



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2508

DATE FILMED 4/23/88 CAMERA NO. 3

CAMERAMAN GR

8804064387



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 22, 1987

MEMORANDUM

TO: LAWRENCE M. NOBLE
ACTING 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 FILE THE 1986 12 DAY PRE-GENERAL REPORT
BY ELECTION DAY

The attached list of unauthorized committees consists of forty-nine (49) quarterly filers which failed to file a 1986 12 Day Pre-General Report by Election Day, November 4, 1986. In accordance with Standard 3 of the RAD Review and Referral Procedures, 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. All unauthorized committees were sent prior notification regarding the pre- and post-general filing requirements on September 29, 1986 (Attachment 50).

The Party/Non-Party Branch conducted a thorough examination to identify quarterly filers disclosing contributions or expenditures between October 1 and October 15, 1986. The research revealed committees that submitted:

- a) 12 Day Pre-General Reports in an untimely manner;
- b) 30 Day Post-General Reports indicating that 12 Day Pre-General Reports should have been filed; and
- c) Year End Reports indicating that 12 Day Pre-General Reports should have been filed.

ATTACHMENT 1

83040525388

For your information, the pertinent supporting documentation on each committee has been arranged in alphabetical order. Statistics on all C indices only reflect activity through December 31, 1986. Any reports disclosing activity in 1987 have not been reviewed.

The following committees were previously referred either to your office or to the Audit Division for a possible 2 U.S.C. §438(b) audit.

(1)

(2)

(3)

(4)

(5)

(6) Project Political Involvement Committee (PPIC)

(a) #86MF-31: MUR 2333, still open.

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

Attachments

8 3 0 4 0 6 4 5 3 8 9

C00048579

Project Political Involvement
Committee (PPIC)

87MF-128

88040695390

PROJECT POLITICAL INVOLVEMENT COMMITTEE (PPIC)

(Attachments 43a - 43e)

83040695391

8 8 0 4 0 6 9 5 3 9 2

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 29APR87
PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
PROJECT POLITICAL INVOLVEMENT COMMITTEE (PPIC) CONNECTED ORGANIZATION: SALT RIVER PROJECT				NON-PARTY QUALIFIED	ID 0C00040579	
1985	MISCELLANEOUS REPORT			28JUN85 TO FEC	2	85FEC/377/0453
	MID-YEAR REPORT	11,381	8,006	1JAN85 -30JUN85	10	85FEC/303/2013
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN85 -30JUN85	4	86FEC/394/0230
	REQUEST FOR ADDITIONAL INFORMATION			1JAN85 -30JUN85	3	85FEC/392/2292
	YEAR-END	10,124	3,546	1JUL85 -31DEC85	10	86FEC/400/2918
1986	STATEMENT OF ORGANIZATION - AMENDMENT			15JUL86	1	86FEC/421/1482
	MISCELLANEOUS NOTICE FROM FEC			19NOV86	1	86FEC/444/3482
	APRIL QUARTERLY	7,370	9,049	1JAN86 -31MAR86	10	86FEC/415/3259
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN86 -31MAR86	4	86FEC/421/1482
	NOTICE OF FAILURE TO FILE			1JAN86 -31MAR86	1	86FEC/413/2968
	1'ST LETTER INFORMATIONAL NOTICE			1JAN86 -31MAR86	2	86FEC/416/1607
	JULY QUARTERLY	4,951	2,259	1APR86 -30JUN86	9	86FEC/423/3080
	PRE-PRIMARY	3,971	15,063	1JUL86 -20AUG86	14	86FEC/432/2521
	PRE-PRIMARY - AMENDMENT	-	-	1JUL86 -20AUG86	3	86FEC/433/4919
	1'ST LETTER INFORMATIONAL NOTICE			1JAN86 -20AUG86	1	86FEC/430/2290
	OCTOBER QUARTERLY	2,494	3,000	21AUG86 -30SEP86	8	86FEC/444/0234
	NOTICE OF FAILURE TO FILE			30SEP86	1	86FEC/443/3965
	POST-GENERAL	3,633	11,559	1OCT86 -24NOV86	11	86FEC/449/1110
	YEAR-END	1,702	8	25NOV86 -31DEC86	6	87FEC/450/5502
	TOTAL	45,626	0 52,490	0	101	TOTAL PAGES

All reports have been reviewed.
Ending cash-on-hand as of 12/31/86: \$4,808
Outstanding debts owed by the committee as of 12/31/86: \$0

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

RECEIVED AT THE FEC:

(Summary Page)

08 DEC 8 09:38

1. Name of Committee (in Full)

Project Political Involvement Committee

Address (Number and Street)

P. O. Box 52025

City, State and ZIP Code

Phoenix, Arizona 85072-2025

☐ Check here if address is different than previously reported.2. FEC Identification Number
C000485793. ☐ 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 _____

☒ Post General Election Report
Thirtieth day report following the General Election

on 11/4/86 in the State of Arizona

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES☐ NO

SUMMARY

5. Covering Period 10/1/86 through 11/24/86

6. (a) Cash on hand January 1, 19 86

(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)

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

GLENDA M. RAUSCHER

Type or Print Name of Treasurer

Glenda M. Rauscher
SIGNATURE OF TREASURER12-3-86
Date

For further information contact:

Federal Election Commission
800 E Street, N.W.
Washington, D.C. 20543

Tel: 202-456-9000

Local: 202-396-3120

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

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

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FEC FORM 3X (3/80)

03040695393

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

Attachment 43c

Name of Committee or Fund Project Political Involvement Committee		Period Ending On or Before From 10/1/86 To 11/24/86	
		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 Unitemized \$ 2,631.24)		3,437.24	21,157.94
(b) Political Party Committees			
(c) Other Political Committees			
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))		3,437.24	21,157.94
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.)		195.96	1,264.10
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)		3,633.20	22,422.04
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES		9.57	581.73
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		3,250.00	13,750.00
22. INDEPENDENT EXPENDITURES (use Schedule E)			
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 6441 old) (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		8,300.00	26,600.00
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		11,559.57	40,931.73
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)		3,437.24	21,157.94
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)		3,437.24	21,157.94
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)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Attachment 43d

Use separate schedule
for each category of the
Detailed Summary PagePage 1 of 1
FOR LINE NUMBER:
21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of collecting 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)

PROJECT POLITICAL INVOLVEMENT COMMITTEE

AJD

A. Full Name, Mailing Address and ZIP Code
Jon Kyl for Congress
P. O. Box 16207
Phoenix, AZ 85011Purpose of Disbursement
U. S. Repr.Date (month,
day, year)Amount of Each
Disbursement This Period

10/3/86

\$ 750.00

Disbursement for: ☐ Primary ☒ General
☐ Other (specify)

11/3/86

\$1,000.00

B. Full Name, Mailing Address and ZIP Code
Jim Kolbe Committee
600 Independence Ave., S.E.
Washington, D.C. 20003Purpose of Disbursement
U. S. Repr.Date (month,
day, year)Amount of Each
Disbursement This Period

10/21/86

\$1,000.00

Disbursement for: ☐ Primary ☒ General
☐ Other (specify)C. Full Name, Mailing Address and ZIP Code
McCain for Senate
663 W. 2nd Avenue
Mesa, AZ 85202Purpose of Disbursement
U. S. SenateDate (month,
day, year)Amount of Each
Disbursement This Period

11/3/86

\$ 500.00

Disbursement for: ☐ Primary ☒ General
☐ Other (specify)

D. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
day, year)Amount of Each
Disbursement This PeriodDisbursement for: ☐ Primary ☐ General
☐ Other (specify)

E. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
day, year)Amount of Each
Disbursement This PeriodDisbursement for: ☐ Primary ☐ General
☐ Other (specify)

F. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
day, year)Amount of Each
Disbursement This PeriodDisbursement for: ☐ Primary ☐ General
☐ Other (specify)

G. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
day, year)Amount of Each
Disbursement This PeriodDisbursement for: ☐ Primary ☐ General
☐ Other (specify)

H. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
day, year)Amount of Each
Disbursement This PeriodDisbursement for: ☐ Primary ☐ General
☐ Other (specify)

I. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
day, year)Amount of Each
Disbursement This PeriodDisbursement for: ☐ Primary ☐ General
☐ Other (specify)

SUBTOTAL of Disbursements This Page (optional)

\$3,250.00

TOTAL This Period (optional) (line number 17)

\$3,250.00

00040695395

2 2 7 4 7 6 4 5 3 9 6

3 5 7 3 4 4 9 1 1 2 0

John Williams
River Project
ning and Administration
52025
rix, AZ 85072-2025



FIRST CLASS MAIL

Christopher Noland
Federal Election Committee
1325 K. Street N.W.
Washington, D.C. 20003

00000 P2:30

Attachment 43e

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

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRALS: 87MF-662134
STAFF MEMBER: George F. Rishel

SOURCE OF MUR:

INTERNALLY GENERATED

33040695397

27 JUN 77 P12:

88040695398

Project Political Involvement Committee and
_ Glenda M. Rauscher, as treasurer

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

INTERNAL REPORTS
CHECKED: Referral Materials

FEDERAL AGENCIES
CHECKED: None

I. GENERATION OF MATTER

The Report Analysis Division ("RAD") referred the above-listed 49 committees to the Office of the General Counsel on May 22, 1987. The basis of the attached referrals is their failure to either file a 12-day Pre-Election Report or file such report in a timely fashion.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file a Pre-Election Report before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. Such report shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) such election and shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii).

The 1986 Pre-Election Report for the 1986 General Election was due on October 23, 1986, complete as of October 15, 1986. Quarterly

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filers were notified on September 29, 1986, of the requirement for filing the Pre-Election Report.

The following committees filed a 12-Day Pre-Election Report, but did not file it in a timely fashion:

<u>Committee</u>	<u>Date Filed</u>	<u>Pre-Election Activity</u>
------------------	-------------------	------------------------------

88040695400

The following committees filed a 1986 Post-General Report that disclosed activity indicating a 12-Day Pre-Election Report should have been filed:

Committee

Date Filed1/

Pre-Election Activity

1
C
C
C
C
C
C
C
C
C
C

Project Political
Involvement
Committee^{3/}

12-4-86
(42 days late)

\$750 in contributions
to one candidate

9 3 0 4 0 5 9 5 4 0 2

The following committees filed a Year End Report disclosing activity indicating that 12-Day Pre-Election Report should have been filed:

COMMITTEE

Date Filed^{4/}

Pre-Election Activity

Accordingly, with regard to 48 of these 49 committees, the Office of the General Counsel recommends that the Commission open Matter Under Review and find reason to believe these committees

III. RECOMMENDATIONS

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

23740695403

9 8 0 4 0 6 9 3 4 0 4

Project Political Involvement Committee and Glenda M. Rauscher,
as treasurer

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

RAD Ref.'s
87NF-86
THROUGH
87NF-134

2374755406

(continued)

0.3 0.4 0.5 0.6 0.7 0.8

[illegible]

General Election

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

(continued)

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15, 1987

Page 4

2 3 0 4 0 6 7 3 4 0 9

(continued)

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15. 1987

Page 5

93040695410

Project Political Involvement Committee and Glenda M.
Rauscher, as treasurer

(continued)

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15, 1987

Page 6

2. Approve and send the letters and factual and legal analyses to the respective committees listed in recommendation 1.

3

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

Attest:

6-16-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: Thurs., 6-11-87, 12:34
Circulated on 48 hour tally basis: Thurs., 6-11-87, 4:00
Deadline for vote: Mon., 6-15-87, 4:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 29, 1987

Glenda J. Rauscher, Treasurer
Project Political Involvement Committee
P. O. Box 52025
Phoenix, AZ 85072

RE: MUR 2508
Project Political Involvement
Committee and Glenda M.
Rauscher, as treasurer

Dear Ms. Rauscher:

On June 15, 1987, the Federal Election Commission found that there is reason to believe Project Political Involvement Committee ("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 Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-

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probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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

Sincerely,



Scott E. Thomas
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form

03040593413

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Project Political Involvement
 Committee and Glenda M.
 Rauscher, as treasurer

MUR: 2508

23040695414
The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file a Pre-Election Report before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. Such report shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) such election and which shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii).

The 1986 Pre-Election Report for the 1986 General Election was due on October 23, 1986, and complete as of October 15, 1986. Quarterly filers were notified on September 29, 1986, of the requirement for filing the Pre-Election Report. The committee filed a 1986 Post-General Election Report that disclosed a \$750 contribution to one candidate between October 1, 1986, and October 15, 1986. Thus, the committee was required to file a 12-Day Pre-Election Report by October 23, 1986, and complete as of October 15, 1986. The Committee did not file a report disclosing this activity until it filed its 1986 Post-General Election Report on December 4, 1986. Accordingly, the committee and its treasurer have violated 2 U.S.C. § 434(a)(4)(A)(ii).

RECEIVED AT THE FEC

87 JUL 21 P 1:51

GCC 3978



SALT RIVER PROJECT
POST OFFICE BOX 52025
PHOENIX, ARIZONA
85072-2025
(602) 236-5900

CERTIFIED MAIL

July 16, 1987

Federal Election Commission
Office of General Counsel
Washington, D.C. 20463
ATTN: Scott E. Thomas, Chairman

Re: MUR 2508
Project Political Involvement Committee and
Glenda M. Rauscher as Treasurer

Dear Mr. Thomas:

I represent the Project Political Involvement Committee ("PPIC") in the above matter. I have enclosed a statement signed by Glenda M. Rauscher, Chairman of PPIC, designating me as counsel for PPIC and authorizing me to receive notifications and other communications from the Federal Election Commission ("Commission").

We have reviewed the general counsel's factual and legal analysis of the Matter Under Review ("MUR"), which was enclosed with the letter to Glenda M. Rauscher as Treasurer of PPIC, dated June 29, 1987. (Glenda M. Rauscher is now Chairman of PPIC, effective February 13, 1987, and John Sullivan became Secretary-Treasurer on that same day.) By this letter, PPIC is stating its desire to enter into negotiations directed towards reaching a conciliation agreement with the Commission pursuant to 11 C.F.R. §111.18(d).

The facts stated in the MUR are correct. PPIC did not file a Pre-Election Report reporting a contribution made on October 3, 1986, to a candidate. Instead, PPIC reported the contribution on its 1986 Post-General Election Report which it filed on December 4, 1986.

While no excuse can justify this mistake, it was done neither intentionally nor deliberately, nor with any intent to deceive the Commission or any member of the general public. PPIC reported the contribution, but on the wrong form and at the wrong time. It was 13 days late in reporting the contribution.

To PPIC's knowledge, no harm has been suffered or claimed to have been suffered by any individual on account of PPIC's failure to file a Pre-Election Report. Therefore, PPIC

87 JUL 21 P 3:21

RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Page 2
MUR 2508
July 16, 1987



respectfully requests that this matter be resolved by pre-probable cause conciliation.

I can be reached at (602) 236-2359 for further discussions of this matter.

Very truly yours,

Jane D. Alfano
Jane D. Alfano
Managing Attorney

JDA:sc

Enclosure

cc: Glenda M. Rauscher

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RECEIVED AT THE FEC

87 JUL 27 AM: 28

GCC 4028



SALT RIVER PROJECT

POST OFFICE BOX 52025
PHOENIX, ARIZONA
85072-2025
(602) 236-5900

July 23, 1987

17 JUL 27 P 2: 25

Federal Election Commission
Office of General Counsel
Washington, D. C. 20463
ATTN: Scott E. Thomas, Chairman

Re: MUR 2508
Project Political Involvement Committee and
Glenda M. Rauscher as Treasurer

Dear Mr. Thomas:

Please find enclosed the statement signed by
Glenda M. Rauscher, Chairman of PPIC, designating me as
counsel for PPIC and authorizing me to receive notifications
and other communications from the Federal Election Commis-
sion which was inadvertently not included in my July 16,
1987, letter addressed to you.

I apologize for any inconvenience this may have
caused you.

Very truly yours,

A handwritten signature in cursive script, reading "Jane D. Alfano".
Jane D. Alfano
Managing Attorney

JDA:sc

Enclosure

cc: Glenda Rauscher

7
1
4
5
9
6
7
4
3
2

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2508

NAME OF COUNSEL: Jane D. Alfano

ADDRESS: Salt River Project - Law Department

P. O. Box 52025

Phoenix, AZ 85072-2025

TELEPHONE: (602) 236-2359

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.

7/14/87
Date

Glenda M. Rauscher
Signature

RESPONDENT'S NAME: Glenda M. Rauscher

ADDRESS: Salt River Project - Rates & Corporate Economics

P. O. Box 52025

Phoenix, AZ 85072-2025

HOME PHONE: _____

BUSINESS PHONE: (602) 236-2079

83040695418

6CC#7+18



SALT RIVER PROJECT

POST OFFICE BOX 52025
PHOENIX, ARIZONA
85072-2025
(602) 236-5900

September 17, 1987

Federal Election Commission
Office of General Counsel
Washington, D.C. 20463
ATTN: Deborah Curry, Chairman

Re: MUR 2508
Project Political Involvement Committee
and Glenda M. Rauscher as Treasurer

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 SEP 23 AM 12:14

Dear Deborah:

This letter confirms our telephone conversation of September 4, 1987, in which I indicated that the Project Political Involvement Committee ("PPIC") had not timely notified the Commission of its change of officers. We have now done so. See the enclosed letters dated September 8, 1987, and September 10, 1987, to Christopher L. Nuland from John F. Sullivan.

PPIC requests that this infraction be joined with the matter presently under review and be resolved by pre-probable cause conciliation.

When the treasurer of a political committee shows that best efforts have been used to obtain, maintain, and submit the information required by this Act for the political committee, any report or any records of such committee shall be considered in compliance with this Act.

2 U.S.C. §432(i).

Very truly yours,

cc: Glenda Rauscher



PROJECT POLITICAL INVOLVEMENT COMMITTEE
P.O. Box 52025
Phoenix, Arizona 85072-2025

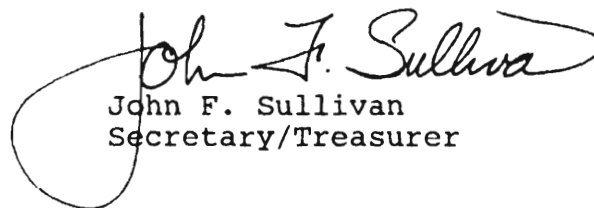
September 10, 1987

Christopher L. Nuland
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Nuland:

Please disregard my letter to you dated September 8, 1987. The following is the correct information. The Project Political Involvement Committee has reorganized its Advisory Committee and the following individuals are its new officers, effective February 13, 1987: Glenda M. Rauscher, Chairman; John F. Sullivan, Secretary-Treasurer.

Sincerely,


John F. Sullivan
Secretary/Treasurer

JFS/sw

cc: J. A. Alfano
G. M. Rauscher

A political involvement activity of the Employees and Shareholders of the Salt River Project

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C.

3 9 0 4 0 5 9 5 4 2 1



PROJECT POLITICAL INVOLVEMENT COMMITTEE
P.O. Box 52025
Phoenix, Arizona 85072-2025

RECEIVED

SEP 9 1987

LAW DEPARTMENT

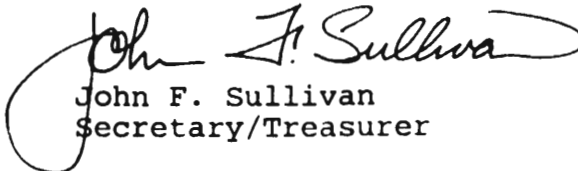
September 8, 1987

Christopher L. Nuland
Federal Election Commission
1325 K Street, N. W.
Washington, D.C. 20463

Dear Mr. Nuland:

This is to inform you that the Project Political Involvement Committee has reorganized its Advisory Committee and the following individuals are its new officers, effective November 13, 1987: Glenda M. Rauscher, Chairman; John F. Sullivan, Secretary-Treasurer.

Very truly yours,


John F. Sullivan
Secretary/Treasurer

JFS/sw

cc: J. A. Alfano
G. M. Rauscher

A political involvement activity of the Employees and Shareholders of the Salt River Project

A copy of our report is filed with the Federal Election Commission and is available for purchase from the
Federal Election Commission, Washington, D.C.

SENSITIVE

AUGUST 13 PM 4:39

RECEIVED
FEDERAL ELECTION COMMISSION

In the Matter of)
)
Project Political Involvement)
Committee and John F. Sullivan,)
as treasurer)

MUR 2508

GENERAL COUNSEL'S REPORT**I. BACKGROUND**

On June 15, 1987, the Commission found reason to believe Project Political Involvement Committee and Glenda M. Rauscher, as treasurer, ("PPIC") violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file the 1986 Pre-General Election Report in a timely manner.

The Office of the General Counsel received a response from Respondents requesting settlement of the matter prior to a finding of probable cause to believe. (Attachment 1) PPIC indicates that the late filing was not intentional but a mistake. Subsequently, the Office of General Counsel received supplemental information during a telephone conversation with the Committee. This supplemental information 1/, pursuant to a request by this Office, clarified the semi-monthly payroll deduction entries on PPIC's Schedule A contained in their 30 Day Post General Election Report covering the period from 10/1/86 through 10/15/86.

1/ PPIC indicated that only one pay period occurred during the time period 10/1/86 through 10/15/86.

Additionally, PPIC's request for pre-probable cause conciliation noted that PPIC had changed treasurers. On September 4, 1987, this office spoke to Ms. Jane Alfano, counsel for PPIC, with regard to the change in treasurers from Glenda M. Rauscher to John F. Sullivan. Ms. Alfano indicated that PPIC had in fact changed treasurers but failed to notify the Commission of the change.

On September 22, 1987, the Office of General Counsel received a supplemental letter from PPIC indicating that the PPIC had failed to notify the Commission of the change but had now done so. (Attachment 2) PPIC requests that the failure to timely notify the Commission of the change in treasurers now be joined with the present matter in review and be resolved by pre-probable cause conciliation.

II. ANALYSIS

Pursuant to 2 U.S.C. § 433, political committees are required to notify the Commission of a change in treasurer within 10 days after the date of the change. Here, PPIC changed their treasurer on February 13, 1987, but did not notify the Commission until September 10, 1987. PPIC failed to notify the Commission of the change in treasurer in a timely manner in violation of 2 U.S.C. § 433. Therefore, the Office of General Counsel recommends the Commission find reason to believe PPIC and John F. Sullivan, as treasurer, violated 2 U.S.C. § 433. The Office of General Counsel also recommends that the Commission accept PPIC's request for pre-probable cause conciliation on both these issues.

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

Attached for the Commission's approval is a proposed conciliation agreement with PPIC and John F. Sullivan, as

treasurer. (Attachment 3).

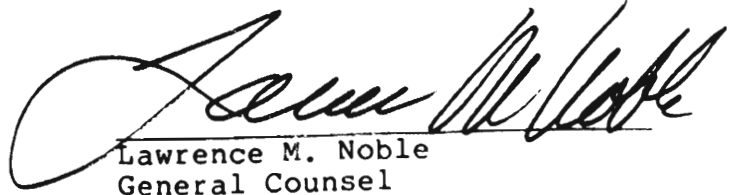
III. RECOMMENDATIONS

1. Find reason to believe Project Political Involvement Committee and John F. Sullivan, as treasurer, violated 2 U.S.C. § 433.
2. Enter into conciliation with Project Political Involvement Committee and John F. Sullivan, as treasurer, prior to a finding of probable cause to believe.

3. Approve the attached proposed conciliation agreement and letter.

Date

10/13/07


Lawrence M. Noble
General Counsel

Attachments

1. Response of PPIC
2. Supplemental Response of PPIC
3. Proposed Conciliation Agreement
4. Letter to Respondents

93040693426

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Project Political Involvement) MUR 2508
Committee and John F. Sullivan,)
as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 16, 1987, the Commission decided by a vote of 4-0 to take the following actions in MUR 2508:

1. Find reason to believe Project Political Involvement Committee and John F. Sullivan, as treasurer, violated 2 U.S.C. § 433.
2. Enter into conciliation with Project Political Involvement Committee and John F. Sullivan, as treasurer, prior to a finding of probable cause to believe.
3. Approve the proposed conciliation agreement and letter, as recommended in the General Counsel's report signed October 13, 1987.

Commissioners Aikens, Elliott, Josefiak, and McGarry voted affirmatively for the decision;
Commissioners McDonald and Thomas did not cast a vote.

Attest:

10-16-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Tues., 10-13-87, 4:39
Circulated on 48 hour tally basis: Wed., 10-14-87, 11:00
Deadline for vote: Fri., 10-16-87, 11:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

23 October 1987

Jane D. Alfano
Salt River Project
P.O. Box 52025
Phoenix, AZ 85072-2025

RE: MUR 2508
Project Political
Involvement
Committee and
John F. Sullivan,
as treasurer

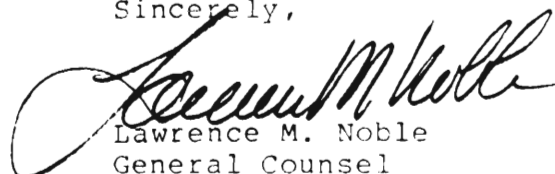
Dear Ms. Alfano:

On June 15, 1987, the Federal Election Commission found reason to believe that Project Political Involvement Committee and its treasurer violated 2 U.S.C. § 434(a)(4)(A)(ii). On October 16, 1987, the Commission also found reason to believe that Project Political Involvement Committee and John F. Sullivan, as treasurer, violated 2 U.S.C. § 433. At your request, on October 16, 1987, the Commission determined 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 your clients 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 Deborah Curry, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

MEMORANDUM TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/SUSAN GREENLEE SG

DATE: February 1, 1988

SUBJECT: OBJECTION TO MUR 2508: General Counsel's Report
signed January 28, 1988

The above-captioned document was circulated to the
Commission on Friday, January 29, 1988 at 12:00 P.M.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____ X _____
Commissioner Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	_____

This matter will be placed on the Executive Session
agenda for February 9, 1988.

Please notify us who will represent your Division
before the Commission on this matter.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN *[Signature]*

DATE: FEBRUARY 2, 1988

SUBJECT: COMMENTS TO MUR 2508 - General Counsel's Report
Signed January 28, 1988

Attached is a copy of Commissioner McDonald's vote
sheet with comments regarding the above-captioned matter.

Attachment:
copy of vote sheet

33040695430

BALLOT

SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DATE & TIME TRANSMITTED: FRIDAY, JANUARY 29, 1988 12:00

COMMISSIONER: AIKENS, ELLIOTT, JOSEFIAR, McDONALD, McGARRY, THOMAS

RETURN TO COMMISSION SECRETARY BY TUESDAY, FEBRUARY 2, 1988 4:00

SUBJECT: MUR 2508 - General Counsel's Report
signed January 28, 1988

- (☒) I approve the recommendation
(☐) I object to the recommendation

COMMENTS: Although I agree with DGC's conclusion,
you can't help but like the respondent's
approach

DATE: 2-2-88

SIGNATURE

Danny McDonald

A DEFINITE VOTE IS REQUIRED. ALL BALLOTS MUST BE SIGNED AND DATED.
PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.
PLEASE RETURN BALLOT NO LATER THAN DATE AND TIME SHOWN ABOVE.

RECEIVED
FEDERAL ELECTION COMMISSION
88 FEB -2 PM 1:30

RECEIVED
FEDERAL ELECTION COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

68 JAN 29 AM 9:28

In the Matter of)
Project Political Involvement) MUR 2508
Committee and John F. Sullivan,)
as treasurer)

SENSITIVE
EXECUTIVE SESSION
FEB 00 1988

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 15, 1987, the Commission found reason to believe Project Political Involvement Committee ("PPIC") and John F. Sullivan, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file the 1986 Pre-General Election Report in a timely manner. On October 16, 1987, the Commission also found reason to believe PPIC and John F. Sullivan, as treasurer, violated 2 U.S.C. § 433 by failing to notify the Commission in a timely manner of a change in PPIC's treasurer.

2 3 7 4 7 6 9 5 4 3 3

II. RECOMMENDATIONS

1.

2.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Project Political Involvement)
Committee and John F. Sullivan,)
as treasurer)

MUR 2508

CERTIFICATION

I, Mary W. Dove, recording secretary for the Federal Election Commission executive session of February 9, 1988, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions on the above-captioned matter:

1.

2.

3. Approve and send the letter attached to the General Counsel's Report dated January 28, 1988, subject to revision pursuant to the discussion held in the meeting.

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

Attest:

2-9-88

Date

Mary W. Dove

Mary W. Dove
Administrative Assistant

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION

88 APR -7 AM 10:46

SENSITIVE

In the Matter of)
Project Political Involvement) MUR 2508
Committee and John F.)
Sullivan, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Jane D. Alfano on behalf of Project Political Involvement Committee and John F. Sullivan, as treasurer.

The attached agreement contains no changes from the agreement approved by the Commission on February 9, 1988. Though the letter accompanying the civil penalty states that a check for the civil penalty is enclosed, a check for the civil penalty was not received with the mailing. Respondents have been contacted and will send the omitted check immediately.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Project Political Involvement Committee and John F. Sullivan, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

Date

4/6/88

By:

Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Letter to Respondent

Staff Person: Debby Curry

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Project Political Involvement) MUR 2508
Committee and John F.)
Sullivan, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 11, 1988, the Commission decided by a vote of 6-0 to take the following actions in MUR 2508:

1. Accept the conciliation agreement with Project Political Involvement Committee and John F. Sullivan, as treasurer, as recommended in the General Counsel's report signed April 6, 1988.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report signed April 6, 1988.

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

Attest:

4-11-88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Thurs., 4-7-88, 10:4
Circulated on 48 hour tally basis: Thurs., 4-7-88, 4:0
Deadline for vote: Mon., 4-11-88, 4:0



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 15, 1988

Jane D. Alfano, Esquire
Salt River Project
P.O. Box 52025
Phoenix, Arizona 85072-2025

RE: MUR 2508
Project Political
Involvement Committee
John F. Sullivan, as
treasurer

Dear Ms. Alfano:


On April 1, 1988, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. §§ 433 and 434(a)(4)(A)(ii), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your client. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Deborah Curry, the attorney assigned to this matter at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel


By: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Project Political Involvement)	MUR 2508
Committee and John F.)	
Sullivan, as treasurer)	

CONCILIATION AGREEMENT

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 Project Political Involvement Committee and its treasurer ("Respondents or PPIC") violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file the 1986 Pre-General Election Report in a timely manner. The Commission also found reason to believe that Project Political Involvement Committee and John F. Sullivan, as treasurer, violated 2 U.S.C. § 433 by failing to notify the Commission in a timely manner of a change in PPIC's treasurer.

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

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

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

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

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

1. Project Political Involvement Committee is the separate segregated fund of Salt River Project. John F. Sullivan is the treasurer of PPIC.

2. Respondents were required by 2 U.S.C. § 434(a)(4)(A)(ii) to file the 1986 Pre-General Election Report on October 23, 1986.

3. Respondents failed to file the 1986 Pre-General Election Report until December 5, 1986. The 30 Day Post General Election Report filed on December 5, 1986 contained the 1986 Pre-General Election activity. The 1986 Pre-General Election Report activity was filed 44 days late.

4. On February 13, 1987, John F. Sullivan became the new secretary/treasurer of PPIC.

5. Respondents did not notify the Commission of the change in treasurer until September 10, 1987.

6. Respondents were required by 2 U.S.C. § 433 to notify the Commission of a change in treasurer within 10 days after the date of the change.

V. Respondents failed to file the 1986 Pre-General Election Report in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(A)(ii). Respondents also failed to notify the Commission in a timely manner of the change in treasurer, in violation of 2 U.S.C. § 433.

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Five Hundred dollars (\$500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

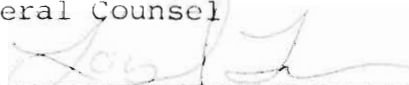
VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than 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.

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

FOR THE COMMISSION:


Lawrence M. Noble
General Counsel


By: Lois G. Lerner
Associate General Counsel

Date

4/14/88

FOR THE RESPONDENTS:


Jane D. Alfano
Counsel for Respondents

Date

3/4/88
987



FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20463

THIS IS THE END OF MUR # 2508

DATE FILMED 4/23/88 CAMERA NO. 3

CAMERAMAN CR

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