



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3290

DATE FILMED 8/13/91 CAMERA NO. 4

CAMERAMAN AS

91040354781



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

4 February 1991

MEMORANDUM

TO: LAWRENCE M. NOBEE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF MONTHLY UNAUTHORIZED COMMITTEES
FOR FAILING TO FILE THE 1990 12 DAY PRE-GENERAL
REPORT BY ELECTION DAY

Attached is a listing of thirty-five (35) monthly unauthorized committees which failed to file the 1990 12 Day Pre-General Report by Election Day, November 6, 1990.

For your information, each committee was sent Prior Notice of the due date of the report on October 1, 1990 (Attachment 36). Twenty-nine (29) of the committees were sent Non-Filer Notices on November 15, 1990 (Attachment 37). Six (6) of the committees Hudson Valley PAC,

were not sent Non-Filer Notices because their 12 Day Pre-General Reports were filed by November 15, 1990.

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

Attachment

91040854782

91040854783

C00158865 Hudson Valley Political Action Committee 91NF-32

91040354784

HUDSON VALLEY POLITICAL ACTION COMMITTEE

(Attachment 16a - 16b)

FEDERAL ELECTION COMMISSION
1989-1990
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 1FEB91

PAGE 11

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
HILSON VALLEY POLITICAL ACTION COMMITTEE				ID #C00156865 NON-PARTY QUALIFIED		
CONNECTED ORGANIZATION: NONE						
1989	FEBRUARY MONTHLY	6,860	3,667	1JAN89 - 31JAN89	8	89FEC/585/3159
	MARCH MONTHLY	10,198	9,282	1FEB89 - 28FEB89	7	89FEC/587/0392
	APRIL MONTHLY	13,571	8,262	1MAR89 - 31MAR89	8	89FEC/591/4299
	MAY MONTHLY	22,000	3,565	1APR89 - 30APR89	8	89FEC/595/4446
	JUNE MONTHLY	23,201	33,501	1MAY89 - 31MAY89	13	89FEC/595/2535
	JULY MONTHLY	22,682	13,139	1JUN89 - 30JUN89	11	89FEC/600/1883
	AUGUST MONTHLY	14,157	10,509	1JUL89 - 31JUL89	9	89FEC/607/4615
	SEPTEMBER MONTHLY	39,104	6,189	1AUG89 - 31AUG89	14	89FEC/610/0309
	OCTOBER MONTHLY	46,171	43,196	1SEP89 - 30SEP89	20	89FEC/611/5171
	NOVEMBER MONTHLY	6,166	16,911	1OCT89 - 31OCT89	8	89FEC/615/3576
	DECEMBER MONTHLY	17,175	10,376	1NOV89 - 30NOV89	10	89FEC/617/0571
	YEAR-END	9,213	25,433	1DEC89 - 31DEC89	9	90FEC/621/2756
1990	FEBRUARY MONTHLY	19,708	18,382	1JAN90 - 31JAN90	10	90FEC/629/1099
	MARCH MONTHLY	15,778	13,542	1FEB90 - 28FEB90	9	90FEC/631/4807
	APRIL MONTHLY	8,233	13,758	1MAR90 - 31MAR90	7	90FEC/638/0275
	MAY MONTHLY	16,413	22,750	1APR90 - 30APR90	11	90FEC/640/3321
	JUNE MONTHLY	30,684	32,481	1MAY90 - 31MAY90	13	90FEC/642/5100
	JULY MONTHLY	25,027	37,440	1JUN90 - 30JUN90	12	90FEC/649/1729
	AUGUST MONTHLY	38,043	27,656	1JUL90 - 31JUL90	14	90FEC/653/1719
	SEPTEMBER MONTHLY	9,842	13,728	1AUG90 - 31AUG90	9	90FEC/655/0783
	OCTOBER MONTHLY	9,326	21,298	1SEP90 - 30SEP90	9	90FEC/664/3625
	PRE-GENERAL	29,183	8,145	1OCT90 - 17OCT90	11	90FEC/670/2857
	POST-GENERAL	56,916	73,971	18OCT90 - 26NOV90	26	90FEC/674/2843
TOTAL		486,671	0 467,217 0	256 TOTAL PAGES		

ALL REPORTS HAVE BEEN REVIEWED EXCEPT FOR THE 30 DAY POST GENERAL
ENDING CASH ON HAND AS OF 11/26/90: 31,797.00
OUTSTANDING DEBTS OWED BY THE COMMITTEE AS OF 11/26/90: 0.00

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
HUDSON VALLEY POLITICAL ACTION COMMITTEE

ADDRESS (number and street) ☐ Check if different than previously reported
100 RED SCHOOLHOUSE ROAD-SUITE A7A
CITY, STATE and ZIP CODE
SPRING VALLEY NY 10977

2. FEC IDENTIFICATION NUMBER
C 00158865

3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

90 NOV -7 PM 11:15

(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:

☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ 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>10/1/90</u> through <u>10/17/90</u>		
6. (a) Cash on Hand January 1, 19 <u>90</u>			\$ 58,807.33
(b) Cash on Hand at Beginning of Reporting Period		\$ 27,814.84	
(c) Total Receipts (from Line 18)		\$ 29,183.-	\$ 199,261.68
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 56,997.84	\$ 258,069.01
7. Total Disbursements (from Line 28)		\$ 8,145.-	\$ 209,216.17
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 48,852.84	\$ 48,852.84
9. Debts and Obligations Owed TO the Committee (Reimburse all on Schedule C and/or Schedule D)		\$ -0-	
10. Debts and Obligations Owed BY the Committee (Reimburse all on Schedule C and/or Schedule D)		\$ -0-	

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
MAUREEN ERIKSON

Signature of Treasurer
Maureen Erikson

Date
11/5/90

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)

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GENERAL ELECTION REPORT NOTICE

ATTACHMENT 36
(Page 1 of 2)

FEDERAL ELECTION COMMISSION

PARTIES AND PACs

October 1, 1990

I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
Pre-General	10/01/90**-10/17/90	10/22/90	10/25/90
Post-General	10/18/90 - 11/26/90	12/06/90	12/06/90

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 17***

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
Pre-General	10/01/90**-10/17/90	10/22/90	10/25/90
Post-General	10/18/90 - 11/26/90	12/06/90	12/06/90

III. QUARTERLY FILERS WHICH DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 17***

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
Post-General	10/01/90**-11/26/90	12/06/90	12/06/90

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) must follow the above charts in order to determine whether they must file the pre-general election report. All party committees and PACs, regardless of financial activity, must file the post-general election report.

WHAT MUST BE REPORTED

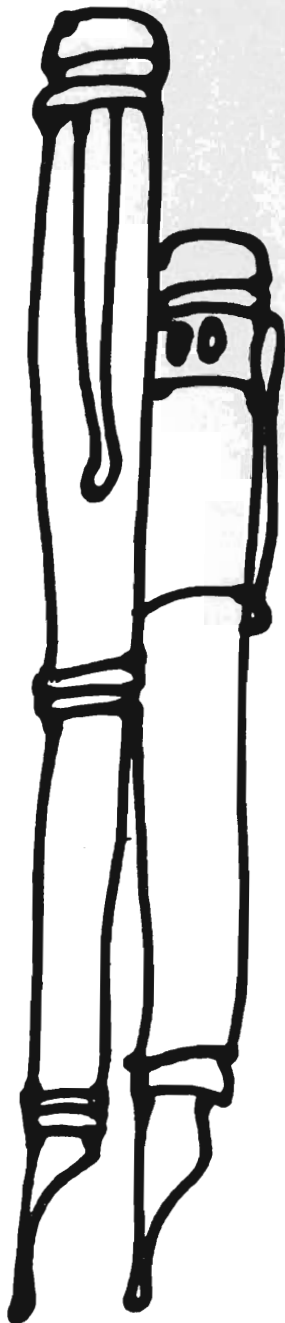
All financial activity (not previously reported) that occurred during the reporting period.

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

**The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

***Committees that made general election contributions or expenditures prior to October 1 which have not been previously reported must also follow the Chart II reporting requirements.

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PARTIES AND PACs

GENERAL ELECTION

REPORTING FORMS

Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE

Consult the instructions on the back of the Form 3X Summary Page. Note State filing requirements also.

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

LAST-MINUTE INDEPENDENT EXPENDITURES

Any PAC which makes any independent expenditures aggregating \$1,000 or more during the period beginning October 18 and ending November 4 must report them within 24 hours. Call the FEC for more information.

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.

FOR INFORMATION, Call: 202/376-3120 or 800/424-9530

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-7

November 15, 1990

TREASURER
COMMITTEE
STREET
CITY, STATE ZIP

Identification Number: ID NUMBER

Reference: 12 Day Pre-General Report (10/1/90-10/17/90)

Dear TREASURER:

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 previously notified 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 its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§108.2, 108.3, 108.4).

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 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

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD Referral: 91NF 17 - 51
Staff Member: Noriega E. James

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

RESPONDENTS:

91040854790

Hudson Valley Political Action Committee and
Marilyn Enison, as treasurer (91NF-32)

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RELEVANT STATUTES: 434(a)(4)(B)
INTERNAL REPORTS CHECKED: Referral Materials
FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the above thirty-five (35) committees and their treasurers to the Office of the General Counsel on February 5, 1991. The basis of the attached RAD referral is the committees' failure to file the

1990 12 Day Pre-General Report in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(B).

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that all unauthorized political committees that file monthly reports, shall file a pre-general election report in lieu of filing the report otherwise due in November of any year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(B). According to Section 434(a)(2)(A)(i) the pre-election report must be filed no later than the 12th day before any election, and should be complete as of the 20th day before the election.

With regard to the 1990 general election, unauthorized committees were required to file a 12 Day Pre-General Election Report, covering the pre-election period of October 1 through October 17, by October 25, 1990. The committees referred by RAD failed to file the 1990 Pre-General Report or a report covering the pre-election period by the required deadline. However, seven of the committees filed 1990 November Monthly Reports with coverage dates of October 1 through 31, 1990. These reports

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were received after the due date for the 12 Day Pre-General Report.

On October 1, 1990, prior notification was sent to all unauthorized committees which specifically informed monthly filers of the requirement to file a 12 Day Pre-General Report by October 25, 1990 (Attachment 1, pages 177 - 178). Each committee which failed to submit either a 12 Day Pre-General Report or a November Monthly Report was sent a Non-Filer Notice on November 15, 1990 (Attachment 1, page 179).

Accordingly, the Office of the General Counsel recommends that the Commission open Matters Under Review and find reason to believe that 34 of the 35 previously referenced committees and their treasurers (See Recommendation I) violated 2 U.S.C. § 434(a)(4)(B) by failing to file timely the 1990 12 Day Pre-General Report.

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III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

This Office also recommends that the Commission offer to enter into conciliation with the respondents prior to a finding of probable cause to believe.

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PAGES 7 THROUGH 27 DO NOT PERTAIN TO THESE RESPONDENTS.

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IV. RECOMMENDATIONS

1. Open Matters Under Review, find reason to believe that the following committees and their treasurer violated 2 U.S.C. § 434(a)(4)(B) and enter into conciliation prior to a finding of probable cause to believe:

A.

B.

C.

D.

E.

F.

G.

H.

I.

J.

K.

L.

M.

N.

O.

P. Hudson Valley Political Action Committee and
Marilyn Enison, as treasurer (91NF-32)

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Q.

R.

S.

T.

U.

V.

W.

X.

Y.

Z.

AA.

BB.

CC.

DD.

EE.

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FF.

GG.

HH.

2.

3. Approve the attached Factual and Legal Analyses and proposed conciliation agreements and the appropriate letters.

Lawrence M. Noble
General Counsel

Date 5/2/91

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

1. RAD Referral
2. Factual and Legal Analysis (34)
3. Conciliation Agreement (34)

21040854800

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Thirty-five (35) Committees and) RAD Referrals
their treasurers) #91NF 17-51
)

CERTIFICATION

I, Marjorie W. Emmons, do hereby certify that
the Commission took the following actions with respect
to the above-captioned referrals:

1. Decided by a vote of 6-0 to

- a) Open Matters Under Review, find reason
to believe that the following committees
and their treasurer violated 2 U.S.C.
§ 434(a)(4)(B) and enter into concili-
ation prior to a finding of probable
cause to believe:

A.

B.

C.

(continued)

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D.

E.

F.

G.

H.

I.

J.

K.

(continued)

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Federation Election Commission
Certification: RAD 91NF 17-51
May 14, 1991

Page 3

L.

M.

N.

Q. Hudson Valley Political Action
Committee and Marilyn Enison,
as treasurer (91NF-32)

P.

Q.

R.

S.

(continued)

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Federal Election Commission
Certification: RAD 9INF 17-51
May 14, 1991

Page 4

T.

U.

V.

W.

X.

Y.

Z.

AA.

(continued)

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BB.

CC.

DD.

EE.

FF.

GG.

b)

- c) Approve the Factual and Legal Analyses
and proposed conciliation agreements
and the appropriate letters as
recommended in the General Counsel's
Report dated May 2, 1991.**

(continued)

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Federal Election Commission
Certification: RAD 91NF 17-51
May 14, 1991

Page 6

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

Attest:

5-17-91
Date

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

91040854806



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 28, 1991

**Marilyn Enison, Treasurer
Hudson Valley Political Action Committee
100 Red Schoolhouse Road, Suite A7A
Spring Valley, NY 10977**

**RE: MUR 3290
Hudson Valley Political Action
Committee and
Marilyn Enison, as treasurer**

Dear Ms. Enison:

On May 14, 1991, the Federal Election Commission found that there is reason to believe Hudson Valley 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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Marilyn Enison, Treasurer
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 James A. Brown, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Vice Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

21040354808

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 3290

RESPONDENTS: Hudson Valley Political Action Committee and Marilyn Enison, as treasurer

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that all unauthorized political committees that file monthly reports, shall file a pre-general election report in lieu of filing the report otherwise due in November of any year in which a regularly scheduled general election is held.

2 U.S.C. § 434(a)(4)(B). According to Section 434(a)(2)(A)(i) the pre-election report must be filed no later than the 12th day before any election, and should be complete as of the 20th day before the election.

With regard to the 1990 general election, unauthorized committees were required to file a 12 Day Pre-General Election Report, covering the pre-election period of October 1 through October 17, by October 25, 1990. The above referenced committee failed to file the 1990 Pre-General Report or a report covering the pre-election period by the required deadline. Therefore, there is reason to believe the Hudson Valley Political Action Committee and Marilyn Enison, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) by failing to timely file the 1990 12 Day Pre-General Report.

21040354809



HUDSON VALLEY POLITICAL ACTION COMMITTEE
100 RED SCHOOLHOUSE ROAD • SUITE A-7A • SPRING VALLEY • NEW YORK 10977

06-1877
B"H

(914) 356-4490

91 JUL 15 PM 3:38

FEDERAL ELECTION COMMISSION
OFFICE OF CLERK OF HOUSE

July 9, 1991

Mr. James Brown
Federal Election Commission
999 E Street 6th Floor
Washington, D.C. 20463

91 JUL 12 AM 11:07

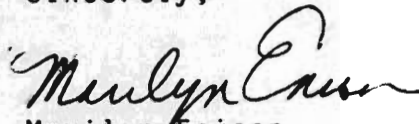
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

Dear Mr. Brown:

As per our telephone conversation of July 9th, I am enclosing herewith our check #3426 in amount of \$1,240.00 to cover the civil penalty .

I am also enclosing the literature and copies of our cancelled checks that we discussed also.
If there any questions please call me.

Sincerely,


Marilyn Enison
Treasurer

91040354810



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAR 20 1991

Marilyn Enison, Treasurer
Hudson Valley Political Action
Committee
100 Red Schoolhouse Road, Suite A7A
Spring Valley, NY 10977

Identification Number: C00158865

Reference: 12 Day Pre-General Report (10/1/90-10/17/90)

Dear Ms. Enison:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses an apparent contribution(s) from a labor organization (pertinent portion(s) attached). You are advised that contributions from labor organizations are prohibited by the Act, unless made from a separate segregated fund established by the labor organization. (2 U.S.C. §441b(a)) If you have received a labor organization contribution(s), the Commission recommends that you refund the full amount to the donor(s) in accordance with 11 CFR §103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In the best interests of the committee, all refunds and transfers-out should be made within thirty (30) days of the treasurer's receipt of the contributions. See 11 CFR §103.3(b). Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

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Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, prompt action by your committee to refund or transfer-out the amount will be taken into consideration.

-Your report disclosed a line number total that has been reflected on the wrong line of the Detailed Summary Page. Contributions (other than loans) from other political committees should be properly disclosed on Schedule A, supporting Line 11(c) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-For future reporting, please be advised that contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 21 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 27.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Carol E. Glass
Reports Analyst
Reports Analysis Division

91040354812



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

NR 20 100

**Marilyn Enison, Treasurer
Hudson Valley Political Action
Committee
100 Red Schoolhouse Road, Suite A7A
Spring Valley, NY 10977**

Identification Number: C00158865

Reference: 30 Day Post-General Report (10/18/90-11/26/90)

Dear Ms. Enison:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses an apparent contribution(s) from a labor organization (pertinent portion(s) attached). You are advised that contributions from labor organizations are prohibited by the Act, unless made from a separate segregated fund established by the labor organization. (2 U.S.C. §441b(a)) If you have received a labor organization contribution(s), the Commission recommends that you refund the full amount to the donor(s) in accordance with 11 CFR §103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In the best interests of the committee, all refunds and transfers-out should be made within thirty (30) days of the treasurer's receipt of the contributions. See 11 CFR §103.3(b). Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

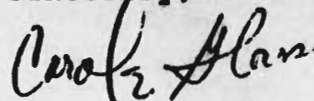
If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

21040854813

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, prompt action by your committee to refund or transfer-out the amount will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Carol E. Glass
Reports Analyst
Reports Analysis Division

91040354814

SCHEDULE B

ITEMIZED DISBURSEMENTS

(Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 111 OF 111
FOR LINE NUMBER 28A

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

NAME OF COMMITTEE (in Full)

HUDSON VALLEY POLITICAL ACTION COMMITTEE

A. Full Name, Mailing Address and ZIP Code I.B.E.W. LOCAL UNION 363 ELECTRICAL UNION 60 PHILLIPS HILL RD NEW CITY NY 10956	Purpose of Disbursement AMENDED 306 CONTRIBUTION REFUND Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 3/27/91	Amount of Each Disbursement This Period 3000.00
B. Full Name, Mailing Address and ZIP Code SERVICE EMPLOYEES INTNL UNION LOCAL 328 REGULAR 4124 BRONX BLVD BRONX NY 10466	Purpose of Disbursement AMENDED 126 CONTRIBUTION REFUND Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 3/17/91	Amount of Each Disbursement This Period 600.00
C. Full Name, Mailing Address and ZIP Code NATIONAL ELECTRICAL CONTRACTORS ASSOC 355 ROUTE 17M MONROE NY 10950	Purpose of Disbursement AMENDED 126 CONTRIBUTION REFUND Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 3/17/91	Amount of Each Disbursement This Period 1500.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

5100.00

TOTAL This Period (last page this line number only)

5100.00

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HUDSON VALLEY
POLITICAL ACTION COMMITTEE
100 RED SCHOOLHOUSE ROAD
SPRING VALLEY, NY 10977

DATE	INVOICE	AMOUNT

50-244/219

3312

CHECK
AMOUNT

PAY *Three Thousand 00/100*

DOLLARS

DATE	TO THE ORDER OF	DESCRIPTION	CHECK NO.	\$
3/7/91	IBEW LOCAL UNION 363 P.A.C.	CONTRIBUTION REFUND	3312	3000.00

THE BANK OF NEW YORK
2 NEW HEMPSTEAD RD., NEW CITY, N.Y. 10956

Michael J. Glavin

⑈003312⑈ ⑆021902446⑆ ⑈258017987⑈

⑈0000300000⑈

21040316

8180402

HUDSON VALLEY
POLITICAL ACTION COMMITTEE
100 RED SCHOOLHOUSE ROAD
SPRING VALLEY, NY 10977

DATE	INVOICE	AMOUNT

50-244/219

3310

AY *One Thousand Five Hundred 00/100* DOLLARS

CHECK
AMOUNT

DATE	TO THE ORDER OF	DESCRIPTION	CHECK NO.
3/27/91	NATIONAL ELECTRICAL CONTRACTORS ASSN	CONTRIBUTION REFUND	3310

\$ 1500.00

THE BANK OF NEW YORK
2 NEW HEMPSTEAD RD., NEW CITY, N.Y. 10956

Signature
M. L. Shon

⑈003310⑈ ⑆021902446⑆ ⑆258017987⑆

⑈0000150000⑈

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0214-0950-9
0214-0950-94

AP '91' 17

PAID
THE BANK OF
NEW YORK
TRUST COMPANY, N.Y.

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FOR FINANCIAL

NEW YORK TRUST
COMPANY
FOR DEPOSIT
HUDSON VALLEY BRANCH
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COMMON TRUST
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NY, NY 10016
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HUDSON VALLEY
POLITICAL ACTION COMMITTEE
100 RED SCHOOLHOUSE ROAD
SPRING VALLEY, NY 10977

DATE	AMOUNT	AMOUNT

50-244/219

3311

PAY Six Hundred 00/100

DOLLARS

CHECK
AMOUNT

DATE	TO THE ORDER OF	DESCRIPTION	CHECK NO.
3/17/91	SERVICE EMPLOYEES INTNL LOCAL 32E REGULAR	CONTRIBUTION REFUND	3311

\$ 600.00

29-004531 04 6912 0251188123-99

THE BANK OF NEW YORK
2 NEW HEMPSTEAD RD., NEW CITY, N.Y. 10956

[Signature]

⑆00331⑆ ⑆021902446⑆ ⑆258017987⑆

⑆0000060000⑆

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MR '91' 29
New York (NY) 19023524
New York (NY) 19023524

For deposit
IBEW 4135
258016765

only
P.H.C.

020821710

91 JUL 23 PM 3:06

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Hudson Valley Political Action
Committee, and
Marilyn Enison, as treasurer

)
)
)
)
)

MUR 3290

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Marilyn Enison, the treasurer of the Hudson Valley Political Action Committee.

The attached agreement contains no changes from the agreement previously approved by the Commission. The civil penalty payment of \$1,240.00 was received on July 12, 1991.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Hudson Valley Political Action Committee, and Marilyn Enison, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date 7/23/91

BY:


Lois G. Lerner
Associate General Counsel

Attachments

July 9, 1991 Response
Conciliation Agreement
Photocopy of Civil Penalty Check

Staff assigned: J. Albert Brown

91040354822

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Hudson Valley Political Action) MUR 3290
Committee, and Marilyn Enison,)
as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 26, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 3290:

1. Accept the conciliation agreement with the Hudson Valley Political Action Committee, and Marilyn Enison, as treasurer.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated July 23, 1991.

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

Attest:

7-29-91
Date

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

Received in the Secretariat: Tues., July 23, 1991 3:06 p.m.
Circulated to the Commission: Wed., July 24, 1991 11:00 a.m.
Deadline for vote: Fri., July 26, 1991 11:00 a.m.

dr

91040354823



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

July 31, 1991

Marilyn Enison, Treasurer
Hudson Valley Political Action Committee
100 Red Schoolhouse Road, Suite A-7A
Spring Valley, New York 10977

RE: MUR 3290
Hudson Valley Political Action
Committee and
Marilyn Enison, as treasurer

Dear Ms. Enison:

On July 26, 1991, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on behalf of the Hudson Valley Political Action and yourself, 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.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact James Brown, 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

21040354824

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Hudson Valley Political Action
Committee and Marilyn Enison,
as treasurer

MUR: 3290

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 Hudson Valley Political Action Committee and Marilyn Enison, 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. Hudson Valley Political Action Committee and is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Marilyn Enison is the treasurer of Hudson Valley Political Action Committee.

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3. Section 434(a)(4)(B) of the Federal Election Campaign Act of 1971, as amended ("the Act"), provides that all unauthorized political committees, that file monthly reports, shall file a pre-general election report in lieu of filing the report otherwise due in November of any year in which a regularly scheduled general election is held. According to Section 434(a)(2)(A)(i) the pre-election report must be filed no later than the 12th day before any election, and should be complete as of the 20th day before the election.

4. Respondents were required to file the 12 Day Pre-General Election Report, covering the pre-election period of October 1 through October 17, by October 25, 1990. Respondents failed to file the 1990 12 Day Pre-General Report or a report covering the pre-election period until November 7, 1990, 13 days late, disclosing \$29,183 in receipts and \$8,145 in disbursements for the relevant reporting period.

V. Respondents failed to file the 1990 12 Day Pre-General 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 One Thousand Two Hundred and Forty Dollars (\$1,240), 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

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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 30 days from the date this agreement becomes effective to comply with and implement the requirement 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:

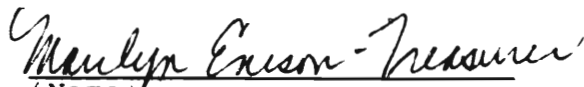
Lawrence M. Noble
General Counsel

BY:


Lois G. Lerner
Associate General Counsel

7/31/91
Date

FOR THE RESPONDENTS:


(Name)
(Position)

7/8/91
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3290

DATE FILMED 8/13/91 CAMERA NO. 4

CAMERAMAN AS

91040354828



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3320

DATE FILMED 8/13/91 CAMERA NO. 4

CAMERAMAN AS

21040354829

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 18 April 1991

ANALYST: ANDREW DODSON

I. COMMITTEE: Connecticut Carpenters Legislative Improvement Committee (C00150045)
John Cunningham, Treasurer
P.O. Box 562
Norwalk, CT 06852

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(ii) and (iii)
11 CFR §104.5(c)(1)(ii) and (iii)

III. BACKGROUND:

Failure to Timely File the 1990 30 Day Post-General Report and Failure to File the 12 Day Pre-General Report by Election Day

The Connecticut Carpenters Legislative Improvement Committee (the "Committee") failed to file the 1990 12 Day Pre-General Report of Receipts and Disbursements by Election Day, November 6, 1990. In addition, the Committee failed to file the 1990 30 Day Post-General Report in a timely manner. When ultimately filed, the 30 Day Post-General Report included financial activity which indicated that a 12 Day Pre-General Report should have been filed.

The Committee was notified on October 1, 1990 that a 12 Day Pre-General Report was due on October 25, 1990 if contributions and expenditures, which had not been previously reported, were made in connection with the general election during the period of October 1, 1990 through October 17, 1990. The Committee was also notified that a 30 Day Post-General Report was due on December 6, 1990 (Attachment 2).

On December 31, 1990, a Non-Filer Notice was sent to the Committee for failure to file the 1990 30 Day Post-General Report (Attachment 3).

On January 29, 1991, the Reports Analysis Division ("RAD") analyst spoke to the Committee's treasurer, Mr. John Cunningham, regarding the failure to file the 30 Day Post-General Report. Mr. Cunningham stated that he was

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unaware that the report had not been filed and that the RAD analyst should contact Mr. Tom Regan for further information (Attachment 4).

Mr. Tom Regan called the RAD analyst on January 29, 1991 and stated that the 30 Day Post-General and Year-End reports for 1990 would be filed as soon as possible (Attachment 5).

On January 31, 1991, the 1990 30 Day Post-General Report covering the period October 1, 1990 through November 26, 1990 was filed with the Commission. The report disclosed one (1) contribution to a Federal candidate of \$3,000 on October 15, 1990. This contribution indicates that a 12 Day Pre-General should have been timely filed (Attachment 6, Pg. 2 of 3).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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FEDERAL ELECTION COMMISSION
1989-1990
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

Attachment 1

DATE 5APR91

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
					TYPE OF FILER	
CONNECTICUT CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE				ID #C00150045 NON-PARTY QUALIFIED		
CONNECTED ORGANIZATION: CARPENTERS & JOINERS OF AMERICA, UN BRHD						
1989	MID-YEAR REPORT	15,901	7,809	1JAN89 -30JUN89	5	89FEC/603/3774
	YEAR-END	14,100	9,935	1JUL89 -31DEC89	5	90FEC/620/1468
1990	APRIL QUARTERLY	11,995	6,000	1JAN90 -30MAR90	5	90FEC/636/4538
	APRIL QUARTERLY - AMENDMENT	11,995	6,000	1JAN90 -30MAR90	6	90FEC/644/1142
	REQUEST FOR ADDITIONAL INFORMATION			1JAN90 -30MAR90	1	90FEC/642/2135
	JULY QUARTERLY	428	5,000	1APR90 -30JUN90	5	90FEC/646/5372
	OCTOBER QUARTERLY	10,377	0	1JUL90 -30SEP90	5	90FEC/662/3675
	OCTOBER QUARTERLY - AMENDMENT	10,206	0	1JUL90 -30SEP90	6	91FEC/690/2384
	REQUEST FOR ADDITIONAL INFORMATION			1JUL90 -30SEP90	1	91FEC/688/2379
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL90 -30SEP90	2	91FEC/690/0696
	POST-GENERAL	221	9,000	1OCT90 -26NOV90	5	91FEC/686/1457
	POST-GENERAL - AMENDMENT	221	9,000	1OCT90 -26NOV90	4	91FEC/690/2395
	NOTICE OF FAILURE TO FILE			1OCT90 -26NOV90	1	90FEC/679/2848
	YEAR-END	414	2,000	27NOV90 -31DEC90	5	91FEC/686/1452
	YEAR-END - AMENDMENT	414	2,000	27NOV90 -31DEC90	5	91FEC/690/2390
TOTAL		53,265	0	39,744	0	61 TOTAL PAGES

All reports have been reviewed.

Ending cash on hand as of 12/31/90: \$14,430.92

Outstanding debts owed by the committee as of 12/31/90: \$0.00

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GENERAL ELECTION REPORT NOTICE

Attachment 2
Page 1 of 2

FEDERAL ELECTION COMMISSION

PARTIES AND PACs

October 1, 1990

I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
Pre-General	10/01/90**-10/17/90	10/22/90	10/25/90
Post-General	10/18/90 - 11/26/90	12/06/90	12/06/90

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 17***

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
Pre-General	10/01/90**-10/17/90	10/22/90	10/25/90
Post-General	10/18/90 - 11/26/90	12/06/90	12/06/90

III. QUARTERLY FILERS WHICH DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 17***

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
Post-General	10/01/90**-11/26/90	12/06/90	12/06/90

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) must follow the above charts in order to determine whether they must file the pre-general election report. All party committees and PACs, regardless of financial activity, must file the post-general election report.

WHAT MUST BE REPORTED

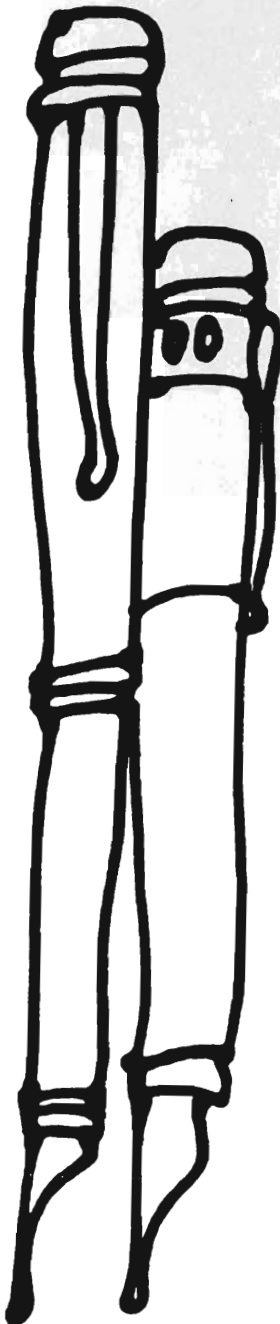
All financial activity (not previously reported) that occurred during the reporting period.

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

**The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

***Committees that made general election contributions or expenditures prior to October 1 which have not been previously reported must also follow the Chart II reporting requirements.

1 0 4 0 3 5 4 3 3 3



PARTIES AND PACs

GENERAL ELECTION

REPORTING FORMS

Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE

Consult the instructions on the back of the Form 3X Summary Page. Note State filing requirements also.

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

LAST-MINUTE INDEPENDENT EXPENDITURES

Any PAC which makes any independent expenditures aggregating \$1,000 or more during the period beginning October 18 and ending November 4 must report them within 24 hours. Call the FEC for more information.

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.

FOR INFORMATION, Call: 202/376-3120 or 800/424-9530

21040354834

**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

20-7

December 31, 1990

John Cunningham, Treasurer
Connecticut Carpenters Legislative
Improvement Committee
P.O. Box 562
Norwalk, CT 06852

Identification Number: C00150045

Reference: 30 Day Post-General Report (10/1/90-11/26/90)

Dear Mr. Cunningham:

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 previously notified 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 its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§108.2, 108.3, 108.4).

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 Andrew Dodson on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

21040854835
27036792348

TELECON

ANALYST: Andrew Dodson

CONVERSATION WITH: John Cunningham , Treasurer

COMMITTEE: Connecticut Carpenters Legislative Improvement Committee

DATE: January 29, 1991

SUBJECT(S): Failure to file the 30 Day Post General Report (10/1/90-11/26/90)

I spoke to Mr. John Cunningham today concerning the Connecticut Carpenters Legislative Improvement Committee and its failure to file a 30 Day Post General Report (10/1/90-11/26/90). Mr. Cunningham informed me that he was unaware that the 30 Day Post General Report had not been filed and that I should contact Mr. Tom Regan for further information.

21040854836

TELECONANALYST:

Andrew Dodson

CONVERSATION WITH:

Mr. Tom Regan

COMMITTEE:

Connecticut Carpenters Legislative Improvement Committee

DATE:

January 29, 1991

SUBJECT(S):Failure to file the 30 Day Post General Report
(10/1/90-11/26/90)

Mr. Regan called me today and stated that the 30 Day Post General and the Year End reports for 1990 would be filed shortly.

91040354837

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

Attachment 6
Page 1 of 3

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 FEB -4 AM 11:29

CC0150045 091790 P 219
JOHN CUNNINGHAM
CONNECTICUT CARPENTERS LEGISLA
TIVE IMPROVEMENT COMMITTEE
P O BOX 562
NORWALK CT 06852

2. FEC IDENTIFICATION NUMBER

C00150045

3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on (date)

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)

Monthly Report Due On:

☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

☐ Twelfth day report preceding (Type of Election) election on in the State of

☐ Thirtieth day report following the General Election on 11/6/90 in the State of Connecticut

Termination Report

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

SUMMARY

	Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	10/1/90 through 11/26/90		
6	(a) Cash on Hand January 1, 1990		\$ 13,163.57
	(b) Cash on Hand at Beginning of Reporting Period	\$ 24,964.70	
	(c) Total Receipts (from Line 18)	\$ 221.54	\$ 23,022.67
	(d) Subtotal: add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B	\$ 25,186.24	\$ 36,186.24
	Total Disbursements (from Line 28)	\$ 9,000.00	\$ 20,000.00
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 16,186.24	\$ 16,186.24
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and or Schedule D)	\$ 0	For further information contact: Federal Election Commission 999 E Street NW Washington, DC 20461 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)	\$ 0	

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

John Cunningham
Signature of Treasurer

Date

1/20/91

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 4370

FEC FORM 3X

REVISED 8/90

2,104,308.31437

USE FEC MAILING LABEL ON TYPE OR PRINT

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule for each category of the Detailed Summary Page

PAGE 6
FOR LINE NUMBER

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

NAME OF COMMITTEE (in Full)

Connecticut Carpenters Legislative Improvement Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C.O.P.F. AFL-CIO 215 Sixteenth Street, N.W. Washington, D.C.	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/22/90	\$1,000.00
B. Full Name, Mailing Address and ZIP Code Diane Fienstein for Governor Los Angeles, CA	Non-federal Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/23/90	\$5,000.00
C. Full Name, Mailing Address and ZIP Code Chris Shays for Congress Washington Blouvard Stamford, CT 06912	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/15/90	\$3,000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

\$0,000.00

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FEDERAL ELECTION COMMISSION
MAIL ROOM

91 FEB -4 AM 11:29

Andrew Dolson

FEC

999 E Street, NW

Washington, D. C. 20463

911 570 541 2616

MAIL



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RECEIVED
JUN 22 1997

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

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD Referral # 91NF-62
Staff Member Craig D. Reffner

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

RESPONDENTS: Connecticut Carpenters Legislative Improvement
Committee and John Cunningham, as treasurer

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

INTERNAL REPORTS CHECKED: Referral Materials
Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division referred the Connecticut Carpenters Legislative Improvement Committee and John Cunningham, as treasurer (collectively referred to as the "Committee"), to the General Counsel's Office for failing to file the 1990 12 Day Pre-Election Report for the 1990 general election and for failing to file the 1990 30 Day Post-General Election Report in a timely fashion. Attachment A.

II. FACTUAL AND LEGAL ANALYSIS

See Attachment B.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Connecticut Carpenters Legislative Improvement Committee and John Cunningham, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii) and 2 U.S.C. § 434(a)(4)(A)(iii) and enter into conciliation prior to a finding of probable cause to believe.

3. Approve the attached Factual and Legal Analysis and conciliation agreement, and the appropriate letter.

Lawrence M. Noble
General Counsel

Date 5/22/91

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

- A. Referral Materials
- B. Factual and Legal Analysis
- C. Proposed conciliation agreement

21040354844

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Connecticut Carpenters Legislative)
Improvement Committee and)
John Cunningham as treasurer.)

RAD Referral #91NF-62

(MUR)
3320

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 29, 1991, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral #91NF-62:

1. Open a MUR.
2. Find reason to believe that the Connecticut Carpenters Legislative Improvement Committee and John Cunningham, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii) and 2 U.S.C. § 434(a)(4) (A)(iii) and enter into conciliation prior to a finding of probable cause to believe.

(Continued)

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3. Approve the Factual and Legal Analysis and conciliation agreement, and the appropriate letter, as recommended in the General Counsel's Report dated May 22, 1991.

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

Attest:

5-30-91

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Thurs., May 23, 1991 11:37 a.m.
Circulated to the Commission: Thurs., May 23, 1991 4:00 p.m.
Deadline for vote: Tues., May 28, 1991 4:00 p.m.

dr

21040354846



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 5, 1991

John Cunningham, Treasurer
Connecticut Carpenters Legislative
Improvement Committee
P. O. Box 562
Norwalk, Connecticut 06852

RE: MUR 3320
Connecticut Carpenters Legislative
Improvement Committee and
John Cunningham, as treasurer

Dear Mr. Cunningham:

On May 29, 1991, the Federal Election Commission found that there is reason to believe the Connecticut Carpenters Legislative Improvement Committee ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(ii) and 434(a)(4)(A)(iii), provisions 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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John Cunningham, Treasurer
MUR 3320
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.

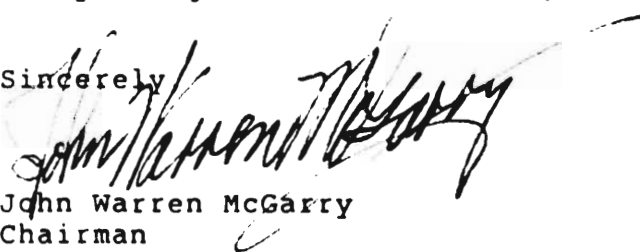
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Craig Douglas Reffner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,


John Warren McGarry
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Connecticut Carpenters MUR: 3320
Legislative Improvement
Committee and
John Cunningham, as treasurer

The Federal Election Campaign Act of 1971, as amended (the "Act"), provides that unauthorized committees that file quarterly must submit a 12 Day Pre-Election Report if the Committee made contributions to or expenditures on behalf of a federal candidate in such election. 2 U.S.C.

§ 434(a)(4)(A)(ii). The Pre-Election Report must be filed no later than the 12th day before the election and should be complete as of the 20th day before the election. Id. Thus, if the Connecticut Carpenters Legislative Improvement Committee and John Cunningham, as treasurer (collectively known as the "Committee"), made contributions and expenditures on behalf of a candidate in the 1990 general election, between October 1, 1990 and October 17, 1990, the 1990 12 Day Pre-Election Report would have been due on October 25, 1990. Additionally, the Act requires that unauthorized committees that file quarterly submit a 30 Day Post-General Election Report. 2 U.S.C.

§ 434(a)(4)(A)(iii). The 30 Day Post-general Report shall be filed no later than the 30th day after the general election and should be completed as of the 20th day after such general election. Id. Thus, the 1990 30 Day Post-general Report was due on December 6, 1990.

To date, the Committee has not filed the 1990 12 Day

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Pre-Election Report for the 1990 general election. On January 31, 1991, the Committee filed the 1990 30 Day Post-General Election Report, which disclosed a contribution to a Federal candidate on October 15, 1990. Given the timing of this contribution, the Committee was required to submit a 1990 12 Day Pre-Election Report. However, the Committee did not file a 1990 12 Day Pre-Election Report and instead disclosed the contribution on 1990 30 Day Post-General Election Report, ninety-eight (98) days late. Additionally, the Committee should have filed the 1990 30 Day Post-General Election Report no later than December 6, 1990, but instead filed that Report on January 31, 1991, fifty-six (56) days late.

Therefore, there is reason to believe that the Connecticut Carpenters Legislative Improvement Committee and John Cunningham, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii) and 2 U.S.C. § 434(a)(4)(A)(iii).

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UNITED BROTHERHOOD OF CARPENTERS
LOCAL 210
WESTERN CONNECTICUT

35 PULASKI STREET • P.O. BOX 562 • NORWALK, CONNECTICUT 06852
(203) 324-3127 — 846-2003

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

91 JUL -1 AM 11:05

June 23, 1991

Greg Refner
Office of the General Counsel
Federal Elections Commission
999 E. Street, N.W.
Washington, D.C. 20463

Dear Sir:

I am writing in regard to MUR 3320, a complaint against the Connecticut Carpenters Legislative Improvement Committee. As I stated in our phone conversation, we are still reviewing the stipulated agreement with the Federal Election Commission.

Our preliminary review indicates that the stipulation is agreeable. Unless some basis for appeal is discovered, it is our intent to return the signed stipulated agreement and the civil fine within the given thirty day period. You can expect receipt of these articles by July 5, 1991.

If I may be of any further assistance, do not hesitate to contact me. Thank you for your time and cooperation in this matter.

Sincerely,

Thomas J. Regan
Thomas J. Regan
Director of Legislative Affairs

cc: J. Cunningham, Treasurer

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
) MUR 3320
Connecticut Carpenters Legislative)
Improvement Committee and)
John Cunningham, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by the treasurer of the Connecticut Carpenters Legislative Improvement Committee. Attachment A.

The attached agreement contains no changes from the agreement approved by the Commission on May 29, 1991. A check for the civil penalty has been received. Attachment B.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Connecticut Carpenters Legislative Improvement Committee and John Cunningham, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date 7/11/91

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

- A. Conciliation Agreement
- B. Copy of the civil penalty check

Staff Assigned: Craig Douglas Reffner

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter

Connecticut Carpenters Legislative)
Improvement Committee and) MUR 3320
John Cunningham, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 17, 1991, the Commission decided by a vote of 5-0 to take the following actions in MUR 3320:

1. Accept the conciliation agreement with the Connecticut Carpenters Legislative Improvement Committee and John Cunningham, as treasurer.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated July 11, 1991.

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

Attest:

7-17-91

Date

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

Received in the Secretariat: Fri., July 12, 1991 1:51 p.m.
Circulated to the Commission: Mon., July 15, 1991 11:00 a.m.
Deadline for vote: Wed., July 17, 1991 11:00 a.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 23, 1991

John Cunningham, Treasurer
Connecticut Carpenters Legislative
Improvement Committee
P. O. Box 562
Norwalk, Connecticut 06852

RE: MUR 3320
Connecticut Carpenters Legislative
Improvement Committee and
John Cunningham, as treasurer

Dear Mr. Cunningham:


On July 17, 1991, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. §§ 434(a)(4)(A)(ii) and 434(a)(4)(A)(iii), provisions 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 Craig Douglas Reffner, 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

21 J 40354
CLOSED

06C#1796

BEFORE THE FEDERAL ELECTION COMMISSION

91 JUL -5 AM 10:42

In the Matter of)
Connecticut Carpenters Legislative) MUR 3320
Improvement Committee and)
John Cunningham, 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 Connecticut Carpenters Legislative Improvement Committee and John Cunningham, as treasurer ("Respondents"), violated 2 U.S.C. § 434(a)(4)(A)(ii) and 2 U.S.C. § 434(a)(4)(A)(iii).

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.

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OFFICE OF THE CLERK

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

1. The Connecticut Carpenters Legislative Improvement Committee is a political committee within the meaning of 2 U.S.C. § 431(4).
2. John Cunningham is the treasurer of the Connecticut Carpenters Legislative Improvement Committee.
3. The Federal Election Campaign Act of 1971, as amended (the "Act"), provides that unauthorized committees that file quarterly must submit a 12 Day Pre-Election Report if the Committee made contributions to or expenditures on behalf of a federal candidate in such election. 2 U.S.C. § 434(a)(4)(A)(ii). The Pre-Election Report must be filed no later than the 12th day before the election and should be complete as of the 20th day before the election. Id.
4. Additionally, the Act requires that unauthorized committees that file quarterly submit a 30 Day Post-General Election Report. 2 U.S.C. § 434(a)(4)(A)(iii). The 30 Day Post-General Election Report shall be filed no later than the 30th day after the general election and should be completed as of the 20th day after such general election. Id.
5. The Respondents did not file the 1990 12 Day Pre-Election Report but did file the 1990 30 Day Post-General Election Report on January 31, 1990, disclosing a contribution to a Federal candidate on October 15, 1990. Thus, the information relevant to the coverage dates for the 1988 12 Day Pre-Election Report was filed ninety-eight (98) days late, disclosing \$221.54 in receipts and \$3,000 in disbursements for

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the relevant reporting period.

6. Additionally, Respondents were required to submit the 1990 30 Day Post-General Election Report no later than December 6, 1990. Respondents filed the 1990 30 Day Post-General Report on January 31, 1991, fifty-six (56) days late, disclosing \$6,000 in disbursements.

V. 1. Respondents failed to file the 1990 12 Day Pre-Election Report for the 1990 general election in violation of 2 U.S.C. § 434(a)(4)(A)(ii).

2. Respondents failed to file the 1990 Post-General Election Report in a timely manner in violation of 2 U.S.C. § 434(a)(4)(A)(iii).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of seven hundred and fifty dollars (\$750), 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 requirement 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:

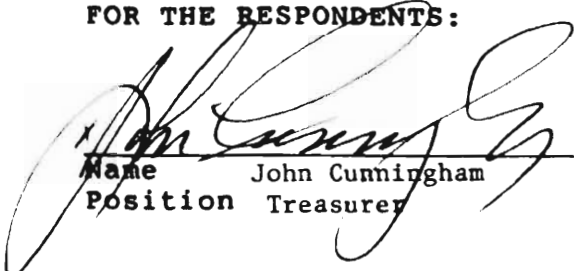
Lawrence M. Noble
General Counsel

BY:


Lois G. Lerner
Associate General Counsel

7/23/91
Date

FOR THE RESPONDENTS:


Name John Cunningham
Position Treasurer

7/3/91
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3320

DATE FILMED 8/13/91 CAMERA NO. 4

CAMERAMAN AS

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