



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4655

DATE FILMED 11-29-57 CAMERA NO. 2

CAMERAMAN JMU

97043644947

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: March 24, 1997

ANALYST: Debbie Manzano

- I. COMMITTEE: Dyncorp Federal Political Action Committee
(FKA: Dynalectron Corporation Federal PAC)
(C00131383)
Susan Drake White, Treasurer
(March 21, 1996 to Present)
Dagmar Ellingson, Treasurer
(Pre-January 1, 1995-March 20, 1996)
2000 Edmund Halley Drive, 4th Floor
Reston, VA 22091
- II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(i) and (ii)
11 CFR §104.5(c)(1)(i)(A) and (c)(1)(ii)

III. BACKGROUND:

Failure to Timely File a Report and Chronic Late Filing of Reports

The Dyncorp Federal Political Action Committee ("the Committee") failed to file three (3) Reports of Receipts and Disbursements in a timely manner for the 1995-1996 election cycle (see attached chart). The reports were filed between twenty-eight (28) and sixty-seven (67) calendar days late. In addition, the Committee failed to file the 12 Day Pre-General Report, as required, based on evidence disclosed in the 30 Day Post-General Report.

Prior Notice was sent on March 22, 1996 informing the Committee that the 1996 April Quarterly Report was due on April 15, 1996 (Attachment 2). A Non-Filer Notice was sent on May 8, 1996 for failure to file the April Quarterly Report (Attachment 3).

9704384498

DYNACORP FEDERAL POLITICAL ACTION COMMITTEE
(FKA: DYNALECTRON CORPORATION FEDERAL PAC)
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

On June 3, 1996, a Reports Analysis Division ("RAD") analyst called the Committee and spoke with the treasurer, Susan Drake White. The RAD analyst informed the treasurer that the 1996 April Quarterly Report had not been filed. Ms. White said that she had just recently taken over as treasurer, and that the report would be filed that week. (Attachment 4). The Committee filed its April Quarterly Report on June 21, 1996 (Attachment 5).

On August 16, 1996, a Chronic Late Filing Notice was sent to the Committee for failing to file the 1996 April Quarterly and 1996 July Quarterly Reports in a timely manner (Attachment 8). The Notice advised the Committee that any additional late filing of reports may result in legal enforcement action.

On October 24, 1996, Richard Stephenson, PAC Chairman for the Committee, called the analyst. He asked if any legal action would be taken against the Committee for the failure to timely file the 1996 July Quarterly Report. The analyst informed him that these decisions are made on a case-by-case basis, by the Office of General Counsel. Mr. Stephenson requested that a copy of the Chronic Late Filing Notice be faxed to him. He also stated that he would be sending a letter to the Commission, regarding the late reports (Attachment 11).

On October 27, 1996, the Committee filed a letter with the Commission. The letter explains that the Committee had to amend several past reports "before the July 1996 report could be updated accurately" (Attachment 12).

Subsequent to the sending of the Chronic Late Filing Notice, the Committee failed to file the 1996 12 Day Pre-General Report. The Committee filed the 1996 30 Day Post-General Report on November 21, 1996, which disclosed \$1,500 in contributions to two (2) federal candidates during the 12 Day Pre-General reporting period (10/01/96-10/16/96), thus requiring the filing of such a Report (Attachment 13).

97043844949

LATE FILING HISTORY

<u>REPORT TYPE</u>	<u>PRIOR NOTICE</u>	<u>DATE DUE</u>	<u>NON-FILER NOTICE</u>	<u>DATE FILED</u>
1996 April Quarterly (1/01/96-3/31/96)	3/22/96 (Attachment 2)	4/15/96	5/08/96 (Attachment 3)	6/21/96 (Attachment 5)
1996 July Quarterly (4/01/96-6/30/96)	6/21/96 (Attachment 6)	7/15/96	8/12/96 (Attachment 7)	8/27/96 (Attachment 9)
1996 12 Day Pre-General (10/01/96-10/16/96)	9/30/96 (Attachment 10)	10/24/96	N/A	11/21/96 ¹ (Attachment 13)

¹ The Committee disclosed contributions to federal candidates in their 30 Day Post-General Report, that were made during the 12 Day Pre-General Reporting period (10/1/96-10/16/96).

FEDERAL ELECTION COMMISSION
1995-1996
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 2/11/97

PAGE 2 Attachment 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	# OF COVERAGE DATES PAGES TYPE OF FILER	MICROFILM LOCATION TYPE OF FILER
DYNACORP FEDERAL POLITICAL ACTION COMMITTEE (FOR DYNALLECTRON CORPORATION FED PAC)				ID #C01131383 NON-PARTY QUALIFIED	
CONNECTED ORGANIZATION: DYNACORP					
1995	APRIL QUARTERLY	6,901	8,468	1JAN95 -31MAR95	6 95FEC/976/4306
	1 ST LETTER INFORMATIONAL NOTICE			1JAN95 -31MAR95	2 96FEC/129/3034
	JULY QUARTERLY	5,052	11,200	1APR95 -30JUN95	6 95FEC/985/1263
	JULY QUARTERLY - AMENDMENT	5,052	11,200	1APR95 -30JUN95	6 95FEC/106/2357
	1 ST LETTER INFORMATIONAL NOTICE			1APR95 -30JUN95	2 96FEC/129/3036
	OCTOBER QUARTERLY	10,136	7,475	1JUL95 -30SEP95	5 95FEC/106/2352
	1 ST LETTER INFORMATIONAL NOTICE			1JUL95 -30SEP95	3 96FEC/129/3038
	YEAR-END	7,608	6,500	1OCT95 -31DEC95	5 96FEC/122/2133
	YEAR-END - AMENDMENT	10,066	6,500	1OCT95 -31DEC95	3 96FEC/158/1565
1996	STATEMENT OF ORGANIZATION - AMENDMENT			25MAR96	2 96FEC/136/1663
	MISCELLANEOUS NOTICE FROM FEC			16AUG96	2 96FEC/173/3319
	MISCELLANEOUS REPORT TO FEC			27OCT96	3 96FEC/121/2870
	APRIL QUARTERLY	5,978	5,700	1JAN96 -31MAR96	5 96FEC/158/1560
	APRIL QUARTERLY - AMENDMENT	6,000	5,700	1JAN96 -31MAR96	3 96FEC/176/3720
	* APRIL QUARTERLY - AMENDMENT	6,000	5,700	1JAN96 -31MAR96	6 97FEC/188/3259
	NOTICE OF FAILURE TO FILE			1JAN96 -31MAR96	2 96FEC/149/2674
	REQUEST FOR ADDITIONAL INFORMATION			1JAN96 -31MAR96	2 96FEC/170/1609
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN96 -31MAR96	3 96FEC/172/2483
	JULY QUARTERLY	8,632	9,200	1APR96 -30JUN96	6 96FEC/176/3714
	JULY QUARTERLY - AMENDMENT	8,632	9,200	1APR96 -30JUN96	7 96FEC/127/4169
	* JULY QUARTERLY - AMENDMENT	8,632	9,200	1APR96 -30JUN96	6 97FEC/188/3265
	NOTICE OF FAILURE TO FILE			1APR96 -30JUN96	2 96FEC/171/5441
	1 ST LETTER INFORMATIONAL NOTICE			1APR96 -30JUN96	2 96FEC/125/2965
	OCTOBER QUARTERLY	4,486	2,000	1JUL96 -30SEP96	4 96FEC/119/4429
	OCTOBER QUARTERLY - AMENDMENT	4,486	2,000	1JUL96 -30SEP96	5 97FEC/167/1161
	* OCTOBER QUARTERLY - AMENDMENT	4,486	2,000	1JUL96 -30SEP96	4 97FEC/188/3271
	REQUEST FOR ADDITIONAL INFORMATION			1JUL96 -30SEP96	3 97FEC/164/2747
	POST-GENERAL	8,546	14,900	1OCT96 -25NOV96	6 96FEC/128/3936
	POST-GENERAL - AMENDMENT	8,546	13,800	1OCT96 -25NOV96	7 97FEC/167/3478
	* POST-GENERAL - AMENDMENT	8,546	13,800	1OCT96 -25NOV96	7 97FEC/188/3275
	REQUEST FOR ADDITIONAL INFORMATION			1OCT96 -25NOV96	3 97FEC/164/2750
	YEAR-END	450	1,500	26NOV96 -31DEC96	5 97FEC/180/2802
	YEAR-END - AMENDMENT	450	1,500	26NOV96 -31DEC96	6 97FEC/188/3334
	REQUEST FOR ADDITIONAL INFORMATION			26NOV96 -31DEC96	3 97FEC/185/1636

TOTAL 61,069 0 65,843 0 142 TOTAL PAGES

All Reports have been reviewed except those noted with an asterisk.

Debts and obligations owed to/by the committee as of 12/31/96 : 50

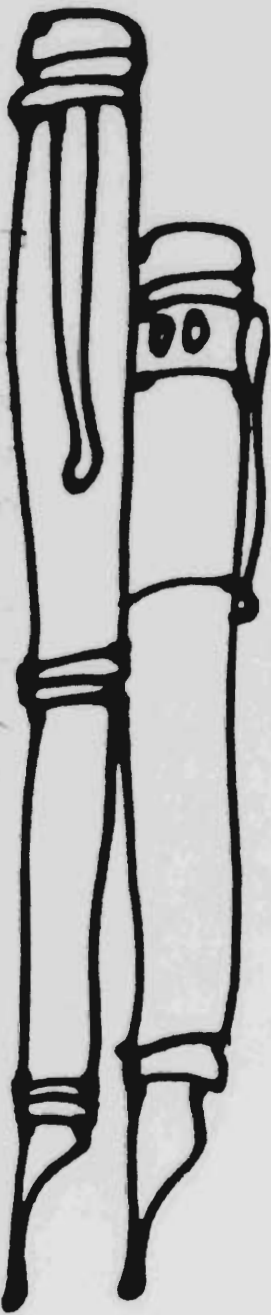
Cash on hand as of 12/31/96: \$13,092

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 22, 1996



REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April Quarterly	01/01/96 - 03/31/96	04/15/96	04/15/96

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in April.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1996 Record.

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee make independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the election day.

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

LABEL

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

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)

PARTIES AND PACS

AFRIL QUARTERLY

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 (except for FEC approved computer generated forms) will be required to refile.

97043844953

FOR INFORMATION, CALL: 800/424-9530 or 202/219-3420



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

RQ-7

May 9, 1996

Susan Drake White, Treasurer
Dyncorp Federal Political Action
Committee (PKA Dynalectron
Corporation Fed PAC)
2000 Edmund Halley Drive, 4th Floor
Reston, VA 22091

Identification Number: C00131383

Reference: April Quarterly Report (1/1/96-3/31/96)

Dear Ms. White:

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 Secretary of the Senate). 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 Deborah Manzano on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

TELECON

ANALYST: Ken Davis (for Debbie Manzano)

CONVERSATION WITH: Susan Drake White

COMMITTEE: Dyncorp Federal Political Action Committee
(C00131383)

DATE: Monday, June 3, 1996

SUBJECT: Failure to Timely File the 1996 April Quarterly Report

On June 3, 1996, Ken Davis, a Reports Analysis Division ("RAD") analyst, called the Committee and spoke to the treasurer, Susan Drake White. The RAD analyst asked the treasurer when the Committee intended to file the 1996 April Quarterly Report with the Commission. Ms. White stated that she just recently took over as treasurer, and that the report would be filed later that week.

97043844955

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

Attachment 5
Page 1 of 2

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

JUN 24 11 35 AM '96

000131383 121094 p250
DAGMAR ELLINGSON / Susan D. White
DYNCORP FEDERAL POLITICAL ACTION
ON COMMITTEE (FKA DYNALECTRON)
2000 EDMUND HALLEY DRIVE 3RD FLOOR
RESTON, VA 22091

2. FEC IDENTIFICATION NUMBER
C00131383

3. ☐ This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

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 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	1/1/96 through 3/31/96		
6. (a) Cash on Hand January 1, 1996			\$13,418.78
(b) Cash on Hand at Beginning of Reporting Period		\$13,418.78	
(c) Total Receipts (from Line 19)		\$ 5,978.98	\$ 5,978.98
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$19,397.28	\$19,397.28
7. Total Disbursements (from Line 30)		\$ 5,700.00	\$ 5,700.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$13,697.28	\$13,697.28
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 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$	
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.			
Type or Print Name of Treasurer Susan D. White			
Signature of Treasurer		Date	
Susan D. White		6/21/96	6/21/96

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 9/93)

Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

☐ Hand Delivered

DATE OF RECEIPT

☐ First Class Mail

POSTMARKED

☒ Registered/Certified Mail

POSTMARKED

6/4/96

☐ No Postmark

☐ Postmark Illegible

☐ Received from the House Office of Records
and Registration

DATE OF RECEIPT

☐ Received from the Senate Office of Public
Records

DATE OF RECEIPT

☐ Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

E.S.

PREPARER

DATE PREPARED

6/24/96

2704384497

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

June 21, 1996

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in July.

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
July Quarterly	04/01/96 - 06/30/96	07/15/96	07/15/96

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1996 Record.

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the election day.

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

LABEL

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

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)

PARTIES AND PACS

JULY QUARTERLY

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 (except for FEC approved computer generated forms) will be required to refile.

3

97043844959

FOR INFORMATION, Call: 800/424-9530 or 202/219-3420



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

RQ-7

August 12, 1996

Susan Drake White, Treasurer
Dyncorp Federal Political Action
Committee (FKA Dynalectron
Corporation FED PAC)
2000 Edmund Halley Drive, 4th Floor
Reston, VA 22091

Identification Number: C00131383

Reference: July Quarterly Report (4/1/96-6/30/96)

Dear Ms. White:

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 Secretary of the Senate). 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 Deborah Manzano on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

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

John D. Gibson
Assistant Staff Director
Reports Analysis Division

27013844900



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MS-J.

AUG 16 1996

Susan Drake White, Treasurer
Dyncorp Federal Political Action
Committee
2000 Edmund Halley Drive, 4th Floor
Reston, VA 22091

Identification Number: C00131383

Reference: 1995-1996 Election Cycle Reports

Dear Ms. White:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. §434(a), by failing to timely file Reports of Receipts and Disbursements. The following is a list of the reports in question.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
April Quarterly (1/1/96-3/31/96)	4/15/96	6/21/96
July Quarterly (4/1/96-6/30/96)	7/15/96	Not Filed

Timely filing is a specific requirement of the Federal Election Campaign Act ("the Act") and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views failure to timely file reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending before the Commission, any additional report which is not submitted in a timely manner by your committee may result in the Commission initiating legal enforcement or audit action.

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Debbie Manzano on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Lisa J. Stolaruk
Chief, Party/Non-Party Branch
Reports Analysis Division

2704844901

REPORT OF RECEIPTS AND DISBURSEMENTSFor Other Than An Authorized Committee
(Summary Page)RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOMAttachment 9
Page 1 of 2

AUG 29 12 04 PM '96

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) DynCorp Federal Political Action Committee		2. FEC IDENTIFICATION NUMBER C00131383
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 2000 Edmund Halley Dr.		
CITY, STATE and ZIP CODE Reston, VA 20191-3436		
3. <input type="checkbox"/> This committee has qualified as a multicandidate committee. (see FEC FORM 1M)		

4. TYPE OF REPORT(a) ☐ April 15 Quarterly Report☒ July 15 Quarterly Report☐ October 15 Quarterly Report☐ January 31 Year End Report☐ July 31 Mid Year Report (Non-election Year Only)☐ Termination Report

Monthly Report Due On:

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

☐ Twelfth day report preceding _____
(Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____
in the State of _____

(b) Is this Report an Amendment?

☐ YES ☒ NO**SUMMARY**

5. Covering Period 4/1/96 through 6/30/96		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6 (a)	Cash on Hand January 1, 1996		\$ 17,176.76
(b)	Cash on Hand at Beginning of Reporting Period	\$ 17,477.26	
(c)	Total Receipts (from Line 19)	\$ 8,632.00	\$ 14,632.50
(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 26,109.26	\$ 31,809.26
7	Total Disbursements (from Line 30)	\$ 9,200.00	\$ 14,900.00
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 16,909.26	\$ 16,909.26
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 202-219-3420
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$	
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.			
Type or Print Name of Treasurer Susan Drake White			
Signature of Treasurer <i>Susan D White</i>			Date 8/27/96

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 5/93)

Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

☐ Hand Delivered

DATE OF RECEIPT

☐ First Class Mail

POSTMARKED

☒ Registered/Certified Mail

POSTMARKED

8-27-76

☐ No Postmark

☐ Postmark Illegible

☐ Received from the House Office of Records
and Registration

DATE OF RECEIPT

☐ Received from the Senate Office of Public
Records

DATE OF RECEIPT

☐ Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

SLB

PREPARER

8-22-76

DATE PREPARED

GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 30, 1996

I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96

III. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16***

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Post-General	10/01/96 - 11/25/96	12/05/96	12/05/96

WHO MUST FILE

Party committees and PACs must follow the above charts in order to determine whether they must file a report 12 days before the general election on November 5 (the Pre-General Report). All Party committees and PACs, regardless of financial activity, must file a report 30 days after the general election (the Post-General Election Report).

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

***Committees that made general election contributions or expenditures before October 1 and did not previously report them must also follow Chart II reporting requirements.

(over)

PARTIES AND PACS

PRE/POST GENERAL ELECTION

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures aggregating \$1,000 or more during the period beginning October 17 and ending November 3 must report them within 24 hours.

LABEL

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

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 (except for FEC approved computer generated forms) will be required to refile.

FOR INFORMATION, CALL: 800/424-9530 or 202/219-3420

TELECON

ANALYST: Debbie Manzano

CONVERSATION WITH: Richard Stephenson

COMMITTEE: Dyncorp Federal Political Action Committee
(C00131383)

DATE: Thursday, October 24, 1996

SUBJECT: Failure to Timely File the 1996 July Quarterly Report

On October 24, 1996, Richard Stephenson, PAC Chairman for the Committee, called the analyst. He asked if any legal action would be taken against the Committee for their failure to timely file the 1996 July Quarterly Report. The analyst informed him that these decisions are made on a case-by-case basis, by the Office of General Counsel. Mr. Stephenson requested that a copy of the Chronic Late Filing Notice be faxed to him. He also stated that he would be sending a letter to the Commission, regarding the late reports.

9704384496

DynCorp

Attachment 12

Page 1 of 2

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM
2500 Edmund Helly Drive
Herndon, Virginia 22061-3438
(703) 284-0330
FAX: (703) 284-8800

OCT 27 8 38 AM '96

October 24, 1996

Debbie Manzano
Federal Election Commission
Reports Analysis Division
Washington, DC 20463

Identification Number: C00131383

Dear Debbie,

DynCorp regrets any inconvenience arising from any delayed reporting that has occurred in the past.

I am the PAC Chairman, and also the Corporate Vice President, Technology and Government Relations, so any delinquency or discrepancy is my direct responsibility.

I retired after 35 U.S. Army years (+4 more at West Point, NY) in 1991, came to DynCorp as the strategic planner for the first year. I was capture manager for a \$500 million dollar contract which we won and which effort took about one more year. We reorganized in 1993 and I fell heir to the PAC Chairmanship in 1994.

I believe that we now have a good and viable PAC team, especially including Ms. Susan Drake White as our PAC Treasurer since March 1996.

We now believe we have gotten things under control for an expansion of our program, which we hope to move on to \$100,000/year threshold as soon as possible, obviously in compliance with the law and FEC regulations.

As you will recall our April and July quarterly reports were delayed when we asked for guidance in Susan's first quarterly report exercise when it was discovered that disbursements and receipts should be cleaned up and put into the appropriate quarterly segments. This required going over several past quarterly reports and amending them before the July 1996 report could be updated accurately, as was advised in telephone conversations with you and Susan. It is not our intent to be either late or wrong in the future.

27043844967

On a personal note, Debbie, we all appreciate your help, your counsel and your professionalism. With a bit more coaching, we hope to become one of your unqualified success stories.

You will never see DynCorp on any delinquency or deficiency list again
promise!

*Susan really appreciates
all your help -*

Lee
10/25/96

Sincerely,

Richard E. Stephenson
Richard E. Stephenson

2704844988

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

Attachment 13
Page 1 of 3

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

Nov 25 11 27 AM '96

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) DynCorp Federal Political Action Committee		2. FEC IDENTIFICATION NUMBER C0013183
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 2000 Edmund Halley Dr.		
CITY, STATE and ZIP CODE Reston, VA 20191-3436		
3. <input type="checkbox"/> This committee has qualified as a multicandidate committee. (see FEC FORM 1M)		

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 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
11/5/96 in the State of Virginia & USA

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

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
10/1/96 through 11/25/96		
6 (a) Cash on Hand January 1, 1996		\$ 17,176.76
(b) Cash on Hand at Beginning of Reporting Period	\$ 19,395.60	
(c) Total Receipts (from Line 19)	\$ 8,546.89	\$ 27,665.73
(d) Subtotal: add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B	\$ 27,942.49	\$ 44,842.49
7. Total Disbursements (from Line 30)	\$ 14,900.00	\$ 31,800.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 13,042.49	\$ 13,042.49
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 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$	

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

Type or Print Name of Treasurer

Susan Drake White

Signature of Treasurer

Susan Drake White

Date

11/21/96

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 8-93)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 4 OF 5
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 committee.

NAME OF COMMITTEE (in Full)

DynCorp Federal Political Action Committee

A. Full Name, Mailing Address and ZIP Code Congressman Terry Everett Terry Everett For Congress 4451 Brookfield Corp. Dr. Chantilly, VA 20151-1652	Purpose of Disbursement contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 11/29/96	Amount of Each Disbursement This Period \$1,100.00
B. Full Name, Mailing Address and ZIP Code Congressman Floyd Spence Spence For Congress 4451 Brookfield Corp. Dr. Chantilly, VA 20151-1652	Purpose of Disbursement contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/29/96	Amount of Each Disbursement This Period \$ 500.00
C. Full Name, Mailing Address and ZIP Code Congressman Jim Moran Moran For Congress 5115 Franconia Rd. Alexandria, VA	Purpose of Disbursement contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/29/96	Amount of Each Disbursement This Period \$1,500.00
D. Full Name, Mailing Address and ZIP Code Congressman Chet Edwards Chet Edwards For Congress PO Box 70528 Wash., DC 20024	Purpose of Disbursement contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/29/96	Amount of Each Disbursement This Period \$ 500.00
E. Full Name, Mailing Address and ZIP Code Congressman Joe Skeen Joe Skeen For Congress PO Box 2446 Roswell, NM 88202	Purpose of Disbursement contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 11/5/96	Amount of Each Disbursement This Period \$ 500.00
F. Full Name, Mailing Address and ZIP Code Congressman Frank Wolf Friends of Frank Wolf PO Box 515 The Plains, VA 22171	Purpose of Disbursement contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 11/5/96	Amount of Each Disbursement This Period \$ 500.00
G. Full Name, Mailing Address and ZIP Code Congressman Cinnie Morella Friends of Connie Morella PO Box 5945 Bethesda, MD 20824	Purpose of Disbursement contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 11/5/96	Amount of Each Disbursement This Period \$ 500.00
H. Full Name, Mailing Address and ZIP Code Congressman Tom Davis PO Box 483 Dunn Loring, VA 22027	Purpose of Disbursement contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/8/96	Amount of Each Disbursement This Period \$ 500.00
I. Full Name, Mailing Address and ZIP Code Congressman Steny Hoyer Hoyer For Congress 7905 Malcom Rd., Suite 102 Clinton, MD 20735	Purpose of Disbursement contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/8/96	Amount of Each Disbursement This Period \$1,000.00

SUBTOTAL of Disbursements This Page (optional)

\$6,600.00

TOTAL This Period (last page this line number only)

Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

☐

Hand Delivered

DATE OF RECEIPT

☐

First Class Mail

POSTMARKED

☒

Registered/Certified Mail

POSTMARKED

11/21/96

☐

No Postmark

☐

Postmark Illegible

☐

Received from the House Office of Records
and Registration

DATE OF RECEIPT

☐

Received from the Senate Office of Public
Records

DATE OF RECEIPT

☐

Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

E.S.

PREPARER

11/25/96

DATE PREPARED

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

JUN 25 1997

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD REFERRAL: 97NF-04

DATE ACTIVATED: 5/29/97

STAFF MEMBER: AMANDA RIXSE

SOURCE: INTERNALLY GENERATED

RESPONDENTS Dyncorp Federal Political Action Committee (FKA: Dynalectron Corporation Federal PAC) and Susan Drake White, as treasurer

INTERNAL REPORTS CHECKED Referral Material and Disclosure Reports

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

FEDERAL AGENCIES CHECKED None

I. GENERATION OF MATTER

The Office of General Counsel received a referral from the Reports Analysis Division ("RAD") on March 25, 1997. The basis of the attached referral is the failure of the Dyncorp Federal Political Action Committee (FKA: Dynalectron Corporation Federal PAC) and Susan Drake White, as treasurer (the "Committee"), to file three (3) Reports of Receipts and Disbursements in a timely manner for the 1995-1996 election cycle. Specifically, the Committee failed to timely file its 1996 April and July Quarterly Reports and its 1996 12 Day Pre-General Report.

II. FACTUAL AND LEGAL ANALYSIS

Based on the Factual and Legal Analysis, see Attachment 1, this Office recommends the Commission find reason to believe Dyncorp Federal Political Action Committee and Susan Drake White, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii).

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III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

In addition to recommending that the Commission find reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii), this Office recommends that the Commission offer to enter into conciliation with the Committee prior to a finding of probable cause to believe. Attached for the Commission's approval is a proposed conciliation agreement

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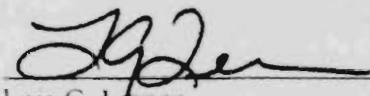
IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe Dyncorp Federal Political Action Committee and Susan Drake White, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached proposed Factual and Legal Analysis and conciliation agreement, and the appropriate letter.

Lawrence M. Noble
General Counsel

6/24/97

Date

BY 
Lois G. Lerner
Associate General Counsel

Attachments

1. Factual and Legal Analysis
2. Proposed Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Dyncorp Federal Political Action
Committee (FKA: Dynalectron
Corporation Federal PAC) and
Susan Drake White, as treasurer.

)
)
)
)
)
)

RAD Referral
#97NF-04

MUR 4655

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election
Commission, do hereby certify that on June 30, 1997, the
Commission decided by a vote of 4-0 to take the following
actions in RAD Referral #97NF-04:

1. Open a MUR.
2. Find reason to believe Dyncorp Federal
Political Action Committee and Susan Drake
White, as treasurer, violated 2 U.S.C.
§ 434(a)(4)(A)(i) and (ii), and enter into
conciliation prior to a finding of probable
cause to believe.
3. Approve the proposed Factual and Legal
Analysis and conciliation agreement, and the
appropriate letter, as recommended in the
General Counsel's Report dated June 24, 1997.

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

Attest:

7-1-97
Date

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

Received in the Secretariat: Wed., June 25, 1997 10:56 a.m.
Circulated to the Commission: Wed., June 25, 1997 4:00 p.m.
Deadline for vote: Mon., June 30, 1997 4:00 p.m.

bjr

97043844976



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 1997

Susan Drake White
Dyncorp Federal Political Action Committee
2000 Edmund Halley Drive
Reston, VA 20191-3436

RE: MUR 4655
Dyncorp Federal Political Action Committee
Susan Drake White, as treasurer

Dear Ms. White:

On July 1, 1997, the Federal Election Commission found that there is reason to believe Dyncorp Federal Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii), 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.

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 additional information, the Commission may find probable cause to believe that violations have 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.

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.

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Susan Drake White
MUR 4655
Page 2

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 Amanda Rixse, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,



Scott E. Thomas
Commissioner

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

9704364498

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Dyncorp Federal Political Action Committee and MUR 4655
Susan Drake White, as treasurer

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2).

The Federal Election Campaign Act of 1971, as amended (the "Act") requires treasurers of political committees, other than authorized committees of a candidate, to file periodic reports of receipts and disbursements. In any calendar year, all political committees that choose to file on a quarterly basis shall file quarterly reports which shall be filed no later than the 15th day after the last day of each calendar quarter, and a year end report which shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(i) and (ii).

The Dyncorp Federal Political Action Committee (the "Committee") is a political committee not authorized by any candidate and has elected to report on a quarterly basis. Pursuant to 2 U.S.C. § 434(a)(4)(A)(i) and (ii), the due date for the Committee's 1996 April Quarterly Report was April 15, 1996, the due date for the Committee's 1996 July Quarterly Report was July 15, 1996, and the due date for the Committee's 1996 12 Day Pre-General Report was October 24, 1996.

The Committee was notified on March 22, 1996 that its 1996 April Quarterly Report was due on April 15, 1996. A Non-Filer Notice was sent to the Committee on May 8, 1996.

informing it that a failure to file the report in a timely manner could result in an audit or legal enforcement action. On June 21, 1996, the Committee filed its 1996 April Quarterly Report, sixty-seven (67) days late, disclosing receipts totaling \$5,978 and disbursements totaling \$5,700.

The Committee was notified on June 21, 1996 that its 1996 July Quarterly Report was due on July 15, 1996. A Non-Filer Notice was sent to the Committee on August 12, 1996, informing it that a failure to file the report in a timely manner could result in an audit or legal enforcement action. On August 27, 1996, the Committee filed its report, forty-three (43) days late, disclosing receipts totaling \$8,632 and disbursements totaling \$9,200.

The Committee was notified on September 30, 1996 that its 12 Day Pre-General Report was due on October 24, 1996. The notification indicated that if the Committee makes general election contributions or expenditures during the period of October 1, 1996 to October 16, 1996, it must file a 12 Day Pre-General Report. In lieu of this Pre-General Report, on November 21, 1996, the Committee filed a 30 Day Post-General Report, encompassing contributions and expenditures from October 1, 1996 to November 25, 1996 and disclosing receipts totaling \$8,546 and disbursements totaling \$13,800. According to the report, the Committee disclosed receipts totaling \$4,010.95 and disbursements totaling \$1,750 that were made between October 1, 1996 and October 16, 1996. The Committee filed the 1996 30 Day Post-General Report twenty-eight (28) days late.

Based on the foregoing, there is reason to believe that Dyncorp Federal Political Action Committee and Susan Drake White, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii).

970484490

DynCorp

2000 Edmund Halley Drive
Reston, Virginia 20191-3436
(703) 264-0330
Fax: (703) 264-8600

JUL 10 2 52 PM '97

July 10, 1997

Federal Election Commission
Washington, DC 20463

Attn: Amanda Rixse

RE: MUR 4655
DynCorp Federal Political Action Committee
Susan Drake White, Treasurer

JUL 10 3 01 PM '97

FEDERAL ELECTION
COMMISSION
OFFICE OF SECRETARY

Dear Ms. Rixse:

As discussed in our telephone conversation this morning, I am requesting an extension of 20 days to respond to this notification. The due date, by my calculations would then be August 14, 1997. It is my intent, however, to bring this to closure as soon as possible.

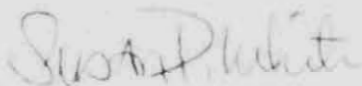
The reasons I am requesting this extension are laid out below:

1. In order to research the files as to the charges, I will have to devote my full time to this exercise. Along with my duties as the PAC Treasurer I am also the only other person in a very busy department working for the Vice President of Technology and Government Relations. As a result, I have other duties that will have to be set aside.
2. I had already arranged for a temp to work in my place starting July 17, 1997 as I will be taking vacation for two weeks which involves financial commitments.

I respectfully request an extension so that I may get this matter resolved with as much accuracy and in as timely a manner as possible.

Thank you for your attention to this matter.

Sincerely,



Susan Drake White
Treasurer, DynCorp PAC





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 11, 1997

Susan Drake White, Treasurer
Dyncorp Federal Political Action Committee
2000 Edmund Halley Drive, 4th Floor
Reston, VA 22091

RE: MUR 4655

Dear Ms. White:

This is in response to your letter dated July 10, 1997, which we received on July 11, 1997, requesting an extension of twenty (20) days until August 14, 1997 to respond to the notification referenced in the above matter. After considering the circumstances presented in your letter, the Office of the General Counsel at the Federal Election Commission has granted the requested extension. Accordingly, your response is due by the close of business on August 14, 1997.

If you have any questions, please contact me at (202) 219-3756.

Sincerely,

A L Rixse
Amanda L. Rixse

97043844982

DynCorp

Cheralyn S. Cameron
Associate Counsel

JUL 21 2 47 PM '97

2000 Edmund Halley Drive
Reston, VA 22091-3436
(703) 264-9149
FAX (703) 264-9147

Internet: cameronc@usva1.dynCorp.com

97-065

July 15, 1997

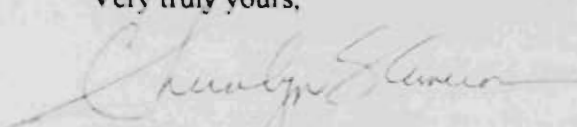
Amanda Rixse
Office of The General Counsel
Federal Election Commission
Washington, DC 20463

RE MUR 4655

Dear Ms Rixse

Enclosed please find the Statement of Designation of Counsel executed by Susan Drake White as Treasurer of DynCorp PAC. Please address any future correspondence or requests for information to my attention at the above address.

Very truly yours,


Cheralyn S. Cameron

CSC kdj

Enclosure



STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL

MUR 4655

JUL 21 2 47 PM '97

NAME OF COUNSEL: Cheralyn Cameron Esq.

ADDRESS: 2000 Edmund Halley Drive
Reston, Virginia 22091

Associate Counsel, DynCorp
TELEPHONE: (703) 264-0149

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

7/15/97
Date

Susan Drake White
Signature

RESPONDENT'S NAME: Susan Drake White

ADDRESS: DynCorp
2000 Edmund Halley Drive
Reston, Virginia 22091

HOME PHONE: _____

BUSINESS PHONE: (703) 264-8726

97043844934



Cheralyn S. Cameron
Associate Counsel

2000 Edmund Halley Drive
Reston, VA 22091-3436
(703) 264-9149
FAX (703) 264-9147

Internet: cameronc@usva1.dyncorp.com

97-079

August 13, 1997

Office of the General Counsel
Federal Election Commission
E Street, N.W.
Washington, D.C. 20463

Re MUR 4655
DynCorp Political Action Committee
Susan Drake White, Treasurer

Dear Sir or Madam:

This response is written on behalf of the DynCorp Federal Political Action Committee in response to the July 7, 1997, Notice of Violation issued by the Federal Election Commission ("Commission"). That notice stated that the Commission found reason to believe that the DynCorp PAC and Susan White as its Treasurer, had violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii) of the Federal Election Campaign Act of 1972 as amended. DynCorp wishes, at this time, to respond to those alleged violations and to provide for the Commission's consideration, both factual background and legal materials it respectfully requests the Commission to consider prior to issuance of a final decision.

As background, the DynCorp PAC has been in existence since the early 1980's. DynCorp takes its responsibilities with regard to its PAC very seriously, especially its obligations to file quarterly and year-end reports under 2 U.S.C. § 434(a)(4)(A)(i) and (ii). To that end, the DynCorp PAC has always, prior to the incidents at issue, filed timely reports. The violations at issue are the result of abrupt personnel changes prompted by illness, that did not allow time for the adequate transitioning of a new treasurer.



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Susan Drake White was sent to DynCorp by a temporary placement agency on March 14, 1996. Ms. White was replacing Dagmar Ellingson who had been the previously designated DynCorp PAC Treasurer. Ms. Ellingson left abruptly on March 14, 1996 on disability leave due to a medical condition. Since the PAC required a Treasurer in order to issue contributions, Ms. White was designated to the Commission as a replacement for Dagmar Ellingson on March 21, 1996, only one week after being placed with DynCorp. Due to her abrupt departure, Ms. Ellingson was unable to provide any training to Ms. White. The Commission did provide literature to Ms. White but given the fact she had assumed many new responsibilities without any transitioning, Ms. White did not have the opportunity to fully understand the literature. Ms. White attempted to obtain guidance from Ms. Ellingson over the phone but due to her illness, Ms. Ellingson was unable to offer any assistance.

The first of the late filings at issue was due April 15, 1996, only one month after Ms. White had been designated as treasurer. The filing covered the period from 1/1/96 to 3/31/96. The Commission apparently sent a notice to PAC treasurers during March reminding them of the April reporting requirement but Ms. White did not receive such notice. When Ms. White received a Notice of Non Filing on May 8, 1996, she immediately called her point of contact at the Commission, Ms. Deborah Manzano. During their phone conversation Ms. White explained to Ms. Manzano that she was new and that she had attempted the filing but was concerned that some last quarter 1995 contributions not actually received until 1996 were not properly accounted. Ms. White explained that it would take her some time to retrace the payment receipts to the proper quarters. Ms. Manzano left Ms. White with the impression that correct accounting was more important than timely filing and that she understood Ms. White's concerns. Ms. White completed her review of the accounts and submitted the April filing on June 21, 1996.

By coincidence, the Commission sent out reminders for second quarter filings on June 21, 1996, the same day Ms. White filed her first quarter report. Ms. White never received such notice and was accordingly surprised when on August 12, 1996, she received a Notice of Non Filing for the second quarter covering the period from 4/1/96 to 6/30/96. Ms. White immediately contacted Ms. Manzano and told her that she would complete and file her report. Again, Ms. Manzano was understanding and told Ms. White to file as soon as possible. The second quarter report was subsequently filed on August 27, 1996.

The final two filings at issue are only required in election years. These are the Pre General and Post General reports which were due to be filed on October 24, 1996, and December 5, 1996, respectively. On October 24, 1996, Ms. White and the DynCorp PAC Chairman, Richard Stephenson, who is also Vice President of Technology and Government Relations, jointly called Ms. Manzano. Both Mr. Stephenson and Ms. White expressed their concerns about missing filing deadlines and the fact they required, and very much appreciated the Commission's assistance through Ms. Manzano. Mr. Stephenson wrote a follow-up letter to Ms. Manzano on October 24, 1997, in which he again

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explained the reason for late filing, expressed his gratitude for Ms. Manzano's guidance and closed with "You will never see DynCorp on any delinquency or deficiency list again... promise!" After the call both Mr. Stephenson and Ms. White believed DynCorp was in compliance. This belief was misplaced because at the point of the phone conversation DynCorp was already late in filing its Pre General report. Ms. Manzano made no reference to a report being due the very day of the phone conversation. As a result of Ms. White's confusion, instead of filing two reports to cover Pre and Post general transactions Ms. White filed one report on November 21, 1997, which was twenty eight (28) days late for the Pre General report and fourteen (14) days too early for Post General report. All subsequent filings are current, accurate and timely filed.

The above scenario reflects a PAC Treasurer who was desperately trying to comply with her new responsibilities. When Ms. White received Notices of Non Filing, she immediately contacted Ms. Manzano at the Commission to discuss appropriate resolution. The Notices of Non Filing state in pertinent part that "Although the Commission may initiate an audit or legal enforcement, your prompt response and letter of explanation will be taken into consideration". Ms. White believed that her phone conversations during which she explained her problems with filing, were sufficient to show a good faith compliance with the filing requirements. As Ms. White explained, she was trying to produce accurate reports which, unfortunately, required more time because she had no training. Ms. White believed, through her conversations with Ms. Manzano, that the additional time was being informally granted on behalf of the Commission.

DynCorp also wishes to point out that the late filings were not done intentionally. They were not done late to avoid disclosure of large contributions or to hide data from the Commission. The DynCorp PAC is a relatively modest entity that makes ordinary course contributions to its local area representatives. The late filings resulted from lack of transitional training. Unfortunately, Ms. White never received adequate training prior to assuming her duties. DynCorp is ultimately responsible for this lack of training but as previously addressed, through the years DynCorp has diligently complied with all reporting requirements. Unfortunately in the instant situation, due to circumstances involving emergency medical leave, Ms. White did not receive training.

Very truly yours,

Cheralyn S. Cameron
Cheralyn S. Cameron

Enclosures: As Stated

AFFIDAVIT OF
SUSAN DRAKE WHITE

I, Susan Drake White of full age, certify under oath and state as follows:

1 I was called by a temporary agency and assigned to DynCorp, where I began the afternoon of March 14, 1996. I was hired to provide administrative support to Richard Stephenson, the Vice President for Technology and Government Relations.

2 As part of my responsibilities, I was designated as treasurer of the DynCorp Federal Political Action Committee on March 21, 1996.

3 The Federal Election Commission provided me with a copy of Volume 11 of the Code of Federal Regulations as a reference manual for my obligations as treasurer. I reviewed the material briefly, but was constrained due to all the new responsibilities I had assumed since March 14, 1996.

4 I was unaware that I was not in compliance with my treasurer responsibilities until I received a May 8, 1996 Notice of Non Filing. Upon receipt of the notice, I immediately called my contact at the Federal Election Commission ("Commission"), Deborah Manzano. During that phone conversation, I explained my concern that, based on the records I had, some disbursements and receipts were not accounted for in proper quarters. In particular, I was concerned with last quarter 1995 contributions received in 1996. I explained to Ms. Manzano that I needed to research the files to correct the problem. Ms. Manzano was understanding and from our conversation I believed that correct filings were more important than timely filings. There was no discussion about future reports.

5 I filed the first quarter report due April 15, 1996 on June 21, 1996.

6 On August 12, 1996, I received a Second Notice of Non Filing for the second quarter which was apparently due on July 15, 1996. I later discovered from Ms. Manzano that notices of filing deadlines were sent, but I didn't receive copies of these notices until Ms. Manzano faxed them to me on July 11, 1997.

7 After receipt of the August 12, 1996 Notice, I immediately called Ms. Manzano. I again explained that I was still experiencing difficulty with accounting for prior contributions. Ms. Manzano asked me to file as soon as possible. I filed the July quarterly report on August 27, 1996.

8 On October 24, 1996, I had a phone conversation with Ms. Manzano and Dick Stephenson, my immediate supervisor, concerning the fact that the first two quarterly reports were not filed in a timely manner. Mr. Stephenson and I were concerned with proper compliance. At no time during the phone conversation did Ms. Manzano state that a filing was due that very day because it was a general election year. After the call ended, both

Mr. Stephenson and I believed we were in compliance, and my next filing would be due for the third quarter

9 I was not aware that in general election years a Pre-General and Post General filing was due. I filed what I believed to be the third quarter report covering these same periods on November 21, 1996 and have made timely filings since

10 During all my conversations with Ms. Manzano, she never mentioned the possibility of a fine or formal violation proceeding. Ms. Manzano was always very helpful and responded to my concerns with filing late by telling me to file as soon as I could work out the discrepancies. From these discussions, I believed that the late filings were acceptable to the Commission.

I, Susan Drake White, certify that the foregoing statements made by me are true and correct. I am aware that if any of the preceding statements made by me are willfully false, I am subject to punishment

Susan Drake White
Susan Drake White

Commonwealth of Virginia)
County of Fairfax) ss

Subscribed and sworn before me this 14 day of August, 1997

Kathleen M. Jones
Kathleen M. Jones

My Commission expires April, 30, 1998

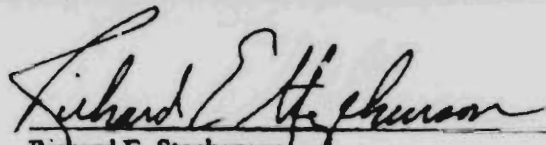
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AFFIDAVIT OF
RICHARD E. STEPHENSON

I, Richard E. Stephenson, of full age, certify under oath and state as follows:

- 1 I am the Vice President of Technology and Government Relations at DynCorp.
- 2 Part of my job responsibilities for DynCorp include Chairman of the DynCorp Federal Political Action Committee ("PAC"). I assumed this responsibility in 1994. At that time, Dagmar Ellingson, my administrative assistant performed the duties of PAC treasurer. Ms. Ellingson had been trained in her responsibilities by the prior treasurer Barbara Geisler. I did not have daily involvement in those duties and Ms. Ellingson made the required PAC filings without my involvement.
- 3 On March 13, 1996, Ms. Ellingson left on medical disability. On the afternoon of March 14, 1996, the temporary employment agency sent Susan Drake White to provide administrative assistance while Ms. Ellingson was on disability.
- 4 Since the PAC required a designated treasurer to function, I suggested Susan White request designation as PAC treasurer which she did on March 21, 1996.
- 5 When Ms. White received the First Notice of Non Filing, she informed me that she had apparently missed a filing deadline, but had called her Commission contact person, Deborah Manzano, and discussed the problems she was encountering with accounting for contributions. Ms. White relayed that during their conversation she received the impression that Ms. Manzano understood her problems and requested the filing be made as soon as possible.
- 6 When Ms. White received a Notice of Non Filing for the second quarter, she also informed me, and I understood that she was having difficulty researching filing issues. Ms. White relayed that she had spoken to Ms. Manzano and she had asked Ms. White to file as soon as possible.
- 7 On October, 24, 1996, Ms. White and I jointly placed a call to Ms. Manzano. I was concerned that we had been experiencing difficulty in filing in a timely manner and I wanted to thank Ms. Manzano for her guidance and assure her that we finally had things under control. I had no idea when I wrote my follow-up letter (see Attachment I to affidavit) that we had missed the Pre General filing for that very day. I specifically asked Ms. Manzano during our conversation what the worst that can result from late filings because I was concerned about our prior filings. Ms. Manzano stated that the Commission might issue a reprimand.
- 8 Ms. Manzano made no mention of the general election filings that were due on the very day we spoke, October 24, 1996.
- 9 All DynCorp PAC filings are current since these delinquent filings in 1996.

I, Richard E. Stephenson, certify that the foregoing statements made by me are true and correct. I am aware that if any of the preceding statements made by me are willfully false, I am subject to punishment.


Richard E. Stephenson

Commonwealth of Virginia)
County of Fairfax) ss:

Subscribed and sworn before me this ____ day of August, 1997.

Kathleen M. Jones

My Commission expires: April, 30, 1998

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Oct 21 1997

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

MUR 4655

SENSITIVE

Dyncorp Federal Political Action)
Committee and Susan Drake White,)
as treasurer)

GENERAL COUNSEL'S REPORT

I. **BACKGROUND**

Attached is a conciliation agreement which has been signed by David L. Reichardt, counsel for Dyncorp Federal Political Action Committee and Susan Drake White, as treasurer ("Respondents"). The attached agreement contains no changes from the agreement approved by the Commission on June 30, 1997. Attachment 2. A copy of the check in payment for the civil penalty is also attached. Attachment 3.

II. **RECOMMENDATIONS**

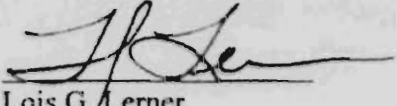
1. Accept the attached conciliation agreement with Dyncorp Federal Political Action Committee and Susan Drake White, as treasurer.
2. Close the file.

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3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

10/23/97
Date


BY: Lois G. Lerner
Associate General Counsel

Attachments:

1. Response to Reason to Believe Findings dated 8/13/97
2. Signed Conciliation Agreement dated 9/29/97
3. Photocopy of civil penalty check

Staff Assigned: Tamara K. Kapper

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Dyncorp Federal Political Action) MUR 4655
Committee and Susan Drake White,)
as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 29, 1997, the Commission decided by a vote of 4-0 to take the following actions in MUR 4655:

1. Accept the conciliation agreement with Dyncorp Federal Political Action Committee and Susan Drake White, as treasurer, as recommended in the General Counsel's Report dated October 23, 1997.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated October 23, 1997.

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

Attest:

10-29-97
Date

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

Received in the Secretariat: Fri., Oct. 24, 1997 10:56 a.m.
Circulated to the Commission: Fri., Oct. 24, 1997 12:00 p.m.
Deadline for vote: Wed., Oct. 29, 1997 4:00 p.m.

lrd

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 5, 1997

Cheralyn S. Cameron, Associate Counsel
Dyncorp Federal Political Action Committee
2000 Edmund Halley Drive
Reston, VA 22091-3436

RE: MUR 4655
Dyncorp Federal Political Action
Committee Susan Drake White,
treasurer

Dear Ms. Cameron:

On October 29, 1997, the Federal Election Commission accepted the signed conciliation agreement and civil penalty that you submitted on behalf of Dyncorp Federal Political Action Committee and Susan Drake White, as treasurer, in settlement of violations of 2 U.S.C. § 434(a)(4)(A)(i) and (ii), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

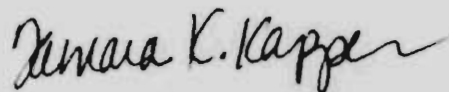
Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

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Ms. Cameron, Esq.
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files.
If you have any questions, please contact me at (202) 219-3690.

Sincerely,



Tamara K. Kapper
Paralegal Specialist

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Dyncorp Federal Political Action Committee)
and Susan Drake White, as treasurer)

MUR 4655

Oct 6 1 21 PM '91

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 Dyncorp Federal Political Action Committee and Susan Drake White, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii).

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

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

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

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

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

1. Dyncorp Federal Political Action Committee is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Susan Drake White is the current treasurer of Dyncorp Federal Political Action Committee.

3. Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), Respondents' 1996 April Quarterly Report was due on April 15, 1996. Respondents filed their 1996 April Quarterly Report on June 21, 1996, sixty-seven (67) days late, disclosing receipts totaling \$5,978 and disbursements totaling \$5,700.

4. Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), Respondents' 1996 July Quarterly Report was due on July 15, 1996. Respondents filed their 1996 July Quarterly Report on August 27, 1996, forty-three (43) days late, disclosing receipts totaling \$8,632 and disbursements totaling \$9,200.

5. Pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), Respondents' 1996 12 Day Pre-General Report was due on October 24, 1996. Respondents filed their 1996 30 Day Post-General Report, encompassing contributions and expenditures that should have been contained in a 1996 12 Day Pre-General Report, on November 21, 1996. The 1996 30 Day Post-General Report was twenty-eight (28) days late, disclosing for the period of October 1, 1996 through November 25, 1996 receipts totaling \$8,546 and disbursements totaling \$13,800. The contributions and expenditures that should have been included in a separate 1996 12 Day Pre-General Report include receipts totaling \$4,010.95 and disbursements totaling \$1,750.

V. Respondents failed to timely file their 1996 April and July Quarterly Reports and their 1996 12 Day Pre-General Report in violation of 2 U.S.C. § 434(a)(4)(A)(i) and (ii).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of one thousand eight hundred dollars (\$1,800), 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

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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.

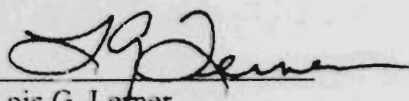
IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

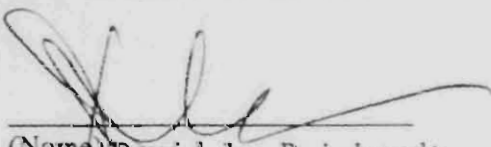
BY:


Lois G. Lerner
Associate General Counsel

Date

11/5/97

FOR THE RESPONDENTS:


(Name) David L. Reichardt
(Position) Sr. VP and General Counsel
DynCorp

Date

9/29/97
September 29, 1997

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4655

DATE FILMED 11-24-97 CAMERA NO. 2

CAMERAMAN Jm13

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