



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3295

DATE FILMED 7/10/91 CAMERA NO. 2

CAMERAMAN AS

21040350824



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

4 February 1991

MEMORANDUM

TO: LAWRENCE M. NOBLE
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

Lockheed Employees' 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

21040850825

C00030783

Lockheed Employees' Political Action
Committee

91NF-37

2104035J826

91040850827

LOCKHEED EMPLOYEES' POLITICAL ACTION COMMITTEE

(Attachment 21a - 21d)

1989-1990

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 21

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	# OF COVERAGE DATES	MICROFILM PAGES LOCATION TYPE OF FILER
LOCKHEED EMPLOYEES' POLITICAL ACTION COMMITTEE				ID #C00030783 NON-PARTY QUALIFIED	
CONNECTED ORGANIZATION: LOCKHEED EMPLOYEES PAC					
1989	FEBRUARY MONTHLY	21,507	2,750	1JAN89 -31JAN89	5 89FEC/585/4129
	1 ST LETTER INFORMATIONAL NOTICE			1JAN89 -31JAN89	1 89FEC/608/1912
	MARCH MONTHLY	19,686	1,000	1FEB89 -28FEB89	5 89FEC/589/3423
	APRIL MONTHLY	21,156	21,337	1MAR89 -31MAR89	10 89FEC/591/2882
	APRIL MONTHLY - AMENDMENT	21,156	21,337	1MAR89 -31MAR89	4 89FEC/609/1002
	REQUEST FOR ADDITIONAL INFORMATION			1MAR89 -31MAR89	1 89FEC/608/0831
	MAY MONTHLY	20,682	29,300	1APR89 -30APR89	11 89FEC/595/4201
	MAY MONTHLY - AMENDMENT	20,682	29,300	1APR89 -30APR89	4 89FEC/609/1006
	REQUEST FOR ADDITIONAL INFORMATION			1APR89 -30APR89	1 89FEC/608/0829
	JUNE MONTHLY	17,872	41,350	1MAY89 -31MAY89	17 89FEC/597/4206
	JUNE MONTHLY - AMENDMENT	17,872	41,000	1MAY89 -31MAY89	6 89FEC/609/1015
	1 ST LETTER INFORMATIONAL NOTICE			1MAY89 -31MAY89	1 89FEC/608/1911
	JULY MONTHLY	25,843	37,100	1JUN89 -30JUN89	17 89FEC/601/0184
	JULY MONTHLY - AMENDMENT	25,843	37,450	1JUN89 -30JUN89	5 89FEC/609/1010
	REQUEST FOR ADDITIONAL INFORMATION			1JUN89 -30JUN89	1 89FEC/608/0827
	AUGUST MONTHLY	21,628	12,050	1JUL89 -31JUL89	16 89FEC/607/2701
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL89 -31JUL89	7 89FEC/616/2674
	REQUEST FOR ADDITIONAL INFORMATION			1JUL89 -31JUL89	1 89FEC/614/1465
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL89 -31JUL89	2 89FEC/615/4800
	SEPTEMBER MONTHLY	19,371	12,000	1AUG89 -31AUG89	14 89FEC/609/3414
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG89 -31AUG89	5 89FEC/616/2661
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG89 -31AUG89	2 90FEC/629/2015
	1 ST LETTER INFORMATIONAL NOTICE			1AUG89 -31AUG89	1 89FEC/614/0812
	OCTOBER MONTHLY	23,271	7,250	1SEP89 -30SEP89	15 89FEC/611/3604
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP89 -30SEP89	5 89FEC/616/1516
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP89 -30SEP89	2 90FEC/629/2015
	1 ST LETTER INFORMATIONAL NOTICE			1SEP89 -30SEP89	1 89FEC/616/3360
	REQUEST FOR ADDITIONAL INFORMATION			1SEP89 -30SEP89	1 90FEC/628/0091
	NOVEMBER MONTHLY	20,763	54,147	1OCT89 -31OCT89	54 89FEC/616/1035
	NOVEMBER MONTHLY - AMENDMENT	-	-	1OCT89 -31OCT89	2 89FEC/616/1501
	NOVEMBER MONTHLY - AMENDMENT	-	-	1OCT89 -31OCT89	2 90FEC/629/2015
	DECEMBER MONTHLY	23,726	28,650	1NOV89 -30NOV89	52 89FEC/617/0531
	DECEMBER MONTHLY - AMENDMENT	-	-	1NOV89 -30NOV89	2 90FEC/629/2015
	DECEMBER MONTHLY - AMENDMENT	23,726	28,650	1NOV89 -30NOV89	10 90FEC/630/2355
	REQUEST FOR ADDITIONAL INFORMATION			1NOV89 -30NOV89	1 90FEC/628/0093
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1NOV89 -30NOV89	1 90FEC/629/5435
	YEAR-END	25,417	2,006	1DEC89 -31DEC89	50 90FEC/622/2834
	YEAR-END - AMENDMENT	-	-	1DEC89 -31DEC89	4 90FEC/629/2015
1990	STATEMENT OF ORGANIZATION - AMENDMENT			20FEB90	1 90FEC/629/2014
	STATEMENT OF ORGANIZATION - AMENDMENT			30JUL90	2 90FEC/651/0900
	FEBRUARY MONTHLY	17,775	2,100	1JAN90 -31JAN90	6 90FEC/629/0837
	MARCH MONTHLY	17,185	26,400	1FEB90 -28FEB90	8 90FEC/631/4619
	APRIL MONTHLY	17,106	27,525	1MAR90 -31MAR90	10 90FEC/636/4833
	MAY MONTHLY	22,632	29,850	1APR90 -30APR90	12 90FEC/640/2660

21040850828

ATTACHMENT

FEDERAL ELECTION COMMISSION
1977-1990

DATE 1FEB91

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 22

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
	MAY MONTHLY - AMENDMENT	-	-	1APR90 -30APR90	3	90FEC/650/4571
	REQUEST FOR ADDITIONAL INFORMATION			1APR90 -30APR90	1	90FEC/644/3154
	JUNE MONTHLY	14,407	25,650	1MAY90 -31MAY90	16	90FEC/643/1732
	JULY MONTHLY	19,204	19,050	1JUN90 -30JUN90	13	90FEC/650/2642
	AUGUST MONTHLY	20,286	1,100	1JUL90 -31JUL90	11	90FEC/653/0043
	SEPTEMBER MONTHLY	15,734	16,250	1AUG90 -31AUG90	16	90FEC/657/0473
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG90 -31AUG90	4	90FEC/657/0451
	OCTOBER MONTHLY	11,342	12,950	1SEP90 -30SEP90	15	90FEC/665/5327
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP90 -30SEP90	4	91FEC/683/0543
	REQUEST FOR ADDITIONAL INFORMATION			1SEP90 -30SEP90	1	91FEC/680/1510
	PRE-GENERAL	8,337	-	1OCT90 -17OCT90	11	90FEC/670/4553
	POST-GENERAL	21,351	58,450	18OCT90 -26NOV90	45	90FEC/677/4925
	TOTAL	444,250	0 472,165	0	516	TOTAL PAGES

ALL REPORTS HAVE BEEN REVIEWED EXCEPT 30 DAY POST GENERAL
ENDING CASH ON HAND AS OF 11/26/90: 53,179.00
OUTSTANDING DEBTS OWED BY THE COMMITTEE AS OF 11/26/90: 0.00

21040850322



4500 Park Granada Boulevard
Calabasas, California 91301

NOV 13 AM 10:38

October 19, 1990

Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Gentlemen:

Enclosed is the completed FEC Form 31 report for the Lockheed Employees' Political Action Committee covering the Pre-General election report October 1 through 17, 1990.

Very truly yours,

A handwritten signature in cursive script that reads "Anne Woodyard".

Anne Woodyard
Director of Accounting

AWing

93036704553

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

USE PREC MARKING LABEL
OR
TYPE ON PRINT

1. NAME OF COMMITTEE (in full) Lockheed Employees Political Action Committee		90 NOV 13 AM 10:38	
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 4500 Park Granada Boulevard		2. FEC IDENTIFICATION NUMBER C00030783	
CITY, STATE and ZIP CODE Calabasas, CA 91399		3. <input type="checkbox"/> The 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)☐ Termination Report

Monthly Report Due On:

☐ February 28☐ June 30☐ October 30☐ March 30☐ July 30☐ November 30☐ April 30☐ August 30☐ December 30☐ May 30☐ September 30☐ January 31☒ Twelfth day report preceding General

(Type of Election)

election on 11-6-90 in the State of Calif.☐ 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>		\$ 91,038.94
(b) Cash on Hand at Beginning of Reporting Period	\$ 81,940.32	
(c) Total Receipts (from Line 18)	\$ 8,337.99	\$ 164,014.37
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 90,278.31	\$ 255,053.31
7. Total Disbursements (from Line 28)	\$ —	\$ 164,775.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 90,278.31	\$ 90,278.31
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

S. E. Chaudet

Signature of Treasurer

S.E. Chaudet

Date

10/18/90

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)

93036704554

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.

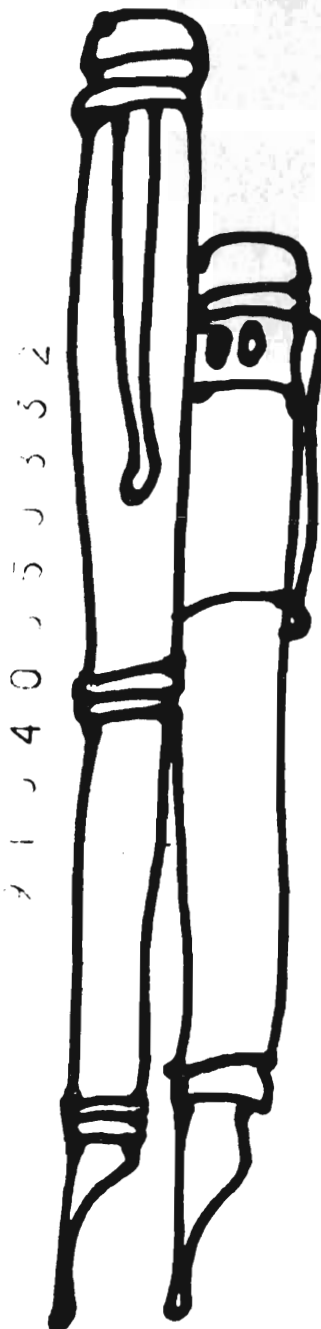
WHAT MUST BE REPORTED

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.



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

2104035033



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

2104050334

RECEIVED
91NF-17-51
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:

91040350335

Lockheed Employees' Political Action Committee
and Stephen E. Chaudet, as treasurer (91NF-37)

2104035J336

2140350337

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

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.

21040350339

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.

21040850840

PAGES 7 THROUGH 27 DO NOT PERTAIN TO THESE RESPONDENTS.

2104035J341

91040850842

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.

21040350843

Q.

R.

S.

T.

U. Lockheed Employees' Political Action Committee and
Stephen E. Chaudet, as treasurer (91NF-37)

V.

W.

X.

Y.

Z.

AA.

BB.

CC.

DD.

EE.

91040350344

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)

91040850845

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)

21040850346

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

Page 2

D.

E.

F.

G.

H.

I.

J.

K.

(continued)

21040850847

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

Page 3

L.

M.

N.

Q.

P.

Q.

R.

S.

(continued)

21040350648

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

Page 4

T. Lockheed Employees' Political
Action Committee and Stephen E.
Chaudet, as treasurer (91NF-37)

U.

V.

W.

X.

Y.

Z.

AA.

(continued)

91040850349

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)

21040350850

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

Page 6

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

2.

Attest:

5-17-91
Date

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

21040850851



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 28, 1991

Robert W. Cannon, Treasurer
Lockheed Employees' Political Action Committee
4500 Park Granada Blvd, Building 9
Calabasas, Ca 91399

RE: MUR 3295
Lockheed Employees' Political
Action Committee and
Robert W. Cannon, as treasurer

Dear Mr. Cannon:

On May 14, 1991, the Federal Election Commission found that there is reason to believe Lockheed Employees' Political Action Committee ("Committee") and its 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.

Robert W. Cannon, 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 John Canfield, 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

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 3295

RESPONDENTS: Lockheed Employees' Political Action Committee and
Robert W. Cannon, as treasurer

21040850854
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 Lockheed Employees' Political Action Committee and Robert W. Cannon, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) by failing to timely file the 1990 12 Day Pre-General Report.

91 JUN 24 PM 4:26

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Lockheed Employees' Political)
Action Committee and Robert W.)
Cannon, as treasurer)

MUR 3295

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Robert W. Cannon, the treasurer of Lockheed Employees' Political Action Committee.

The attached agreement contains no changes from the agreement approved by the Commission. A check for the civil penalty has been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Lockheed Employees Political Action Committee and Robert W. Cannon, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

June 24, 1991
Date

BY:

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check, if appropriate

Staff Assigned: John Canfield

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3295
Lockheed Employees' Political)
Action Committee and Robert W.)
Cannon, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 27, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 3295:

1. Accept the conciliation agreement with Lockheed Employees Political Action Committee and Robert W. Cannon, as treasurer, as recommended in the General Counsel's Report dated June 24, 1991.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report dated June 24, 1991.

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

Attest:

June 28, 1991
Date

Delores Harris
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Monday, June 24, 1991 4:26 p.m.
Circulated to the Commission: Tuesday, June 25, 1991 11:00 a.m.
Deadline for vote: Thursday, June 27, 1991 11:00 a.m.

dh



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

July 2, 1991

Robert W. Cannon, Treasurer
Lockheed Employees' Political Action Committee
4500 Park Granada Blvd., Building 9
Calabasas, California 91399

RE: MUR 3295
Lockheed Employees' Political
Action Committee and Robert W.
Cannon, as treasurer

Dear Mr. Cannon:

On June 27, 1991, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on behalf of the Lockheed Employees' Political Action Committee and Robert W. Cannon, 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 Jeff Long, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

21040850857

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

MUR: 3295

Lockheed Employees' Political Action)
Committee and Robert W. Cannon,)
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 Lockheed Employees' Political Action Committee and its 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. Lockheed Employees' Political Action Committee is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Robert W. Cannon is the treasurer of Lockheed Employees' Political Action Committee.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 JUN 20 PM 3:41

8
5
8
0
5
3
0
4
0
1
6

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 13, 1990, 19 days late, disclosing \$8,337 in receipts and \$0 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 Three Hundred and Seventy-Five Dollars (\$375), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

the District of Columbia.

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

IX. Respondents shall have no more than 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:

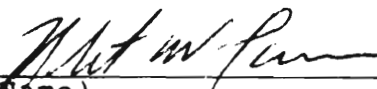
Lawrence M. Noble
General Counsel

BY:


Lois G. Lerner
Associate General Counsel

7/2/91
Date

FOR THE RESPONDENTS:


(Name)
(Position)

6/18/91
Date

91040350360

7-671 21 00 12



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3295

DATE FILMED 7/10/91 CAMERA NO. 2

CAMERAMAN AS

21040850861