT as treasurer;)

COMMITTEE TO ELECT MADELEINE Z) AF# 894

BORDALLO 2002, and P JUNE TERLAJE as)

treasurer;)

COMMITTEE TO ELECT KUTSCH, and MICHAEL) AF# 895

J KOLAN as treasurer;)

JOE FINLEY FOR CONGRESS, and SAL) AF# 897

PERROTTA as treasurer;)

AMERICANS FOR COMMON SENSE GOVERNMENT,) AF# 898

and JOHN A MARSALISI as treasurer;)

BUILD AMERICA PAC, and JOAN FLOWERS as) AF# 899

treasurer;)

Federal Election Commission
Certification for Administrative Fines
April 29, 2003

Page 2

FUND FOR A BETTER FUTURE, and STEPHEN J KAUFMAN as treasurer;)	AF# 900
PRAIRIE LEADERSHIP COMMITTEE, and PAM TERRELL as treasurer;)	AF# 901
SUMMIT PAC, and JOHN DOUGLAS HARDESTY JR as treasurer;)	AF# 902
WHITE MOUNTAIN PAC, and H SCOTT FLEGAL as treasurer;)	AF# 903
3M COMPANY, and Karen K. Martodam as treasurer;)	AF# 904
ACPAC ACA INTERNATIONAL POLITICAL ACTION COMMITTEE, and THOMAS CIESLUKOWSKI as treasurer;)	AF# 905
AMERICAN NURSERY AND LANDSCAPE ASSOCIATION - POLITICAL ACTION COMMITTEE, and Meredith, John Mr. as treasurer;)	AF# 906
CABLEVISION SYSTEMS CORPORATION POLITICAL ACTION COMMITTEE, and SHEILA MAHONY as treasurer;)	AF# 907
CAMPAIGN FOR U N REFORM POLITICAL ACTION COMMITTEE, and HOWARD L TAYLOR as treasurer;)	AF# 908
DICKSTEIN SHAPIRO MORIN & OSHINSKY LLP POLITICAL ACTION COMMITTEE ("DSMO PAC"), and L ANDREW ZAUSNER as treasurer;)	AF# 909
GAY AND LESBIAN VICTORY FUND, and Wolfe, Charles A. as treasurer;)	AF# 910
KPAC, and JILL MELLINGER as treasurer;)	AF# 911
NATIONAL BANK OF COMMERCE COMMITTEE ON POLITICAL AFFAIRS, and CHARLES A NEALE as treasurer;)	AF# 912
NEWSTAR PAC (FKA NEW CENTURY FEDERAL PAC; THE, and J KAREN BUTLER as treasurer;)	AF# 913
OFFICE AND PROFESSIONAL EMPLOYEES INTERNATIONAL UNION-VOICE OF THE ELECTORATE, and Wohlforth, Nancy as treasurer;)	AF# 914

Federal Election Commission
Certification for Administrative Fines
April 29, 2003

Page 3

OFFICE OF THE COMMISSIONER OF MAJOR)	AF# 915
LEAGUE BASEBALL POLITICAL ACTION)	
COMMITTEE, and Schweitzer, William as)	
treasurer;)	
PLUMBERS UNION LOCAL 690..PLUMBING &)	AF# 916
PIPE FITTING IND US & CAN LOCAL)	
ELECTION POL ACT FUND, and EDWARD C)	
KEENAN as treasurer;)	
PRAIRIE POLITICAL ACTION COMMITTEE,)	AF# 917
and MICHAEL EDWARD DALY as treasurer;)	
SALEM COMMUNICATIONS CORPORATION)	AF# 918
POLITICAL ACTION COMMITTEE, and)	
RUSSELL R HAUTH as treasurer;)	
SALTCHUK RESOURCES INC POLITICAL)	AF# 919
ACTION COMMITTEE (AKA SALTCHUK PAC),)	
and ALAN A BUTCHMAN as treasurer;)	
SELECT MILK PRODUCERS PAC, and RANCE)	AF# 920
MILES as treasurer;)	
SHEET METAL WORKERS INTERNATIONAL)	AF# 921
ASSOCIATION LOCAL 28 POLITICAL ACTION)	
COMMITTEE, and FRED AMATO as)	
treasurer;)	
SHEET METAL WORKERS LOCAL 100)	AF# 922
POLITICAL ACTION COMMITTEE (100 PAC),)	
and ROBERT A WALTER as treasurer;)	
UNITED ASSOC OF JOURNEYMEN &)	AF# 923
APPRENTICES/PLUMBING & PIPE FITTING)	
INDUSTRY LOCAL UNION 335 , and RICHARD)	
G FRANTZ as treasurer;)	
UNITED EMP PAC, CENTRAL LOUISIANA)	AF# 924
ELECTRIC CO INC, and MELISSA HENRY as)	
treasurer;)	
WOMEN'S PRO-ISRAEL NATIONAL POLITICAL)	AF# 925
ACTION COMMITTEE ("WIN PAC"), and)	
JOYCE ULLMAN as treasurer;)	
LOUISVILLE & JEFFERSON COUNTY)	AF# 927
REPUBLICAN EXECUTIVE COMMITTEE, and)	

Federal Election Commission
Certification for Administrative Fines
April 29, 2003

Page 4

Bachelor, Chris as treasurer;)	
MISSISSIPPI DEMOCRATIC PARTY POLITICAL)	AF# 928
ACTION COMMITTEE, and Seale, Audrey)	
Mrs. as treasurer;)	
BRICKLAYERS AND ALLIED CRAFTWORKERS)	AF# 929
LOCAL NO 3 NEW YORK NIAGARA)	
FALLS/BUFFALO CHAPTER PAC , and DANIEL)	
ROSE as treasurer;)	
NATIONAL ITALIAN AMERICAN POLITICAL)	AF# 931
ACTION COMMITTEE, and VINCENT M)	
LASORSA CPA MBA as treasurer;)	
PATRIOT PAC, and Mullen, Audrey as)	AF# 932
treasurer;)	
S C JOHNSON & SON INC POLITICAL ACTION)	AF# 933
COMMITTEE (SCJPAC), and WILLIAM H VAN)	
LOPIK as treasurer;)	
AMERICAN BAKERS ASSOCIATION BREAD)	AF# 934
POLITICAL ACTION COMMITTEE, and PAUL C)	
ABENANTE as treasurer;)	
AMERICAN FURNITURE MANUFACTURERS)	AF# 935
ASSOCIATION POLITICAL ACTION)	
COMMITTEE, and MR RUSSELL B BATSON as)	
treasurer;)	
AMERICAN SPEECH-LANGUAGE-HEARING)	AF# 936
ASSOCIATION POLITICAL ACTION)	
COMMITTEE, and FREDERICK T SPAHR as)	
treasurer;)	
BANK OF NEW YORK COMPANY POLITICAL)	AF# 937
ACTION COMMITTEE-BNY PAC, and MR)	
THOMAS J MASTRO as treasurer;)	
BANKERS UNITE IN LEGISLATIVE DECISIONS)	AF# 938
AKA BUILD (FKA IOWA BANKERS ASSOC),)	
and JOHN SORENSEN as treasurer;)	
BI-COUNTY POLITICAL ACTION COMMITTEE)	AF# 939
(FKA SUFFOLK PAC), and IRA LAMEL as)	
treasurer;)	
BIG TENT PAC;THE, and MS SYLVIA L)	AF# 940
NOLDE as treasurer;)	

Federal Election Commission
Certification for Administrative Fines
April 29, 2003

Page 5

DISTILLED SPIRITS COUNCIL OF THE)	AF# 942
UNITED STATES INC POLITICAL ACTION)	
COMMITTEE, and MS MICHELE FAMIGLIETTI)	
as treasurer;)	
ELECT LIFE, and MR JOHN MAWN as)	AF# 943
treasurer;)	
FLORIDA ROCK INDUSTRIES INC GOOD)	AF# 944
GOVERNMENT COMMITTEE, and JOHN D)	
MILTON JR as treasurer;)	
FLORIDA SUGAR CANE LEAGUE PAC, and)	AF# 945
Yancey III, F. D. as treasurer;)	
INDIANA DENTAL PAC, and RAYMOND M)	AF# 946
MADDOX as treasurer;)	
IUOE LOCAL 542 OPERATING ENGINEERS)	AF# 947
POLITICAL ACTION FUND, and ROBERT T)	
HEENAN as treasurer;)	
KEYSPAN ENERGY POLITICAL ACTION)	AF# 948
COMMITTEE (KEYPAC), and Carr, Ed Mr.)	
as treasurer;)	
LABORER'S INTERNATIONAL UNION OF NO)	AF# 949
AMERICA LOCAL NO 17 POLITICAL LEAGUE,)	
and JOSEPH R LIBONATI as treasurer;)	
LOCAL 617 COPE COMMITTEE, and MINNIE)	AF# 950
MCELROY as treasurer;)	
MARYLAND ASSOCIATION FOR CONCERNED)	AF# 951
CITIZENS POLITICAL ACTION COMMITTEE,)	
and MR JAMES BERG as treasurer;)	
NATIONAL PROPANE GAS ASSOCIATION)	AF# 952
POLITICAL ACTION COMMITTEE)	
-PROPANEPAC, and Roldan, Richard as)	
treasurer;)	
OLD NATIONAL BANK IN EVANSVILLE OLBANK)	AF# 953
PAC, and Dan Sauls as treasurer;)	
POLITICAL ACTION COMMITTEE OF FOCAL)	AF# 954
COMMUNICATIONS CORPORATION, and ROBERT)	
M JUNKROSKI as treasurer;)	
PRO - LIFE CAMPAIGN COMMITTEE, and)	AF# 955

Federal Election Commission
Certification for Administrative Fines
April 29, 2003

Page 6

Gersten, Pablo as treasurer;)	
REPUBLICANS FOR CHOICE, and ANN E W)	AF# 956
STONE as treasurer;)	
SUPPORTERS OF ENGINEERS LOCAL 3)	AF# 957
ENDORSED CANDIDATES (SELEC), and)	
GARLAND ROSAURO as treasurer;)	
TECO ENERGY INC EMPLOYEES' PAC, and)	AF# 958
ROBIN J HASTINGS as treasurer;)	
THELEN REID & PRIEST POLITICAL ACTION)	AF# 959
COMMITTEE, and WILLIAM A KIRK as)	
treasurer;)	
15TH DISTRICT DEMOCRATIC PARTY, and)	AF# 960
PATRICIA A FEDEWA as treasurer;)	
MINNESOTA DFL HOUSE CAUCUS, and PAUL)	AF# 961
ROGOSHESKE as treasurer;)	
RHODE ISLAND REPUBLICAN STATE CENTRAL)	AF# 962
COMMITTEE, and Drew, Merrill C. as)	
treasurer;)	

CERTIFICATION

I, Mary W. Dove, Secretary for the Federal Election Commission, do hereby certify that on April 29, 2003, the Commission took the following actions on the Reason To Believe Recommendation - 30 Day Post-General Report for the Administrative Fines Program, as recommended in the Reports Analysis Division's Memorandum dated April 23, 2003, on the following committees:

AF# 883: Decided by a vote of 6-0 to: (1) reason to believe that LAWRENCE R WIESNER FOR CONGRESS COMMITTEE, and LAWRENCE R WIESNER 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 884: Decided by a vote of 6-0 to: (1) reason to believe that STRICKLAND FOR COLORADO INC, and ALAN SCHWARTZ 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

Federal Election Commission
Certification for Administrative Fines
April 29, 2003

Page 8

AF# 886: Decided by a vote of 6-0 to: (1) reason to believe that COMMITTEE TO ELECT CLINTON B LESUEUR, and LEE R BUSH 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 887: Decided by a vote of 6-0 to: (1) reason to believe that COMMITTEE TO ELECT FRANK W BALLANCE JR, and JOYCE L BULLOCK 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 888: Decided by a vote of 6-0 to: (1) reason to believe that MEL WATT FOR CONGRESS COMMITTEE, and BOBBY T MARTIN 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

Federal Election Commission
Certification for Administrative Fines
April 29, 2003

Page 9

AF# 889: Decided by a vote of 6-0 to: (1) reason to believe that FRIENDS OF JIM FARRIN, and JULIAN H GINGOLD 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 890: Decided by a vote of 6-0 to: (1) reason to believe that BUCKLEY02, and GREGORY J LAYTON 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 891: Decided by a vote of 6-0 to: (1) reason to believe that ROB BISHOP FOR CONGRESS, and CHRISTOPHER LARRY BROWN 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 892: Decided by a vote of 6-0 to: (1) reason to believe that SYED MA'MOOD FOR CONGRESS, and IMTIAZ AHMAD 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 893: Decided by a vote of 6-0 to: (1) reason to believe that COMMITTEE TO ELECT ROSS MOEN, and PHILIP M PARLETT as treasurer, violated 2 U.S.C. 434(a) and make a preliminary determination that the

Federal Election Commission
Certification for Administrative Fines
April 29, 2003

Page 10

civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 894: Decided by a vote of 6-0 to: (1) reason to believe that COMMITTEE TO ELECT MADELEINE Z BORDALLO 2002, and P JUNE TERLAJE 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 895: Decided by a vote of 6-0 to: (1) reason to believe that COMMITTEE TO ELECT KUTSCH, and MICHAEL J KOLAN 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 897: Decided by a vote of 6-0 to: (1) reason to believe that JOE FINLEY FOR CONGRESS, and SAL PERROTTA 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner,

and Weintraub voted affirmatively for the decision.
AF# 898: Decided by a vote of 6-0 to: (1) reason to believe that AMERICANS FOR COMMON SENSE GOVERNMENT, and JOHN A MARSALISI 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 899: Decided by a vote of 6-0 to: (1) reason to believe that BUILD AMERICA PAC, and JOAN FLOWERS 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 900: Decided by a vote of 6-0 to: (1) reason to believe that FUND FOR A BETTER FUTURE, and STEPHEN J KAUFMAN 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 901: Decided by a vote of 6-0 to: (1) reason to believe that PRAIRIE LEADERSHIP COMMITTEE, and PAM TERRELL 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

Federal Election Commission
Certification for Administrative Fines
April 29, 2003

Page 12

AF# 902: Decided by a vote of 6-0 to: (1) reason to believe that SUMMIT PAC, and JOHN DOUGLAS HARDESTY JR 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 903: Decided by a vote of 6-0 to: (1) reason to believe that WHITE MOUNTAIN PAC, and H SCOTT FLEGAL 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 904: Decided by a vote of 6-0 to: (1) reason to believe that 3M COMPANY, and Karen K. Martodam 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 905: Decided by a vote of 6-0 to: (1) reason to believe that ACPAC ACA INTERNATIONAL POLITICAL ACTION COMMITTEE, and THOMAS CIESLUKOWSKI 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 906: Decided by a vote of 6-0 to: (1) reason to believe that AMERICAN NURSERY AND LANDSCAPE ASSOCIATION - POLITICAL ACTION COMMITTEE, and Meredith, John Mr. 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 907: Decided by a vote of 6-0 to: (1) reason to believe that CABLEVISION SYSTEMS CORPORATION POLITICAL ACTION COMMITTEE, and SHEILA MAHONY 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 908: Decided by a vote of 6-0 to: (1) reason to believe that CAMPAIGN FOR U N REFORM POLITICAL ACTION COMMITTEE, and HOWARD L TAYLOR 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 909: Decided by a vote of 6-0 to: (1) reason to believe that DICKSTEIN SHAPIRO MORIN & OSHINSKY LLP POLITICAL ACTION COMMITTEE ("DSMO PAC"), and L ANDREW ZAUSNER 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 910: Decided by a vote of 6-0 to: (1) reason to believe that GAY AND LESBIAN VICTORY FUND, and Wolfe, Charles A. 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 911: Decided by a vote of 6-0 to: (1) reason to believe that KPAC, and JILL MELLINGER 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 912: Decided by a vote of 6-0 to: (1) reason to believe that NATIONAL BANK OF COMMERCE COMMITTEE ON POLITICAL AFFAIRS, and CHARLES A NEALE 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 913: Decided by a vote of 6-0 to: (1) reason to believe that NEWSTAR PAC (FKA NEW CENTURY FEDERAL PAC; THE, and J KAREN BUTLER 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 914: Decided by a vote of 6-0 to: (1) reason to believe that OFFICE AND PROFESSIONAL EMPLOYEES INTERNATIONAL UNION-VOICE OF THE ELECTORATE, and Wohlforth, Nancy 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

Federal Election Commission
Certification for Administrative Fines
April 29, 2003

Page 15

the report; (2) send the appropriate letter.
Commissioners Mason, McDonald, Smith, Thomas, Toner,
and Weintraub voted affirmatively for the decision.

AF# 915: Decided by a vote of 6-0 to: (1) reason
to believe that OFFICE OF THE COMMISSIONER OF MAJOR
LEAGUE BASEBALL POLITICAL ACTION COMMITTEE, and
Schweitzer, William 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 letter.
Commissioners Mason, McDonald, Smith, Thomas, Toner,
and Weintraub voted affirmatively for the decision.

AF# 916: Decided by a vote of 6-0 to: (1) reason
to believe that PLUMBERS UNION LOCAL 690..PLUMBING &
PIPE FITTING IND US & CAN LOCAL ELECTION POL ACT
FUND, and EDWARD C KEENAN 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
letter. Commissioners Mason, McDonald, Smith,
Thomas, Toner, and Weintraub voted affirmatively for
the decision.

AF# 917: Decided by a vote of 6-0 to: (1) reason
to believe that PRAIRIE POLITICAL ACTION COMMITTEE,
and MICHAEL EDWARD DALY 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
letter. Commissioners Mason, McDonald, Smith,
Thomas, Toner, and Weintraub voted affirmatively for
the decision.

AF# 918: Decided by a vote of 6-0 to: (1) reason
to believe that SALEM COMMUNICATIONS CORPORATION
POLITICAL ACTION COMMITTEE, and RUSSELL R HAUTH 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 letter. Commissioners
Mason, McDonald, Smith, Thomas, Toner, and Weintraub
voted affirmatively for the decision.

AF# 919: Decided by a vote of 6-0 to: (1) reason
to believe that SALTCHUK RESOURCES INC POLITICAL
ACTION COMMITTEE (AKA SALTCHUK PAC), and ALAN A
BUTCHMAN 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 letter.
Commissioners Mason, McDonald, Smith, Thomas, Toner,
and Weintraub voted affirmatively for the decision.

AF# 920: Decided by a vote of 6-0 to: (1) reason
to believe that SELECT MILK PRODUCERS PAC, and RANCE
MILES 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 letter.
Commissioners Mason, McDonald, Smith, Thomas, Toner,
and Weintraub voted affirmatively for the decision.

AF# 921: Decided by a vote of 6-0 to: (1) reason
to believe that SHEET METAL WORKERS INTERNATIONAL
ASSOCIATION LOCAL 28 POLITICAL ACTION COMMITTEE, and
FRED AMATO 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 letter.
Commissioners Mason, McDonald, Smith, Thomas, Toner,
and Weintraub voted affirmatively for the decision.

AF# 922: Decided by a vote of 6-0 to: (1) reason
to believe that SHEET METAL WORKERS LOCAL 100
POLITICAL ACTION COMMITTEE (100 PAC), and ROBERT A
WALTER 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

Federal Election Commission
Certification for Administrative Fines
April 29, 2003

Page 17

report; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 923: Decided by a vote of 6-0 to: (1) reason to believe that UNITED ASSOC OF JOURNEYMEN & APPRENTICES/PLUMBING & PIPE FITTING INDUSTRY LOCAL UNION 335 , and RICHARD G FRANTZ 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 924: Decided by a vote of 6-0 to: (1) reason to believe that UNITED EMP PAC, CENTRAL LOUISIANA ELECTRIC CO INC, and MELISSA HENRY 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 925: Decided by a vote of 6-0 to: (1) reason to believe that WOMEN'S PRO-ISRAEL NATIONAL POLITICAL ACTION COMMITTEE ("WIN PAC"), and JOYCE ULLMAN 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 927: Decided by a vote of 6-0 to: (1) reason to believe that LOUISVILLE & JEFFERSON COUNTY REPUBLICAN EXECUTIVE COMMITTEE, and Bachelder, Chris 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 928: Decided by a vote of 6-0 to: (1) reason to believe that MISSISSIPPI DEMOCRATIC PARTY POLITICAL ACTION COMMITTEE, and Seale, Audrey Mrs. 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 929: Decided by a vote of 6-0 to: (1) reason to believe that BRICKLAYERS AND ALLIED CRAFTWORKERS LOCAL NO 3 NEW YORK NIAGARA FALLS/BUFFALO CHAPTER PAC, and DANIEL ROSE 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 931: Decided by a vote of 6-0 to: (1) reason to believe that NATIONAL ITALIAN AMERICAN POLITICAL ACTION COMMITTEE, and VINCENT M LASORSA CPA MBA 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 932: Decided by a vote of 6-0 to: (1) reason to believe that PATRIOT PAC, and Mullen, Audrey 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 933: Decided by a vote of 6-0 to: (1) reason to believe that S C JOHNSON & SON INC POLITICAL ACTION COMMITTEE (SCJPAC), and WILLIAM H VAN LOPIK 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 934: Decided by a vote of 6-0 to: (1) reason to believe that AMERICAN BAKERS ASSOCIATION BREAD POLITICAL ACTION COMMITTEE, and PAUL C ABENANTE 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 letter. Commissioners
Mason, McDonald, Smith, Thomas, Toner, and Weintraub
voted affirmatively for the decision.

AF# 935: Decided by a vote of 6-0 to: (1) reason
to believe that AMERICAN FURNITURE MANUFACTURERS
ASSOCIATION POLITICAL ACTION COMMITTEE, and MR
RUSSELL B BATSON 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 letter.
Commissioners Mason, McDonald, Smith, Thomas, Toner,
and Weintraub voted affirmatively for the decision.

AF# 936: Decided by a vote of 6-0 to: (1) reason
to believe that AMERICAN SPEECH-LANGUAGE-HEARING
ASSOCIATION POLITICAL ACTION COMMITTEE, and
FREDERICK T SPAHR 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 letter.
Commissioners Mason, McDonald, Smith, Thomas, Toner,
and Weintraub voted affirmatively for the decision.

AF# 937: Decided by a vote of 6-0 to: (1) reason
to believe that BANK OF NEW YORK COMPANY POLITICAL
ACTION COMMITTEE-BNY PAC, and MR THOMAS J MASTRO 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 letter. Commissioners
Mason, McDonald, Smith, Thomas, Toner, and Weintraub
voted affirmatively for the decision.

AF# 938: Decided by a vote of 6-0 to: (1) reason
to believe that BANKERS UNITE IN LEGISLATIVE
DECISIONS AKA BUILD (FKA IOWA BANKERS ASSOC), and
JOHN SORENSEN 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 939: Decided by a vote of 6-0 to: (1) reason to believe that BI-COUNTY POLITICAL ACTION COMMITTEE (FKA SUFFOLK PAC), and IRA LAMEL 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 940: Decided by a vote of 6-0 to: (1) reason to believe that BIG TENT PAC;THE, and MS SYLVIA L NOLDE 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 942: Decided by a vote of 6-0 to: (1) reason to believe that DISTILLED SPIRITS COUNCIL OF THE UNITED STATES INC POLITICAL ACTION COMMITTEE, and MS MICHELE FAMIGLIETTI 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 943: Decided by a vote of 6-0 to: (1) reason to believe that ELECT LIFE, and MR JOHN MAWN 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 944: Decided by a vote of 6-0 to: (1) reason to believe that FLORIDA ROCK INDUSTRIES INC GOOD GOVERNMENT COMMITTEE, and JOHN D MILTON JR 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 945: Decided by a vote of 6-0 to: (1) reason to believe that FLORIDA SUGAR CANE LEAGUE PAC, and Yancey III, F. D. 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 946: Decided by a vote of 6-0 to: (1) reason to believe that INDIANA DENTAL PAC, and RAYMOND M MADDOX 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 947: Decided by a vote of 6-0 to: (1) reason to believe that IUOE LOCAL 542 OPERATING ENGINEERS POLITICAL ACTION FUND, and ROBERT T HEENAN 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 948: Decided by a vote of 6-0 to: (1) reason to believe that KEYSpan ENERGY POLITICAL ACTION COMMITTEE (KEYPAC), and Carr, Ed Mr. 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 949: Decided by a vote of 6-0 to: (1) reason to believe that LABORER'S INTERNATIONAL UNION OF NO AMERICA LOCAL NO 17 POLITICAL LEAGUE, and JOSEPH R LIBONATI 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 950: Decided by a vote of 6-0 to: (1) reason to believe that LOCAL 617 COPE COMMITTEE, and MINNIE MCELROY 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

Federal Election Commission
Certification for Administrative Fines
April 29, 2003

Page 24

AF# 951: Decided by a vote of 6-0 to: (1) reason to believe that MARYLAND ASSOCIATION FOR CONCERNED CITIZENS POLITICAL ACTION COMMITTEE, and MR JAMES BERG 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 952: Decided by a vote of 6-0 to: (1) reason to believe that NATIONAL PROPANE GAS ASSOCIATION POLITICAL ACTION COMMITTEE -PROPANE PAC, and Roldan, Richard 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 953: Decided by a vote of 6-0 to: (1) reason to believe that OLD NATIONAL BANK IN EVANSVILLE OLBANK PAC, and Dan Sauls 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 954: Decided by a vote of 6-0 to: (1) reason to believe that POLITICAL ACTION COMMITTEE OF FOCAL COMMUNICATIONS CORPORATION, and ROBERT M JUNKROSKI 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 955: Decided by a vote of 6-0 to: (1) reason to believe that PRO - LIFE CAMPAIGN COMMITTEE, and Gersten, Pablo 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 956: Decided by a vote of 6-0 to: (1) reason to believe that REPUBLICANS FOR CHOICE, and ANN E W STONE 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 957: Decided by a vote of 6-0 to: (1) reason to believe that SUPPORTERS OF ENGINEERS LOCAL 3 ENDORSED CANDIDATES (SELEC), and GARLAND ROSAURO 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 958: Decided by a vote of 6-0 to: (1) reason to believe that TECO ENERGY INC EMPLOYEES' PAC, and ROBIN J HASTINGS 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

Federal Election Commission
Certification for Administrative Fines
April 29, 2003

Page 26

AF# 959: Decided by a vote of 6-0 to: (1) reason to believe that THELEN REID & PRIEST POLITICAL ACTION COMMITTEE, and WILLIAM A KIRK 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 960: Decided by a vote of 6-0 to: (1) reason to believe that 15TH DISTRICT DEMOCRATIC PARTY, and PATRICIA A FEDEWA 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 961: Decided by a vote of 6-0 to: (1) reason to believe that MINNESOTA DFL HOUSE CAUCUS, and PAUL ROGOSHESKE 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF# 962: Decided by a vote of 6-0 to: (1) reason to believe that RHODE ISLAND REPUBLICAN STATE CENTRAL COMMITTEE, and Drew, Merrill C. 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 letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

Federal Election Commission
Certification for Administrative Fines
April 29, 2003

Page 27

Attest:

May 2, 2003
Date

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

Received in the Secretariat: Fri., Apr. 23, 2003 3:58 p.m.
Circulated to the Commission: Mon., Apr. 24, 2003 11:00 a.m.
Deadline for vote: Thurs., Apr. 29, 2003 4:00 p.m.

**WESTERN
UNION**

CONFIRMATION OF CHGM

WESTERN UNION COMMERCIAL SERVICES
TO: GREGORY J LAYTON
BUCKLEY02
71 DEWEY ST
ASHLAND OR 97520-2108

ALICE KANG -REPORT ANALYSIS DIV.
FEDERAL ELECTION COMMISSION
999 E ST NW
WASHINGTON DC 20463

MAY 2, 2003

GREGORY J LAYTON
BUCKLEY02
71 DEWEY STREET
ASHLAND OR 97520

C00375410
AF#: 890

DEAR GREGORY J LAYTON:

THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED ("THE ACT"), REQUIRES THAT YOUR COMMITTEE FILE A 30 DAY POST-GENERAL REPORT OF RECEIPTS AND DISBURSEMENTS IN A CALENDAR YEAR DURING WHICH THERE IS A REGULARLY SCHEDULED GENERAL ELECTION FOR WHICH THE CANDIDATE SOUGHT ELECTION. THIS REPORT, COVERING THE PERIOD THROUGH NOVEMBER 25TH, SHALL BE FILED NO LATER THAN DECEMBER 5TH. 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 FILED ON 12/12/2002, 7 DAYS LATE.

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 04/29/2003, THE FEC FOUND THAT THERE IS REASON TO BELIEVE ("RTB") THAT BUCKLEY02 AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) BY FAILING TO FILE TIMELY THIS REPORT ON OR BEFORE DECEMBER 5TH. 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 \$275. IT IS DUE BY 06/11/2003 AND IS BASED ON THESE FACTORS:

ELECTION SENSITIVITY OF REPORT: NOT ELECTION SENSITIVE
LEVEL OF ACTIVITY: \$23546
NUMBER OF DAYS LATE: 7
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 REMITTANCE AND YOUR PAYMENT TO THE FEC AT THE ADDRESS ON PAGE 3.


**WESTERN
UNION**

WESTERN UNION COMMERCIAL SERVICES

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 AFF# 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 06/11/2003. 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 BUCKLEY02 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.

ADDITIONAL INFORMATION ON THE FEC'S ADMINISTRATIVE FINE PROGRAM,

**WESTERN
UNION****WESTERN UNION COMMERCIAL SERVICES**

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 ALAN SHOOK IN THE REPORTS ANALYSIS DIVISION AT OUR TOLL FREE NUMBER (800)424-9530 (PRESS 1, THEN PRESS 2) 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,

ELLEN L. WEINTRAUB
CHAIR

* * * * *
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 \$275 FOR THE 2002 30 DAY POST-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 06/11/2003. 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: BUCKLEY02

FEC ID#: C00375410

AF#: 890

PAYMENT DUE DATE: 06/11/2003

PAYMENT AMOUNT DUE: \$275



FINANCIAL ADVISORS, INC.

FEC OFFICE OF
ADMINISTRATIVE REVIEW

2003 JUN 11 P 1:21

June 10, 2003

F.E.C. RTB
999 "E" Street NW, Room 703
Washington, DC 20463

Dear Sir:

RE: Buckley 02: ID #C00375410 AF# 890

The campaign was assessed a fine based on a late filing. On December 5, 2002 we completed and downloaded our filing at 8:20 PM PST. On December 12, 2002 we printed out the form 3 and determined that a \$3,000 error had been made in one of the expenditures. The person who was inputting the information called the Election Commission to ask how to file an amendment. The gentleman on the line was not our usual assistant. He researched our records and said that we had no report on file. He then said to make the changes and resubmit the file. We told him that when we downloaded on 12/5/03 we received a number on our screen SDRDNLD1. He said to unclosethe file and resubmit.

When we received the fine notification, we spoke with our FEC assistant Jennifer Pittman. She said that she did not know what the SDRDNLD1 indicated and sent us to the technical department. Mr. Jeff Chumley stated that the SDRD message was an error message. He also said that the reports analysis department would not know that this was an error message. We referred to the manual but could not find any section referring to this error message. All notations on our report screen indicated that the form had been filed. . It would be helpful to have a prompt on your error message which says to contact your analyst.

If we had not called in on December 12, 2002 to learn how to file an amendment, we would not have known that the form had not been filed until May. We ask relief from this fine. We were a very small campaign without any full time staff and had never used the electronic filing before. We have also closed our books, cleared out our bank account and filed our termination report.

Thank you for your attention in this matter.

Sincerely,

Gregory J. Layton, CFP



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Via First Class Mail

June 12, 2003

Gregory J. Layton, as Treasurer
Buckley02
71 Dewey Street
Ashland, Oregon 97520

C00375410
AF# 890

Dear Mr. Layton:

On April 29, 2003, the Federal Election Commission ("the Commission") found reason to believe that Buckley02 and you, as Treasurer, violated 2 U.S.C. § 434(a) with respect to the 2002 30 Day Post-General Report.

On June 11, 2003, the Commission received your written response ("challenge") which is being reviewed by the Office of Administrative Review. If you have any questions regarding your 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 cursive script, reading "Shawn Woodhead Werth".

Shawn Woodhead Werth
Reviewing Officer
Office of Administrative Review

2003 JUN 25 P 2:02

Date: June 25, 2003

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

AF#: 890

Committee Name: Buckley02

Committee ID#: C00375410

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 April 23, 2003 and RTB Certification
Dated April 29, 2003 Previously Forwarded to Your Office -
Attachment # : N/A**

Copy of RTB Mailgram - Attachment # : see declaration

Certified Return Receipt - Attachment # : 1

**Other Reports (Redacted if Necessary) Used for RTB Review -
Attachment # : N/A**

**Telecons and Visitcons in Response to RTB Mailgram (Y/N): Y
Attachment # : 2**

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

RAD Staff Declaration - Attachment # : 3

SENDER: COMPLETE THIS SECTION

- 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.

1. Article Addressed to:

Gregory J. LAYTON
 71 Dewey Street
 Island, Oregon
 97520-2108

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

Langley

B. Date of Delivery

5-5-03

C. Signature

*Bill Gordin

☐ Agent☒ AddresseeD. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)


☐ Yes

2. Article Number (Copy from service label)

7001 0360 0003 4247 1183

DECLARATION OF LISA J. STOLARUK

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 Buckley02:
 - A) Prior Notice dated September 30, 2002 and November 8, 2002 referencing the 2002 30 Day Post-General Report;
 - B) Reason-to-Believe Mailgram dated May 2, 2003 referencing the 2002 30 Day Post-General Report.
3. I hereby certify that I have searched the Commission's public records and find that Buckley02 electronically filed the 2002 30 Day Post-General Report with the Commission on December 12, 2002.
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 25th day of June, 2003.



Lisa J. Stolaruk
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission

● GENERAL ELECTION ● REPORT NOTICE

FEDERAL ELECTION COMMISSION

CONGRESSIONAL COMMITTEES

September 30, 2002

2002 GENERAL ELECTION CANDIDATE COMMITTEES

REPORT	REPORTING PERIOD ¹	REG./CERT.	FILING
		MAILING DATE ²	DATE
Pre-General	10/01/02 - 10/16/02	10/21/02	10/24/02
48-Hour Notices	10/17/02 - 11/02/02	----see reverse side----	
Post-General	10/17/02 - 11/25/02	12/05/02	12/05/02

WHO MUST FILE

Principal campaign committees of congressional candidates³ (including unopposed candidates and candidates whose names do not appear on the ballot) who seek election in 2002 must file Pre- and Post-General Election Reports.⁴

Campaigns that raise or spend more than \$5,000 for the 2002 election cycle (and thus trigger registration and reporting requirements) must file quarterly reports throughout 2002, even if the candidate plans to retire, withdraws from the race prior to the primary election, loses the primary or drops out of the race prior to the general election. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

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/elecfil/electron.html>.

ELECTION CYCLE REPORTING

Authorized committees of federal candidates must aggregate and report receipts and disbursements on an election-cycle basis. For more information, see the enclosed handout, "Election Cycle Reporting for Candidate Committees."

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.

²Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

³An individual becomes a candidate for Federal office (and thus triggers registration and reporting obligations) when his or her campaign exceeds \$5,000 in either contributions or expenditures. If the campaign has not exceeded the \$5,000 threshold, it is not required to file reports.

⁴If the campaign has more than one authorized committee(s) in addition to the principal campaign committee, the principal campaign committee must also file a consolidated report on Form 3Z.

(over)

IMPORTANT FILING INFORMATION

In response to the anthrax threat, the US Postal Service is irradiating mail directed to many federal government agencies, including the FEC and the Secretary of the Senate.⁵ This process has not only delayed mail delivery, it has also damaged and in some cases destroyed pieces of mail. As a result, committees that file reports with the FEC may want to consider submitting their reports by some means other than regular US mail. Alternative methods include:

- Electronic Filing;
- Overnight mail service; and
- Hand delivery.

48 HOUR NOTICES ON CONTRIBUTIONS

Notices are required if the committee receives contributions **(including in-kind gifts or advances of goods or services; loans from the candidate or other non-bank sources; and guarantees or endorsements of bank loans to the candidate or committee)** of \$1,000 or more, during the period of October 17 through November 2, 2002.

The notices must reach the appropriate federal and state filing offices within 48 hours of the committee's receipt of the contribution(s). U.S. House candidates faxing 48-hour notices should transmit them to the FEC at (202) 219-0174. Senate candidates should transmit them to the Secretary of the Senate at (202) 224-1851. Campaign committees that file electronically **MUST** submit their 48-hour notices electronically; for more information, visit the FEC web site at <http://www.fec.gov> and click on the Electronic Filing logo.

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 (including 48-hour notices) on time may be subject to civil money penalties ranging from \$125 to \$16,000 (or more for repeat late- and non-filers). For additional information, see the enclosed handout entitled, "Administrative Fine Program," and visit the FEC 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 that does not pass the validation test will be considered non-filers and may be subject to enforcement actions (including administrative fines).

⁵Senate committees should contact the Secretary of the Senate at (202) 224-0322 for more information on filing reports via regular US mail.

GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

CONGRESSIONAL COMMITTEES

November 8, 2002

*****REMINDER**

REMINDER

REMINDER***

All principal campaign committees of congressional candidates (including unopposed candidates and candidates whose names do not appear on the ballot) who sought election in the General Election must file a Post-General Election Report.

Note: In election years, the reporting period for the Post-General Election Report spans two election cycles. **For this report only, committees should use the Post-Election Detailed Summary Page (FEC Form 3, Pages 5-8).** Committees should not use the normal Detailed Summary Page

Reports sent by registered or certified mail must be postmarked by the mailing date (December 5, 2002); otherwise, they must be received by the filing date (December 5, 2002).

FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2004 MAY 17 A 11:07

May 13, 2004

MEMORANDUM

SENSITIVE

TO: THE COMMISSION

THROUGH: JAMES A. PEHRKON *[Signature]*
STAFF DIRECTOR

ALISON L. DOONE *ALD*
DEPUTY STAFF DIRECTOR

FROM: SHAWN WOODHEAD WERTH *[Signature]*
REVIEWING OFFICER
OFFICE OF ADMINISTRATIVE REVIEW

SUBJECT: AF# 890 - BUCKLEY02 AND GREGORY LAYTON, AS
TREASURER (C00675410)

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). 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



FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20463

May 13, 2004

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

AF# 890 – Buckley02 and Gregory J. Layton, as Treasurer (C00375410)

On April 29, 2003, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Buckley02 and Gregory J. Layton, as Treasurer ("the respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2002 30 Day Post General Report in a timely manner. The Commission also made a preliminary determination that the civil money penalty was \$275 based on the schedule of penalties at 11 C.F.R. § 111.43. The respondents were notified by the Reports Analysis Division ("RAD") via mailgram on May 2, 2003 of the Commission's finding and civil money penalty calculated at RTB.

Respondents' Response

On June 11, 2003, the Commission received the written response ("challenge") from the Treasurer who states that they "completed and downloaded our filing at 8:20 PM PST" on December 5, 2002. When, on December 12, 2002 they "determined that a[n]... error had been made" for one expenditure, they "called the [Federal] Election Commission to ask how to file an amendment. The gentleman on the line was not our usual assistant. He researched our records and said that we had no report on file." He instructed them

to make the changes and resubmit the file. We told him that when we downloaded on 12/5/03 we received a number on our screen SDRDNLD1. He said to unclothe the file and resubmit. When we received the fine notification, we spoke with our FEC assistant Jennifer Pittman. She said that she did not know what the SDRDNLD1 indicated and sent us to the technical department. Mr. Jeff Chumley stated that the SDRD message was an error message. He also said that [RAD] would not know that this was an error message. We referred to the manual but could not find any section referring to this error message. All notations on our report screen indicated that the form had been filed. It would be helpful to have a prompt on your error message which says to contact your analyst. If we had not called in on December 12, 2002 to learn how to file an amendment, we would not have known that the form had not been filed until May.

The Treasurer "asks for relief" from the civil money penalty as they "were a very small campaign without any full time staff" and they "had never used electronic filing before."

Supplemental Requests and Responses

Because the respondents indicate that they thought they had "completed and downloaded our filing at 8:20 PM PST" on December 5, 2002, discovered a week later that there was "no report on file," and spoke to Commission staff about the "SDRDNLD1" message which they received, OAR sent requests for supplemental information to RAD and the Information Technology Division ("ITD"). In its March 17,

2004 request, OAR asked RAD for any information regarding conversations between RAD staff and the respondents concerning the filing of this report.

On April 22, 2004, the Assistant Staff Director for RAD responded, providing records of telephone conversations ("telecons") between two Campaign Finance Analysts ("Analysts") Jennifer Pittman and Alice Kang, and "Ms. Beth Miller, a staff representative from the Buckley02 committee regarding the filing of the committee's reports. We have no other documented telephone conversations with the committee regarding this matter." On March 7, 2003, Jennifer Pittman states in her telecon that

Ms. Miller called in reference to the 2002 Non Filer Notice ... for the Year End Report. Ms. Miller called previously stating that she was concerned because she was going to file an amendment to the Year End report however she could not find the report on our website. I informed her that the report was never received and for her to go back and check her records to see if the Committee received a confirmation code via email or fax stating that report had been successfully uploaded to the server. She said she never received the notice and I told her to try and file an amendment to the previous "filed"-(in terms of her computer records) report and upload that report to the server. She said she would and I put her in contact with [the Electronic Filing Office].

The Analyst states that Ms. Miller called again that day and "informed me that she did file an amendment and uploaded to the server and received a conf[i]rmation via email. I asked her to locate that email and fax it to the Commission ASAP. She said that she would look for it right away." They next spoke on May 28, 2003, when Ms. Miller called the Analyst about "a letter she received stating that the Committee is being fined" and she

is contesting that she called the FEC ... in December [2002] to state that she was having some difficulties filing an amendment to her report. She claims that she filed her report and received a FEC conf[i]rmation number. However, while she was reviewing a paper copy of the report she noticed an error so she was attempting to file an amendment to the report when she received a message that the report could not be amended because it was never filed. Ms. Miller stated that she then called the Commission for help in resolving this.... She claims to have spoken with someone in Electronic Filing.

On May 30, 2003, Ms. Miller spoke with Alice Kang "regarding the RTB mailgram for the 2002 30 Day Post-General Report." Ms. Kang's telecon notes that Ms. Miller explained:

that she had thought the report was filed timely. However, when she called technical support in order to inquire about filing an amendment, they informed her that the ... report was not filed. Ms. Miller filed the report promptly after being informed by electronic filing that the report was not filed. Ms. Miller claimed that the "FDR #" was her confirmation number that the report was filed. Ms. Miller wants to challenge the fine based on [the] belief that the report was prevented in filing timely because of the "FDR#."

In its September 11, 2003 request, OAR asked ITD for information concerning telephone conversations with the respondents about the filing of this report. In its response dated October 10, 2003, the Manager of the Systems Analysis and Design

Branch in ITD states that, on May 3, 2002, the Treasurer requested a password and one "was assigned on the same day." On July 16, 2002, Carlos Luna from the Electronic Filing Office ("EFO") spoke with Ms. Miller "who was experiencing validation errors while attempting to file the July Quarterly Report for 2002." He "had her fax the validation errors and walked her through the process of correcting them. The July Quarterly Report was successfully uploaded and a confirmation receipt was sent to greg@astreetfinancial.com." On October 15, 2002, the October Quarterly Report was "successfully uploaded and a confirmation receipt was sent to greg@astreetfinancial.com" On October 21, 2002, Ms. Miller called the EFO because

the 2002 October quarterly totals in her software did not correspond with the totals of the report she had uploaded. Mr. Luna determined that she had filed her report correctly but had exited the program without saving the changes. He gave her instructions that would enable her to correct the numbers....

On October 23, 2002, "Ms. Miller needed help completing the process of correcting the totals on the 2002 October Quarterly Report. Mr. Luna helped her complete the process." That same day, the "12 Day Pre-General Report was successfully uploaded and a confirmation receipt was sent to greg@astreetfinancial.com." The ITD Manager's response indicates that, on December 12, 2002, the 30 Day Post General Report "was successfully uploaded and a confirmation receipt was sent to greg@astreetfinancial.com."

The next contact between the EFO staff and the respondents occurred when Ms. Miller called the EFO on April 16, 2003 and "wanted to know if she was required to file a Quarterly Report even though she was filing a Termination Report." The EFO staff "referred [her] to her RAD analyst." On May 28, 2003, a committee representative

spoke with Jeff Chumley, Program Manager for the EFO. Mr. Chumley indicated that he suspected the "number SDRDNLD1" the committee received on their screen when they "completed and downloaded" their report was an error message. He suggested they talk to tech[nical] support.

The ITD Manager's response notes that the "EFO logs show no other communications with the committee about the 30 Day Post General Report." Addressing the respondents' statement that the 30 Day Post-General Report was "completed and downloaded" on December 5 at 8:20 pm, and that they received a "number on our screen SDRDNLD1," the ITD Manager states that it

[i]t appears the committee mistakenly initiated the Lookup File download which updates the list of federal committees contained in FECFile, instead of initiating the report upload process. "SDRDNLD1" is a file decryption key, not an error message, and is displayed during the download process of the Lookup File as is the date and time of the download (8:20 pm). There are instructions for proper use of the Lookup File and instructions on how to upload a report in the on-line user's manual. There is no direct relationship between downloading the Lookup File and uploading a report. The processes are quite different: uploading a report requires a committee ID and password whereas downloading the lookup table does not. Had the committee uploaded the 30 Day Post-General Report correctly on December 5, 2002, a confirmation receipt would have been sent as it was for the committee's previous reports.

The ITD Manager further states that

[o]n October 24, all electronic filing systems were transferred to a backup site. The committee's e-mail address contained in the electronic filing system database and used to notify the committee that the report has not been filed, was not among the e-mail addresses available on the backup site. As a result, the EFO did not send a late filing notification email to the committee on December 6, 2002.

He states that "[a]ll reports filed using FECFile prior to December 20, 2002 were filed using FECFile version 4."

Analysis of Challenge

The 30 Day Post-General Report was electronically filed on December 12, 2002, 7 days late.

The Federal Election Campaign Act ("Act") states that the treasurer of a political committee shall file a 30 day post general election report no later than 30 days after the General Election which shall be complete as of the 20th day after the General Election. 2 U.S.C. § 434(a)(2)(A)(ii) and 11 C.F.R. § 104.5(a)(1)(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 and complete filing of reports. 11 C.F.R. § 104.14(d).

Prior Notices for the 30 Day Post General and the October and July Quarterly Reports, sent to the respondents on September 30, September 20 and June 21, respectively, direct filers to the Commission's web site for more information on electronic filing (see <http://www.fec.gov/electfil/electron.html>). At the Electronic Filing section of the Commission's web site, there are articles and material about the Commission's FECFile software and how to electronically file reports.

In the article titled "Don't Make These Common Electronic Filing Mistakes!," it notes that "[a]fter you upload your report electronically a receipt will be sent to you via email or fax. If you do not get the receipt, you must assume that you have not successfully filed. Call the electronic filing office ... if more than a few minutes pass with no receipt. The receipt is proof of filing. Print it out, keep it." The "Electronic Filing FAQ" article explains that "[a] report submitted via the internet or modem requires a password instead of a signature" and advises filers to "keep this email or fax for your records. You may also visit the FEC web site and see your filing on the web." Filers are told that the FECFile software does not come with a printed user manual but "you can download a PDF file that contains the entire manual."

The "FECFile Version 4.0 Electronic Filing Software User's Manual" instructs users in the data entry and uploading procedures required to create and file reports electronically. Chapter 3 explains how to download the Lookup File, the master list of committees and candidates. On page 31, it explains that "when you open your file, if your Lookup table is older than 30 days, you will get a notice on your screen asking if you would like to download a copy of today's database (*fig3-15*)." If you choose "Yes," the "FECLoad Settings window will appear asking you to choose your filing method (i.e.,

the communication method you will utilize to download the latest file)." On page 33, it states that

[w]hen the download is near completion, you may see a window telling you it is "Working". Afterwards, you will get another window saying "The file can be decrypted by these keys: SDRDNLD1." (fig 3-16) Click OK. Again, you may get a window letting you know FECload is "Working", followed by the word "Succeeded" as the last line on your screen.

The screenshot of the "FECload" window displayed in figure 3-16 shows the results of the download process, including the date and time, and the word "Downloading" appears on the first and last lines. The screenshot of the other window in figure 3-16 contains the message that "[t]his file can be decrypted by these keys: SDRDNLD1" and is followed by an "OK" button.

Chapter 6 explains how to upload a report. On page 82, it states that "[i]f the password is correct, and there are no other reasons to reject the file,... the last line of the message is *Succeeded*. At this point you know that your file has been received by the FEC. This does not mean that the file has been accepted. If the file is accepted, you will receive a fax or email within a few minutes notifying you that the filing was accepted. If you don't receive this notification, you should call the electronic filing office immediately." The Manual states at the bottom of the page "NOTE: The faxed or emailed receipt is your official receipt and should be kept just as you would keep a certified mail receipt. This is proof that you filed your report." This same information is presented on the next page in a chapter review summary.

The respondents believed that they had timely filed the 30 Day Post-General Report on December 5 because they received a "number on [the respondents'] screen SDRDNLD1" as well as the date and time. According to the ITD Manger's response, "SDRDNLD1" is not an e-mail confirmation receipt; instead, it is a message users receive when they download the Lookup File. He also explains that there is "no direct relationship between downloading the Lookup File," which does not require a committee ID number and password, and "uploading a report," which does require the use of both an ID number and password.

Although the respondents state that they "had never used the electronic filing before," Commission records show that, prior to December 5, 2002, the respondents successfully uploaded their 2002 July Quarterly, October Quarterly, and 12 Day Pre-General Reports using the Commission's FECFile4 software. E-mail confirmation receipts for these reports were sent to greg@astreetfinancial.com on July 16, October 15, and October 23, 2002, respectively. Thus, they should have been aware that the on-screen message, "SDRDNLD1" with the "FECload" window displaying the date and time, was not an e-mail confirmation receipt for a successful filing. The "SDRDNLD1" FECload message informs the user that the lookup table update has been successfully downloaded and is unrelated to the upload process to file a report.

Had they correctly uploaded the report on December 5, as they did their previous reports, they would have used their Committee ID Number and electronic filing password to complete the upload process and an e-mail confirmation receipt would have been sent to them after the report was accepted and passed validation. As directed in the website

article and the User's Manual, they could have contacted the EFO staff to determine why they did not receive an e-mail confirmation receipt for the 30 Day Post-General Report and then received assistance in filing it, as they did for their prior reports. They also could have checked the Commission's web site to determine if the report had been received by the Commission or called the RAD Analyst and asked that she verify its receipt and acceptance.

The respondents state that it was not until they called on December 12, when they called to request assistance in filing an amended report, that they were told that the 30 Day Post General Report had not been filed. As the ITD Manager notes, due to the transfer of all electronic filing systems to a backup site on October 24, the respondents were not sent an e-mail late filing notification on December 6, 2002. Although they were not sent an electronic notification of their failure to file the report, it does not absolve them of their responsibility to timely file the report. The Act clearly states that it is the Treasurer's responsibility to file reports in a timely manner even if the person who electronically transmits the report to the Commission fails to complete all of the steps required to electronically file it.

The other issues raised in the challenge (the Committee is a "very small campaign without any full time staff" and they "have ... closed our books, cleared out our bank account and filed our termination report") do not fall within the list of defenses outlined in 11 C.F.R. § 111.35(b). 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 30 Day Post 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 \$275.

OAR Recommendations

- (1) Make a final determination in AF# 890 that Buckley02 and Gregory J. Layton, as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$275; and
- (2) Send the appropriate letter.

Reviewing Analyst: Jennifer H. Boyt

Attachments

- Attachment 1 - Challenge Received from Respondents
- Attachment 2 - Supplemental Request and Response from ITD
- Attachment 3 - Supplemental Request and Response from RAD
- Attachment 4 - Declaration from RAD
- Attachment 5 - Declaration from OAR



FINANCIAL ADVISORS, INC.

FEC OFFICE OF
ADMIN REVIEW

Attachment # 1
Pages

2003 JUN 11 P 1:21

June 10, 2003

F.E.C. RTB
999 "E" Street NW, Room 703
Washington, DC 20463

Dear Sir:

RE: Buckley 02: ID #C00375410 AF# 890

The campaign was assessed a fine based on a late filing. On December 5, 2002 we completed and downloaded our filing at 8:20 PM PST. On December 12, 2002 we printed out the form 3 and determined that a \$3,000 error had been made in one of the expenditures. The person who was inputting the information called the Election Commission to ask how to file an amendment. The gentleman on the line was not our usual assistant. He researched our records and said that we had no report on file. He then said to make the changes and resubmit the file. We told him that when we downloaded on 12/5/03 we received a number on our screen SDRDNL1. He said to uncloze the file and resubmit.

When we received the fine notification, we spoke with our FEC assistant Jennifer Pittman. She said that she did not know what the SDRDNL1 indicated and sent us to the technical department. Mr. Jeff Chumley stated that the SDRD message was an error message. He also said that the reports analysis department would not know that this was an error message. We referred to the manual but could not find any section referring to this error message. All notations on our report screen indicated that the form had been filed. . It would be helpful to have a prompt on your error message which says to contact your analyst.

If we had not called in on December 12, 2002 to learn how to file an amendment, we would not have known that the form had not been filed until May. We ask relief from this fine. We were a very small campaign without any full time staff and had never used the electronic filing before. We have also closed our books, cleared out our bank account and filed our termination report.

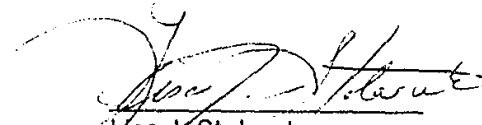
Thank you for your attention in this matter.

Sincerely,

Gregory J. Layton, CFP

DECLARATION OF LISA J. STOLARUK

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 Buckley02:
 - A) Prior Notice dated September 30, 2002 and November 8, 2002 *referencing* the 2002 30 Day Post-General Report;
 - B) Reason-to-Believe Mailgram dated May 2, 2003 referencing the 2002 30 Day Post-General Report.
3. I hereby certify that I have searched the Commission's public records and find that Buckley02 electronically filed the 2002 30 Day Post-General Report with the Commission on December 12, 2002.
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 25th day of June, 2003.


Lisa J. Stolaruk
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission

GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

CONGRESSIONAL COMMITTEES

September 30, 2002

2002 GENERAL ELECTION CANDIDATE COMMITTEES

REPORT	REPORTING PERIOD ¹	REG./CERT.	FILING
		MAILING DATE ²	DATE
Pre-General	10/01/02 - 10/16/02	10/21/02	10/24/02
48-Hour Notices	10/17/02 - 11/02/02	----see reverse side----	
Post-General	10/17/02 - 11/25/02	12/05/02	12/05/02

WHO MUST FILE

Principal campaign committees of congressional candidates³ (including unopposed candidates and candidates whose names do not appear on the ballot) who seek election in 2002 must file Pre- and Post-General Election Reports.⁴

Campaigns that raise or spend more than \$5,000 for the 2002 election cycle (and thus trigger registration and reporting requirements) must file quarterly reports throughout 2002, even if the candidate plans to retire, withdraws from the race prior to the primary election, loses the primary or drops out of the race prior to the general election. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

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/elecfil/electron.html>.

ELECTION CYCLE REPORTING

Authorized committees of federal candidates must aggregate and report receipts and disbursements on an election-cycle basis. For more information, see the enclosed handout, "Election Cycle Reporting for Candidate Committees."

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.

²Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

³An individual becomes a candidate for Federal office (and thus triggers registration and reporting obligations) when his or her campaign exceeds \$5,000 in either contributions or expenditures. If the campaign has not exceeded the \$5,000 threshold, it is not required to file reports.

⁴If the campaign has more than one authorized committee(s) in addition to the principal campaign committee, the principal campaign committee must also file a consolidated report on Form 3Z.

(over)

IMPORTANT FILING INFORMATION

In response to the anthrax threat, the US Postal Service is irradiating mail directed to many federal government agencies, including the FEC and the Secretary of the Senate.⁵ This process has not only delayed mail delivery, it has also damaged and in some cases destroyed pieces of mail. As a result, committees that file reports with the FEC may want to consider submitting their reports by some means other than regular US mail. Alternative methods include:

- Electronic Filing;
- Overnight mail service; and
- Hand delivery.

48 HOUR NOTICES ON CONTRIBUTIONS

Notices are required if the committee receives contributions **(including in-kind gifts or advances of goods or services; loans from the candidate or other non-bank sources; and guarantees or endorsements of bank loans to the candidate or committee)** of \$1,000 or more, during the period of October 17 through November 2, 2002.

The notices must reach the appropriate federal and state filing offices within 48 hours of the committee's receipt of the contribution(s). U.S. House candidates faxing 48-hour notices should transmit them to the FEC at (202) 219-0174. Senate candidates should transmit them to the Secretary of the Senate at (202) 224-1851. Campaign committees that file electronically **MUST** submit their 48-hour notices electronically; for more information, visit the FEC web site at <http://www.fec.gov> and click on the Electronic Filing logo.

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 (including 48-hour notices) on time may be subject to civil money penalties ranging from \$125 to \$16,000 (or more for repeat late- and non-filers). For additional information, see the enclosed handout entitled, "Administrative Fine Program," and visit the FEC 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 that does not pass the validation test will be considered non-filers and may be subject to enforcement actions (including administrative fines).

⁵Senate committees should contact the Secretary of the Senate at (202) 224-0322 for more information on filing reports via regular US mail.

GENERAL ELECTRIC REPORT NOTICE

FEDERAL ELECTION COMMISSION

CONGRESSIONAL COMMITTEES

November 8, 2002

*****REMINDER REMINDER REMINDER*****

All principal campaign committees of congressional candidates (including unopposed candidates and candidates whose names do not appear on the ballot) who sought election in the General Election must file a Post-General Election Report.

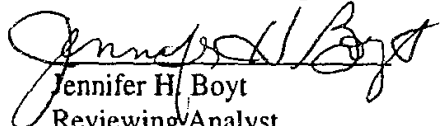
Note: In election years, the reporting period for the Post-General Election Report spans two election cycles. **For this report only, committees should use the Post-Election Detailed Summary Page (FEC Form 3, Pages 5-8).** Committees should not use the normal Detailed Summary Page

Reports sent by registered or certified mail must be postmarked by the mailing date (December 5, 2002); otherwise, they must be received by the filing date (December 5, 2002).

FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100

DECLARATION OF JENNIFER HENRY BOYT

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 2002 30 Day Post-General Report, covering the period October 17 through November 25, 2002, is due December 5, 2002. If electronically filed, it must be received and validated at or before 11:59 p.m., Eastern Standard/Daylight Time on December 5 to be timely filed.
3. It is the practice of the Commission's Information Division to send prior notification of a report's due date to committees and treasurers at their address of record approximately 3 weeks before the due date.
4. It is the practice of the Authorized and Compliance Branches in the Commission's Report Analysis Division to document all calls to or from committees regarding a letter or mailgram they received or any questions relating to the administrative fine regulations including due dates of reports and filing requirements.
5. 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 Version 4.0 Electronic Filing Software User's Manual on the Commission's web site at <http://www.fec.gov/elecfil/electron> for the use of committees and treasurers who are electronic filers.
6. I hereby certify that I have searched the Commission's public records and that the documents identified herein are true and accurate copies of the:
 - a) Page 1 of the Summary Page for the 2002 July Quarterly Report electronically filed by Buckley02 and Gregory J. Layton, as Treasurer. According to the Commission's records, the report was received on July 16, 2002;
 - b) Page 1 of the Summary Page for the 2002 October Quarterly Report electronically filed by Buckley02 and Gregory J. Layton, as Treasurer. According to the Commission's records, the report was received on October 15, 2002;
 - c) Page 1 of the Summary Page for the 2002 12 Day Pre-General Report electronically filed by Buckley02 and Gregory J. Layton, as Treasurer. According to the Commission's records, the report was received on October 23, 2002; and
 - d) Page 1 of the Summary Page for the 2002 30 Day Post General Report electronically filed by Buckley02 and Gregory J. Layton, as Treasurer. According to the Commission's records, the report, covering the period from October 17 through November 30, 2002, was received on December 12, 2002.
7. 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 13th of May, 2004.


Jennifer H. Boyt
Reviewing Analyst
Office of Administrative Review
Federal Election Commission



Federal Election Commission

Select another section of this site

▼ GO

Electronic Filing FAQ

Table of Contents

1. General Information
2. Paper vs. Electronic filing
3. Passwords
4. Submitting an electronic filing

General Information

Question: Can I begin electronic filing at any time of the year?

Answer: Yes... but for aggregate amounts and summary totals to be correct, previous information must be entered either completely or in total amounts. For example, a person who has made three previous contributions during the current year and one during the current reporting period would require either all four contributions, or the current contribution plus a single contribution for the total amount of the three previous contributions be entered. In the second case, the lump sum contribution must be dated in a previous period but the exact date is not relevant for aggregation purposes.

Unitemized contributions from sources that will not reach the itemization threshold during the year can be entered as a single lump sum. This entry need not be attributed to a particular individual or organization. After adding the lump-sum transaction, choose "Itemize" from the edit menu. The itemize feature toggles so that choosing it a second time marks the transaction as itemized. **Important!** If you enter the data this way, the program cannot track aggregates for those whose transactions are not attributed to them. If one of these people eventually goes over \$200 and requires itemization, their transaction amounts must be removed from the lump-sum unitemized transaction and entered into their own record (as individual transactions or a lump sum as described above.)

Question: What information from my report is displayed on the Internet?

Answer: The entire report is made available. The information is presented in several ways. The data is displayed in HTML format and also goes through a virtual scanning procedure and displayed with the scanned images of paper reports. To differentiate between paper and electronically filed reports, the Name of the Treasurer on the summary page of electronically filed reports is preceded by "Electronically filed by".

Question: What are my options for preparing an electronically filed report?

Answer: FECFile is software available at no cost from the FEC. Commercial software is available and electronic filing tools are available to programmers for incorporating into their software.

Question: What are some advantages of electronic filing?

Answer:

▶ **Instant confirmation of submission**

Moments after filing, you will receive a fax or email or both that confirms that your file was not only received by the FEC but was in the accepted format. Included in this receipt are the filing number, necessary for filing amendments, and a checksum number that indicate that the file was not altered in transit.

▶ **Validation features look for missing information prior to filing**

Missing information such as employer, occupation and address is displayed by FECheck, the electronic filing validator. These are "level 4" errors that will not prevent a filing from being accepted by the FEC. Other, more serious errors such as missing signatory and invalid file format cause higher error levels and must be corrected prior to filing.

▶ **Remove third party delivery from the reporting process**

Information filed electronically travels a direct path from your computer into the FEC database. There is no possibility of the report being lost "in the mail". All reports whether paper or electronic are entered into the FEC database. Information from paper reports is keyed into the system manually. Electronic files are sent directly into the system automatically thus offering electronic filers the maximum control over the permanent record.

▶ **Amendments are very easy**

Filing an amendment is as simple as making the necessary changes to existing transaction or adding new ones and filing again. The details vary slightly depending on the software you use but the process is very simple.

▶ **Aggregates and Summary information calculated for you**

Year-to-date aggregates are tracked by the software and transactions are itemized automatically when the \$200 threshold is reached. The line totals on the summary page are calculated automatically based on the data entered for the corresponding schedules.

Question: Will contributor names and addresses be available on the internet?

Answer: Yes. They are available when filed on paper as well.

Question: How do I "sign" my electronic filing?

Answer: A report submitted via the internet or modem requires a password instead of a signature. (The Treasurer's signature is required

to receive a password). Reports filed on diskette must be accompanied by a signed summary page.

Question: How much does FECFile cost?

Answer: Nothing. It is absolutely free.

Question: How do I get FECFile?

Answer: You can download it Or we can send it by mail.

Question: Can I print Reports on paper with FECFile?

Answer: Yes. Paper reports can be printed and used for fact checking purposes, State filings or filing amendments to reports that were originally filed on paper.

Question: Is help available for FECFile?

Answer: Yes. If you have electronic filing questions or need help with any aspect of electronic filing, call the electronic filing help line, 800-424-9530 ext. 1642 or 202-694-1642.

Question: When I order FECFile does that obligate me to file electronically?

Answer: No. Downloading, installing and using the software in no way obligates you to file electronically. Once you actually actually file electronically, you are obligated to continue filing for the remainder of the calendar year.

Question: Does FECFile store my contributor information?

Answer: Yes. FECFile stores names, addresses and transactions.

Question: Does FECFile come with a printed user manual?

Answer: No, but you can download a PDF file that contains the entire manual.

Question: Is FECFile available for Presidential committees

Answer: No. It does not support Form 3P. Presidentials that accept matching funds MUST file electronically but may not use FECFile.

Back to Top

Paper vs. Electronic Filing

Question: Once I file electronically can I switch back to paper?

Answer: Electronic filers are required to finish out the filing year before going back to paper.

Question: Can I amend a paper filing electronically?

Answer: No, but FECFile allows you to print an amendment when necessary.

Question: Should I submit paper forms as well as electronic?

Answer: No. The paper filing would be received after the electronic and thus not be considered an official filing.

Back to Top

Passwords

Question: Can anyone get a password to file electronically?

Answer: Only the current official treasurer and treasurer's assistant as listed in the FEC records may obtain passwords. Obtaining a password requires a request on official committee letterhead for each password. The treasurer must sign all requests and if the password is for an assistant, the assistant must sign as well.

Question: If I forget my password, what should I do

Answer: You are the only one who knows your password. If you forget you must obtain a new password from the electronic filing office following the request procedure outlined above.

Back to Top

Submitting an electronic filing

Question: How do I submit an electronic filing to the FEC?

Answer: The software you use to file electronically will have a validator to make sure your report passes certain basic criteria. The report will not pass validation if there is a major problem such as incorrect file structure or a missing Treasurer's name. It also has an upload feature that automatically sends the report to the FEC via Internet connection or modem or to a floppy disk.

Question: Can I email my filing to the FEC?

Answer: No. Email is not secure enough for that and there is no way to automatically validate and accept or reject an emailed file.

Question: How do I know the FEC has my filing?

Answer: When you upload a filing to the FEC, you receive an instant email and/or fax confirming receipt of the report. It includes a validation number to match against your own validation number to confirm that the report was not altered in any way in transit. It is important that you keep this email or fax for your records. You may also visit the FEC web site and see your filing on the web.

Question: What goes in the "Filing ID" field on the Report Information screen?

Answer: This information is entered *after* filing a report. The email or fax confirmation will include a report ID such as FEC-1234. This ID should be entered into the Filing ID field. If the report ever needs to be amended, this is the information that is entered on the upload screen under "This filing amends."

Question: What are the Configuration screen settings for uploading?

Answer:

- ▶ For uploading via the Internet: (These settings are case sensitive and must be entered exactly as indicated)

TCP/IP Hostname: fecef1.sdrdc.com

Agency ID: FEC

- ▶ For uploading via Modem:

COM Port: 2 is the default and the most common modem com port. It could vary.

BAUD Rate: 19200 is the default. Try 14400 if this does not work.

Dialup string: ATDT12027372293

Agency ID: FEC

Back to Top

Updated 07/09/2001



Federal Election Commission | 999 E Street, NW | Washington, DC 20463
(800) 424-9530 | In Washington (202) 694-1100
For the hearing impaired, TTY (202) 219-3336

Send comments and suggestions about this site to: webmaster@fec.gov
[FEC Privacy Policy](#) | [Viewing Requirements](#)



Common Electronic Filing Mistakes

Passwords

- Not getting a password
- Waiting until the last minute to get a password
- Forgetting your password

If you forget to get a password or put it off until the last minute, it may not be possible to get one on a filing deadline day.

If you forget your password, we can't look it up for you. It is encrypted. You have to request another one.

Attempting a first filing on the filing deadline day

Any problem, be it technical or a matter of non-familiarity with the software, can be difficult to deal with during the rush of a deadline day. Always file as early as possible, especially the first time you file electronically.

No Receipt, no Filing

After you upload your report electronically a receipt will be sent to you via email or fax. If you do not get the receipt, you must assume that you have not successfully filed. Call the electronic filing office - 202-694-1321 - if more than a few minutes pass with no receipt.

The receipt is proof of filing. Print it out, keep it.

Validate early and often

Don't wait until the last minute to validate your filing. Validation will find problems that you might not have noticed. If you validate on a regular basis, you will run much less risk of finding a long list of problems to resolve before uploading is possible.

Wrong Report Type

One of the most common mistakes in electronic filing is filing a report with the wrong report designation. For example, filing a report that covers 1/1/2001 to 6/30/2001 and calling it a "First Quarter" report or a "May Monthly" report instead of correctly identifying it as a "July 31, Mid Year" report.

Chapter 3 – Basic Reports and Transactions



Starting the Program for the First Time

Creating a File

Upon opening FECFile4, you will see the FEC logo in the opening screen (Fig 3-1). In a few seconds, the opening screen will clear and you will see the following selection screen (Fig 3-2). It provides four options. If you select the Exit option, you will simply close the program. The "Get some Help!" option provides a graphical overview of the filing process – a simple map to the process of filing.

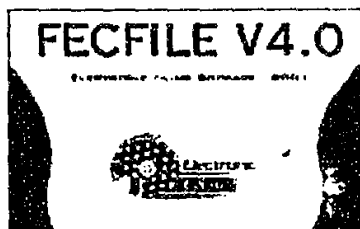


Fig 3-1

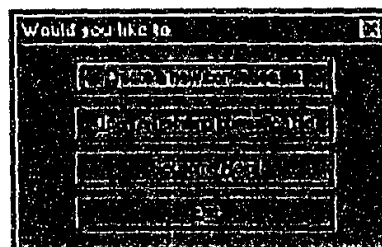


Fig 3-2

First-time users of FECFile should select (click on) the top option, *Create a New Committee File*. Please note that you will usually select this option only once – the first time you enter your committee information. After you complete creating your committee file in the first session, and for all subsequent times you wish to add a new report, or open your file for use, you will always select (click on) the second button *Open an Existing Committee File*.

When you click Prev or Next, with a committee/candidate name highlighted, you will cycle through a list of candidates and committees that are related by FEC ID number. For example, you gave money to Melanie Haskell for Congress committee. You entered Melanie Haskell in the Last Name field of the Individual/Organization Information screen and then clicked Lookup. When the file opens you are brought to Melanie Haskell for Congress. If you then click on Next or Prev, you will see all committees associated with Melanie Haskell. When the committee that received the disbursement appears, click Copy All (if you already have the name and address information, you can choose Copy ID to add the committee ID).

After you have clicked Copy All from the FEC ID Lookup, a screen will appear displaying all of the information that will be copied into your file. The check boxes are automatically checked because all the information is needed for a committee or candidate. However, if you do not want a piece of that information copied you can remove the check by clicking in the check box.

NOTE - if you remove a check from a field when creating an entity, the next time you use the Lookup feature, that checkbox will remain unchecked. To return the check mark in a field, click the box between the field name and the information.

To bring the information into your file, click *OK*. Click the *OK* button to add the entity to your *Individuals/Organizations View*.

Updating (Downloading) the Lookup File

The Lookup file will send a notice to you when it is more than 30 days old. The FEC updates its master list of committees and candidates on a daily basis. The FEC's master list is part of the FECFile installation (a file called export2.cm contains the information). The software is set up to notify you once every 30 days. However, you have the ability to download a recent copy of the file whenever you choose. It is a good idea to do this when you install the program, as the file could be months out of date by the time the program is installed.

The Notification

When you open your file, if your Lookup table is older than 30 days, you will get a notice on your screen asking if you would like to download a copy of today's database (fig 3-15). If you answer by clicking *No*, the file will not be updated but you will be able to enter transactions into FECFile. If you answer by clicking *Yes*, the FECLoad Settings window will appear asking you to choose your filing method (i.e.,

the communication method you will utilize to download the latest file). Your options are TCP/IP (an Internet connection) or Dialup (a modem connection) from the Download screen. All the other fields on this screen will be inactive (shaded gray). The configure screen will vary according to the filing method you chose. If you selected *TCP/IP* on the Download screen, the Configure screen will have **herndon4.sdrdc.com** as the hostname (this is the name of the server that has the export2.cm file available for download) and the Agency ID will be **FECDL**. If you selected *Dialup* from the Download screen, the Configure screen will have your COM port set as **2**; the Baud rate set as **19200**; the Dialup string as **ATDT17038346968** and Agency ID as **FECDL**. The COM port is the communication port that runs your modem. If you cannot connect with this setting, or if you know you are using a different COM port, please change the COM port number in this field (possibilities COM port 1, COM port 2, COM port 3 or COM port 4). In addition, if you are using a different Baud rate, please change the setting. The program defaults to these two setting since they are the most commonly utilized. Do not change the Dialup string or Agency ID unless you are instructed by the software's technical support staff.

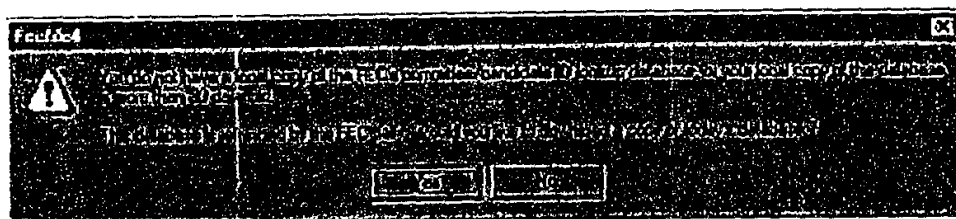


Fig 3-15

NOTE - IF you choose *TCP/IP*, you must be connected to the Internet prior to downloading.

When you click *OK* from the settings screen, you will be asked where you want to save the Lookup file (export2.cm). The software should default to the location where the program is installed. It is important to save this file in the same location as the program. The file will default to export2.cm. Do not change the name of this file. Click *OK*. If you are asked "do you want to replace the existing file?", click *Yes*. The download process will begin. It may take several minutes depending on the speed of your modem and/or quality of your Internet connection.

During the download, you should be looking at a screen that says **FECload** in the upper left corner. Inside **FECload** you will see a window displaying the download results. A few messages will appear on your screen letting you know the program is about to download. The program might pause after it says "Requesting export2.cm"; do not worry, the process should continue. The next message should say "Server response ..." and in the bottom right corner, a number that is growing as the file is downloading (the number represents the bytes being transferred). Currently the file is

about 4 megabytes compressed. The speed of the download process is dependent upon your connectivity. When the download is near completion, you may see a window telling you it is "Working". Afterwards, you will get another window saying "The file can be decrypted by these keys: SDRDNLD1." (fig 3-16) Click OK. Again, you may get a window letting you know FECload is "Working", followed by the word "Succeeded" as the last line on your screen.

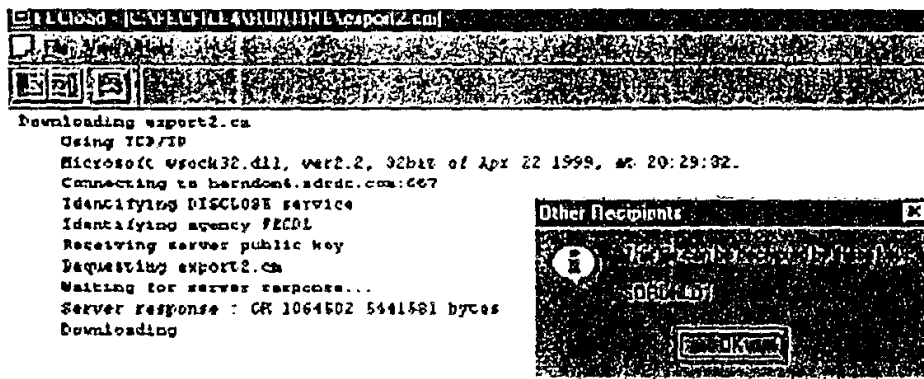


Fig 3-16

Reports

The *Reports* View displays a history of all reports contained in your file. To activate the *Reports* window, go to *View* on the menu bar and select *Reports*. If you have already followed the steps to set up a new committee, you will see one report in the window. Clicking on the report line in this View generates the Summary Page of an FEC report.

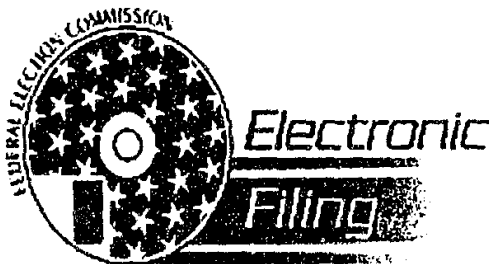
This View has an automatic sort. The sort is based on the report coverage dates (i.e., Date from and Date to) and the Filed on date. The user does not have the ability to change the order of reports in this View. However, you do have the ability to size the columns. In other words, all columns can be made wider or narrower. For further explanation refer to the *Individuals/Organizations* View.

There are six things you can do to a report: create, modify, delete, close, amend and archive.

Create (New) - This feature allows you to enter new reports into your file. With the *Reports* View active:

⇒ Go to *Edit* on the menu bar and select *New*.

Chapter 6 - File Submission



When all transactions have been entered for a given report, and the deadline for reporting is drawing near, it is a good time to take inventory of the pieces of the reporting puzzle that must be assembled in order to file electronically. This chapter addresses what is needed for electronic filing, and the process for doing the filing.

Base Filing Requirements

- ⇒ You must have your FEC electronic filing password. Without this, you cannot file. Call the FEC electronic filing office if you do not have or cannot remember your password.
- ⇒ You must have a modem and phone line connection for dial up, or a network connection to the Internet. (In rare instances, when you have no other option, there is the possibility of filing via diskette).
- ⇒ Your report must pass validation.

Signing and Dating the Report

If the report is not properly signed and dated, the validator will note that the information is missing and generate Level 12 (serious level) errors, and uploading will not be possible. If you are not ready to actually upload the report, but want to validate it, you may want to leave the report date blank.

Dialup string

The *Dialup string* is a series of letters followed by a phone number. This information is passed to your modem to enable it to connect with the FEC modem pool.

Agency ID

This information is used to direct the filing to the proper part of the electronic filing system. The default entry is FEC. There is no need to edit this entry.

During the Filing Process

When you choose *OK*, the file is uploaded to the FEC electronic filing server. On your screen you will see a series of messages telling you what is happening. If at any point during the process, something is found to be incorrect, the process will be terminated and the word *FAILED* will appear at the bottom of the screen. The most common failures are incorrect passwords (The password *IS* case sensitive) and uploading without first connecting to the Internet (TCP/IP only). If the upload process generates a *FAILED* message at any point, call Tech Support.

If the password is correct, and there are no other reasons to reject the file (the Validator usually eliminates most other problems), the last line of the message is *Succeeded*. At this point you know that your file has been received by the FEC. This does not mean that the file has been *accepted*! If the file is accepted, you will receive a fax or email within a few minutes notifying you that the filing was accepted. If you don't receive this notification, you should call the electronic filing office immediately.

When you receive your notification you will recognize it as the same printout that the validator provided. It should in fact be nearly identical. The MD5 Checksum number should match exactly. Example:

The only difference between this notification and the one you print out from the validator is the addition of a block of information about filing date and time and a Filing ID number. This number is assigned when the report is received and it is important. If you find that you must amend this report, you must provide the Filing ID of the report. The Filing ID is automatically saved inside your file, after you upload. You may look up the Filing ID by activating the Reports View, Selecting Edit, and clicking Close Report. There is a field that will hold the Filing ID of the report.

NOTE: The Faxed or emailed receipt is your official receipt and should be kept just as you would keep a certified mail receipt. This is proof that you filed your report.



Review - Chapter 6

1. Password! You must have a password to file electronically.
2. You must "sign" the report by indicating the treasurer or assistant treasurer.
3. Entering a *Filed on* date is required prior to filing, but doing so does *not* upload your report to the FEC!
4. Reports may be uploaded via the Internet or by direct modem connection.
5. When a report is uploaded and accepted by the FEC, you will receive a fax or email confirmation. If you do not receive the confirmation, call the FEC electronic filing office!

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

CONGRESSIONAL COMMITTEES

June 21, 2002

I. CANDIDATES ACTIVE IN 2002 ELECTIONS -- QUARTERLY

REPORT	REPORTING PERIOD ¹	REG./CERT.	FILING
		MAILING DATE ²	DATE
July Quarterly	04/01/02 - 06/30/02	07/15/02	07/15/02

WHO MUST FILE

Principal campaign committees of congressional candidates³ (including unopposed candidates and candidates whose names do not appear on the ballot) who seek election in 2002 must file a July Quarterly Report.⁴

Campaigns that raise or spend more than \$5,000 for the 2002 election cycle (and thus trigger registration and reporting requirements) must file quarterly reports throughout 2002, even if the candidate plans to retire, withdraws from the race prior to the primary election, loses the primary or drops out of the race prior to the general election. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

II. CANDIDATES NOT ACTIVE IN 2002 ELECTIONS -- SEMIANNUAL

REPORT	REPORTING PERIOD ¹	REG./CERT.	FILING
		MAILING DATE ²	DATE
Mid-Year	01/01/02 - 06/30/02	07/31/02	07/31/02

WHO MUST FILE

Principal campaign committees of candidates not active in the 2002 elections (i.e., committees active in past elections or those seeking election in future years) must file a Mid-Year Report.

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.

²Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

³An individual becomes a candidate for Federal office (and thus triggers registration and reporting obligations) when his or her campaign exceeds \$5,000 in either contributions or expenditures. If the campaign has not exceeded the \$5,000 threshold, it is not required to file reports.

⁴If the campaign has more than one authorized committee(s) in addition to the principal campaign committee, the principal campaign committee must also file a consolidated report on Form 3Z.

(over)

IMPORTANT FILING INFORMATION

In response to the anthrax threat, the US Postal Service is irradiating mail directed to many federal government agencies, including the FEC and the Secretary of the Senate.⁵ This process has not only delayed mail delivery, it has also damaged and in some cases destroyed pieces of mail. As a result, committees that file reports with the FEC may want to consider submitting their reports by some means other than regular US mail. Alternative methods include:

- Electronic Filing;
- Overnight mail service; and
- Hand delivery.

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) 694-1307, and visit our web site at <http://www.fec.gov/electfil/electron.html>.

ELECTION CYCLE REPORTING

Authorized committees of federal candidates must aggregate and report receipts and disbursements on an election-cycle basis. For more information, see the enclosed handout, "Election Cycle Reporting for Candidate Committees."

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 (including 48-hour notices) on time may be subject to civil money penalties ranging from \$125 to \$16,000 (or more for repeat late- and non-filers). For additional information, see the enclosed handout entitled, "Administrative Fine Program," and visit the FEC 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 that does not pass the validation test will be considered non-filers and may be subject to enforcement actions (including administrative fines).

⁵Senate committees should contact the Secretary of the Senate at (202) 224-0322 for more information on filing reports via regular US mail.

FEC
FORM 3REPORT OF RECEIPTS
AND DISBURSEMENTS

For 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													
BUCKLEY 02																	
ADDRESS (number and street)		525 'A' STREET															
Check if different than previously reported. (ADC)		SUITE 2															
		ASHLAND		OR 97520													
2. FEC IDENTIFICATION NUMBER		CITY		STATE													
C00375410				ZIP CODE													
		3. IS THIS REPORT		STATE DISTRICT													
		X NEW (N) OR		OR 02													
4. TYPE OF REPORT (Choose One)																	
(a) Quarterly Reports:																	
<table border="0"> <tr> <td>April 15 Quarterly Report (Q1)</td> <td>Primary (12P)</td> <td>General (12G)</td> <td>Runoff (12R)</td> </tr> <tr> <td>X July 15 Quarterly Report (Q2)</td> <td>Convention (12C)</td> <td>Special (12S)</td> <td></td> </tr> <tr> <td>October 15 Quarterly Report (Q3)</td> <td>Election on</td> <td></td> <td>in the State of</td> </tr> </table>						April 15 Quarterly Report (Q1)	Primary (12P)	General (12G)	Runoff (12R)	X July 15 Quarterly Report (Q2)	Convention (12C)	Special (12S)		October 15 Quarterly Report (Q3)	Election on		in the State of
April 15 Quarterly Report (Q1)	Primary (12P)	General (12G)	Runoff (12R)														
X July 15 Quarterly Report (Q2)	Convention (12C)	Special (12S)															
October 15 Quarterly Report (Q3)	Election on		in the State of														
(b) 12-Day PRE-Election Report for the:																	
<table border="0"> <tr> <td>January 31 Year-End Report (YE)</td> <td>(c) 30-Day POST-Election Report for the:</td> <td></td> <td></td> </tr> <tr> <td>July 31 Mid-Year Report (Non-election Year Only) (MY)</td> <td>General (30G)</td> <td>Runoff (30R)</td> <td>Special (30S)</td> </tr> <tr> <td>Termination Report (TER)</td> <td>Election on</td> <td></td> <td>in the State of</td> </tr> </table>						January 31 Year-End Report (YE)	(c) 30-Day POST-Election Report for the:			July 31 Mid-Year Report (Non-election Year Only) (MY)	General (30G)	Runoff (30R)	Special (30S)	Termination Report (TER)	Election on		in the State of
January 31 Year-End Report (YE)	(c) 30-Day POST-Election Report for the:																
July 31 Mid-Year Report (Non-election Year Only) (MY)	General (30G)	Runoff (30R)	Special (30S)														
Termination Report (TER)	Election on		in the State of														
5. Covering Period 05 02 2002 through 06 30 2002																	

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 GREGORY LAYTON

Signature of Treasurer Electronically Filed by GREGORY LAYTON

Date 07 16 2002

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
OnlyFEC FORM 3
(Revised 1/2001)

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

CONGRESSIONAL COMMITTEES

September 20, 2002

REPORTING DATES

REPORT	REPORTING PERIOD ¹	REG./CERT.	FILING
		MAILING DATE ²	DATE
October Quarterly	07/01/02 - 09/30/02	10/15/02	10/15/02

WHO MUST FILE

Principal campaign committees of congressional candidates³ (including unopposed candidates and candidates whose names do not appear on the ballot) who seek election in 2002 must file an October Quarterly Report.⁴

Campaigns that raise or spend more than \$5,000 for the 2002 election cycle (and thus trigger registration and reporting requirements) must file quarterly reports throughout 2002, even if the candidate plans to retire, withdraws from the race prior to the primary election, loses the primary or drops out of the race prior to the general election. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

WHO NEED NOT FILE

Principal campaign committees of candidates not active in the 2002 elections (i.e., committees active in past elections or those seeking election in future years) should not file the October Quarterly report; instead, they report semiannually. The next semiannual report is due January 31, 2003.

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.

²Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

³An individual becomes a candidate for Federal office (and thus triggers registration and reporting obligations) when his or her campaign exceeds \$5,000 in either contributions or expenditures. If the campaign has not exceeded the \$5,000 threshold, it is not required to file reports.

⁴If the campaign has more than one authorized committee(s) in addition to the principal campaign committee, the principal campaign committee must also file a consolidated report on Form 3Z.

(over)

IMPORTANT FILING INFORMATION

In response to the anthrax threat, the US Postal Service is irradiating mail directed to many federal government agencies, including the FEC and the Secretary of the Senate.⁵ This process has not only delayed mail delivery, it has also damaged and in some cases destroyed pieces of mail. As a result, committees that file reports with the FEC may want to consider submitting their reports by some means other than regular US mail. Alternative methods include:

- Electronic Filing;
- Overnight mail service; and
- Hand delivery.

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/elecfil/electron.html>.

ELECTION CYCLE REPORTING

Authorized committees of federal candidates must aggregate and report receipts and disbursements on an election-cycle basis. For more information, see the enclosed handout, "Election Cycle Reporting for Candidate Committees."

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 (including 48-hour notices) on time may be subject to civil money penalties ranging from \$125 to \$16,000 (or more for repeat late- and non-filers). For additional information, see the enclosed handout entitled, "Administrative Fine Program," and visit the FEC 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 that does not pass the validation test will be considered non-filers and may be subject to enforcement actions (including administrative fines).

⁵Senate committees should contact the Secretary of the Senate at (202) 224-0322 for more information on filing reports via regular US mail.

FEC
FORM 3REPORT OF RECEIPTS
AND DISBURSEMENTS

For An Authorized Committee

Office Use Only

1. NAME OF
COMMITTEE (in full)USE FEC MAILING LABEL
OR TYPE OR PRINTExample: If typing, type
over the lines

BUCKLEY 02

ADDRESS (number and street)

525 'A' STREET

Check if different
than previously
reported. (ADC)

SUITE 2

ASHLAND

OR

97520

2. FEC IDENTIFICATION NUMBER

CITY

STATE

ZIP CODE

STATE DISTRICT

C00375410

3. IS THIS
REPORT

X

NEW
(N)

OR

AMENDED
(A)

OR

02

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

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

April 15 Quarterly Report (Q1)

Primary (12P)

General (12G)

Runoff (12R)

July 15 Quarterly Report (Q2)

Convention (12C)

Special (12S)

X October 15 Quarterly Report (Q3)

Election on

in the
State of

January 31 Year-End Report (YE)

(c) 30-Day POST-Election Report for the:

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

General (30G)

Runoff (30R)

Special (30S)

Termination Report (TER)

Election on

in the
State of

Covering Period

07

01

2002

through

09

30

2002

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

GREGORY LAYTON

Signature of Treasurer

Electronically Filed by GREGORY LAYTON

Date

10

15

2002

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
OnlyFEC FORM 3
(Revised 1/2001)

**FEC
FORM 3****REPORT OF RECEIPTS
AND DISBURSEMENTS**

For 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
BUCKLEY 02			
ADDRESS (number and street)		525 'A' STREET	
Check if different than previously reported. (ACC)		SUITE 2	
		ASHLAND	OR 97520
2. FEC IDENTIFICATION NUMBER		CITY	STATE
C00375410			
		3. IS THIS REPORT	STATE DISTRICT
		X NEW (N) OR	OR 02

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

Primary (12P)

X

General (12G)

Runoff (12R)

July 15 Quarterly Report (Q2)

Convention (12C)

Special (12S)

October 15 Quarterly Report (Q3)

Election on

11

08

2002

in the
State of

OR

January 31 Year-End Report (YE)

(c) 30-Day POST-Election Report for the:

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

General (30G)

Runoff (30R)

Special (30S)

Termination Report (TER)

Election on

in the
State of

5. Covering Period 10 01 2002 through 10 18 2002

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 GREGORY LAYTON

Signature of Treasurer Electronically Filed by GREGORY LAYTON

Date 10 23 2002

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 3**
(Revised 1/2001)

FEC
FORM 3REPORT OF RECEIPTS
AND DISBURSEMENTS

For An Authorized Committee

Office Use Only

1. NAME OF
COMMITTEE (in full)USE FEC MAILING LABEL
OR TYPE OR PRINTExample: If typing, type
over the lines

BUCKLEY 02

ADDRESS (number and street)

525 'A' STREET

Check if different
than previously
reported. (ACC)

SUITE 2

ASHLAND

OR

97520

2. FEC IDENTIFICATION NUMBER

CITY

STATE

ZIP CODE

STATE DISTRICT

C00375410

3. IS THIS
REPORT

X

NEW
(N)

OR

AMENDED
(A)

OR

02

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

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

Primary (12P)

General (12G)

Runoff (12R)

April 15 Quarterly Report (Q1)

Convention (12C)

Special (12S)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

Election on

in the
State of

January 31 Year-End Report (YE)

(c) 30-Day POST-Election Report for the:

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

X

General (30G)

Runoff (30R)

Special (30S)

Termination Report (TER)

Election on

11

08

2002

in the
State of

OR

5. Covering Period

10

17

2002

through

11

30

2002

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

GREGORY LAYTON

Signature of Treasurer

Electronically Filed by GREGORY LAYTON

Date

12

05

2002

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
OnlyFEC FORM 3
(Revised 1/2001)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

VIA OVERNIGHT DELIVERY

May 17, 2004

Gregory J. Layton, as Treasurer
Buckley02
525 "A" Street, Suite 2
Ashland, OR 97520

C00375410
AF # 890

Dear Mr. Layton:

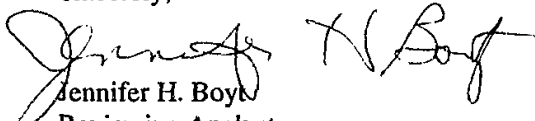
On April 29, 2003, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Buckley02 and you, as Treasurer ("respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2002 30 Day Post-General Report in a timely manner. The Commission also made a preliminary determination that the civil money penalty was \$275 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,


Jennifer H. Boyl
Reviewing Analyst
Office of Administrative Review

Attachment

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2004 MAY 19 A 11:02

VIA OVERNIGHT DELIVERY

May 18, 2004

Federal Election Commission
Attn: Commission Secretary
999 E Street NW
Washington, DC 20004

Re: **C00375410**
AF # 890

To Whom It May Concern:

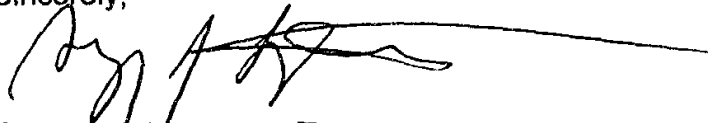
Your 45-page report to me documenting our failure to file the 2002, 30 Day Post General Report in a timely manner completely validates the difficulty lay volunteers, such as myself, have in negotiating the FEC's byzantine electronic filing process.

Our intent has always been to file our reports correctly and in a timely manner. The electronic system is not in the least bit user friendly. We obviously were extremely confused.

I have enclosed my personal check for \$275 with the expectation that this ends the matter. I do not have the time or inclination to be further involved with the FEC.

Please move with utmost haste to terminate our committee.

Sincerely,



Gregory J. Layton, as Treasurer
Buckley02
C00375410
AF # 890

GJL/fkp

Cc: Peter Buckley

RECEIVED
FEC MAIL
OPERATIONS CENTER
2004 MAY 19 A 10:34



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

June 4, 2004 2004 JUN -4 P 3: 53

MEMORANDUM

SENSITIVE

TO: THE COMMISSION

THROUGH: JAMES A. PEHRKON
STAFF DIRECTOR

ALISON L. DOONE
DEPUTY STAFF DIRECTOR

FROM: SHAWN WOODHEAD WERTH
REVIEWING OFFICER
OFFICE OF ADMINISTRATIVE REVIEW

SUBJECT: FINAL DETERMINATION RECOMMENDATION IN
AF# 890 - BUCKLEY02 AND GREGORY J. LAYTON,
AS TREASURER (C00375410)

On April 29, 2003, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Buckley02 and Gregory J. Layton, as Treasurer ("the respondents"), violated 2 U.S.C. § 434(a) for failing to file in a timely manner the 30 Day Post General Report. The report was filed on December 12, 2002, 7 days late. As a result, on April 29, 2003, the Commission also made a preliminary determination that the civil money penalty was \$275 based on the schedule of penalties at 11 C.F.R. § 111.43.

On June 11, 2003, the Commission received the respondents' written response ("challenge"). After reviewing the challenge, the Reviewing Officer's recommendation dated May 13, 2004, 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 \$275 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 30 Day Post 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 respondents' written response and check for the \$275 civil money penalty were received via overnight delivery on May 19, 2004; the response is attached for your review.

OAR Recommendations

- (1) Make a final determination in AF# 890 that Buckley02 and Gregory J. Layton, as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$275; and
- (2) Send the appropriate letter.

Reviewing Analyst: Jennifer H. Boyt

Attachment



FEDERAL ELECTION COMMISSION

Washington, DC 20463

SENSITIVE

DATE & TIME OF TRANSMITTAL: Monday, June 07, 2004 11:00

BALLOT DEADLINE: Thursday, June 10, 2004 4:00

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

SUBJECT: **Final Determination Recommendation In AF #890 –
Buckley 02 and Gregory J. Layton, as treasurer
(C00375410). Memorandum from The Reviewing Officer,
Office of Administrative Review dated June 4, 2004.**

- ☐ I approve the recommendation(s)
- ☐ I object to the recommendation(s)
- ☐ I abstain from voting on the recommendation(s)
- ☐ I am recused from voting on the recommendation(s)
- ☐ 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

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Final Determination Recommendation:) AF #890
Buckley 02 and Gregory J. Layton, as)
treasurer (C00375410))

CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby
certify that on June 10, 2004, the Commission decided by a vote of 6-0 to take the
following actions in AF #890:

1. Make a final determination in AF #890 that Buckley 02 and Gregory J. Layton, as treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$275.
2. Send the appropriate letter, as recommended in the Reviewing Officer's Memorandum dated June 4, 2004.

Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub
voted affirmatively for the decision.

Attest:

June 10, 2004
Date

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

**WESTERN
UNION**

CONFIRMATION OF CMGM

WESTERN UNION COMMERCIAL SERVICES
TO: GREGORY J. LAYTON, AS TREASURER
BUCKLEY02
525 A ST STE 2
ASHLAND OR 97520-2098

JENNIFER BOYT/OAR, REVIEW
FEDERAL ELECTION COMMISSION
999 E ST NW
WASHINGTON DC 20463

FEDERAL ELECTION COMMISSION
999 E STREET, NW
WASHINGTON, DC 20463

JUNE 14, 2004

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

GREGORY J. LAYTON, AS TREASURER
BUCKLEY02
525 "A" STREET, SUITE 2
ASHLAND, OR 97520

ID# C00375410
AF# 890

DEAR MR. LAYTON:

ON APRIL 29, 2003, THE FEDERAL ELECTION COMMISSION ("THE COMMISSION") FOUND REASON TO BELIEVE ("RTB") THAT BUCKLEY02 AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) FOR FAILING TO FILE THE 2002 30 DAY POST GENERAL REPORT, A NON-ELECTION SENSITIVE REPORT, IN A TIMELY MANNER. BY LETTER DATED MAY 2, 2003, THE COMMISSION SENT YOU NOTIFICATION OF THE RTB FINDING THAT INCLUDED A CIVIL MONEY PENALTY CALCULATED AT RTB OF \$275 IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R. 111.43. ON JUNE 11, 2003, THE OFFICE OF ADMINISTRATIVE REVIEW RECEIVED YOUR WRITTEN RESPONSE ("CHALLENGE") CHALLENGING THE CIVIL MONEY PENALTY CALCULATED AT RTB.

THE REVIEWING OFFICER REVIEWED THE COMMISSION'S RTB FINDING WITH ITS SUPPORTING DOCUMENTATION AND THE WRITTEN RESPONSE. BASED ON THIS REVIEW, THE REVIEWING OFFICER RECOMMENDED THAT THE COMMISSION MAKE A FINAL DETERMINATION THAT BUCKLEY02 AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) AND ASSESS A CIVIL MONEY PENALTY OF \$275 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 MAY 17, 2004. THE COMMISSION SECRETARY RECEIVED YOUR WRITTEN RESPONSE AND PAYMENT OF THE CIVIL MONEY PENALTY RECOMMENDED BY THE REVIEWING OFFICER ON MAY 19, 2004, AND A COPY WAS FORWARDED TO THE COMMISSION.

**WESTERN
UNION**

WESTERN UNION COMMERCIAL SERVICES

THE COMMISSION ADOPTED THE REVIEWING OFFICER'S RECOMMENDATION AND MADE A FINAL DETERMINATION ON JUNE 10, 2004 THAT BUCKLEY02 AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A), AND ASSESSED A CIVIL MONEY PENALTY IN THE AMOUNT OF \$275 IN ACCORDANCE WITH 11 C.F.R. 111.43.

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 THIS MATTER, PLEASE CONTACT JENNIFER H. BOYT ON OUR TOLL FREE NUMBER (800)424-9530 (PRESS 0, THEN EXT. 1660) OR (202)694-1660.

SINCERELY,

BRADLEY A. SMITH
CHAIRMAN

QUALITY IS OUR PRIORITY FOR LOCKBOX 2182
SEQ# 001 \$ 000027500 BA# 1 05-21-04 20 9

usbancorp.
The New Business Community

GREGORY J. LAYTON		96-74717322	9325
		<i>9/28/04</i>	
Pay To The Order Of	<i>Federal Election Commission</i>		<i>\$275.00</i>
<i>Two hundred seventy five and 00/100</i>		Dollars  	
ROGUE FEDERAL CREDIT UNION			
NORTH MEDFORD BRANCH			
1123 ROYAL AVENUE			
MEDFORD, OR 97504			
For	<i>FINES</i>	<i>AF#890</i>	<i>MTJ</i>
C00375410			

THIS IS THE END OF ADMINISTRATIVE FINE CASE

890

DATE FILMED 7-9-04 CAMERA NO. 3

CAMERAMAN JM N