



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20563

THIS IS THE END OF TUB # 1632

Date Filmed 7/10/84 Camera No. --- 1

Cameraman JRL

9404046319

FEDERAL ELECTION COMMISSION

Extra
copies

12 Day Report and Comment Sheets

All Routing Slips

Documents relating to Conciliation including
General Counsel's Report recommending
pre-probable cause conciliation and General
Counsel's Report recommending acceptance of conciliatory agreement

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act; 5 U.S.C. Section 552(b):

- (1) Classified Information
- (2) Internal rules and practices
- (3) Exempted by other statute 2 U.S.C. § 437g(a)(4)(B)
- (4) Trade secrets and commercial or financial information
- (5) Internal Documents
- (6) Personal privacy
- (7) Investigatory files
- (8) Banking Information
- (9) Well Information (geographic or geophysical)

Signed M. Tanant
date 7/3/84

34040463319



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 22, 1984

Thomas C. Spring, Esquire
1756 N Street, N.W.
Washington, D.C. 20036

Re: MUR 1632
Women's Action for Nuclear Disarmament
Linda L. Rounds, Treasurer

Dear Mr. Spring:

On June 19, 1984, the Commission accepted the conciliation agreement signed by you on behalf of your clients, and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in cursive script, appearing to read "Kenneth A. Gross".

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

34040465320

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Women's Action for Nuclear) MUR 1632
Disarmament)
Linda L. Rounds, Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 19, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1632:

1. Accept the conciliation agreement submitted with the General Counsel's Report signed June 14, 1984.
2. Close the file.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

6-19-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

6-14-84, 1:31
6-15-84, 2:00

34040463321

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Women's Action for Nuclear) MUR 1632
Disarmament)
Linda L. Rounds, Treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Women's Action for Nuclear Disarmament ("WAND") and Linda L. Rounds, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a) (4) (A) by failing to file six reports in a timely manner.

NOW, THEREFORE, the Commission and 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. Respondent, WAND, is a political committee within the meaning of 2 U.S.C. § 431(4) (A).

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2. On April 26, 1982, WAND filed a statement of organization amendment naming Linda L. Rounds as treasurer.

3. Pursuant to 2 U.S.C. § 434(a)(4)(A), a political committee filing quarterly reports in a calendar year in which a regularly scheduled general election is held is required, through its treasurer, to file such reports no later than the 15th day after the last day of each calendar quarter: except that the report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year. In addition, the committee is required, through its treasurer, to file a pre-election report no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. In any other calendar year, the committee is required, through its treasurer, to file a mid-year report no later than July 31 and a year end report no later than January 31 of the following calendar year.

4. WAND's 1981 Mid-Year report was required to be filed on July 31, 1981. WAND filed its 1981 Mid-Year report on August 13, 1981, which was 13 days late.

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5. WAND's 1981 Year End report was required to be filed on January 31, 1982. WAND filed its 1981 Year End report on April 19, 1982, which was 78 days late.

6. Respondents' 1982 April Quarterly report was due on April 15, 1982. Respondents filed their 1982 April Quarterly report on April 26, 1982, which was 11 days late.

7. Respondents' 1982 October Quarterly report was required to be filed on October 15, 1982. Respondents filed their 1982 October Quarterly Report on November 3, 1982, which was 19 days late.

8. Respondents' 1982 12 Day Pre-General Election report (covering the period 10/1/82 - 10/13/82) was required to be filed on October 21, 1982. Respondents filed a 1982 30 Day Post General Election report, covering the period in question, on December 6, 1982, which was 46 days later.

9. Respondents' Year End report was required to be filed on January 31, 1983. Respondents filed their 1982 Year End report, which was also marked as a Termination report, on February 7, 1983, which was 7 days late.

V. Respondents' failure to comply with the reporting requirements of 2 U.S.C. § 434(a)(4)(A) is a violation of this section.

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VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Six Hundred Dollars (\$600), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matter 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.

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

X. Respondents shall have no more than thirty (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.

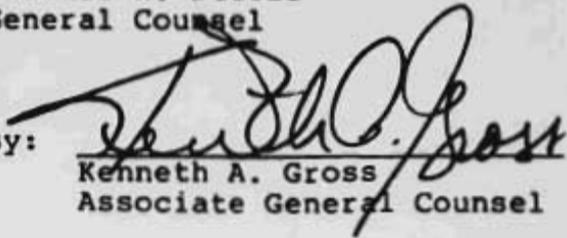
XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or

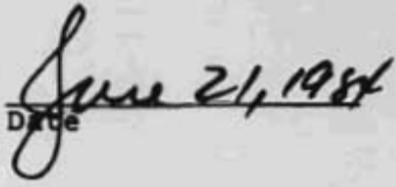
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oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

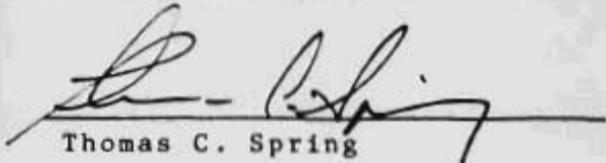
FOR THE COMMISSION:

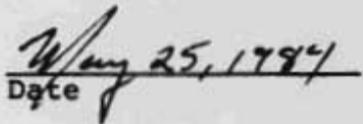
Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel


Date

FOR THE RESPONDENTS:


Thomas C. Spring


Date

94040463326

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Women's Action For Nuclear Disarmament, Inc.
P.O. BOX 153 NEW TOWN BRANCH
BOSTON, MA. 02258

DATE	INVOICE	AMOUNT

63-80
113 07

946

PAY Six hundred and 00/100 DOLLARS

TIME WHEN PAID	DATE	TO THE ORDER OF	GROSS AMOUNT	INCOME TAX	SOC. SEC.	STATE TAX	NET AMOUNT
	5/21/84	Treasurer of the United States					600.00

DESCRIPTION

BAYBANK HARVARD TRUST COMPANY
MASSACHUSETTS

Diane J. Brown

⑆011300605⑆ 815 28 14 0⑆

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 1632
Women's Action for Nuclear)	
Disarmament)	
Linda L. Rounds, Treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 1, 1984, the Commission decided by a vote of 4-0 to take the following actions in MUR 1632:

1. Enter into pre-probable cause conciliation with WAND and Linda L. Rounds.
2. Approve the conciliation agreement as submitted with the General Counsel's Report signed April 26, 1984.
3. Approve and send the letter attached to the General Counsel's Report signed April 26, 1984.

Commissioners Elliott, Harris, McGarry and Reiche voted affirmatively in this matter; Commissioners Aikens and McDonald did not cast a vote.

Attest:

5-1-84
Date

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

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

4-26-84, 5:25
4-27-84, 2:00

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GCC# 1992

LAW OFFICES
THOMAS C. SPRING
1756 N STREET, N. W.
WASHINGTON, D. C. 20036
(202) 296-2560

*Mur 1632
Tarrant*

March 30, 1984

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

MAR 30 P 2:04

Attn: Ms. Marybeth Tarrant

Re: Women's Action for Nuclear Disarmament
Linda L. Rounds
Matter Under Review 1632

Dear Mr. Steele:

On behalf of Women's Action for Nuclear Disarmament (the "Committee") and Linda L. Rounds, the Committee's Treasurer, I am submitting this letter in the above-captioned Matter Under Review. This Matter involves the late filing of six reports required by the Federal Election Campaign Act (the "Act").

A Statement of Designation of Attorney authorizing me to represent the Committee in this Matter is on file with your office. All future notifications and other communications with respect to this Matter should be directed to me.

The Committee and Ms. Rounds respectfully request the

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Charles N. Steele, Esquire
Federal Election Commission
March 30, 1984
Page 2

Commission to find that best efforts were exercised in filing the six reports in question and that they are in compliance with the Act. Alternatively, they request that the Commission enter into negotiations for reaching a conciliation agreement prior to a finding of probable cause to believe that a violation has occurred.

Factual Background

The Committee was formed in mid-1980 by a group of women living in the Boston area who wanted to act politically in support of nuclear disarmament policies and programs. During the period in question, the Committee's activities were carried out in the most part by an informal group of women who volunteered their services whenever they had time. Most had families, and many even had full-time or part-time jobs. The Committee did not have paid staff personnel until May 1982, almost two years after the women first started meeting.

Janice Trickett served as the Committee's first Treasurer during its organizational period as a part-time volunteer. In this start-up period, she spent much of her time on organizing and on bringing women together. She was not experienced in

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Charles N. Steele, Esquire
Federal Election Commission
March 30, 1984
Page 3

accounting or in filing financial reports.

Ms. Trickett was responsible for filing the first report in question.*/ When she resigned in late November 1981 due to responsibilities at home (her two children were about 5 and 13 years old), it was discovered that she had failed to keep the books up-to-date for several months and had not left any instructions on how she had set up the accounts.

Dorothy Cahill, the Committee's Secretary (again, a part-time volunteer and mother of two small boys) agreed to help out as Treasurer until someone more familiar with accounting could take over the Committee's books. Due to her lack of an accounting background, she had to be assisted by a bookkeeper friend in preparing the second report in question, which was based on books that had been within Ms. Trickett's

*/ The six reports in question are:

<u>Report</u>	<u>Due Date</u>	<u>Days Late</u>
Mid-Year	7/31/81	15
Year End	1/31/82	78
April Quarterly	4/15/82	11
October Quarterly	10/15/82	19
12 Day Pre-General	10/21/82	46
Year End Termination	1/31/83	7

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Charles N. Steele, Esquire
Federal Election Commission
March 30, 1984
Page 4

responsibility.

Ms. Rounds, who had no previous connection with the Committee, was asked to join and serve as Treasurer and up-date the Committee's books. Ms. Rounds had the financial expertise the Committee needed - a Masters in Business Administration from Harvard University and and four years experience as Assistant Director for Finance for the Massachusetts Institute of Technology's three Health Plans. She agreed to volunteer on a part-time basis only since her full-time job demanded 60 to 70 hours a week.

Ms. Rounds was not experienced with election law and began learning the requirements of the Act by reading the Campaign Guide. However, she overlooked the specialized "filing by mail" requirements and erroneously assumed, throughout the period in question, that election law filing requirements paralleled IRS requirements - that FEC reports would be deemed filed when delivered to the U.S. Postal Service.

Ms. Rounds filed the third report in question - the first report due while she was Treasurer - as soon as she finished the accounting for the pertinent period. The 11-day delay

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Charles N. Steele, Esquire
Federal Election Commission
March 30, 1984
Page 6

November 22, 1982) by first class mail on December 1, 1982.

Importantly, this report would have been timely filed had it been the required report and mailed by certified or registered mail.

The final report in question was filed with the Commission by first class mail on January 31, 1983, the normal filing deadline. It too would have been timely filed had she mailed it by registered or certified mail.

* * *

Ms. Rounds made a highly conscientious and professional effort to comply with the Federal Election Campaign Act. In order to ensure the accuracy of the reports she filed, she went back and made a complete audit of all the Committee's books and amended every report her predecessors had filed. This effort required a substantial amount of her time, in addition to the normal heavy workload of her full-time job. Her only actual errors were to file a 30-Day Report instead of a 12-Day Report and to assume that filing occurred when the report was placed

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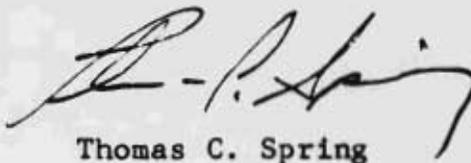
Charles N. Steele, Esquire
Federal Election Commission
March 30, 1984
Page 7

in a mailbox.

The Committee and Ms. Rounds believe her performance meets the "best-efforts" standard in Federal Election Regulations section 114.7(a)(i), which provides that a report will be deemed in compliance with the Act if "best efforts have been used to obtain, maintain and submit the information required by the Act."

The Committee and Ms. Rounds respectfully request the Commission to find that best efforts have been exercised in submitting the reports in question and that the Committee and Ms. Rounds are not in violation of the Act. Alternatively, the Committee and Ms. Rounds submit that the facts described above are extenuating and request the Commission to enter into negotiations for reaching a conciliation agreement prior to a finding of probable cause.

Respectfully submitted,


Thomas C. Spring

cc: Ms. Linda L. Rounds

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LAW OFFICES
THOMAS C. SPRING
1756 N STREET, N.W.
WASHINGTON, D.C. 20036

To
Charles H. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Ms. Marybeth Tarrant



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 16, 1984

H. Richard Mayberry, Jr., Esquire
Suite 960
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1632 ·
Women's Action for
Nuclear Disarmament
Linda Rounds, Treasurer

Dear Mr. Mayberry:

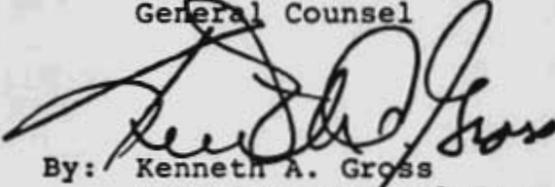
This is in reference to your letter dated March 14, 1984, requesting an extension of 30 days to respond to the Commission's notice that it has reason to believe that your clients have violated the Act.

Considering the Commission's responsibilities to act expeditiously and the circumstances of this matter, your request for an extension will be granted only until March 30, 1984.

If you have any questions, please contact Marybeth Tarrant, the staff member handling this matter at 523-4529.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

8404046337



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

H. Richard Mayberry, Jr., Esquire
Suite 960
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1632
Women's Action for
Nuclear Disarmament
Linda Rounds, Treasurer

Dear Mr. Mayberry:

This is in reference to your letter dated March 14, 1984, requesting an extension of 30 days to respond to the Commission's notice that it has reason to believe that your clients have violated the Act.

Considering the Commission's responsibilities to act expeditiously and the circumstances of this matter, your request for an extension will be granted only until March 30, 1984.

If you have any questions, please contact Marybeth Tarrant, the staff member handling this matter at 523-4529.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8404046338

LAW OFFICES
H. RICHARD MAYBERRY, JR.
SUITE 990
1325 NEW HAMPSHIRE AVENUE, N.W.
WASHINGTON, D.C. 20036
AREA CODE 202 822-8822

RECEIVED
GENERAL COUNSEL

14 MAR 14 8 41 34

EOC # 1873

Mur 1632
Tarrant

March 14, 1984

VIA MESSENGER

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attn: Ms. Marybeth Tarrant

Re: MUR 1632--REQUEST FOR ENLARGEMENT OF TIME
FOR RESPONDENT'S REPLY

Dear Mr. Steele:

We respectfully request a 30-day enlargement of the period during which Women's Action for Nuclear Disarmament may demonstrate that no further action should be taken in this compliance action.

This firm was retained on March 13, 1984. The additional time is needed to be able to familiarize ourselves with the facts, to advise our client and to research and prepare a response to the allegations of the complaint.

Thank you in advance for your anticipated cooperation.

Sincerely,

H. Richard Mayberry Jr.
H. Richard Mayberry, Jr.

HRM:jb

Enclosure: Statement of Designation of Counsel

cc: Diane D. Aronson
Linda Rounds
Thomas C. Spring, Esquire

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LAW OFFICES
H. RICHARD MAYBERRY, JR.
SUITE 960
1333 NEW HAMPSHIRE, N.W.
WASHINGTON, D.C. 20036

TELEPHONE (202) 822-9822

TO:

VIA CENTRAL DELIVERY COURIER

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
7th Floor
1325 K Street, N.W.
Wash., D.C. 20463



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 23, 1984

Linda Rounds, Treasurer
Women's Action for Nuclear Disarmament
691 Massachusetts Avenue
Arlington, Massachusetts 02791

Re: MUR 1632

Dear Ms. Rounds:

On February 21, 1984, the Federal Election Commission determined that there is reason to believe that the Women's Action for Nuclear Disarmament ("the Committee") and you, as treasurer of the Committee, have violated 2 U.S.C. § 434(a) (4) (A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by not timely filing reports. The General Counsel's 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 you and the Committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you and the Committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe, if you so desire. See 11 C.F.R. § 111.18(d).

If you and the Committee 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 a statement authorizing such counsel to receive any notifications and other communications from the Commission.

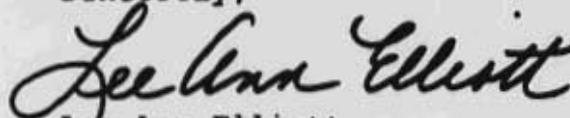
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Letter to Linda Rounds
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you and the Committee 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 Marybeth Tarrant, the staff member assigned to this matter, at 202-523-4057.

Sincerely,



Lee Ann Elliott
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

94040463343

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1632
STAFF MEMBER(S) & TEL. NO.
Marybeth Tarrant
202-523-4057

RESPONDENTS Women's Action for Nuclear
Disarmament
Linda Rounds, Treasurer

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

SUMMARY OF ALLEGATIONS

Women's Action for Nuclear Disarmament ("WAND") and Linda Rounds, as treasurer, failed to file six (6) reports during the 1981-1982 election cycle in a timely manner in violation of 2 U.S.C. § 434(a)(4)(A). The reports ranged between 11 and 78 calendar days late as demonstrated by the following chart:

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year 1/ (4/1/81-6/30/81)	7/31/81	8/13/81
Year End (7/1/81- 12/31/81)	1/31/82	4/19/82
April Quarterly (1/1/82-3/31/82)	4/15/82	4/26/82
October Quarterly (7/1/82-9/30/82)	10/15/82	11/03/82
12 Day Pre-General 2/ (10/1/82-10/13/82)	10/21/82	12/06/82
Year End Termination (11/23/82-12/31/82)	1/31/83	2/07/83

1/ A 1981 April Quarterly Report, which covered activity from January 1, 1981 - March 31, 1981, was filed on April 21, 1981.

2/ WAND filed a 30 Day Post-General Election report which included the pre-election period.

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FACTUAL BASIS AND LEGAL ANALYSIS

A Request for Additional Information was sent by the Reports Analysis Division on September 14, 1983, requesting an explanation concerning the late filing of reports. WAND's response, received on October 4, 1983, stated that the treasurer was a volunteer, and unfamiliar with the requirements of the Act and Regulations. The letter also stated that WAND had terminated, and started up a new committee with a different organizational structure. 3/

Pursuant to 2 U.S.C. § 434(a)(4)(A), a political committee filing quarterly reports in a calendar year in which a regularly scheduled general election is held is required, through its treasurer, to file such reports no later than the 15th day after the last day of each calendar quarter: except that the report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year. In addition, the committee is required, through its treasurer, to file a pre-election report no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. In any other calendar year, the committee is required, through its

3/ On September 21, 1983, the Women's Action for Nuclear Disarmament, a citizen's organization, Inc., Political Action Committee ("WAND-PAC") filed a statement of organization. Linda Rounds is the designated treasurer. On January 26, 1984, WAND-PAC filed its 1983 Year End Report.

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treasurer, to file a mid year report no later than July 31 and a year end report no later than January 31 of the following calendar year.

In view of the fact that the committee has continually failed to file its reports in a timely manner, and that its financial activity during the 1981-82 election cycle was substantial (\$112,354 in receipts and \$114,059 in disbursements), we recommend that the Commission open a MUR and find reason to believe that reporting violations occurred.

The explanation offered by the committee with respect to its late filing is an insufficient defense in light of the number of reports involved.

34040463346



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

84 FEB 23 P 1: 43

February 23, 1984

SENSITIVE

MEMORANDUM TO: The Commission
FROM: Charles N. Steele
General Counsel
By: Kenneth A. Gross
Associate General Counsel *KAG*
SUBJECT: RAD Referral 84NF-14

On February 21, 1984 the Commission approved the recommendation that the subject RAD Referral be made a MUR. Therefore, all documents which had previously been identified as RAD Referral 84NF-14 should now become MUR 1632.

Attachment
Copy of Certification

34040463347

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
Women's Action for Nuclear)	RAD Referral #84NF-14
Disarmament)	
Linda Rounds, Treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 21, 1984, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral #84NF-14:

1. Open a MUR.
2. Find reason to believe that the Women's Action for Nuclear Disarmament and Linda Rounds, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).
3. Approve the letter and analysis as attached to the First General Counsel's Report dated February 16, 1984.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

2-22-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

2-16-84, 10:17
2-16-84, 4:00

34040463348

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Women's Action for Nuclear)	RAD Referral #84NF-14
Disarmament)	
Linda Rounds, Treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 21, 1984, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral #84NF-14:

1. Open a MUR.
2. Find reason to believe that the Women's Action for Nuclear Disarmament and Linda Rounds, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).
3. Approve the letter and analysis as attached to the First General Counsel's Report dated February 16, 1984.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

2-22-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

2-16-84, 10:17
2-16-84, 4:00

84040463349



FEDERAL ELECTION COMMISSION
 WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
 FROM: Office of General Counsel *CW*
 DATE: February 16, 1984
 SUBJECT: 84NF-14: First General Counsel's Report

The attached is submitted as an Agenda document
 for the Commission Meeting of _____
 Open Session _____
 Closed Session _____

CIRCULATIONS

48 Hour Tally Vote
 Sensitive
 Non-Sensitive
 24 Hour No Objection
 Sensitive
 Non-Sensitive
 Information
 Sensitive
 Non-Sensitive
 Other

DISTRIBUTION

Compliance
 Audit Matters
 Litigation
 Closed MUR Letters
 Status Sheets
 Advisory Opinions
 Other (see distribution
 below)

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SENSITIVE

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

84 FEB 16 A10: 17

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION 2/16/84-10:15 RAD Referral #84NF-14
STAFF MEMBER
Marybeth Tarrant

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

RESPONDENTS' NAMES: Women's Action for Nuclear Disarmament and Linda Rounds, Treasurer

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

INTERNAL REPORTS CHECKED: Reports for 1981-1982 election cycle

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

Women's Action for Nuclear Disarmament ("WAND") and Linda Rounds, as treasurer, failed to file six (6) reports during the 1981-1982 election cycle in a timely manner in violation of 2 U.S.C. § 434(a)(4)(A). The reports ranged between 11 and 78 calendar days late as demonstrated by the following chart:

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year <u>1/</u> (4/1/81-6/30/81)	7/31/81	8/13/81
Year End (7/1/81-12/31/81)	1/31/82	4/19/82
April Quarterly (1/1/82-3/31/82)	4/15/82	4/26/82
October Quarterly (7/1/82-9/30/82)	10/15/82	11/03/82
12 Day Pre-General <u>2/</u> (10/1/82-10/13/82)	10/21/82	12/06/82
Year End Termination (11/23/82-12/31/82)	1/31/83	2/07/83

1/ A 1981 April Quarterly Report, which covered activity from January 1, 1981 - March 31, 1981, was filed on April 21, 1981.

2/ WAND filed a 30 Day Post-General Election report which included the pre-election period.

34040463351

FACTUAL BASIS AND LEGAL ANALYSIS

A Request for Additional Information was sent by the Reports Analysis Division on September 14, 1983, requesting an explanation concerning the late filing of reports. WAND's response, received on October 4, 1983, stated that the treasurer was a volunteer, and unfamiliar with the requirements of the Act and Regulations. The letter also stated that WAND had terminated, and started up a new committee with a different organizational structure. 3/

Pursuant to 2 U.S.C. § 434(a)(4)(A), a political committee filing quarterly reports in a calendar year in which a regularly scheduled general election is held is required, through its treasurer, to file such reports no later than the 15th day after the last day of each calendar quarter: except that the report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year. In addition, the committee is required, through its treasurer, to file a pre-election report no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. In any other calendar year, the committee is required, through its treasurer, to file a mid year report no later than July 31 and a year end report no later than January 31 of the following calendar year.

3/ On September 21, 1983, the Women's Action for Nuclear Disarmament, a citizen's organization, Inc., Political Action Committee ("WAND-PAC") filed a statement of organization. Linda Rounds is the designated treasurer. On January 26, 1984, WAND-PAC filed its 1983 Year End Report.

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In view of the fact that the committee has continually failed to file its reports in a timely manner, and that its financial activity during the 1981-82 election cycle was substantial (\$112,354 in receipts and \$114,059 in disbursements), we recommend that the Commission open a MUR and find reason to believe that reporting violations occurred.

The explanation offered by the committee with respect to its late filing is an insufficient defense in light of the number of reports involved.

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Women's Action for Nuclear Disarmament and Linda Rounds, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).
3. Approve the attached letter and analysis.

Charles N. Steele
General Counsel

February 15, 1984
Date

By: 
Kenneth A. Gross
Associate General Counsel

Attachments

1. RAD Referral
2. Proposed letter and analysis

34040463353

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 13 January 1984ANALYST: Pamela Brown

I. COMMITTEE: Women's Action for Nuclear
Disarmament (C00130864)
Linda Rounds, Treasurer
P.O. Box 153, New Town Branch
Boston, MA 02258

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

III. BACKGROUND:

Failure to File Timely Reports

Women's Action for Nuclear Disarmament ("WAND") failed to file six (6) reports during the 1981-1982 election cycle in a timely manner. The reports ranged between 11 and 78 calendar days late (see chart below and Attachments 2a-f).

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year 1/ (4/1/81-6/30/81)	7/31/81	8/13/81
Year End (7/1/81-12/31/81)	1/31/82	4/19/82
April Quarterly (1/1/82-3/31/82)	4/15/82	4/26/82
October Quarterly (7/1/82-9/30/82)	10/15/82	11/3/82
12 Day Pre-General 2/ (10/1/82-10/13/82)	10/21/82	12/6/82
Year End Termination (11/23/82-12/31/82)	1/31/83	2/7/83

1/ A 1981 April Quarterly Report, which covered activity from January 1, 1981 - March 31, 1981, was filed on April 21, 1981.

2/ WAND filed a 30 Day Post-General Election report which included the pre-election period.

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A Request for Additional Information was sent on September 14, 1983 requesting an explanation concerning the late filing of reports (Attachment 2). WAND's response, received on October 4, 1983, stated that the treasurer was a volunteer, and unfamiliar with the requirements of the Act and Regulations. The letter also stated that WAND had terminated, and started up a new committee with a different organizational structure (Attachment 3).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

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8 4 0 4 0 4 6 3 3 5 6
 FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 29DEC83
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
WOMEN'S ACTION FOR NUCLEAR DISARMAMENT(WAND) CONNECTED ORGANIZATION: WOMEN'S PARTY FOR SURVIVAL INC				NON-PARTY NON-QUALIFIED		ID #C00130864
1981	APRIL QUARTERLY	22,257	20,051	7JAN81 -31MAR81	7	81FEC/194/4143
	APRIL QUARTERLY - AMENDMENT	18,341	12,964	1JAN81 -31MAR81	6	82FEC/240/1238
	REQUEST FOR ADDITIONAL INFORMATION			7JAN81 -15APR81	2	82FEC/234/2718
	REQUEST FOR ADDITIONAL INFORMATION 2ND			7JAN81 -15APR81	1	82FEC/239/4337
	JULY QUARTERLY	19,307	21,224	1APR81 -30JUN81	7	81FEC/204/2665
	JULY QUARTERLY - AMENDMENT	22,180	28,296	1APR81 -30JUN81	8	82FEC/240/1230
	JULY QUARTERLY - AMENDMENT	-	-	1APR81 -30JUN81	2	83FEC/284/081
	REQUEST FOR ADDITIONAL INFORMATION			17APR81 -30JUN81	1	82FEC/234/2721
	REQUEST FOR ADDITIONAL INFORMATION 2ND			17APR81 -30JUN81	1	82FEC/239/4339
	REQUEST FOR ADDITIONAL INFORMATION			1APR81 -30JUN81	2	83FEC/282/5198
	YEAR-END	21,506	22,087	1JUL81 -31DEC81	11	82FEC/229/4062
	YEAR-END - AMENDMENT	-	-	1JUL81 -31DEC81	2	82FEC/238/4698
	YEAR-END - AMENDMENT	21,506	22,087	1JUL81 -31DEC81	8	82FEC/240/1222
	YEAR-END - AMENDMENT	-	-	1JUL81 -31DEC81	1	83FEC/284/1021
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31DEC81	1	82FEC/234/2723
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL81 -31DEC81	5	82FEC/239/3256
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31DEC81	1	83FEC/283/0380
1982	STATEMENT OF ORGANIZATION - AMENDMENT			19APR82	3	82FEC/229/4059
	STATEMENT OF ORGANIZATION - AMENDMENT			26APR82	2	82FEC/229/4866
	STATEMENT OF ORGANIZATION - AMENDMENT			17JUL82	2	82FEC/238/1945
	MISCELLANEOUS REPORT			26JUL82 TO FEC	2	82FEC/239/3504
	APRIL QUARTERLY	4,910	1,927	1JAN82 -31MAR82	5	82FEC/229/4861
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN82 -31MAR82	5	82FEC/243/2887
	APRIL QUARTERLY - AMENDMENT	10,469	6,338	1JAN82 -31MAR82	6	82FEC/253/2711
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN82 -31MAR82	1	83FEC/284/1020
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -31MAR82	2	82FEC/242/1750
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -31MAR82	1	83FEC/283/0379
	JULY QUARTERLY	11,381	11,198	1APR82 -30JUN82	6	82FEC/237/3681
	JULY QUARTERLY - AMENDMENT	-	-	1APR82 -30JUN82	1	82FEC/243/3311
	JULY QUARTERLY - AMENDMENT	11,381	11,198	1APR82 -30JUN82	3	82FEC/253/2728
	REQUEST FOR ADDITIONAL INFORMATION			1APR82 -30JUN82	1	82FEC/242/1748
	OCTOBER QUARTERLY	21,250	19,846	1JUL82 -30SEP82	11	82FEC/253/2717
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL82 -30SEP82	1	83FEC/284/1024
	REQUEST FOR ADDITIONAL INFORMATION			1JUL82 -30SEP82	1	83FEC/283/0378
	PRE-GENERAL	-	-	1OCT82 -13OCT82	1	83FEC/283/0401
	PRE-GENERAL - AMENDMENT	-	-	1OCT82 -13OCT82	1	83FEC/284/1023
	REQUEST FOR ADDITIONAL INFORMATION			1OCT82 -13OCT82	1	83FEC/283/0377
	POST-GENERAL	6,910	11,333	1OCT82 -22NOV82	9	82FEC/257/2218
	1'ST LETTER INFORMATIONAL NOTICE			1OCT82 -22NOV82	1	83FEC/263/0449
	YEAR-END - TERMINATED	317	1,997	23NOV82 -31DEC82	3	83FEC/265/3872
	YEAR-END - AMENDMENT	-	-	23NOV82 -31DEC82	1	83FEC/284/1022
	REQUEST FOR ADDITIONAL INFORMATION			23NOV82 -31DEC82	1	83FEC/283/0376
1983	MISCELLANEOUS REPORT			1NOV83 FROM FEC	1	83FEC/286/2604
	TOTAL TERMINATED	112,354	0	114,059	0	138 TOTAL PAGES

All reports received basic review.

Ending Cash: \$71 Debts: -0-
 (12-31-82)

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

61 AUG 18 P12:38

(Summary Page)

Attachment 2a

<p>1. Name of Committee (in Full)</p> <p align="center">Women's Party for Survival</p> <hr/> <p>Address (Number and Street)</p> <p align="center">56 North Beacon Street</p> <hr/> <p>City, State and ZIP Code</p> <p align="center">Watertown, Mass. 02172</p> <hr/> <p><input checked="" type="checkbox"/> Check if address is different than previously reported.</p>	<p>4. TYPE OF REPORT (check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report</p> <p><input checked="" type="checkbox"/> July 15 Quarterly Report</p> <p><input type="checkbox"/> October 15 Quarterly Report</p> <p><input type="checkbox"/> January 31 Year End Report</p> <p><input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only)</p> <p><input type="checkbox"/> Monthly Report for _____</p> <p><input type="checkbox"/> Twelfth day report preceding _____ (Type of Election election on _____ in the State of _____)</p> <p><input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____</p> <p><input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>
<p>2. FEC Identification Number</p> <p align="center">C00130864</p>	
<p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)</p>	

SUMMARY		
	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>April 17, 1981</u> through <u>June 30, 1981</u>		
6. (a) Cash on Hand January 1, 19_____		\$ 590.92
(b) Cash on Hand at Beginning of Reporting Period	\$ 2205.93	
(c) Total Receipts (from Line 18)	\$ 19307.58	
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 21513.51	\$ 22104.43
7. Total Disbursements (from Line 28)	\$ 21224.84	\$ 41276.06
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 288.67	\$ ----
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C 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.

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-527-4068

Janice Trickett

Type or Print Name of Treasurer

Janice Trickett
SIGNATURE OF TREASURER

August 10, 1981

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 2477.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

RECEIVED

(Summary Page)

82 APR 26 P 2:42

1. Name of Committee (In Full)
Women's Action for Nuclear Disarmament

Address (Number and Street)
50 North Beacon Street

City, State and ZIP Code
Watertown, Ma. 02172

Check if address is different than previously reported.

2. FEC Identification Number
C00130864

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report **Attachment 2c**
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for _____
 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 _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>January 1, 1982</u> Through <u>March 31, 1982</u>		
6 (a) Cash on Hand January 1, 1982		\$ 458.00
(b) Cash on Hand at Beginning of Reporting Period	\$ 458.00	
(c) Total Receipts (from Line 18)	\$ 4,910.32	\$ 4,910.32
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 5,368.32	\$ 5,368.32
7 Total Disbursements (from Line 28)	\$ 1,927.07	\$ 1,927.07
8 Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 3,441.25	\$ 3,441.25
9 Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C 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.

For further information, contact

LINDA L ROUNDS

Type or Print Name of Treasurer

Linda L. Rounds

SIGNATURE OF TREASURER

4-22-82

Date

Federal Election Commission
Toll Free 800-424-9530
Local 202-527-4068

NOTE Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 5410

All previous versions of FEC FORM 3 and FEC FORM 2a are obsolete and should no longer be used

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FEC FORM 3

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REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

Attachment 2e

<p>1 Name of Committee (in full) Women's Action for Nuclear Disarmament, Inc.</p> <p>Address (Number and Street) P. O. Box 153 New Town Branch</p> <p>City, State and ZIP Code Boston, Ma. 02258</p> <p>Check if address is different than previously reported</p> <p>2 FEC Identification Number [000] 0000</p> <p>3 This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)</p>	<p>4 TYPE OF REPORT (check appropriate box)</p> <p>(a) April 15 Quarterly Report</p> <p>July 15 Quarterly Report</p> <p>October 15 Quarterly Report</p> <p>January 31 Year End Report</p> <p>July 31 Mid Year Report (Non election Year Only)</p> <p>Monthly Report for _____</p> <p>Twelfth day report preceding _____ (Type of election) election on _____ in the State of _____</p> <p><input checked="" type="checkbox"/> Thirtieth day report following the General Election on NOV. 2 in the State of Mass.</p> <p>Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>
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SUMMARY	Column A This Period	Column B Calendar Year to Date
5 Covering Period from October 1 Through November 22 , 1982		
6 (a) Cash on Hand January 1, 1982		\$ -38,700
(b) Cash on Hand at Beginning of Reporting Period	\$ 6,175.24	
(c) Total Receipts (from Line 18)	\$ 6,910.10	\$ 12,085.34
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 13,085.34	\$ 12,046.64
7 Total Disbursements (from Line 28)	\$ 11,333.78	\$ 11,718.08
8 Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 1,751.56	\$ 328.56
9 Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C 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.

For further information, contact:
Federal Election Commission
Washington, D.C. 20543
Voice 202/418-6500

Janis L. Rounds
Type of Position Held: Treasurer

Janis L. Rounds 1/1/82
SIGNATURE OF TREASURER DATE

NOTE: This form is to be filed with the Federal Election Commission. It is not to be distributed to the public.

All previous editions of FEC FORM 3 and FEC FORM 3e are obsolete and should no longer be used.

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REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

83 FEB 7 10:38
Attachment 2f

(Summary Page)

<p>1. Name of Committee (in Full) Women's Action for Nuclear Disarmament, Inc.</p> <hr/> <p>Address (Number and Street): Post Office Box 153 New Town Branch</p> <hr/> <p>City, State and ZIP Code Boston, Ma. 02258</p> <p><input type="checkbox"/> Check if address is different than previously reported.</p>	<p>4. TYPE OF REPORT (check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report <input checked="" type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only) <input type="checkbox"/> Monthly Report for _____ <input type="checkbox"/> Twelfth day report preceding _____ (Type of Election: election on _____ in the State of _____) <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____</p> <p><input checked="" type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>
<p>2. FEC Identification Number C00130864</p>	
<p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)</p>	

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>November 23</u> Through <u>December 31, 1982</u>		
6. (a) Cash on Hand January 1, 19 <u>82</u>		\$ 458.00
(b) Cash on Hand at Beginning of Reporting Period	\$ 1,751.58	
(c) Total Receipts (from Line 18)	\$ 317.43	\$ 50,329.09
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 2,069.01	\$ 50,787.09
7. Total Disbursements (from Line 28)	\$ 1,997.23	\$ 50,715.31
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 71.78	\$ 71.78
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C 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.

For further information, contact

Federal Election Commission
Toll Free 800-424-6130
Local 202-573-4000

Type or Print Name of Treasurer
Heather H. Rounds
SIGNATURE OF TREASURER

January 31, 1983
Date

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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FEC FORM 3, 1982

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

EQ-2

September 14, 1983

Linda Rounds, Treasurer
Women's Action for Nuclear
Disarmament (WAND)
P.O. Box 153, New Town Branch
Boston, MA 02258

Identification Number: C00130864

Reference: 1981-82 Election Cycle Reports

Dear Ms. Rounds:

This letter is prompted by the Commission's review of the reports filed by your committee for the 1981-82 election cycle. A review of the reports listed below indicates that your committee repeatedly failed to file reports in a timely manner. Timely filing is a specific requirement of the Federal Election Campaign Act and essential to fulfilling the public disclosure concept embodied in the law. The Commission views late filing as a serious violation of the Act.

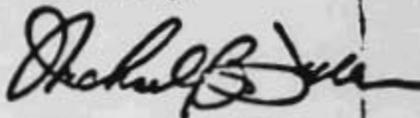
<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year (4/1/81-6/30/81)	7/31/81	8/13/81
Year End (7/1/81-12/31/81)	1/31/82	4/19/82
April Quarterly (1/1/82-3/31/82)	4/15/82	4/26/82
October Quarterly (7/1/82-9/30/82)	10/15/82	11/3/82
12 Day Pre-General (10/1/82-10/13/82)	10/21/82	12/6/82
Year End (11/23/82-12/31/82)	1/31/83	2/7/83

This communication affords you the opportunity to present the reasons behind the late tenders noted above. Your response should be filed with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 within fifteen (15) days of the date of this letter. The Commission will consider your response

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to this notice before taking action in this matter. If you need assistance or have any questions regarding this matter, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,



Michael B. Filler
Chief
Party/Non-Party Branch
Reports Analysis Division

84040465364

03032925199

Attachment 4

September 29, 1983

3 OCT 4 AM: 42

WAND/PAC
P.O. Box 153
New Town Branch
Boston, MA 02258

Michael B. Filler
Chief
Party/NonParty Branch
Reports Analysis Division
Federal Election Commission
1325 K St., NW
Washington, DC 20463

RE: Women's Action for Nuclear Disarmament/
Political Action Committee
ID #: C00130864
Reference: 1981-1982 Election Cycle Report

Dear Mr. Filler:

As requested by Louise Stoller, I am writing to explain the problem that Women's Action for Nuclear Disarmament/Political Action Committee (WAND/PAC) went through from 1981 to 1982.

There was a very difficult personnel problem within the organization when I took on the job as treasurer on a part-time basis and as a volunteer in February 1982. At the time I had yet to learn about the rules and regulations of the FEC. I continued through the job as treasurer until WAND/PAC went inactive in November of 1982 as reported in our termination report of January 31, 1983. (In November 1982 a new organization was incorporated that adopted part of WAND/PAC's name. The new organization called Women's Action for Nuclear Disarmament, a citizen's organization, Inc. is a nationwide membership organization and was formed under a new corporate structure. The new organization is controlled by individual members rather than a small board of directors. Women's Action for Nuclear Disarmament, a citizen's organization, Inc. recently established a separate segregated fund, which filed a Statement of Organization with your office on September 22, 1983.)

While I was learning about the FEC regulations, WAND/PAC did not have money for legal assistance, so we spoke frequently with individuals at the 800 toll-free number and with Pamela Brown during the period from March to November 1982 about specific questions and problems. I was told to do my best and get the reports in as soon as I could.

I am sorry for any difficulties that this has caused the FEC. If you have any questions please contact me again.

Sincerely,

(Handwritten signature: Linda Rounds)
Linda Rounds
WAND/PAC

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FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1632

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