



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2960

DATE FILMED 11/12/89 CAMERA NO. 2

CAMERAMAN AS

330407B2656



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 16, 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: UNAUTHORIZED QUARTERLY FILERS WHICH FAILED TO FILE
THE 1988 12 DAY PRE-GENERAL REPORT BY ELECTION DAY

19 JUN 19 11:41

The attached list of unauthorized committees consists of thirty-seven (37) quarterly filers which failed to file a 1988 12 Day Pre-General Report by Election Day, November 8, 1988.

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 in the general election. All unauthorized committees were sent prior notification regarding the pre- and post-general filing requirements on October 3, 1988 (Attachment 38).

The Party/Non-Party Branch conducted a thorough examination to identify quarterly filers disclosing contributions or expenditures between October 1 and October 19, 1988. 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.

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

A-000.1

8904072657

List of Committees and Prior Commission Actions

- 1.
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20. C00020438

Manufacturers Hanover Association
for Responsible Government Fund

89NF-88

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A-00003

3304072659

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PAGES 4 THROUGH 7 DO NOT PERTAIN TO THESE RESPONDENTS.

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89040782650

A-00004

8 2 0 4 0 7 6 2 5 5 1

Attachments 20a-20d

C00020438
 MANUFACTURERS HANOVER ASSOCIATION FOR RESPONSIBLE GOVERNMENT FUND
 TREASURER'S NAME: SUSAN L HEADE (4/25/88 to present)*
 270 PARK AVENUE - 16TH FLOOR
 NEW YORK NY 10017

None

1988 30 Day
 Post-General
 Report filed
 12/21/88

*Vera Azzarello (1/1/87-4/24/88)

A-00000

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILED ATCH

REPORTS FILED/
RESPONSES

8 3 0 4 0 7 6 2 6 6 2

A-000009

8 7 0 4 0 7 6 2 6 6 3

A-00010

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILED ATCH

REPORTS FILED/
RESPONSES

9 9 9 4 7 6 2 6 6 4

A-00011

82040762665

A-00012

Manufacturers Hanover Association for Responsible Government Fund

(Attachments 20a - 20d)

89040762666

8 2 0 4 0 7 6 2 6 3 7
FEDERAL ELECTION COMMISSION
1987-1988
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 22MAY89

PAGE 3

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES TYPE OF FILER	MICROFILM LOCATION
MANUFACTURERS HANOVER ASSOCIATION FOR RESPONSIBLE GOVERNMENT FUND				ID #C00020438	NON-PARTY QUALIFIED	
CONNECTED ORGANIZATION: MANUFACTURERS HANOVER CORPORATION						
1987	MID-YEAR REPORT	95,991	93,094	1JAN87 -30JUN87	41	87FEC/477/1378
	YEAR-END	60,100	58,370	1JUL87 -31DEC87	28	88FEC/500/3486
	YEAR-END - AMENDMENT	60,078	58,370	1JUL87 -31DEC87	29	88FEC/509/1542
1988	STATEMENT OF ORGANIZATION - AMENDMENT			5MAY88	2	88FEC/524/1681
	APRIL QUARTERLY	0	14,705	1JAN88 -31MAR88	10	88FEC/518/2367
	JULY QUARTERLY	70,706	51,115	1APR88 -30JUN88	28	88FEC/532/5283
	OCTOBER QUARTERLY	37,532	36,525	1JUL88 -30SEP88	14	88FEC/551/4084
	OCTOBER QUARTERLY - AMENDMENT	37,787	36,780	1JUL88 -30SEP88	19	88FEC/566/1504
	1'ST LETTER INFORMATIONAL NOTICE			1JUL88 -30SEP88	1	88FEC/565/2744
	POST-GENERAL	10,277	14,440	1OCT88 -28NOV88	11	88FEC/575/1636
	POST-GENERAL - AMENDMENT	10,277	14,090	1OCT88 -28NOV88	3	89FEC/584/4062
	YEAR-END	16,515	23,780	29NOV88 -31DEC88	8	89FEC/580/3594
	YEAR-END - AMENDMENT	16,515	23,780	29NOV88 -31DEC88	2	89FEC/584/4059
	YEAR-END - AMENDMENT	4,015	11,280	29NOV88 -31DEC88	2	89FEC/586/5196
	REQUEST FOR ADDITIONAL INFORMATION			29NOV88 -31DEC88	1	89FEC/586/3437
TOTAL		278,854	0 279,434	0	199	TOTAL PAGES

All reports have been reviewed.

Ending cash-on-hand as of 12/31/88: \$11,974

Outstanding debts owed to or by the committee as of 12/31/88: \$0

☐ 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

Weekly Report Due On:

<input type="checkbox"/> February 20	<input type="checkbox"/> June 20	<input 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

☐ Weekly day report preceding _____
(Type of Election)

election on _____ in the State of _____

☒ Weekly day report following the General Election on

Nov. 11th in the State of New York

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
1	Covering Period <u>10-1-88</u> through <u>11-28-88</u>		
2	(a) Cash on Hand January 1, 19 <u>88</u>		\$ 17,157.37
	(b) Cash on Hand at Beginning of Reporting Period	\$ 23,051.57	
	(c) Total Receipts (from Line 18)	\$ 10,277.26	\$ 106,016.46
	(d) Subtotal (add Lines 2(b) and 2(c) for Column A and Lines 2(a) and 2(c) for Column B)	\$ 33,328.83	\$ 123,173.93
7	Total Disbursements (from Line 20)	\$ 14,440.00	\$ 104,285.00
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 2(d))	\$ 18,888.83	\$ 18,888.83
9	Debts and Obligations Owed TO the Committee (Itemize all 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	Debts and Obligations Owed BY the Committee (Itemize all 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

Susan L. Meade

Signature of Treasurer

Susan L. Meade

Date

12/20/88

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

 FEC FORM 3X
(revised 4/87)

From 10-1-88		To 11-28-88
COLUMBIA		COLUMBIA
II. RECEIPTS		
11. CONTRIBUTIONS (other than loans)		
(a) Individuals/Persons Other Than Political Committees		
(1) Standard (see Schedule A)	41,825.00	41,825.00
(2) Unaffiliated	61,825.54	61,825.54
(3) Total of contributions from individuals		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTIONS (add 11(a)(1), (a)(2), and (c))	10,002.26	105,741.46
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	275.00	275.00
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)	10,277.26	106,016.46
III. DISBURSEMENTS		
19. OPERATING EXPENDITURES		
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	6,515.00	69,510.00
22. INDEPENDENT EXPENDITURES (see Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (see 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 (such as PACs)		
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b) and (c))		
27. OTHER DISBURSEMENTS	7,925.00	34,775.00
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	14,440.00	104,285.00
IV. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	10,002.26	105,741.46
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	-0-	-0-
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	10,002.26	105,741.46
32. TOTAL OPERATING EXPENDITURES (from Line 19)	-275-	-275-
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)		
34. NET OPERATING EXPENDITURES (add Line 32 from 33)	10,277.26	106,016.46

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Continued

3803375164370

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
1. Full Name, Mailing Address and ZIP Code [Redacted] [Redacted] NY [Redacted]	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/19/88	\$250.00
2. Full Name, Mailing Address and ZIP Code P.O. Box 3994 Syracuse, NY 13202	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/19/88	\$250.00
3. Full Name, Mailing Address and ZIP Code Huntington John Democratic Committee 44 Elm St. Huntington, NY 11743	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/19/88	\$135.00
4. Full Name, Mailing Address and ZIP Code Suffolk County Democratic Committee 467 Route 112 Patchogue, NY 11772	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/19/88	\$300.00
5. Full Name, Mailing Address and ZIP Code Suffolk County Republican Committee 500 Montauk West Islip, NY 11795	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/19/88	\$300.00
6. Full Name, Mailing Address and ZIP Code Friends of Connie Mack P.O. Box 1835 Tarpa, FL	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/19/88	\$500.00
7. Full Name, Mailing Address and ZIP Code Orange County Republican Committee 42 Park Place P.O. Box 208 Goshen, NY 10924	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/19/88	\$50.00
8. Full Name, Mailing Address and ZIP Code Friends of Slade Gorton 215 W. Harrison, Suite G Washington, DC	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/19/88	\$1,000.00
9. Full Name, Mailing Address and ZIP Code Committee to Re-Elect LaFalce P.O. Box 383 Niagara Falls, NY 14302	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/21/88	\$1,000.00
SUBTOTAL of Disbursements This Page (section 1)			\$3,785.00
TOTAL This Period (last page this line number only)			\$6,515.00

RECEIVED
FEDERAL ELECTION COMMISSION

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

89 AUG -9 AM 10:03

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRAL: 89NF-69 thru
89NF-105

STAFF MEMBER: Gregory Baker

SOURCE: Internally Generated

RESPONDENTS: a.

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t. Manufacturers Hanover Association for
Responsible Government and Susan L. Meade, as
treasurer (89NF-88)

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

INTERNAL REPORTS CHECKED: Disclosure Reports and
Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the above (37) committees to the Office of the General Counsel on June 16, 1989. (Attachment 1). The basis for the attached referral is

89040762673

the committees' failure to file the 12 Day Pre-General Report by October 27, 1988.

II. FACTUAL AND LEGAL ANALYSIS

A. Filing of Reports

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall submit 12 Day Pre-General Reports if the Committees make any contributions to or expenditures on behalf of federal candidates in the general election. 2 U.S.C. § 434(a)(4)(A)(ii). The 12 Day Pre-General Report is due as of the 12th day before the election (October 27, 1988) and should be complete as of the 20th day before the election (October 19, 1988). The Committees were notified on October 3, 1988, that the report was due on October 27, 1988.

The (37) committees fall into three categories; (1) committees that filed 12 Day Pre-General Reports in an untimely manner, (2) committees that filed 30 Day Post-General Reports indicating that 12 Day Pre-General Reports should have been filed, and (3) committees that filed Year End Reports indicating that 12 Day Pre-General Reports should have been filed. The following Committees did not file the 1988 12 Day Pre-General Report by October 27, 1988:

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8 9 0 4 0 7 6 2 5 7 5

- (2) 30 Day Post-General Reports Indicating that 12 Day Pre-General Reports should have been filed.

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Manufacturers Hanover Association for
Responsible Government Fund
(89NF-88)

December 21, 1988

- (3) Year End Reports Indicating that 12 day Pre-General Reports should have been filed.

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Accordingly, the Office of the General Counsel recommends that the Commission open Matters Under Review and find reason to believe that the above committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

This Office also recommends that the Commission offer to enter into conciliation prior to a finding of probable cause to believe with respect to the (37) referred committees. Attached for the Commission's approval are proposed conciliation agreements (Attachment 2). The proposed agreements provide for an admission of the violation and civil penalties computed as follows:

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PAGES 9 THROUGH 44 DO NOT PERTAIN TO THESE RESPONDENTS.

3 3 0 4 0 7 6 2 5 7 9

IV. RECOMMENDATIONS

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

8 2 0 4 0 7 6 2 5 3 0

Manufacturers Hanover Association for Responsible
Government and Susan L. Meade, as treasurer (89NF-88)

33040762531

2. Enter into conciliation with the following committees and their treasurers prior to a finding of probable cause to believe.

8 7 0 4 0 7 6 2 5 3 2

8 9 0 4 0 7 6 2 6 3 5

Manufacturers Hanover Association for Responsible
Government and Susan L. Meade, as treasurer (89NF-88)

9 9 0 4 0 7 6 2 6 9 4

3. Approve the attached letters, Factual and Legal Analyses, and proposed conciliation agreements to be sent to the respective respondents listed in Recommendation 2.

Lawrence M. Noble
General Counsel

8/7/89
Date

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

- A. Referral materials
- B. Proposed Conciliation Agreements (37),
Letters and Factual and Legal Analyses (37)

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[illegible]

#89NF-69 through
#89NF-105

8 2 0 4 0 7 6 2 6 3 8

Manufacturers Hanover Association for
Responsible Government and Susan L.
Meade, as treasurer (89NF-88)

(continued)

22040762529

[illegible]

(continued)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of August 22,
1989, do hereby certify that the Commission decided by a
vote of 4-0 to take the following actions with respect to
RAD Referrals 89NF-69 through 89NF-105:

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

(continued)

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 6

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(continued)

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 7

Manufacturers Hanover Association for
Responsible Government and Susan L. Meade,
as treasurer (89NF-88)

89040762502

(continued)

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 8

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2. Enter into conciliation with the following committees and their treasurers prior to a finding of probable cause to believe:

(continued)

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 9

8 9 0 4 0 7 6 2 6 3 4

(continued)

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 10

3 3 0 4 0 7 6 2 5 9 5

Manufacturers Hanover Association for Responsible
Government and Susan L. Meade, as treasurer
(89NF-88)

(continued)

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 11

2 3 0 4 0 7 6 2 6 9 5

(continued)

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 12

3. Approve the letters, Factual and Legal Analyses, and proposed conciliation agreements to be sent to the respective respondents listed in Action 2 above, as recommended in the General Counsel's report dated August 7, 1989, subject to amendment of two of the agreements as agreed in the meeting of August 22, 1989.

Commissioners Aikens, Elliott, Josefiak, and McDonald voted affirmatively for the decision; Commissioners McGarry and Thomas were not present.

Attest:

8-25-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

89040762607



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 6, 1989

Susan L. Meade, Treasurer
Manufacturers Hanover Association
for Responsible Government Fund
270 Park Avenue
16th Floor
New York, NY 10017

RE: MUR 2960
Manufacturers Hanover Association
for Responsible Government Fund
and Susan L. Meade, as treasurer

Dear Ms. Meade:

On August 22, 1989, the Federal Election Commission found that there is reason to believe Manufacturers Hanover Association for Responsible Government Fund ("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.

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.

89040762698

Susan L. Meade, Treasurer
Page 2

If you are interested in expediting the resolution of this matter by pursuing pre-probable 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.

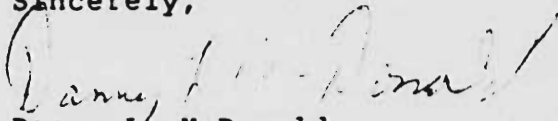
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Dan Blessington, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,


Danny L. McDonald
Chairman

Enclosures

- A. Factual and Legal Analysis
- B. Procedures
- C. Designation of Counsel Form
- D. Conciliation Agreement

06C 3995

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

EPSTEIN BECKER & GREEN, P.C.

ATTORNEYS AT LAW

1140 19TH STREET, N.W.

WASHINGTON, D.C. 20036-6601

(202) 861-0900

TELECOPIER (202) 296-2882

DIRECT LINE

89 SEP 13 PM 3:48

250 PARK AVENUE
NEW YORK, NEW YORK 10177-0077
(212) 351-4500

1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067-2501
(213) 556-8861

SIX LANDMARK SQUARE
STAMFORD, CONNECTICUT 06901-2704
(203) 348-3737

212 CARNEGIE CENTER
PRINCETON, NEW JERSEY 08540-6212
(609) 452-2445

27 SCHOOL STREET
BOSTON, MASSACHUSETTS 02108-4303
(617) 720-3555

* P.C. NEW YORK, WASHINGTON, D.C.
CONNECTICUT, VIRGINIA AND
TEXAS ONLY

FOUR EMBARCADERO
SAN FRANCISCO, CALIFORNIA 94111-5954
(415) 398-3500

12201 MERIT DRIVE
DALLAS, TEXAS 75251-2213
(214) 490-3143

ONE WOODWARD AVENUE
DETROIT, MICHIGAN 48226-3412
(313) 965-3190

515 EAST PARK AVENUE
TALLAHASSEE, FLORIDA 32301-2524
(904) 681-0596

2400 SOUTH DIXIE HIGHWAY, SUITE 100
MIAMI, FLORIDA 33133
(305) 856-1100

510 KING STREET, SUITE 301
ALEXANDRIA, VIRGINIA 22314-3132
(703) 684-1204

September 13, 1989

HAND-DELIVERED

Daniel Blessington, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Room 657
Washington, D.C. 20463

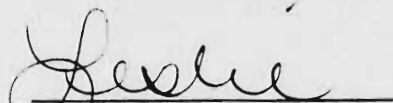
RE: MUR 2960: Respondents Manufacturers Hanover
Association for Responsible Government Fund
and Susan L. Meade, as Treasurer

Dear Dan:

Enclosed please find a completed Statement of Designation of
Counsel in the above-referenced action.

I look forward to working with you to resolve this matter as
expeditiously as possible.

Best regards,


Leslie J. Kerman

Enclosure

3 9 0 4 0 7 6 2 7 0 0

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2960

NAME OF COUNSEL: Leslie J. Kerman, Esquire

ADDRESS: Epstein Becker & Green, P.C.
1140 19th Street, NW, Suite 900
Washington, D.C. 20036

TELEPHONE: 202/861-1877

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.

September 12, 1989
Date

Susan L. Meade
Signature

RESPONDENT'S NAME: Manufacturers Hanover Association for Responsible
Government Fund and Susan L. Meade, as Treasurer

ADDRESS: Manufacturers Hanover Corporation
270 Park Avenue - 4th Floor
New York, New York 10017

HOME PHONE: (914) 337-4310

BUSINESS PHONE: (212) 286-7110

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
Manufacturers Hanover Association) MUR 2960
for Responsible Government Fund)
and Susan L. Meade, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement that has been signed by Leslie L. Kerman, counsel for the Manufacturers Hanover Association for Responsible Government Fund and Susan L. Meade, as treasurer.

On August 22, 1989, the Commission found reason to believe that respondents violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file their 1988 12 Day Pre-General Report in a timely fashion.

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II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Manufacturers Hanover Association for Responsible Government Fund and Susan L. Meade, as Treasurer.

2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

10-30-89
Date

BY:


Lois G. Lerner
Associate General Counsel

Attachments

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

Staff Assigned: Daniel J. Blessington

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2960
Manufacturers Hanover Association)
for Responsible Government Fund)
and Susan L. Meade, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 3, 1989, the Commission decided by a vote of 5-0 to take the following actions in MUR 2960:

1. Accept the conciliation agreement with Manufacturers Hanover Association for Responsible Government Fund and Susan L. Meade, as Treasurer, as recommended in the General Counsel's Report dated October 30, 1989.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report dated October 30, 1989.

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

Attest:

Nov. 3, 1989
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tuesday, October 31, 1989 4:49
Circulated to the Commission: Wednesday, November 1, 1989 11:00
Deadline for vote: Friday, November 3, 1989 11:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1989

Leslie J. Kerman, Esq.
Epstein Becker & Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036-6601

RE: MUR 2960
Manufacturers' Hardware
Association for Responsible
Government and Susan L.
Meade, as treasurer

CLOSED

Dear Ms. Kerman:

On November 3, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted by you in behalf of your clients in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. 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 Daniel J. Blessington, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

20040702700

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Manufacturers Hanover Association) MUR 2960
For Responsible Government Fund and)
Susan L. Meade, as Treasurer)

CONCILIATION AGREEMENT

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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 Manufacturers Hanover Association for Responsible Government Fund and Susan L. Meade, as Treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(ii).

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:

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1. Manufacturers Hanover Association for Responsible Government Fund is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Susan L. Meade is the Treasurer of Manufacturers Hanover Association for Responsible Government Fund.

3. Section 434(a)(4)(A)(ii) of Title 2 provides that unauthorized committees filing quarterly shall file 12 Day Pre-General Reports if the committee makes any contributions to or expenditures on behalf of federal candidates in the general election. The pre-election reports are to be filed no later than the 12th day before the election and should be complete as of the 20th day before the election.

4. Section 434(a)(4)(A)(iii) of Title 2 provides that unauthorized committees filing quarterly shall file 30 Day Post-General Reports. The post-election reports are to be filed no later than the 30th day after the election and should be complete as of the 20th day after the election.

5. Respondents were required to file the 1988 12 Day Pre-General Report no later than October 27, 1988. Respondents filed the 1988 30 Day Post-General Report, which contained information relevant to the coverage dates for the 1988 12 Day Pre-General Report, on December 21, 1988. Thus, the information required on the 12 Day Pre-General Report was filed 55 days late, disclosing

\$1,221.24 in receipts and \$4,536.00 in disbursements for the relevant reporting period.

6. Respondents were required to file the 1988 30 Day Post-General Report no later than December 8, 1988. Respondents filed the 1988 30 Day Post-General Report on December 21, 1988, 13 days late.

V. Respondents failed to file the 1988 12 Day Pre-General Report and the 1988 30 Day Post-General Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(A)(ii) and (iii).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Five Hundred Dollars (\$500.00), 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 of the District of Columbia.

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

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: *Lois G. Lerner*
Lois G. Lerner
Associate General Counsel

November 7, 1989
Date

FOR THE RESPONDENTS:

Leslie J. Kerman
Leslie J. Kerman
Counsel
Manufacturers Hanover Association
for Responsible Government Fund
and Susan L. Meade, as Treasurer

October 10, 1989
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2960

DATE FILMED 11/12/82 CAMERA NO. 2

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