



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2018

Date Filmed 9/10/85 Camera No. --- 2

Cameraman AS

85040544998

Routing Cards

Conciliation Materials

Bank Act numbers

Duplicates of Notification Letters

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- | | |
|--|---|
| <input checked="" type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy |
| <input checked="" type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input checked="" type="checkbox"/> (3) Exempted by other statute | <input checked="" type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents | |

Signed

Paul Reys

date

9/4/85

FEC 9-21-77

[Handwritten signature]
9/5/85

185040544999



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 23, 1985

Paul H. Broyhill, Treasurer
Broyhill Furniture Industries
Political Action Committee
Box 700
Lenoir, North Carolina 28633

RE: MUR 2018
Broyhill Furniture Industries
Political Action Committee
Paul H. Broyhill, Treasurer

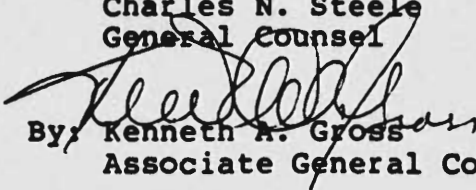
Dear Mr. Broyhill:

On August 21, 1985, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a), 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

PR #3

85040545000

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED AT THE FEC

QCC# 8221

85 AUG 5

PI: 48

In the Matter of

Broyhill Furniture Industries
Political Action Committee
Paul H. Broyhill, Treasurer

MUR 2018

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Broyhill Furniture Industries Political Action Committee and Paul H. Broyhill, as treasurer (hereinafter "the Respondents"), violated 2 U.S.C. § 434(a).

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. The Broyhill Furniture Industries Political Action Committee is a political committee registered with the Commission.

AUG 6 1985
PM 1:43

RECEIVED
FEDERAL ELECTION COMMISSION

RECEIVED

10056504058

2. Paul H. Broyhill is the treasurer of the Committee.

3. The Respondents were required to file the 1984 Pre-General Election Report by October 25, 1984. On November 30, 1984 the respondents filed a 1984 Post-General Election report including information about their Pre-General election activity. Thus the Pre-General Election information was filed thirty-six (36) days late.

V. Respondents violated 2 U.S.C. § 434(a) by failing to file timely the 1984 Pre-General Election Report.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of one hundred dollars (\$100) 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 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 that all parties hereto have executed same and the Commission has approved the entire agreement.

2
0
0
5
4
5
0
4
0
5
8

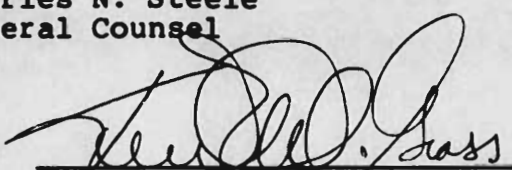
X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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:

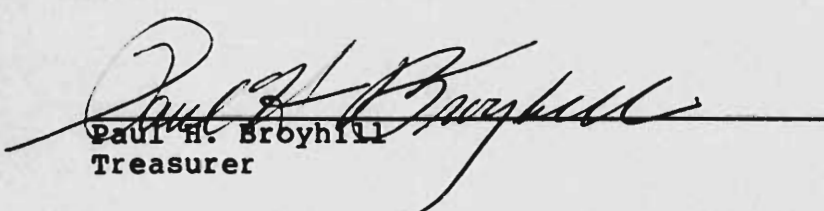
Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel


Date

FOR THE RESPONDENTS:


Paul H. Broyhill
Treasurer

August 2, 1985
Date

85040545003



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

pt 8/22/85

Paul H. Broyhill, Treasurer
Broyhill Furniture Industries
Political Action Committee
Box 700
Lenoir, North Carolina 28633

RE: MUR 2018
Broyhill Furniture Industries
Political Action Committee
Paul H. Broyhill, Treasurer

Dear Mr. Broyhill:

On , 1985, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a), 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

PR #3

85040545004

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2018
Broyhill Furniture Industries)
Political Action Committee)
Paul H. Broyhill, treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 21, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 2018:

1. Accept the conciliation agreement submitted with the General Counsel's Report signed August 15, 1985.
2. Close the file.
3. Approve and send the proposed letter attached to the General Counsel's Report signed August 15, 1985.

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

Attest:

8-21-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

Fri., 8-16-85, 5:03
Mon., 8-19-85, 11:00
Wed., 8-21-85, 11:00

85040545005



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *PM3*
DATE: August 16, 1985
SUBJECT: MUR 2018 - 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	<input checked="" type="checkbox"/>
Sensitive	<input checked="" type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>
24 Hour No Objection	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>
Information	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>
Other	<input type="checkbox"/>

DISTRIBUTION

Compliance	<input checked="" type="checkbox"/>
Audit Matters	<input type="checkbox"/>
Litigation	<input type="checkbox"/>
Closed MUR Letters	<input type="checkbox"/>
Status Sheets	<input type="checkbox"/>
Advisory Opinions	<input type="checkbox"/>
Other (see distribution below)	<input type="checkbox"/>

85040545006

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

In the Matter of

Broyhill Furniture Industries
Political Action Committee
Paul H. Broyhill, Treasurer

MUR 2015 AUG 16 P 5: 03

GENERAL COUNSEL'S REPORT

SENSITIVE

Background

Attached is a conciliation agreement which has been signed by Paul H. Broyhill, treasurer of the Broyhill Furniture Industries PAC.

A check for the civil penalty has been received.

Recommendation

The Office of General Counsel recommends the acceptance of this agreement, closing of the file and approving and sending the attached proposed letter.

Charles N. Steele
General Counsel

Date

Aug 15, 1985

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

Conciliation Agreement (1)
Photocopy of civil penalty check
Proposed letter

PR #3

185040545007

BROYPAC

P. O. BOX 700
LENOIR, NC 28645

823

August 2

19 85

66-166
531

PAY TO THE
ORDER OF

TREASURER OF THE UNITED STATES

\$ 100.00

-----ONE HUNDRED AND NO/100-----

DOLLARS

Penalty for failure to timely report

Pre-election contributions

THIS CHECK IS DELIVERED IN CONNECTION WITH THE ABOVE ACCOUNT (S)

BROYPAC

Lee E. Putcha

FIRST UNION NATIONAL BANK
LENOIR, NORTH CAROLINA

545098

185040



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Paul H. Broyhill, Treasurer
Broyhill Furniture Industries
Political Action Committee
Box 700
Lenoir, North Carolina 28633

RE: MUR 2018
Broyhill Furniture Industries
Political Action Committee
Paul H. Broyhill, Treasurer

Dear Mr. Broyhill:

On , 1985, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a), 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

PR #3

Attachment 3

5

85040545009

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Broyhill Furniture Industries) MUR 2018
Political Action Committee)
Paul H. Broyhill, Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 17, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 2018:

1. Enter into conciliation with the Broyhill Furniture Industries Political Action Committee and Paul H. Broyhill, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter attached to the General Counsel's Report signed July 12, 1985.

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

Attest:

7-18-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

7-15-85, 12:00
7-15-85, 4:00

85040545010



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *ld*
DATE: July 15, 1985
SUBJECT: MUR 2018 - 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) []

85040545011

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

In the Matter of

Broyhill Furniture Industries
Political Action Committee
Paul H. Broyhill, Treasurer

)
)
)
)
)

25 JUL 1985 P12:00

GENERAL COUNSEL'S REPORT

SENSITIVE

I. BACKGROUND

On May 30, 1985, the Commission determined that there is reason to believe the Broyhill Furniture Industries Political Action Committee and Paul H. Broyhill, as treasurer, violated 2 U.S.C. § 434(a) by failing to file the 1984 Pre-General Election Report in a timely manner. By letter dated June 17, 1985, the respondents requested to settle this matter prior to a finding of probable cause to believe (Attachment 1).

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

185040545012

185040545013

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Enter into conciliation with the Broyhill Furniture Industries Political Action Committee and Paul H. Broyhill, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Date

July 12, 1985

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. Letter from Respondent
2. Proposed agreement and letter

Broyhill Furniture Industries, Inc.

Broyhill Park, Lenoir, North Carolina 28633 (704) 758-3222

PAUL H. BROYHILL
Chairman of the Board

June 17, 1985

Mr. Kenneth A. Gross
Associate General Counsel
FEDERAL ELECTION COMMISSION
1325 K Street, N. W.
Washington, D. C. 20462

Re: Broyhill Furniture Industries, Inc.
Political Action Committee
FED ID #C00032615

Dear Mr. Gross:

We are in receipt of Chairman John Warren McGarry's letter of June 5, 1985 concerning failure to file the 1984 Pre-General Election Report of Receipts and Disbursements for the above-captioned PAC.

In reviewing our records, I find that the Report in question was inadvertently not filed at the designated time, but that the information requested for that October 1 - 17, 1984 time frame was included in our "Thirtieth Day Report Following the General Election". That information is as follows:

Victor Ashe for U. S. Senate Knoxville, Tennessee 37919	10/4/84	\$ 500.00
Dave Christian for Congress Levittown, Pennsylvania 19055	10/8/84	\$ 250.00

You will note that disbursements for the Pre-General Election Report totalled \$750.00 with no receipts.

Inasmuch as the above information is the only information to be included in the report in question and that failure to file was totally unintentional, I respectfully request that we enter into a Pre-Probable Cause Conciliation Agreement.

On behalf of my Committee, I apologize for any inconvenience caused by failure to disclose the above and ask for any and all consideration in properly and satisfactorily settling this matter.

Yours very truly,

Paul H. Broyhill
Treasurer
Broyhill Furniture Industries, Inc.
Political Action Committee

PHB:lp
Enclosure

A Attachment A

60-7776
RECEIVED
JANU DELIVERED
85 JUN 19
A 9:04
BROYHILL

85 JUN 19
A 9:27
GENERAL COUNSEL

85040545014



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Paul H. Broyhill, Treasurer
Broyhill Furniture Industries
Political Action Committee
Box 700
Lenoir, North Carolina 28633

RE: MUR 2018
Broyhill Furniture Industries
Political Action Committee
Paul H. Broyhill, Treasurer

Dear Mr. Broyhill:

On May 30, 1985, the Commission found reason to believe that your committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii). At your request, the Commission determined on , 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosures

B (4)

85040545015

Broyhill Furniture Industries, Inc.

Broyhill Park, Lenoir, North Carolina 28633 (704) 758-3222

PAUL H. BROYHILL
Chairman of the Board

June 17, 1985

Mr. Kenneth A. Gross
Associate General Counsel
FEDERAL ELECTION COMMISSION
1325 K Street, N. W.
Washington, D. C. 20462

Re: Broyhill Furniture Industries, Inc.
Political Action Committee
FED ID #C00032615

Dear Mr. Gross:

We are in receipt of Chairman John Warren McGarry's letter of June 5, 1985 concerning failure to file the 1984 Pre-General Election Report of Receipts and Disbursements for the above-captioned PAC.

In reviewing our records, I find that the Report in question was inadvertently not filed at the designated time, but that the information requested for that October 1 - 17, 1984 time frame was included in our "Thirtieth Day Report Following the General Election". That information is as follows:

Victor Ashe for U. S. Senate Knoxville, Tennessee 37919	10/4/84	\$ 500.00
Dave Christian for Congress Levittown, Pennsylvania 19055	10/8/84	\$ 250.00

You will note that disbursements for the Pre-General Election Report totalled \$750.00 with no receipts.

Inasmuch as the above information is the only information to be included in the report in question and that failure to file was totally unintentional, I respectfully request that we enter into a Pre-Probable Cause Conciliation Agreement.

On behalf of my Committee, I apologize for any inconvenience caused by failure to disclose the above and ask for any and all consideration in properly and satisfactorily settling this matter.

Yours very truly,

Paul H. Broyhill
Treasurer
Broyhill Furniture Industries, Inc.
Political Action Committee

PHB:lp
Enclosure

85040545016



REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

Broyhill Furniture Industries, Inc.
Political Action Committee

Address (Number and Street)

Box 700

City, State and ZIP Code

Lenoir, North Carolina 28645

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C 000 32615

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

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 _____

☐ Twelfth day report preceding _____ (Type of Election)

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 10/1/84 through 11/26/84

6. (a) Cash on hand January 1, 19 84

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (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)

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

\$ 28,019.37

\$ 31,612.44

\$ 292.11

\$ 30,685.18

\$ 31,904.55

\$ 58,704.55

\$ 1,500.00

\$ 28,300.00

\$ 30,404.55

\$ 30,404.55

\$

\$

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4068

Paul H. Broyhill
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

Date 11/28/84

Revised 4/15/85

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

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

FEC FORM 3X (3/80)

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)**

Name of Committee (in Full)

Broyhill Furniture Industries Political Action Comm.

Report Covering the Period:

From: **10/1/84**

To: **11/26/84**

**COLUMN A
Total This Period**

**COLUMN B
Calendar Year-To-Date**

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitized \$ **175.00**)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

**16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES
AND OTHER POLITICAL COMMITTEES**

17. OTHER RECEIPTS (Dividends, Interest, etc.)

18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND
OTHER POLITICAL COMMITTEES**

22. INDEPENDENT EXPENDITURES (use Schedule E)

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES
(2 U.S.C. § 441 a(d)) (Use Schedule F)

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))

27. OTHER DISBURSEMENTS

28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)

30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)

31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)

85040545013

11(a)
11(b)
11(c)
11(d)
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26(a)
26(b)
26(c)
26(d)
27
28
29
30
31
32
33
34

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 1 for
LINE NUMBER 17
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

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

Name of Committee (in Full)

Broyhill Furniture Industries, Inc. Political Action Committee

A. Full Name, Mailing Address and ZIP Code First Union National Bank Lenoir, N. C.		Name of Employer Interest on checking account	Date (month, day, year) 10/31/84	Amount of Each Receipt this Period 117.11
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date—\$ 1,384.18	
B. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date—\$	
C. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date—\$	
D. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date—\$	
E. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date—\$	
F. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date—\$	
G. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date—\$	
SUBTOTAL of Receipts This Page (optional)				
TOTAL This Period (last page this line number only)				\$ 117.11

85040545012

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for
LINE NUMBER 21
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

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

Name of Committee (in Full)

~~Broyhill Furniture Industries, Inc. Political Action Committee~~

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Victor Ashe for U. S. Senate 1111 Northshore Drive Knoxville, Tennessee 37919	Senate - Tennessee Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): YTD \$ 1,000.	10/4/84	\$ 500.00
B. Full Name, Mailing Address and ZIP Code Dave Christian for Congress 7405 Rt. 13 Levittown, Pennsylvania 19055	Purpose of Disbursement Dave Christian for Cong. Pennsylvania Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): YTD \$ 250	10/8/84	\$ 250.00
C. Full Name, Mailing Address and ZIP Code Congressman McKernan Committee '84 Box 691 Portland, Maine 04104	Purpose of Disbursement McKernan for Congress 1st District - Maine Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): YTD \$ 250.	10/18/84	\$ 250.00
D. Full Name, Mailing Address and ZIP Code People for Boschwitz '84 P. O. Box 10 Minneapolis, Minnesota	Purpose of Disbursement Boschwitz for Senate Minnesota Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): YTD \$ 500	10/18/84	\$ 500.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			\$ 1,500.00

85040545020



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 5, 1985

Paul H. Broyhill, Treasurer
Broyhill Furniture Industries
Political Action Committee
Box 700
Lenoir, North Carolina 28633

RE: MUR 2018
Broyhill Furniture Industries PAC
Paul H. Broyhill, Treasurer

Dear Mr. Broyhill:

On May 30, 1985, the Federal Election Commission determined that there is reason to believe that the Broyhill Furniture Industries Political Action Committee (the "Committee"), 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 you so desire. 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 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.

85040545021

Paul H. Broyhill, Treasurer
Page 2

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 Paul Reyes, 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

85040545022

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Broyhill Furniture Industries
Political Action Committee
Paul H. Broyhill, Treasurer

MUR NO. _____

SUMMARY OF ALLEGATIONS

The Broyhill Furniture Industries Political Action Committee (the "Committee") and Paul Broyhill, as treasurer, failed to timely file the 1984 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 that Pre-General Election Reports, in a calendar year in which a regularly scheduled general election is held, shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th before) any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election, and which shall be complete as of the 20th day before the election.

Section 104.5(c)(1)(ii)(A) of Title 11 Code of Federal Regulations, reiterates the requirement of 2 U.S.C. § 434(a)(4) and explains further that pre-election reports need to be filed regarding contributions or expenditures made in connection with an election "...if such disbursements have not been previously disclosed." In 1984 the Pre-General Election Report should have disclosed all financial activity of a committee from October 1 through October 17, 1984.

A regularly scheduled general election was held in 1984 on November 6.

85040545023

The Committee was notified on October 1, 1984, that the report was due on October 25, 1984, or, if sent by registered or certified mail should be post marked no later than October 22, 1984.

The Committee filed, by certified mail, a 1984 Post-General Election report covering the period October 1 through November 26, 1984 which indicated that the Committee had made contributions to two candidates in the pre-General election period which had not been previously disclosed. Therefore, the Committee violated 2 U.S.C. § 434(a)(4)(A)(ii) by not filing a Pre-General election report for the period October 1 through October 17, 1984 on October 25, 1984. Its Post-General Election report should have covered October 18 through November 26, 1984.

85040545024

DESCRIPTION OF PRELIMINARY PROCEDURES
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE
FEDERAL ELECTION COMMISSION

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of General Counsel where they are assigned a MUR (Matter Under Review) number, and assigned to a staff member.

Following review of the information which generated the MUR, a recommendation on how to proceed on the matter, which shall include preliminary legal and factual analysis, and any information compiled from materials available to the Commission shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act (FECA) may have occurred or is about to occur and that the Commission conduct an investigation of the matter; or (b) that the Commission find no reason to believe that a possible violation of the FECA has occurred and that the Commission close the file on the matter.

Thereafter, if the Commission decides by an affirmative vote of four (4) Commissioners that there is reason to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed, the Office of the General Counsel shall open an investigation into the matter. Upon notification of the Commission's finding(s), within 15 days a respondent(s) may submit any factual or legal materials relevant to the allegations. During the investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order answers to interrogatories. The respondent(s) may be contacted more than once by the Commission in its investigation.

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: _____

ADDRESS: _____

TELEPHONE: _____

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

Date

Signature

RESPONDENT'S NAME: _____

ADDRESS: _____

HOME PHONE: _____

BUSINESS PHONE: _____

85040545026



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Paul H. Broyhill, Treasurer
Broyhill Furniture Industries
Political Action Committee
Box 700
Lenoir, North Carolina 28633

RL

RE: MUR
Broyhill Furniture Industries PAC
Paul H. Broyhill, Treasurer

Dear Mr. Broyhill:

On , 1985, the Federal Election Commission determined that there is reason to believe that the Broyhill Furniture Industries Political Action Committee (the "Committee"), 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 you so desire. 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 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.

85040545027

Paul H. Broyhill, Treasurer
Page 2

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 Paul Reyes, 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

85040545028

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) RAD Referral 85NF-95
Broyhill Furniture Industries)
Political Action Committee)
Paul H. Broyhill, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 30, 1985, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral 85NF-95:

1. Open a MUR.
2. Find reason to believe that the Broyhill Furniture Industries Political Action Committee and Paul H. Broyhill, 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 May 24, 1985.

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

Attest:

5-31-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

5-28-85, 10:31
5-28-85, 4:00

85040545029



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE FEC
COMM. SECRETARY

May 29, 1985 MAY 30 9:29

Memorandum

To: The Commission

From: Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Subject: Errata; First General Counsel's Report
RAD Referral 85-NF-95

SENSITIVE

The Factual and Legal Analysis Section of the First General Counsel's Report in this matter, signed May 24, 1985, and the accompanying proposed General Counsel's Factual and Legal Analysis, which is to be sent to the respondents, inadvertently state that section 434(a)(4)(A)(ii) "requires that Post-General Election Reports...shall be filed...." These sections should state that section 434(a)(4)(A)(ii) "requires that Pre-General Election Reports...shall be filed...." Substitute pages are attached.

85040545030

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 _____

RAD REFERRAL NO. 85-87-95
STAFF MEMBER Paul Bates

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

RESPONDENT'S NAME: Broyhill Furniture Industries
Political Action Committee
Paul H. Broyhill, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(ii)
11 C.F.R. § 104.5(c)(1)(ii)(A)

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 General Counsel's Office on May 10, 1985.

SUMMARY OF ALLEGATIONS

The Broyhill Furniture Industries Political Action Committee (the "Committee") and Paul Broyhill, as treasurer, failed to timely file the 1984 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 that Pre-General Election Reports, in a calendar year in which a regularly scheduled general election is held, shall be filed no later than the 12th day before (or posted by registered

85040545031

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Broyhill Furniture Industries
Political Action Committee
Paul H. Broyhill, Treasurer

MUR NO. _____

SUMMARY OF ALLEGATIONS

The Broyhill Furniture Industries Political Action Committee (the "Committee") and Paul Broyhill, as treasurer, failed to timely file the 1984 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 that Pre-General Election Reports, in a calendar year in which a regularly scheduled general election is held, shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th before) any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election, and which shall be complete as of the 20th day before the election.

Section 104.5(c)(1)(ii)(A) of Title 11 Code of Federal Regulations, reiterates the requirement of 2 U.S.C. § 434(a)(4) and explains further that pre-election reports need to be filed regarding contributions or expenditures made in connection with an election "...if such disbursements have not been previously disclosed." In 1984 the Pre-General Election Report should have disclosed all financial activity of a committee from October 1 through October 17, 1984.

A regularly scheduled general election was held in 1984 on November 6.

85040545032



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 29, 1985

Memorandum

To: The Commission

From: Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel *KAG*

Subject: Errata; First General Counsel's Report
RAD Referral 85-NF-95

SENSITIVE

The Factual and Legal Analysis Section of the First General Counsel's Report in this matter, signed May 24, 1985, and the accompanying proposed General Counsel's Factual and Legal Analysis, which is to be sent to the respondents, inadvertently state that section 434(a)(4)(A)(ii) "requires that Post-General Election Reports...shall be filed...." These sections should state that section 434(a)(4)(A)(ii) "requires that Pre-General Election Reports...shall be filed...." Substitute pages are attached.

85040545033

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 _____

RAD REFERRAL NO. 85-WF-95
STAFF MEMBER Paul Reyes

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

RESPONDENT'S NAME: Broyhill Furniture Industries
Political Action Committee
Paul H. Broyhill, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(ii)
11 C.F.R. § 104.5(c)(1)(ii)(A)

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 General Counsel's Office on May 10, 1985.

SUMMARY OF ALLEGATIONS

The Broyhill Furniture Industries Political Action Committee (the "Committee") and Paul Broyhill, as treasurer, failed to timely file the 1984 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 that Pre-General Election Reports, in a calendar year in which a regularly scheduled general election is held, shall be filed no later than the 12th day before (or posted by registered

85040545034

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Broyhill Furniture Industries
Political Action Committee
Paul H. Broyhill, Treasurer

MUR NO. _____

SUMMARY OF ALLEGATIONS

The Broyhill Furniture Industries Political Action Committee (the "Committee") and Paul Broyhill, as treasurer, failed to timely file the 1984 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 that Pre-General Election Reports, in a calendar year in which a regularly scheduled general election is held, shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th before) any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election, and which shall be complete as of the 20th day before the election.

Section 104.5(c)(1)(ii)(A) of Title 11 Code of Federal Regulations, reiterates the requirement of 2 U.S.C. § 434(a)(4) and explains further that pre-election reports need to be filed regarding contributions or expenditures made in connection with an election "...if such disbursements have not been previously disclosed." In 1984 the Pre-General Election Report should have disclosed all financial activity of a committee from October 1 through October 17, 1984.

A regularly scheduled general election was held in 1984 on November 6.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cut*
DATE: May 28, 1985
SUBJECT: RAD 85NF-95: 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	<input checked="" type="checkbox"/>
Sensitive	<input checked="" type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>
24 Hour No Objection	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>
Information	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>
Other	<input type="checkbox"/>

DISTRIBUTION

Compliance	<input checked="" type="checkbox"/>
Audit Matters	<input type="checkbox"/>
Litigation	<input type="checkbox"/>
Closed MUR Letters	<input type="checkbox"/>
Status Sheets	<input type="checkbox"/>
Advisory Opinions	<input type="checkbox"/>
Other (see distribution below)	<input type="checkbox"/>

85040545036

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

FIRST GENERAL COUNSEL'S REPORT 28 AIO: 31

DATE AND TIME OF TRANSMITTAL BY OGC
TO THE COMMISSION 5/28/85 - 10:30

RAD REFERRAL NO. 85-02-25
STAFF MEMBER PAUL ROYER

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

RESPONDENT'S NAME: Broyhill Furniture Industries
Political Action Committee
Paul H. Broyhill, as treasurer

SENSITIVE

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(ii)
11 C.F.R. § 104.5(c)(1)(ii)(A)

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 General Counsel's Office on May 10, 1985.

SUMMARY OF ALLEGATIONS

The Broyhill Furniture Industries Political Action Committee (the "Committee") and Paul Broyhill, as treasurer, failed to timely file the 1984 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 that Post-General Election Reports, in a calendar year in which a regularly scheduled general election is held, shall be filed no later than the 12th day before (or posted by registered

05040545037

or certified mail no later than the 15th before) any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election, and which shall be complete as of the 20th day before the election.

Section 104.5(c)(1)(ii)(A) of Title 11 Code of Federal Regulations, reiterates the requirement of 2 U.S.C. § 434(a)(4) and explains further that pre-election reports need to be filed regarding contributions or expenditures made in connection with an election "...if such disbursements have not been previously disclosed." In 1984 the Pre-General Election Report should have disclosed all financial activity of a committee from October 1 through October 17, 1984.

A regularly scheduled general election was held in 1984 on November 6.

The Committee was notified on October 1, 1984, that the report was due on October 25, 1984, or, if sent by registered or certified mail should be post marked no later than October 22, 1984.

The Committee filed, by certified mail, a 1984 Post-General Election report covering the period October 1 through November 26, 1984 which indicated that the Committee had made contributions to two candidates in the pre-General election period which had not been previously disclosed. Therefore, the Committee violated 2 U.S.C. § 434(a)(4)(A)(ii) by not filing a

85040545038

Pre-General election report for the period October 1 through October 17, 1984 on October 25, 1984. Its Post-General Election report should only have covered October 18 through November 26, 1984.


RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Broyhill Furniture Industries Political Action Committee and Paul H. Broyhill, 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

Date

BY:


Kenneth A. Gross
Associate General Counsel

Attachments

Proposed letter (1)
General Counsel's Factual and Legal Analysis
Referral Materials

850405450339



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

10 May 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: QUARTERLY FILERS (UNAUTHORIZED COMMITTEES) WHICH FAILED
TO SUBMIT TIMELY 1984 12 DAY PRE-GENERAL REPORTS

The attached list of unauthorized committees consists of twenty-three (23) quarterly filers, which failed to submit a 12 Day Pre-General Report by Election Day, November 6, 1984. According to the RAD Review and Referral Procedures for Unauthorized Committees (Standard 3), further examination is required by your office.

Unlike the mandatory reporting requirement placed upon monthly filers, 2 U.S.C. §434(a)(4)(A)(ii) requires quarterly filers to submit 12 Day Pre-General Reports only if the committees make contributions to or expenditures on behalf of Federal candidates involved in the general election.

The Party/Non-Party Branch conducted a thorough examination to identify quarterly filers disclosing contributions or expenditures between October 1 and October 17, 1984. The research revealed committees that submitted either:

- a) 12 Day Pre-General Reports in a untimely manner, or
- b) 30 Day Post-General Reports indicating that 12 Day Pre-General Reports should have been filed.

All unauthorized committees were sent prior notification concerning the pre- and post-general filing requirements on October 1, 1984. In addition, twelve (12) of the committees being referred were sent Non-Filer Notices on December 28, 1984 for failure to file the 30 Day Post-General Report covering October 1 through November 26, 1984.

Attachment

85040545040

For your information, the pertinent supporting documentation on each committee has been arranged in alphabetical order. If you have any questions, please contact Michael Filler at 523-4048.

Attachments

85040545041

8 5 0 4 0 5 4 5 0 4 2

COMMITTEE ID, NAME AND ADDRESS	NOTICES SENT/ CONTACTS WITH FILERS	REPORTS FILED/ RESPONSE(S)
000010015 FURNITURE INDUSTRIES, INC POLITICAL ACTION COMMITTEE TREASURER'S NAME: PAUL H BROVHILL P.O. BOX 700 LEWIS NC 20633	None	Post-General Report (covering 10/1-11/26/84) filed 11/28/84
000010016 COLUMBIAN AND OHIO RAILWAY COMPANY OFFICERS GOOD GOVERNMENT FUND TREASURER'S NAME: MR. ROLAND W. DONNEM P.O. BOX 1419 CHICAGO OH 44101	None	Post-General Report (covering 10/1-11/26/84) filed 12/4/84
000010017 CIGNA CORPORATION POLITICAL ACTION COMMITTEE TREASURER'S NAME: PAUL ROHRKEMPER ONE LOGAN SQUARE PHILADELPHIA PA 19103	Non-Filer Notice sent 12/28/84	Pre-General Report filed 1/10/85
000010018 CITIZENS CONCERNED FOR THE NATIONAL INTEREST TREASURER'S NAME: ROBERT ASHER 640 N MICHIGAN AVENUE ROOM 420 CHICAGO IL 60611	Non-Filer Notice sent 12/28/84	Post-General Report (covering 10/1-11/26/84) filed 1/7/85
000010019 ROFFMAN-LE ROCHE INC GOOD GOVERNMENT COMMITTEE TREASURER'S NAME: S C ROSEN 340 KINGSLAND STREET NOVELL NJ 07110	Non-Filer Notice sent 12/28/84	Post-General Report (covering 10/1-11/26/84) filed 1/8/85
000010020 MINNESOTA POLITICAL ACTION CMTE FOR EDUCATION TREASURER'S NAME: KEN BRESIN 41 BIRCHMERE AVENUE MINN 55103	Non-Filer Notice sent 12/28/84	Pre-General Report filed 1/11/85

BROYHILL FURNITURE INDUSTRIES, INC.
POLITICAL ACTION COMMITTEE

(Attachments 7a - 7c)

85040545043

8 5 0 4 0 5 4 5 0 4 4

COMMITTEE INDEX OF DISBURSEMENT DOCUMENTS - (C) (33-04)

DATE: 10/10/84

NON-PARTY RELATED

DATE	DESCRIPTION	AMOUNT	DISBURSEMENTS	TYPE OF FILE	# OF PAGES	LOCATION
1983	WASH. STATE	19,219	7,800	1 JAN 83 - 31 MAR 83	9	85FEC/2/0/5085
	JULY	9,207	6,000	1 APR 83 - 30 JUN 83	7	85FEC/2/6/4030
	DECEMBER	9,817	3,000	1 JUL 83 - 30 SEPT 83	7	85FEC/2/85/0232
1984	JANUARY	12,970	4,771	1 OCT 83 - 31 DEC 83	8	85FEC/2/90/1237
	FEBRUARY	9,087	9,150	1 JAN 84 - 31 MAR 84	7	85FEC/3/1/1238
	MARCH	20,975	10,300	1 APR 84 - 30 JUN 84	9	85FEC/3/2/1239
	APRIL	20,975	9,800	1 JUL 84 - 30 SEPT 84	10	85FEC/3/3/1240
	MAY	5,029	7,850	1 OCT 84 - 30 NOV 84	9	85FEC/3/4/1241
	JUNE	5,029	7,850	1 DEC 84 - 31 JAN 85	9	85FEC/3/5/1242
	JULY	292	1,500	1 FEB 85 - 31 MAR 85	5	85FEC/3/6/1243
	AUGUST	292	1,500	1 APR 85 - 30 MAY 85	5	85FEC/3/7/1244
	SEPTEMBER	3,077	4,202	1 JUN 85 - 31 JUL 85	7	85FEC/3/8/1245
	OCTOBER	3,077	4,202	1 AUG 85 - 31 SEP 85	7	85FEC/3/9/1246
	NOVEMBER			1 OCT 85 - 31 NOV 85	1	85FEC/3/10/1247
	DECEMBER			1 DEC 85 - 31 JAN 86	2	85FEC/3/11/1248
	TOTAL	89,396	59,953		102	TOTAL PAGES

5

All Reports Reviewed
 Ending Cash on Hand as of 12/31/84= \$29,998.96
 Outstanding Debts as of 12/31/84= \$0



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

page 1 of 2

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(c) and (d).

-over-

85040545045

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
800/224-9530 or 202/523-4068

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee or for an Authorized Committee

(Monetary Page)

ALIC AREA

84 NOV 30 12 30 PM '84

1 Name of Committee (In Full)

Broyhill Furniture Industries, Inc. Political Action Committee

Address (Business and Street)

Box 700

City, State and ZIP Code

Lenoir, North Carolina 28633

☐ Check here if address is different than previously reported

2 FEC Identification Number

C 000 32615

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 _____☐ Twelfth day report preceding _____

Election on _____ in the State of _____

☒ Thirtieth day report following the General Election

on November 6 in the State of North Carolina

☐ Termination Report3 ☐ This committee qualified as a multiple districts committee during the Reporting Period on _____

(b) Is this Report an Amendment?

☐ YES☒ NO

SUMMARY

5 Covering Period 10-1-84 through 11-26-84

6 (a) Cash on Hand January 1, 1984

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1B)

(d) Subtract (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 2B)

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)

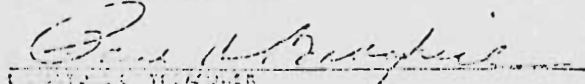
10 Debts and Obligations Owed BY the Committee

(Itemize all on Schedule C or Schedule D)

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

Paul H. Broyhill

Date of Preparation of Report



11/28/84

For further information contact:

Federal Election Commission

P.O. Box 630 474 5530

Local 207 522 4000

NOTE: Submitting false or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437e

DO NOT WRITE IN THESE SPACES

FEC FORM 3X (2/80)

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FPC FORM 3X)

Name of Committee or Fund		Period Covering the Report		
Ironhill Furniture Industries Political Action Committee		From 10/1/84	To 11/28/84	
		COLUMN A Total This Period	COLUMN B Calendar Year To Date	
I. RECEIPTS				
11. CONTRIBUTIONS (other than loaned FFOIA)				
(a) Individuals, Firms, Other Than Political Committees		175.00	28,801.00	11(a)
(b) Political Party Committees		-	-	11(b)
(c) Other Political Committees		-	-	11(c)
(d) TOTAL CONTRIBUTIONS (other than loaned) (Add 11(a), 11(b) and 11(c))		175.00	28,801.00	11(d)
12 TRANSFERS FROM AFFILIATED OTHER PARTY COMMITTEES				12
13 ALL LOANS RECEIVED				13
14 LOAN REPAYMENTS RECEIVED				14
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Refunds, etc.)				15
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES				16
17 OTHER RECEIPTS (Donations, Interest, etc.)		112.11	2,185.16	17
18 TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 17 and 18)		287.11	31,185.16	18
II. DISBURSEMENTS				
19 OPERATING EXPENDITURES				19
20 TRANSFERS TO AFFILIATED OTHER PARTY COMMITTEES				20
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		1,500.00	28,800.00	21
22 INDEPENDENT EXPENDITURES (See Section 6)				22
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 1741a(d)) (Use Schedule F)				23
24 LOAN REPAYMENTS MADE				24
25 LOANS MADE				25
26 REFUNDS OF CONTRIBUTIONS TO				
(a) Individuals, Firms, Other Than Political Committees				26(a)
(b) Political Party Committees				26(b)
(c) Other Political Committees				26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))				26(d)
27 OTHER DISBURSEMENTS				27
28 TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		1,500.00	28,800.00	28
III. SUMMARY OF CONTRIBUTIONS AND NET OPERATING EXPENDITURES				
29 TOTAL CONTRIBUTIONS (other than loaned) (from Line 11(d))		175.00	28,801.00	29
30 TOTAL CONTRIBUTIONS (other than loaned) (from Line 11(d))				30
31 NET CONTRIBUTIONS (other than loaned) (from Line 29)		175.00	28,801.00	31
32 TOTAL OPERATING EXPENDITURES (from Line 19)				32
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)				33
34 NET OPERATING EXPENDITURES (from Line 32)				34

9

SCHEDULE B

ITEMIZED DISBURSEMENTS

ATTACHMENT 7c
page 3 of 4

Use itemized schedule for each category of the Official Summary Page

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

Name of Committee (in Full)

~~People's Party for the United States - The National Labor Committee~~

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
* Victor Arke for U. S. Senate 1111 Northshore Drive Knoxville, Tennessee 37919	Senate - Tennessee Disbursement for Primary & General Other (specify) \$ 1,000	10/4/84	\$ 500.00
* Dave Christian for Congress 7405 Rt. 13 Levittown, Pennsylvania 19055	Dave Christian for Cong. Disbursement for Primary & General Other (specify) \$ 250	10/8/84	\$ 250.00
C. Full Name, Mailing Address and ZIP Code Congressman McKernan Committee '84 Box 691 Portland, Maine 04104	McKernan for Congress 1st District - Maine Disbursement for Primary & General Other (specify) YTD \$ 250.	10/18/84	\$ 250.00
D. Full Name, Mailing Address and ZIP Code People for Loschultz '84 P. O. Box 10 Minneapolis, Minnesota	Loschultz for Senate Minnesota Disbursement for Primary & General Other (specify) YTD \$ 500	10/18/84	\$ 500.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for Primary & General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for Primary & General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for Primary & General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for Primary & General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for Primary & General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
J. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for Primary & General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
			\$ 1,500.00

85040545049

4 0 3 5 0 0 5 1

84 NOV 30 AM: 30

IRNITURE INDUSTRIES, INC.
NORTH CAROLINA 28633

First Class Mail



Broyhill
INDUSTRIES

LENOIR, NORTH CAROLINA 28645

TO

Public Records Division
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

ALLCHANDISE. May be opened for postal inspection.
Return postage guaranteed.

INSURANCE
NUMBER

CERTIFICATE
No. 1124414

8 5 0 4 0 5 4 5 0 5 0



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Paul H. Broyhill, Treasurer
Broyhill Furniture Industries
Political Action Committee
Box 700
Lenoir, North Carolina 28633

RE: MUR
Broyhill Furniture Industries PAC
Paul H. Broyhill, Treasurer

Dear Mr. Broyhill:

On , 1985, the Federal Election Commission determined that there is reason to believe that the Broyhill Furniture Industries Political Action Committee (the "Committee"), 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 you so desire. 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 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.

Paul H. Broyhill, Treasurer
Page 2

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 Paul Reyes, 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

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Broyhill Furniture Industries
Political Action Committee
Paul H. Broyhill, Treasurer

MUR NO. _____

SUMMARY OF ALLEGATIONS

The Broyhill Furniture Industries Political Action Committee (the "Committee") and Paul Broyhill, as treasurer, failed to timely file the 1984 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 that Post-General Election Reports, in a calendar year in which a regularly scheduled general election is held, shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th before) any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election, and which shall be complete as of the 20th day before the election.

Section 104.5(c)(1)(ii)(A) of Title 11 Code of Federal Regulations, reiterates the requirement of 2 U.S.C. § 434(a)(4) and explains further that pre-election reports need to be filed regarding contributions or expenditures made in connection with an election "...if such disbursements have not been previously disclosed." In 1984 the Pre-General Election Report should have disclosed all financial activity of a committee from October 1 through October 17, 1984.

A regularly scheduled general election was held in 1984 on November 6.

The Committee was notified on October 1, 1984, that the report was due on October 25, 1984, or, if sent by registered or certified mail should be post marked no later than October 22, 1984.

The Committee filed, by certified mail, a 1984 Post-General Election report covering the period October 1 through November 26, 1984 which indicated that the Committee had made contributions to two candidates in the pre-General election period which had not been previously disclosed. Therefore, the Committee violated 2 U.S.C. § 434(a)(4)(A)(ii) by not filing a Pre-General election report for the period October 1 through October 17, 1984 on October 25, 1984. Its Post-General Election report should have covered October 18 through November 26, 1984.

85040545055



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2018

Date Filmed 9/10/85 Camera No. --- 2

Cameraman AS