



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE BEGINNING OF MUR # 2849

DATE FILMED 7/2/89 CAMERA NO. 4

CAMERAMAN AS

89040754104



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 5, 1989

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: FAILURE TO FILE THE OCTOBER MONTHLY REPORT BY
ELECTION DAY

Attached is a list of three monthly filers which failed to file the 1988 October Monthly Report by Election Day, November 8, 1988.

For your information, the committees were sent prior notice of the due date of the report on August 20, 1988 (Attachment 4) and a non-filer notice on November 15, 1988 (Attachment 5).

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

Attachment

89040754105

8 9 0 4 0 7 5 4 1 0 6

page 1

COMMITTEE ID, NAME AND ADDRESS

RAD Referral #

CONTACTS
WITH FILER ATCH

REPORTS FILED/
RESPONSES

.....
CO0113001
VETERANS OF FOREIGN WARS POLITICAL ACTION COMMITTEE INC
TREASURER'S NAME: J DOUGLAS FORREST
200 MARYLAND AVENUE, NE SUITE 506
WASHINGTON DC 20002

89NF-5

NONE

LETTER AND REPORT
FILED 11/17/88
ATTACHMENTS 3b-3c

FEDERAL ELECTION COMMISSION
1987-1988

DATE 9DEC88

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 3

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	# OF MICROFILM COVERAGE DATES PAGES LOCATION TYPE OF FILER
VETERANS OF FOREIGN WARS POLITICAL ACTION COMMITTEE INC				ID 000113001 NON-PARTY QUALIFIED
CONNECTED ORGANIZATION: VETERANS OF FOREIGN WARS OF THE UNITED				
1987	FEBRUARY MONTHLY	5,212	5,212	1JAN87 -31JAN87 6 87FEC/461/2840
	FEBRUARY MONTHLY - AMENDMENT	5,212	5,212	1JAN87 -31JAN87 3 87FEC/462/5207
	FEBRUARY MONTHLY - AMENDMENT	15,391	5,212	1JAN87 -31JAN87 3 87FEC/495/1321
	FEBRUARY MONTHLY - AMENDMENT	0	0	1JAN87 -31JAN87 1 88FEC/549/2101
	REQUEST FOR ADDITIONAL INFORMATION			1JAN87 -31JAN87 1 87FEC/493/5299
	MARCH MONTHLY	29,855	29,054	1FEB87 -28FEB87 6 87FEC/463/1312
	MARCH MONTHLY - AMENDMENT	29,855	29,054	1FEB87 -28FEB87 3 87FEC/495/1324
	MARCH MONTHLY - AMENDMENT	0	0	1FEB87 -28FEB87 1 88FEC/549/2099
	REQUEST FOR ADDITIONAL INFORMATION			1FEB87 -28FEB87 1 87FEC/493/5301
	APRIL MONTHLY	81,540	31,983	1MAR87 -31MAR87 6 87FEC/465/4451
	APRIL MONTHLY - AMENDMENT	81,540	31,983	1MAR87 -31MAR87 3 87FEC/495/1327
	APRIL MONTHLY - AMENDMENT	0	0	1MAR87 -31MAR87 1 88FEC/549/2097
	REQUEST FOR ADDITIONAL INFORMATION			1MAR87 -31MAR87 1 87FEC/493/5292
	MAY MONTHLY	18,779	43,606	1APR87 -30APR87 6 87FEC/468/0945
	MAY MONTHLY - AMENDMENT	18,779	43,606	1APR87 -30APR87 3 87FEC/495/1330
	MAY MONTHLY - AMENDMENT	0	0	1APR87 -30APR87 1 88FEC/549/2095
	JUNE MONTHLY	12,747	27,832	1MAY87 -31MAY87 6 87FEC/471/0003
	JUNE MONTHLY - AMENDMENT	12,747	27,832	1MAY87 -31MAY87 3 87FEC/495/1333
	JUNE MONTHLY - AMENDMENT	0	0	1MAY87 -31MAY87 1 88FEC/549/2093
	JULY MONTHLY	10,012	9,510	1JUN87 -30JUN87 7 87FEC/477/5703
	JULY MONTHLY - AMENDMENT	10,012	9,510	1JUN87 -30JUN87 3 87FEC/495/1336
	JULY MONTHLY - AMENDMENT	0	0	1JUN87 -30JUN87 1 88FEC/549/2091
	AUGUST MONTHLY	10,338	39,961	1JUL87 -31JUL87 7 87FEC/484/0174
	AUGUST MONTHLY - AMENDMENT	10,338	39,961	1JUL87 -31JUL87 3 87FEC/495/1341
	AUGUST MONTHLY - AMENDMENT	0	0	1JUL87 -31JUL87 1 88FEC/549/2089
	SEPTEMBER MONTHLY	14,839	45,040	1AUG87 -31AUG87 6 87FEC/485/4791
	SEPTEMBER MONTHLY - AMENDMENT	14,839	414,977	1AUG87 -31AUG87 3 87FEC/495/1344
	SEPTEMBER MONTHLY - AMENDMENT	14,839	57,880	1AUG87 -31AUG87 7 87FEC/496/2115
	SEPTEMBER MONTHLY - AMENDMENT	0	0	1AUG87 -31AUG87 1 88FEC/549/2087
	REQUEST FOR ADDITIONAL INFORMATION			1AUG87 -31AUG87 1 87FEC/493/5297
	REQUEST FOR ADDITIONAL INFORMATION			1AUG87 -31AUG87 1 87FEC/495/4332
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1AUG87 -31AUG87 1 87FEC/495/4674
	OCTOBER MONTHLY	12,364	47,638	1SEP87 -30SEP87 7 87FEC/491/5133
	OCTOBER MONTHLY - AMENDMENT	12,364	47,638	1SEP87 -30SEP87 3 87FEC/495/1347
	OCTOBER MONTHLY - AMENDMENT	0	0	1SEP87 -30SEP87 1 88FEC/549/2085
	NOVEMBER MONTHLY	30,719	29,266	1OCT87 -31OCT87 7 87FEC/494/0192
	NOVEMBER MONTHLY - AMENDMENT	30,719	29,266	1OCT87 -31OCT87 3 87FEC/495/1350
	NOVEMBER MONTHLY - AMENDMENT	0	0	1OCT87 -31OCT87 1 88FEC/549/2083
	DECEMBER MONTHLY	16,479	9,856	1NOV87 -30NOV87 6 87FEC/497/0939
	DECEMBER MONTHLY - AMENDMENT	0	0	1NOV87 -30NOV87 1 88FEC/549/2081
	YEAR-END	23,163	26,156	1DEC87 -31DEC87 7 88FEC/503/5249
	YEAR-END - AMENDMENT	0	0	1DEC87 -31DEC87 1 88FEC/549/2079
	COMPREHENSIVE AMEND	303,628	357,959	1JAN87 -31DEC87 5 88FEC/545/1519
1988	STATEMENT OF ORGANIZATION - AMENDMENT			1SEP88 3 88FEC/545/0787

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FEDERAL ELECTION COMMISSION
1967-1968
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 2/25/88

PAGE 4

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	LOCATION TYPE OF FILER
	FEBRUARY MONTHLY	14,255	12,633	1JAN88 -31JAN88	5	86FED/512/4458
	FEBRUARY MONTHLY - AMENDMENT	15,592	12,633	1JAN88 -31JAN88	4	86FED/545/1524
	MARCH MONTHLY	22,841	95,854	1FEB88 -28FEB88	6	86FED/513/3442
	MARCH MONTHLY - AMENDMENT	22,841	95,854	1FEB88 -28FEB88	3	86FED/545/1526
	APRIL MONTHLY	79,116	25,624	1MAR88 -31MAR88	6	86FED/521/5317
	APRIL MONTHLY - AMENDMENT	79,116	25,624	1MAR88 -31MAR88	2	86FED/545/1531
	MAY MONTHLY	55,841	25,705	1APR88 -30APR88	7	86FED/533/4331
	MAY MONTHLY - AMENDMENT	55,841	25,705	1APR88 -30APR88	2	86FED/545/1534
	JUNE MONTHLY	22,462	6,522	1MAY88 -31MAY88	6	86FED/533/4331
	JUNE MONTHLY - AMENDMENT	22,462	6,522	1MAY88 -31MAY88	2	86FED/545/1537
	JULY MONTHLY	39,632	7,846	1JUN88 -30JUN88	7	86FED/533/4333
	JULY MONTHLY - AMENDMENT	39,632	11,502	1JUN88 -30JUN88	7	86FED/545/1543
	JULY MONTHLY - AMENDMENT	39,632	12,492	1JUN88 -30JUN88	3	86FED/545/1544
	JULY MONTHLY - AMENDMENT	39,632	12,492	1JUN88 -30JUN88	3	86FED/545/1542
	REQUEST FOR ADDITIONAL INFORMATION			1JUN88 -30JUN88	1	86FED/545/1537
	AUGUST MONTHLY	42,262	93,996	1JUL88 -31JUL88	6	86FED/543/2271
	AUGUST MONTHLY - AMENDMENT	42,262	93,996	1JUL88 -31JUL88	3	86FED/543/1543
	SEPTEMBER MONTHLY	27,873	7,932	1AUG88 -31AUG88	6	86FED/547/2132
	OCTOBER MONTHLY	17,532	36,429	1SEP88 -30SEP88	6	86FED/565/3422
	OCTOBER MONTHLY - AMENDMENT	17,532	36,429	1SEP88 -30SEP88	6	86FED/567/5176
	NOTICE OF FAILURE TO FILE			1SEP88 -30SEP88	1	86FED/567/5176
	FIRST LETTER INFORMATIONAL NOTICE			1SEP88 -30SEP88	1	86FED/565/2635
	PRE-GENERAL	17,436	65,823	1OCT88 -19OCT88	6	86FED/571/5121
	PRE-GENERAL - AMENDMENT	17,436	65,823	1OCT88 -19OCT88	4	86FED/575/2554
	REQUEST FOR ADDITIONAL INFORMATION			1OCT88 -19OCT88	1	86FED/575/4426
	POST-GENERAL	47,629	65,339	20OCT88 -28NOV88	26	86FED/567/5243
	POST-GENERAL - AMENDMENT	47,629	65,339	20OCT88 -28NOV88	3	86FED/575/2558
	TOTAL	657,851	8 616,767		279	TOTAL PAGES

Cash on Hand as of 11/28/88: \$346,808

Debts and Obligations Owed to the Committee: \$0

Debts and Obligations Owed by the Committee: \$0

All reports have been reviewed except the amended 1988 October Monthly
Report and both the 1988 30 Day Post General Report and amendment.

89040754108

VETERANS OF FOREIGN WARS OF THE UNITED STATES

Attachment 3b

DIRECTOR
Charles F. Bell, Jr.
TREASURER
J. Douglas Perrett

V
P
W



P
A
C

BOARD OF DIRECTORS
John B. Bay, New York - Chairman
Ted C. Connell, Texas
Charles E. Kinney, New Jersey
William Proctor, Louisiana
John Stang, Kansas
Joe T. Wood, Georgia

POLITICAL ACTION COMMITTEE

November 17, 1988

Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Dear Sir:

Enclosed please find the FEC monthly report covering the period (9-1-88 through 9-30-88). I apologize for the mistake in filing, but I misunderstood the dates for filing the Pre-General Election report. I hope that this does not cause a problem or any inconvenience for the Commission.

If you have any questions, or need further assistance, please do not hesitate to call me at (202) 544-5868.

Sincerely yours,

Teresa M. Perretti

Teresa M. Perretti
VPW-PAC

CFB:tmp
enclosure

NOV 21 AM 11:23

RECEIVED
FEDERAL ELECTION COMMISSION
NOV 21 1988

8904075341709

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

08 NOV 21 AM 11:26

USE FEC MAILING LABEL
OR
TYPE ON PRINTER

1 NAME OF COMMITTEE (in full) Veterans of Foreign Wars Political Action Committee, Inc.		2 FEC IDENTIFICATION NUMBER C0011-3001	
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 200 Maryland Ave., NE, Suite 506		3 <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)	
CITY, STATE and ZIP CODE Washington, D.C. 20002			

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report☐ July 15 Quarterly Report☐ October 15 Quarterly Report☐ January 31 Year End Report☐ July 31 Mid Year Report (Non-election Year Only)☐ Termination Report

Monthly Report Due On

<input type="checkbox"/> February 20	<input type="checkbox"/> June 20	<input checked="" type="checkbox"/> October 20
<input type="checkbox"/> March 20	<input type="checkbox"/> July 20	<input type="checkbox"/> November 20
<input type="checkbox"/> April 20	<input type="checkbox"/> August 20	<input type="checkbox"/> December 20
<input type="checkbox"/> May 20	<input type="checkbox"/> September 20	<input type="checkbox"/> January 31

☐ 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 _____(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period <u>9/1/88</u> through <u>9/30/88</u>		
6	(a) Cash on Hand January 1, 19 <u>88</u>		\$ 412,184.31
	(b) Cash on Hand at Beginning of Reporting Period	\$ 436,299.96	
	(c) Total Receipts (from Line 18)	\$ 17,532.71	\$ 328,389.64
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 453,832.67	\$ 740,574.01
	Total Disbursements (from Line 28)	\$ 36,429.00	\$ 323,170.40
8	Cash on hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 417,403.67	\$ 417,403.67
9	Debits and Obligations Owed TO the Committee (itemize a" on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10	Debits and Obligations Owed BY the Committee (itemize a" on Schedule C and/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.			
Type or Print Name of Treasurer Douglas Forrest, Treasurer			
Signature of Treasurer <i>Douglas Forrest</i>		Date 11/21/88	

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

FEC FORM 3X
(Revised 4-87)

89040754110

NOV 28 1988

8 8 0 3 7 6 3 4 0 5



Thank you for using
Return Receipt Service.

Fold at line over top of envelope to the right
of the return address.

CERTIFIED

P 788 038 915

MAIL

VETERANS OF FOREIGN WARS, P.A.C., INC.
200 MARYLAND AVE. N.E. #506
WASHINGTON, D.C. 20002

TO:

Federal Election Commission
999 E. Street, NW
Washington, D.C. 20463
Attention: Tammy Kapper

Attachment 3c page 2 of 2

NOV 21 11:25



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 20, 1988

REPORTING NOTICE FOR MONTHLY FILERS
ELECTION YEAR 1988

The Commission's records indicate that your committee is filing monthly reports during 1988. This notice will assist you in complying with the monthly filing requirements.

MONTHLY REPORTS

Monthly reports must be filed no later than the 20th day of each month. 11 CFR 104.5(c)(3). Each report must include all financial activity that occurred during the previous month. The next monthly report due in 1988 should be filed by September 20, 1988, and should include all activity between August 1 and August 31, 1988.

NOTE: During November, December and January, monthly filers must file Pre- and Post-General election reports and a Year-End report instead of their Monthly reports. (See chart on reverse side.)

You are required to use FEC Form 3X to file each report. Two of them have been enclosed for your use. You may duplicate these forms, or you may call the Information Services Division for additional copies (800/424-9530 or 202/376-3120).

(over)

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FUTURE REPORTS FOR 1988 MONTHLY FILERS

Report	Period Covered	Reg./Cert. Mailing Date*	Filing Date
September	08/01 - 08/31	09/20/88	09/20/88
October	09/01 - 09/30	10/20/88	10/20/88
Pre-General	10/01 - 10/19	10/24/88	10/27/88
Post-General	10/20 - 11/28	12/08/88	12/08/88
Year-End	11/29 - 12/31	01/31/89	01/31/89

COMPLIANCE

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms will be required to refile.

*Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

89040754113



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

November 15, 1988

**TREASURER
COMMITTEE
STREET
CITY STATE ZIP**

Identification Number: **XX**

Reference: October Monthly Report (9/1/88-9/30/88)

Dear **XX**:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact (RAD ANALYST) on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

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

89 APR 10 PM 12:10

EXECUTIVE SESSION
SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral #89N73-5
Staff Member Sandra J. Dunham

MAY 02 1989

SOURCE: INTERNALLY GENERATED

RESPONDENTS:

Veterans of Foreign Wars Political Action
Committee and J. Douglas Forrest, as
treasurer

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

INTERNAL REPORTS
CHECKED: Documents on C Index

FEDERAL AGENCIES
CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the above three committees to the Office of the General Counsel on January 5, 1989. The basis for the attached referral is the committees' failure to file their 1988 October Monthly Reports in a timely fashion (Attachment 1).

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended (the "Act"), provides that for unauthorized committees filing monthly, such committees shall file monthly reports in all calendar years which shall be filed no later than the 20th day after the last

8904075415

day of the month and shall be complete as of the last day of the month. 2 U.S.C. § 434(a)(4)(B). Thus, the due date for the 1988 October Monthly Report was October 20, 1988. The following committees did not file the 1988 October Monthly Report by this date:

Name of Committee

Date Report Filed

Veterans of Foreign Wars
Political Action Committee

11/17/88

Therefore, the Office of the General Counsel recommends that the Commission open Matters Under Review and find reason to believe that

and the Veterans of Foreign Wars Political Action Committee and their treasurers violated 2 U.S.C. § 434(a)(4)(B).

A.

89040754116

IV. 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)(B), and enter into conciliation prior to findings of probable cause to believe:
 - a.
 - b.
 - c. Veterans of Foreign Wars Political Action Committee and J. Douglas Forrest, as treasurer.
2. Approve the attached letters, Factual and Legal Analyses and proposed conciliation agreements.

Lawrence M. Noble
General Counsel

April 10, 1989
Date

BY:

George F. Rishel
George F. Rishel
Acting Associate General
Counsel

Attachments

1. Referral Materials
2. Proposed agreements
3. Letters and Factual and Legal Analyses

89040754117

39040754118

**Veterans of Foreign Wars Political
Action Committee and J. Douglas
Forrest, as treasurer**

RAD REFERRALS
#89NF3-5

'MUR 28-19

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of April 18, 1989, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions with respect to RAD Referrals #89NF 3-5:

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)(B), and enter into conciliation prior to findings of probable cause to believe:
 - a)
 - b) Veterans of Foreign Wars Political Action Committee and J. Douglas Forrest, as treasurer.

(continued)

Federal Election Commission
Certification for RAD Referrals
#89NF 3-5
April 18, 1989

Page 2

2. Approve the letters, Factual and Legal Analyses and proposed conciliation agreements recommended in the April 10, 1989 report from the Office of General Counsel with respect to the committees and their treasurers noted in action 1 above.

3.

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

Attest:

4-18-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

89040754119



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 27, 1989

J. Douglas Forrest, Treasurer
Veterans of Foreign Wars
Political Action Committee
200 Maryland Avenue, N.E.
Suite 506
Washington, D.C. 20002

RE: MUR 2849
Veterans of Foreign Wars
Political Action Committee
and J. Douglas Forrest, as
treasurer

Dear Mr. Forrest:

On April 18, 1989, the Federal Election Commission found that there is reason to believe Veterans of Foreign Wars Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), 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.

In order to expedite the resolution of this matter, the Commission has also decided to offer 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.

89040754120

J. Douglas Forrest
Page 2

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, 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.

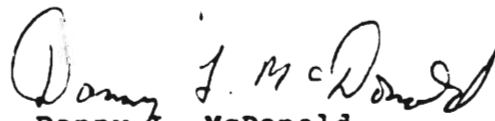
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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.

This matter will remain 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 Sandra J. Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

212 547 040 92

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Veterans of Foreign Wars
Political Action Committee
and J. Douglas Forrest, as
treasurer

MUR: 2849

The Federal Election Campaign Act of 1971, as amended (the "Act"), provides that, for unauthorized committees filing monthly, such committees shall file monthly reports in all calendar years which shall be filed no later than the 20th day after the last day of the month and shall be complete as of the last day of the month. 2 U.S.C. § 434(a)(4)(B). Thus, the due date for the 1988 October Monthly Report was October 20, 1988. The Veterans of Foreign Wars Political Action Committee did not file its 1988 October Monthly Report until November 17, 1988. Therefore, there is reason to believe that the Veterans of Foreign Wars Political Action Committee and J. Douglas Forrest, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).

3 2 0 4 0 7 5 4 1 2 2



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

J. Douglas Forrest, Treasurer
Veterans of Foreign Wars
Political Action Committee
200 Maryland Avenue, N.E.
Suite 506
Washington, D.C. 20002

RE: MUR
Veterans of Foreign Wars
Political Action Committee
and J. Douglas Forrest, as
treasurer

Dear Mr. Forrest:

On , 1989, the Federal Election Commission found that there is reason to believe Veterans of Foreign Wars Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), 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.

In order to expedite the resolution of this matter, the Commission has also decided to offer 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.

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BEFORE THE FEDERAL ELECTION COMMISSION

89 JUN -2 AM 9:29

In the Matter of)

Veterans of Foreign Wars Political)
Action Committee and J. Douglas)
Forrest, as treasurer)

MUR 2849

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

Attached is a conciliation agreement which has been signed by Charles F. Ball, the Chief Executive Officer of the Veterans of Foreign Wars Political Action Committee.

The attached agreement contains no changes from the agreement approved by the Commission on April 18, 1989. A \$925.00 check for the civil penalty has been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Veterans of Foreign Wars Political Action Committee and J. Douglas Forrest, as treasurer.

2. Close the file.


3. Approve the attached letter.

Lawrence M. Noble
General Counsel

Date

6/1/89

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check
3. Letter to Respondent

Staff Assigned: Sandra J. Dunham

89040754124

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Veterans of Foreign Wars Political
Action Committee and J. Douglas
Forrest, as treasurer

MUR 2849

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on June 16,
1989, the Commission decided by a vote of 6-0 to take
the following actions in MUR 2849:

1. Accept the conciliation agreement with the
Veterans of Foreign Wars Political Action
Committee and J. Douglas Forrest, as treasurer,
as recommended in the General Counsel's report
signed June 1, 1989.
2. Close the file.
3. Approve the letter, as recommended in the
General Counsel's report signed June 1,
1989.

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

Attest:

June 16, 1989

Date

Hilke Arnold

for Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Fri., 6-2-89, 9:29
Circulated on 48 hour tally basis: Fri., 6-2-89, 12:00
Deadline for vote: Fri., 6-16-89, 4:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 22, 1989-

J. Douglas Forrest, Treasurer
Veterans of Foreign Wars
Political Action Committee
200 Maryland Avenue, N.E.
Suite 506
Washington, D.C. 20002

RE: MUR 2849
Veterans of Foreign Wars
Political Action Committee
and J. Douglas Forrest,
as treasurer

Dear Mr. Forrest:

On June 16, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on behalf of the Veterans of Foreign Wars Political Action Committee and you, as treasurer, in settlement of a violation of 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. 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.

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J. Douglas Forrest
Page 2

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

Sincerely,

Lawrence M. Noble
General Counsel


BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

89040754127

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Veterans of Foreign Wars) MUR 2849
Political Action Committee and)
J. Douglas Forrest, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Veterans of Foreign Wars Political Action Committee and J. Douglas Forrest, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(B).

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. The Veterans of Foreign Wars Political Action Committee is a political committee within the meaning of 2 U.S.C. § 431(4).

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2. J. Douglas Forrest is the treasurer of the Veterans of Foreign Wars Political Action Committee.

3. Section 434(a)(4)(B) of Title 2 provides that unauthorized committees filing monthly shall file monthly reports in all calendar years. Monthly reports are to be filed no later than the 20th day after the last day of the month.

4. Respondents were required to file the 1988 October Monthly Report no later than October 20, 1988. Respondents filed the 1988 October Monthly Report on November 17, 1988, 28 days late, disclosing \$17,532 in receipts and \$36,948 in disbursements.

V. Respondents failed to file the 1988 October Monthly Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(B).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Nine Hundred and Twenty-Five dollars (\$925.00), 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.

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IX. Respondents shall have no more than 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:

(Original signed)
George F. Rishel
Acting Associate General
Counsel

Date

FOR THE RESPONDENTS:

Charles F. Bell CEO
(Name)
(Position)

Date

5/11/89

89040754130

Dunham

VFW - PAC, INC.
SUITE 508
200 MARYLAND AVENUE, N.E., (202) 844-6888
WASHINGTON, D.C. 20002-6788

FIRST AMERICAN BANK, N.A.
WASHINGTON, D.C.

NO 3200

$\frac{154}{540}$ 10

CHECK NO. DATE AMOUNT

PAY

3200 5/12/89 \$925.00

925 DOLS 00 CTS

TO
THE
ORDER
OF

Federal Election Commission

DIRECTOR Charles A. Bailey

TREASURER J. Douglas Farnest

⑈00003200⑈ ⑆054000043⑆ 3 200 353⑈

GCC 2794

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMIEW

CHECK NO. 3200 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2849 AND NAME Veterans of Foreign Wars PAC

WAS RECIEVED ON 5/19/89. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

/ ☒ / BUDGET CLEARING ACCOUNT { 95F3875.16 }

/ / CIVIL PENALTIES ACCOUNT { 95-1099.160 }

/ / OTHER _____

SIGNATURE Debra A. Trimiew

DATE 5/19/89



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2849

DATE FILMED 7/2/89 CAMERA NO. 4

CAMERAMAN AS

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