



FEDERAL ELECTION COMMISSION

1325 K STREET NW  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1952

Date Filmed 5-7-84 Camera No. --- 2

Cameraman GPC

36040582194



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 3, 1986

John C. Biehl, Esquire  
Ashland Oil, Inc.  
P.O. Box 391  
Ashland, Kentucky 41114

RE: MUR 1952  
Ashland Oil Political Action  
Committee for Employees  
John T. Doyle, as treasurer

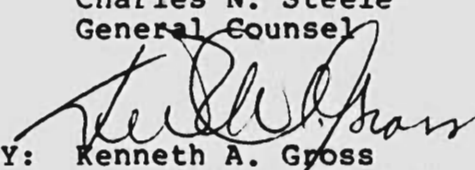
Dear Mr. Biehl:

On February 26, 1986, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele  
General Counsel

  
BY: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Conciliation Agreement

35040362195

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Ashland Oil Political Action ) MUR 1952  
Committee For Employees )  
John T. Doyle, as treasurer )

CONCILIATION AGREEMENT

3 5 0 4 0 5 6 2 1 9 6  
This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Ashland Oil Political Action Committee For Employees and John T. Doyle, as treasurer, ("Ashland Oil PACE" or "Respondents") violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file the 1984 12 Day Pre-General Report in a timely manner.

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

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

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

1. Respondent Ashland Oil PACE is a political committee within the meaning of 2 U.S.C. § 431(4)(A).
2. John T. Doyle is the treasurer of Ashland Oil PACE.
3. Section 434(a)(4)(A)(ii) of Title 2, United States Code, requires, in a calendar year in which a regularly scheduled general election is held, that a pre-general election report be filed no later than the 12th day before any election in which the committee makes a contribution to or an expenditure on behalf of a candidate.

4. Respondents' 1984 12 Day Pre-General Report was required to be filed on October 15, 1984. Respondent filed the 1982 12 Day Pre-General Report on November 21, 1984, which was 27 days late.

V. Respondents violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file the 1982 12 Day Pre-General Report in a timely manner.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of One Hundred and Seventy-Five Dollars (\$175), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein

35040702197

or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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


X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

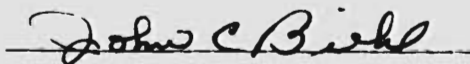
Charles N. Steele  
General Counsel

BY:

  
Kenneth A. Gross  
Associate General Counsel

  
Date February 28, 1986

FOR THE RESPONDENTS:



  
Date February 12, 1986

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Ashland Oil Political Action ) MUR 1952  
Committee for Employees )  
John T. Doyle, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 26, 1986, the Commission decided by a vote of 6-0 to take the following actions in MUR 1952:

1. Accept the conciliation agreement with Ashland Oil Political Action Committee for Employees and John T. Doyle, as treasurer, as recommended in the General Counsel's Report signed February 20, 1986.
2. Approve the proposed letter attached to the General Counsel's Report signed February 20, 1986.
3. Close the file.

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

Attest:

2-26-86

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:	Fri.,	2-21-86,	11:18
Circulated on 48 hour tally basis:	Mon.,	2-24-86,	11:00
Deadline for vote:	Wed.,	2-26-86,	11:00



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

John C. Biehl, Esquire  
Ashland Oil, Inc.  
P.O. Box 391  
Ashland, Kentucky 41114

RE: MUR 1952  
Ashland Oil Political Action  
Committee for Employees  
John T. Doyle, as treasurer

Dear Mr. Biehl:

On , 1986, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Conciliation Agreement



ASHLAND OIL, INC.  
ASHLAND, KENTUCKY 41101

73-00/421

173804

DATE	DOLLARS		CENTS	NET AMOUNT
2/12/86	175	AND	00	\$175.00

PAY TO THE ORDER OF:

Treasurer of the United States  
c/o Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

ASHLAND OIL, INC.  
LIMITED AGENT ACCOUNT

NOT VALID IF MORE THAN \$1,500.00

FIRST BANK AND TRUST COMPANY ASHLAND, KY

BY

*John T. Doyle*  
Authorized Agent

⑈173804⑈ ⑆042100803⑆ ⑆01⑈1986⑈1⑈

CC# 9767

MEMORANDUM

TO: RETHA DIXON

TO: JOAN HARRIS

FROM: JOAN HARRIS

FROM: RETHA DIXON

CHECK NO. 173804 (a copy of which is attached) RELATING  
TO MUR 1952 AND NAME ASHLAND OIL PAC FOR EMPLOYEES  
JOHN T. DOYLE, TREAS  
WAS RECEIVED ON 2-19-86. PLEASE INDICATE THE ACCOUNT INTO  
WHICH IT SHOULD BE DEPOSITED:

/ ☒ BUDGET CLEARING ACCOUNT (#95F3875.16)

/ / CIVIL PENALTIES ACCOUNT (#95-1099.160)

/ / OTHER \_\_\_\_\_

SIGNATURE

*John T. Doyle*

DATE

2-20-86





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 3, 1986

John C. Biehl, Esquire  
Ashland Oil, Inc.  
P.O. Box 391  
Ashland, Kentucky 41114

RE: MUR 1952  
Ashland Oil Political Action  
Committee for Employees  
John T. Doyle, as treasurer

Dear Mr. Biehl:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your clients the Federal Election Commission, on March 20, 1985, found reason to believe that Ashland Oil Political Action Committee for Employees and John T. Doyle, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).

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

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extension beyond 20 days.

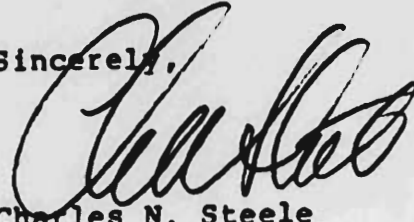
A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

36040502202

-2-

Should you have any questions, please contact George Demougeot, the staff member assigned to handle this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in dark ink, appearing to read "Charles N. Steele". The signature is fluid and cursive, with the first name "Charles" being more prominent than the last name "Steele".

Charles N. Steele  
General Counsel

Enclosure  
Brief

85040582203

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Ashland Oil Political Action ) MUR 1952  
Committee For Employees )  
John T. Doyle, as treasurer )

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

Ashland Oil Political Action Committee for Employees ("Ashland Oil PACE) filed its 1984 12 Day Pre-General report twenty seven days late.

II. Legal Analysis

Section 434(a)(4)(A)(ii) of Title 2, United States Code, requires, in a calendar year in which a regularly scheduled general election is held, that a pre-general election report be filed no later than the 12th day before any election in which the committee makes a contribution to or an expenditure on behalf of a candidate.

The Commission found reason to believe that Ashland Oil PACE violated 2 U.S.C. § 434(a)(4)(A)(ii) and approved pre-probable cause to believe conciliation.

4  
C  
O  
M  
M  
I  
S  
S  
I  
O  
N  
S  
C  
O  
U  
N  
S  
E  
L  
S  
B  
R  
I  
E  
F

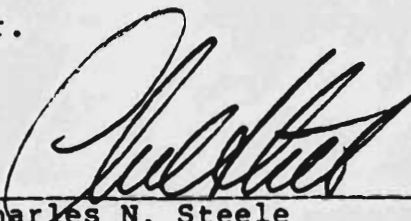
the Office of General Counsel recommends that the Commission find probable cause to believe that Ashland Oil Political Action Committee for Employees and John T. Doyle, as treasurer, violated 2 U.S.C.

§ 434(a)(4)(A)(ii).

**III. General Counsel's Recommendation**

1. Find probable cause to believe that the Ashland Oil Political Action Committee for Employees and John T. Doyle, as treasurer.
2. Approve the proposed letter.

31 January 1986  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel

3504010205

SENSITIVE



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

FEB  
CC JAN 3 AIO: 10

February 3, 1986

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele  
General Counsel *CNS*

SUBJECT: MUR 1952

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on February 3, 1986. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

- I. Brief
- II. Letter to Respondent

3304070200



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 3, 1986

John C. Biehl, Esquire  
Ashland Oil, Inc.  
P.O. Box 391  
Ashland, Kentucky 41114

RE: MUR 1952  
Ashland Oil Political Action  
Committee for Employees  
John T. Doyle, as treasurer

Dear Mr. Biehl:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your clients the Federal Election Commission, on March 20, 1985, found reason to believe that Ashland Oil Political Action Committee for Employees and John T. Doyle, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).

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

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extension beyond 20 days.

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

8504010207

-2-

Should you have any questions, please contact George Demougeot, the staff member assigned to handle this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in dark ink, appearing to read "Charles N. Steele", written in a cursive style.

Charles N. Steele  
General Counsel

Enclosure  
Brief

36040362203



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Ashland Oil Political Action ) MUR 1952  
Committee For Employees )  
John T. Doyle, as treasurer )

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

Ashland Oil Political Action Committee for Employees ("Ashland Oil PACE) filed its 1984 12 Day Pre-General report twenty seven days late.

II. Legal Analysis

Section 434(a)(4)(A)(ii) of Title 2, United States Code, requires, in a calendar year in which a regularly scheduled general election is held, that a pre-general election report be filed no later than the 12th day before any election in which the committee makes a contribution to or an expenditure on behalf of a candidate.

The Commission found reason to believe that Ashland Oil PACE violated 2 U.S.C. § 434(a)(4)(A)(ii) and approved pre-probable cause to believe conciliation.

360407622009


the Office of General Counsel recommends that the Commission find probable cause to believe that Ashland Oil Political Action Committee for Employees and John T. Doyle, as treasurer, violated 2 U.S.C.

§ 434(a)(4)(A)(ii).

**III. General Counsel's Recommendation**

1. Find probable cause to believe that the Ashland Oil Political Action Committee for Employees and John T. Doyle, as treasurer.
2. Approve the proposed letter.

31 January 1986  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel

36040562210

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 1952  
Ashland Oil Political Action )  
Committee for Employees )  
John T. Doyle, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 9, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 1952:

1. Enter into pre-probable cause conciliation with Ashland Oil Political Action Committee for Employees and John T. Doyle, as treasurer.
2. Approve the conciliation agreement submitted with the General Counsel's Report signed May 6, 1985.
3. Approve and send the letter attached to the General Counsel's Report signed May 6, 1985.

Commissioners Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter; Commissioner Aikens did not cast a vote.

Attest:

5-10-85

Date

Jody C. Ransen  
for Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:  
Circulated on 48 hour tally basis:

5-7-85, 8:38  
5-7-85, 4:00

36040532211



Demougeot

ASHLAND OIL, INC. • POST OFFICE BOX 391 • ASHLAND, KENTUCKY • 41114 • PHONE (606) 329-3333

JOHN C. BIEHL  
General Attorney  
(606) 329-4764

VIA COURIER

MUR 1952

April 9, 1985

RECEIVED  
OFFICE OF THE  
GENERAL COUNCIL  
APR 10 9 11 AM '85

Mr. George Demougeot  
Federal Election Commission  
1325 K Street, NW  
Washington, DC 20463

Dear Mr. Demougeot:

On April 1, 1985 John T. Doyle, Treasurer of Ashland Oil Political Action Committee for Employees (PACE) received notice from the Federal Election Commission (the "Commission") that there was reason to believe that he and PACE may have violated 2 U.S.C. §434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended (the "Act").

The Commission's belief is based upon the date on which Ashland filed the 12 Day Pre-General Election Report. Section 434 (a)(4)(A)(ii) of Title 2, United States Code, requires a pre-election report be filed no later than the 12th day before a regularly scheduled general election, in this case, October 25, 1984. Due to an oversight, Ashland filed this report on November 21, 1984.

Ashland does not deny the fact that the report in question was filed after its due date. However, it believes there are mitigating circumstances, which when considered, will cause the Commission to find that this oversight was an inadvertent and isolated act that will not be repeated. Accordingly, Ashland requests the initiation of the pre-probable cause conciliation process for purposes of resolving this matter in an amicable fashion.

The circumstances that Ashland believes militates against a find of violation include the following:

1. PACE was organized early in 1977. Since that time, with the exception of the 12 Day Pre-General Report, every report has been filed in a timely fashion.
2. The facts are clear that the filing date was missed because of an oversight, there was no intent involved. Facts to support this position, in addition to past performance, include the filing of a report that reflected October receipts and disbursements. This

report, though not legally required, was submitted before the 20th day of the month, which is the normal filing date for most reports, and before notice of the missing report was received.

3. Immediately upon receiving notice of the missing report on November 20, 1984, Ashland telephoned Commission staff to acknowledge the oversight and stated that the report would be filed promptly. It was completed the same day, sent via overnight mail and delivered to the Commission the following day, November 21, 1984.
4. In the material received from the Commission, it is stated that Ashland was "previously notified of the due date for the report." I have been unable to identify any Ashland employee who received such a notice. Affidavits from those employees who may reasonably be expected to be recipients of such a notice can be submitted which attests that they did not receive it.
5. Since notice of the missing report was received, Ashland has instituted new procedures to be sure that all future reports are filed in a timely fashion. In brief, these procedures place the burden of confirming that reports are timely filed on two persons, in addition to the Treasurer of PACE, and require each of them to prepare two calendars that will serve to alert them to filing deadlines. While such procedures cannot, of course, correct the past oversight, they will serve to satisfy the disclosure objectives of the Act and the Commission.

I trust the foregoing will serve as the basis for a just settlement of this matter.

Yours truly,

*John C. Biehl*  
John C. Biehl  
General Attorney

JCB/lr

cc: John T. Doyle

3 5 0 4 0 5 0 2 2 1 3

M1952

**SENSITIVE**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MAR 25 4 51 03

March 25, 1985

MEMORANDUM TO: The Commission

FROM: Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

SUBJECT: RAD Referral 85NF-8

On March 20, 1985 the Commission approved the recommendation that RAD Referral 85NF-8 should become a MUR. Therefore, all documents which had previously been contained in RAD Referral 85NF-8 should now become MUR 1952.

Attachment  
Copy of Certification

**SENSITIVE**



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

CONFIDENTIAL

55 MAR 25 10:03

March 25, 1985

MEMORANDUM TO: The Commission

FROM: Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

SUBJECT: RAD Referral 85NF-8

On March 20, 1985 the Commission approved the recommendation that RAD Referral 85NF-8 should become a MUR. Therefore, all documents which had previously been contained in RAD Referral 85NF-8 should now become MUR 1952.

Attachment  
Copy of Certification

83090702215



BEFORE THE FEDERAL ELECTION COMMISSION

M1952  
Demougeot

In the Matter of )  
 )  
Ashland Oil Political Action ) RAD Referral 85NF-8  
Committee for Employees )  
John T. Doyle, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 20, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-8:

1. Open a MUR.
2. Find reason to believe that Ashland Oil Political Action Committee for Employees and John T. Doyle, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).
3. Approve and send the letter and factual and legal analysis attached to the First General Counsel's Report signed March 15, 1985.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

3-21-85

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary: 3-18-85, 9:58  
Circulated on 48 hour tally basis: 3-18-85, 4:00

86040582216



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 26, 1985

John T. Doyle, Treasurer  
Ashland Oil Political Action  
Committee for Employees  
P.O. Box 391  
Ashland, KY 41114

RE: MUR 1952  
Ashland Oil Political Action  
Committee for Employees  
John T. Doyle, Treasurer

Dear Mr. Doyle:

On March 20, 1985, the Federal Election Commission determined that there is reason to believe Ashland Oil Political Action Committee for Employees and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against the committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form

85040382217

John T. Doyle, Treasurer  
Page 2

stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



John Warren McGarry  
Chairman

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

3 5 0 4 0 5 8 2 2 1 8

FEDERAL ELECTION COMMISSION  
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1952  
STAFF MEMBER & TEL. NO.  
George Demougeot  
(202) 523-4000

RESPONDENT      Ashland Oil Political Action Committee  
                     for Employees  
                     John T. Doyle, as treasurer

**SUMMARY OF ALLEGATIONS**

Ashland Oil Political Action Committee For Employees ("Ashland Oil PACE") and John T. Doyle, as treasurer, failed to timely file the 12 Day Pre-General Election Report of receipts and disbursements.

**FACTUAL AND LEGAL ANALYSIS**

Section 434(a)(4)(A)(ii) of Title 2, United States Code, requires, in a calendar year in which a regularly scheduled general election is held, that a pre-general election report be filed no later than the 12th day before any election in which the committee makes a contribution to or an expenditure on behalf of a candidate. A regularly scheduled general election was held in 1984 on November 6. Ashland Oil PACE was notified on October 1, 1984, that its pre-general election report was due on October 25, 1984. Ashland Oil PACE was mailed a non-filer notice on November 16, 1984.

On November 21, 1984, the 12 Day Pre-General Election Report was delivered to the Federal Election Commission ("Commission"). Thus Ashland Oil PACE filed its 1984 12 Day Pre-General Election Report twenty-seven (27) days late. In a cover letter the treasurer of the committee explained that the committee had

95040132219

mistakenly filed its regular monthly report instead of the required 12 Day Pre-General Report. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Ashland Oil Political Action Committee For Employees and John T. Doyle, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).

36040762220

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Ashland Oil Political Action ) RAD Referral 85NF-8  
Committee for Employees )  
John T. Doyle, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 20, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-8:

1. Open a MUR.
2. Find reason to believe that Ashland Oil Political Action Committee for Employees and John T. Doyle, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).
3. Approve and send the letter and factual and legal analysis attached to the First General Counsel's Report signed March 15, 1985.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

3-21-85

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary: 3-18-85, 9:58  
Circulated on 48 hour tally basis: 3-18-85, 4:00

36040592221



# FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

## MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *CA*  
DATE: March 18, 1985  
SUBJECT: RAD 85NF-8: First General Counsel's Report

The attached is submitted as an Agenda document  
for the Commission Meeting of \_\_\_\_\_

Open Session \_\_\_\_\_

Closed Session \_\_\_\_\_

### CIRCULATIONS

48 Hour Tally Vote [X]  
Sensitive [X]  
Non-Sensitive [ ]

24 Hour No Objection [ ]  
Sensitive [ ]  
Non-Sensitive [ ]

Information [ ]  
Sensitive [ ]  
Non-Sensitive [ ]

Other [ ]

### DISTRIBUTION

Compliance [X]

Audit Matters [ ]

Litigation [ ]

Closed MUR Letters [ ]

Status Sheets [ ]

Advisory Opinions [ ]

Other (see distribution below) [ ]

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



**SENSITIVE**

FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20463

**FIRST GENERAL COUNSEL'S REPORT**

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION 3/18/85-9:55

#85NF-8  
STAFF MEMBER  
DEMOUGEOT

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

RESPONDENT'S NAME: Ashland Oil Political Action Committee  
For Employees  
John T. Doyle, as treasurer

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

INTERNAL REPORTS CHECKED: Committee Reports

FEDERAL AGENCIES CHECKED: None

**GENERATION OF MATTER**

Based on information obtained in the normal course of its supervisory duties under the Federal Election Campaign Act of 1971, as amended, (the "Act"), the Reports Analysis Division ("RAD") referred this matter to the Office of General Counsel on January 16, 1985.

**SUMMARY OF ALLEGATIONS**

Ashland Oil Political Action Committee For Employees ("Ashland Oil PACE") and John T. Doyle, as treasurer, failed to timely file the 12 Day Pre-General Election Report of receipts and disbursements.

**FACTUAL AND LEGAL ANALYSIS**

Section 434(a)(4)(A)(ii) of Title 2, United States Code, requires, in a calendar year in which a regularly scheduled general election is held, that a pre-general election report be filed no later than the 12th day before any election in which the

committee makes a contribution to or an expenditure on behalf of a candidate. A regularly scheduled general election was held in 1984 on November 6. Ashland Oil PACE was notified on October 1, 1984, that its pre-general election report was due on October 25, 1984. Ashland Oil PACE was mailed a non-filer notice on November 16, 1984.

On November 21, 1984, the 12 Day Pre-General Election Report was delivered to the Federal Election Commission ("Commission"). Thus Ashland Oil PACE filed its 1984 12 Day Pre-General Election Report twenty-seven (27) days late. In a cover letter the treasurer of the committee explained that the committee had mistakenly filed its regular monthly report instead of the required 12 Day Pre-General Report. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Ashland Oil Political Action Committee For Employees and John T. Doyle, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).

#### RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that Ashland Oil Political Action Committee For Employees and John T. Doyle, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).
3. Approve and send the attached letter and factual and legal analysis.

Charles N. Steele  
General Counsel

March 15, 1985  
Date

BY:

Kenneth A. Gross  
Associate General Counsel

#### Attachments

- I. Referral Materials
- II. Proposed letter
- III. General Counsel's Factual and Legal Analysis

36040562224



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 1, 1984

**GENERAL ELECTION FILING NOTICE  
FOR UNAUTHORIZED COMMITTEES**

**WHO MUST FILE THE PRE-GENERAL ELECTION REPORT**

All committees that file monthly reports must file the pre-general election report due October 25, 1984.

In addition all quarterly filing committees that have made contributions or expenditures (including independent expenditures) in connection with the general election must file a pre-election report, if such activity has not previously been reported. See below for post-general filing information.

**WHAT MUST BE REPORTED**

The report must disclose all financial activity of the committee from the later of, the last report filed or the date of registration\* through October 17, 1984. (Monthly filers must disclose all financial activity from the later of October 1 or the date of registration\* through October 17, 1984.)

**WHEN TO FILE**

Pre-general election reports sent registered or certified mail must be postmarked no later than October 22, 1984. Reports hand delivered or mailed first class must be received no later than close of business October 25, 1984.

\* \* \* \* \*

**WHO MUST FILE THE POST-GENERAL ELECTION REPORT**

All committees must file the post-general election report due December 6, 1984, regardless of election activity.

**WHAT MUST BE REPORTED**

The post-general election report must cover all financial activity of the committee from either the date of the last report filed or the date of registration, whichever is later\* through November 26, 1984.

**WHEN TO FILE**

Post-general election reports sent by registered or certified mail must be postmarked no later than December 6, 1984. Reports hand delivered or mailed first class must be received no later than close of business December 6, 1984.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

-over-

*Attachment I*

③

### WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC form 3X, for details.

### QUARTERLY FILERS

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
3rd Q-Report	07/01* - 09/30	10/15/84	10/15/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General**	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

\*Or from date of registration, or the close of books of the last report filed, whichever is later.

\*\*Reports filed by committees that did not file the pre-General report should cover all financial activity from the last report filed through November 26, 1984.

\* \* \*

### MONTHLY FILERS

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
Oct. Monthly	09/01 - 09/30	10/20/84	10/20/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

### COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

FOR INFORMATION CALL: Office Of Public Communications  
800/424-9530 or 202/523-4068

Attachment I  
(4)



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

RQ-7

November 16, 1984

Identification Number:

Reference: 12 Day Pre-General Report (10/1/84-10/17/84)

Dear

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

If the report in question was filed, please submit documentation for the public record. Although the Commission may take further legal steps concerning this matter, your prompt response will be taken into consideration.

If you have any questions, please contact on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Attachment I  
5

36040302227

3 5 0 4 0 5 5 2 2 2 8

ASHLAND OIL POLITICAL ACTION COMMITTEE  
FOR EMPLOYEES (PACE)  
(Attachments 7a - e)

Attachment I  
⑥



3 5 0 4 0 5 6 2 2 2 9

FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 11JAN85  
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
ASHLAND OIL POLITICAL ACTION COMMITTEE FOR EMPLOYEES (PACE) CONNECTED ORGANIZATION: ASHLAND OIL INC				NON-PARTY QUALIFIED		ID #C00075994
1983	STATEMENT OF ORGANIZATION - AMENDMENT			5APR83	2	83FEC/269/2131
	MISCELLANEOUS REPORT			30JUN83 TO FEC	2	83FEC/274/3347
	FEBRUARY MONTHLY	5,187	0	1JAN83 -31JAN83	5	83FEC/266/5192
	MARCH MONTHLY	5,546	3,750	1FEB83 -28FEB83	7	83FEC/268/0346
	APRIL MONTHLY	8,070	4,300	1MAR83 -31MAR83	6	83FEC/270/0346
	MAY MONTHLY	5,438	1,500	1APR83 -30APR83	7	83FEC/272/0921
	JUNE MONTHLY	5,354	6,650	1MAY83 -31MAY83	10	83FEC/273/4239
	JULY MONTHLY	5,408	5,100	1JUN83 -30JUN83	9	83FEC/277/1439
	AUGUST MONTHLY	5,373	2,550	1JUL83 -31JUL83	9	83FEC/281/3809
	SEPTEMBER MONTHLY	5,466	1,600	1AUG83 -31AUG83	10	83FEC/283/1928
	OCTOBER MONTHLY	7,613	1,000	1SEP83 -30SEP83	14	83FEC/285/3275
	NOVEMBER MONTHLY	5,337	4,250	1OCT83 -31OCT83	15	83FEC/287/5323
	DECEMBER MONTHLY	5,295	4,800	1NOV83 -30NOV83	17	83FEC/289/2830
	YEAR-END	5,197	1,750	1DEC83 -31DEC83	18	84FEC/291/2506
1984	FEBRUARY MONTHLY	5,167	3,400	1JAN84 -31JAN84	5	84FEC/297/0853
	MARCH MONTHLY	5,145	8,800	1FEB84 -29FEB84	7	84FEC/299/3076
	APRIL MONTHLY	7,653	8,050	1MAR84 -31MAR84	7	84FEC/311/1814
	APRIL MONTHLY - AMENDMENT	-	-	1MAR84 -31MAR84	2	84FEC/324/2369
	1'ST LETTER INFORMATIONAL NOTICE			1MAR84 -31MAR84	3	84FEC/323/0933
	MAY MONTHLY	5,530	4,750	1APR84 -30APR84	7	84FEC/314/3464
	MAY MONTHLY - AMENDMENT	5,530	4,750	1APR84 -30APR84	10	84FEC/319/5111
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30APR84		84FEC/318/3161
	JUNE MONTHLY	8,863	14,500	1MAY84 -31MAY84		84FEC/317/1339
	JULY MONTHLY	5,854	3,800	1JUN84 -30JUN84		84FEC/322/0061
	AUGUST MONTHLY	5,508	8,400	1JUL84 -31JUL84		84FEC/326/0248
	SEPTEMBER MONTHLY	7,773	8,500	1AUG84 -31AUG84		84FEC/328/0346
	OCTOBER MONTHLY	5,663	11,800	1SEP84 -30SEP84		84FEC/341/1339
	OCTOBER MONTHLY - AMENDMENT	5,663	11,800	1SEP84 -30SEP84		84FEC/349/363
	REQUEST FOR ADDITIONAL INFORMATION			1SEP84 -30SEP84		84FEC/349/0909
	PRE-GENERAL	2,897	12,450	1OCT84 -17OCT84		84FEC/349/2447
	NOTICE OF FAILURE TO FILE			1OCT84 -17OCT84		84FEC/349/0547
	NOVEMBER MONTHLY	5,519	19,050	1OCT84 -31OCT84		84FEC/349/1328
	POST-GENERAL	7,959	21,300	18OCT84 -26NOV84		84FEC/352/2939
	TOTAL	142,815	0	162,050	0	AL PAGES
	ENDING CASH (11/26):	\$6,726				
	DEBTS:	\$ 0				

Attachment 7a

Attachment I



ANALYST: Carol Cavall

CONVERSATION WITH:

COMMITTEE: Ashland Oil Political Action Committee for Employees

DATE: 11/20/84

SUBJECT(S): Non-filing of the 12 Day Pre-General Report

On 11/20/84, a representative of the committee called to inform me that the 12 Day Pre-General report would be filed immediately. He explained that he had mistakenly filed an October Monthly rather than a 12 Day Pre-General Report. He apologized for the oversight and stated that it was the committee's intention to fully comply with all reporting requirements.

35040362230

Attachment I  
⑧

# REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

(Summary Page)

**HAND DELIVERED**

64 NOV 20 1984

ALIGN AREA

1 Name of Committee (In Full)

Ashland 011 Political Action  
Committee for Employees (PACE)

Address (Number and Street)

P. O. Box 391

City, State and ZIP Code

Ashland, KY 41114

☐ Check here if address is different than previously reported.

2 FEC Identification Number

C00075994

3 ☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report☐ July 15 Quarterly Report ☐ January 31 Year End Report☐ July 31 Mid Year Report (Non Election Year Only)☒ Monthly Report for October 1984☐ Twelfth day report preceding \_\_\_\_\_

election on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Thirtieth day report following the General Election

on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES☒ NO**SUMMARY**5 Covering Period 10/01/84 through 10/31/846 (a) Cash on hand January 1, 19 84

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Addition: Add Lines 6(b) and 6(c) for Column A and  
Lines 6(a) and 6(c) for Column B

7 Total Disbursements (from Line 28)

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

9 Debts and Obligations Owed TO The Committee  
(itemize all on Schedule C or Schedule D)10 Debts and Obligations Owed BY the Committee  
(itemize all on Schedule C or Schedule D)

(Certify that I have examined this Report and to the best of my knowledge and belief it is true and complete)

John T. Doyle  
Type: Full Name of Treasurer

SIGNATURE OF TREASURER

11/19/84  
Date

For further information contact:

Federal Election Commission

Tel. Free 800 424 9630

Local 702 523 4088

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used

SECTION 3138

Attachment I  
9

RECEIVED  
84 NOV 21 12:21

**PACE**  
Political Action Committee for Employees  
P.O. Box 99-Ashland, Kentucky 40001

November 20, 1984

Ms. Carol Caldwell  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

Reference: Identification Number: C00075994  
12 Day Pre-General Report (10/1/84-10/17/84)

Dear Ms. Caldwell:

We are enclosing our 12 Day Pre-General Report covering the period October 1 through October 17, 1984, for Ashland Oil, Inc. Political Action Committee for Employees (PACE). We filed our regular monthly report in error.

We're very sorry for any inconvenience this may have caused. It is our intention to fully comply with FEC rules regarding the filing of timely and accurate reports.

If you need further information, please advise.

Sincerely,

*John T. Doyle*  
John T. Doyle  
Treasurer

dc

Enclosure

Attachment I  
(10)

9 4 0 4 0 7 0 2 2 3 2

**REPORT OF RECEIPTS AND DISBURS**  
For a Political Committee Other Than an Author.

Attachment 7e

84 NOV 21 PM 2:27

(Summary Page)

<p><b>ALIGN AREA</b> <span style="border: 1px solid black; padding: 0 10px;"> </span></p> <p>1 Name of Committee (In Full)</p> <p><b>Ashland 011 Political Action Committee for Employees (PACE)</b></p> <hr/> <p>Address (Number and Street)</p> <p><b>P. O. Box 391</b></p> <hr/> <p>City, State and ZIP Code</p> <p><b>Ashland, KY 41114</b></p> <hr/> <p><input type="checkbox"/> Check here if address is different than previously reported</p> <p>2 FEC Identification Number</p> <p><b>C00075994</b></p> <hr/> <p>3 <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)</p>	<p><b>ALIGN AREA</b> <span style="border: 1px solid black; padding: 0 10px;"> </span></p> <p>4. TYPE OF REPORT (Check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report    <input type="checkbox"/> October 15 Quarterly Report</p> <p><input type="checkbox"/> July 15 Quarterly Report    <input type="checkbox"/> January 31 Year End Report</p> <p><input type="checkbox"/> July 31 Mid Year Report (Non Election Year Only)</p> <p><input type="checkbox"/> Monthly Report for _____</p> <p><input checked="" type="checkbox"/> Twelfth day report preceding <u>General</u> (Type of Election)</p> <p>election on <u>11/6/84</u> in the State of <u>KY</u></p> <p><input type="checkbox"/> Twelfth day report following the General Election</p> <p>on _____ in the State of _____</p> <p><input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment?</p> <p><input type="checkbox"/> YES    <input checked="" type="checkbox"/> NO</p>
--	---

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5 Covering Period <u>10/01/84</u> through <u>10/17/84</u>			
6 (a) Cash on hand January 1, 19 <u>84</u>			\$ 44,460.59
1b Cash on Hand at Beginning of Reporting Period		\$ 29,619.49	
1c Total Receipts (from Line 18)		\$ 2,897.65	\$ 60,056.55
1d Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 32,517.14	\$ 104,517.14
7 Total Disbursements (from Line 28)		\$ 12,450.00	\$ 84,450.00
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 20,067.14	\$ 20,067.14
9 Deb's and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		\$	
10 Deb's and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$	

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

John T. Doyle  
Type or Print Name of Treasurer

*John T. Doyle*  
SIGNATURE OF TREASURER

11/20/84  
Date

For further information contact:  
Federal Election Commission  
Tel. Free 800-426-9530  
Local 202-523-4086

Whoever furnishes false or misleading or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437c.

All previous versions of PDC FORM 2 and PDC FORM 2a are obsolete and should no longer be used.

--	--	--	--

FEC FORM 2X (3/80)

*Attachment I*  
11

03040502233



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

John T. Doyle, Treasurer  
Ashland Oil Political Action  
Committee for Employees  
P.O. Box 391  
Ashland, KY 41114

RE: MUR  
Ashland Oil Political Action  
Committee for Employees  
John T. Doyle, Treasurer

Dear Mr. Doyle:

On , 1985, the Federal Election Commission determined that there is reason to believe Ashland Oil Political Action Committee for Employees and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against the committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form

Attachment II  
~~13~~ 13

86040502234

John T. Doyle, Treasurer  
Page 2

stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

John Warren McGarry  
Chairman

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

Attachment II

(14)

3 5 0 4 0 5 2 2 3 5



FEDERAL ELECTION COMMISSION  
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.  
STAFF MEMBER & TEL. NO.  
George Demougeot  
(202) 523-4000

RESPONDENT      Ashland Oil Political Action Committee  
                         for Employees  
                         John T. Doyle, as treasurer

**SUMMARY OF ALLEGATIONS**

Ashland Oil Political Action Committee For Employees ("Ashland Oil PACE") and John T. Doyle, as treasurer, failed to timely file the 12 Day Pre-General Election Report of receipts and disbursements.

**FACTUAL AND LEGAL ANALYSIS**

Section 434(a)(4)(A)(ii) of Title 2, United States Code, requires, in a calendar year in which a regularly scheduled general election is held, that a pre-general election report be filed no later than the 12th day before any election in which the committee makes a contribution to or an expenditure on behalf of a candidate. A regularly scheduled general election was held in 1984 on November 6. Ashland Oil PACE was notified on October 1, 1984, that its pre-general election report was due on October 25, 1984. Ashland Oil PACE was mailed a non-filer notice on November 16, 1984.

On November 21, 1984, the 12 Day Pre-General Election Report was delivered to the Federal Election Commission ("Commission"). Thus Ashland Oil PACE filed its 1984 12 Day Pre-General Election Report twenty-seven (27) days late. In a cover letter the treasurer of the committee explained that the committee had

*Attachment III*  
*(15)*



mistakenly filed its regular monthly report instead of the required 12 Day Pre-General Report. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Ashland Oil Political Action Committee For Employees and John T. Doyle, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).

86040302237

Attachment III  
(16)



FEDERAL ELECTION COMMISSION

1325 K STREET NW  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1952

Date Filmed 5-7-84 Camera No. --- 2

Cameraman GPC

86040582238