



FEDERAL ELECTION COMMISSION

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

84040480002

THIS IS THE END OF MUR # 1728

Date Filmed 9/26/84 Camera No. --- 4

Cameraman JRL

FEDERAL ELECTION COMMISSION

12 Day Review

Conciliation Information

Routing Slips

Internal Memos

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):

84040480003

- |  |   |
|--|---|
| <input type="checkbox"/> (1) Classified Information                                | <input type="checkbox"/> (6) Personal privacy                             |
| <input checked="" type="checkbox"/> (2) Internal rules and practices               | <input type="checkbox"/> (7) Investigatory files                          |
| <input checked="" type="checkbox"/> (3) Exempted by other statute <i>FCA</i>       | <input type="checkbox"/> (8) Banking Information                          |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents                         |   |

Signed J Sheppard  
date 9-5-84



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 6, 1984

Oscar M. McCallum, M.D., Treasurer  
Independent Medicine's Political Action  
Committee - Tennessee  
112 Louise Avenue  
Nashville, Tennessee 37202

RE: MUR 1728

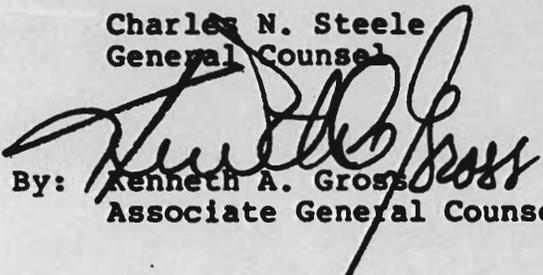
Dear Dr. McCallum:

On September 4, 1984, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(iv), 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 a 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

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Conciliation Agreement

84040480004

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Independent Medicine's ) MUR 1728  
Political Action Committee- )  
Tennessee )  
Oscar M. McCallum, M.D. )

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 Independent Medicine's Political Action Committee-Tennessee and Oscar M. McCallum, M.D., as treasurer, ("Respondent") violated 2 U.S.C. § 434(a)(4)(A)(iv).

NOW, THEREFORE, the Commission and Respondent, 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 Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered into pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent, Independent Medicine's Political Action Committee-Tennessee, is a political committee registered with the Commission.

2. Oscar M. McCallum, M.D. is treasurer of Respondent committee.

84040480005

3. Respondent filed the 1983 Mid-Year Report due July 31, 1983, on March 26, 1984, 238 days late.

4. Respondent filed the 1983 Year-End Report due January 31, 1984, on March 26, 1984, 55 days late.

5. Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), in any non-election year, a political committee is required to file a report covering January 1 through June 30 due on July 31 and a report covering July 1 through December 31 due on January 31 of the following year.

V. Respondent violated 2 U.S.C. § 434(a)(4)(A)(iv) by filing the 1983 Mid-Year and Year-End reports late.

VI. Respondent shall pay a civil penalty to the Treasurer of the United States in the amount of two hundred seventy-five dollars (\$275), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondent agrees that it 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 matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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.

8404048006

X. Respondent 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 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* *September 5, 1984*  
Kenneth A. Gross Date  
Associate General Counsel

FOR THE RESPONDENT:

*Oscar M. McCallum, M.D.* *9/20/84*  
Oscar M. McCallum, M.D. Date  
Treasurer

84040480007



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Oscar M. McCallum, M.D., Treasurer  
Independent Medicine's Political Action  
Committee - Tennessee  
112 Louise Avenue  
Nashville, Tennessee 37202

RE: MUR 1728

Dear Dr. McCallum:

On September , 1984, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(iv), 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 a 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

By: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Conciliation Agreement

JA  
9/5/84

84040480008

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Independent Medicine's Political ) MUR 1728  
Action Committee - Tennessee )  
Oscar M. McCallum, M.D., Treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 4, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1728:

1. Accept the agreement attached to the General Counsel's report dated August 30, 1984.
2. CLOSE THE FILE.
3. Send the letter attached to the General Counsel's report dated August 30, 1984.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision.

Attest:

9-4-84

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

84040480009

84040480010

IMPACT  
112 LOUISE AVE.  
NASHVILLE, TENN. 37202

729

AUGUST 7 19 84

Pay to the  
order of

TREASURER OF THE UNITED STATES

\$ 275.00

17-4  
600

275 DOLLARS

Dollar



Nashville, Tennessee 37244

INDEPENDENT MEDICINES'  
POLITICAL ACTION COMMITTEE OF TENNESSEE  
EDUCATIONAL ACCOUNT

For RE: MJR 1728

*John F. ...*

⑆000729⑆ ⑆064000046⑆

44324022⑆

*CCC*  
*#4484*

14 AUG 28 4 53 PM '84

ATM





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Oscar M. McCallum, M.D., Treasurer  
Independent Medicine's Political Action  
Committee - Tennessee  
112 Louise Avenue  
Nashville, Tennessee 37202

RE: MUR 1728

Dear Dr. McCallum:

On September , 1984, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(iv), 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 a 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

By: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Conciliation Agreement

5

84040480011



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

84 JUN 26 10:06

June 26, 1984

MEMORANDUM TO: The Commission  
FROM: Charles N. Steele  
General Counsel  
By: Kenneth A. Gross  
Associate General Counsel  
SUBJECT: RAD Referral 84NF-35

**SENSITIVE**

On June 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-35 should now become MUR #1728.

Attachment  
Copy of Certification

84040480012

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	RAD Referral 84NF-35
Independent Medicine's Political	)	
Action Committee-Tennessee	)	
Oscar M. McCallum, M.D., Treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 21, 1984, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 84NF-35:

1. Open a MUR.
2. Find reason to believe Independent Medicine's Political Action Committee-Tennessee and its treasurer, Oscar M. McCallum, M.D., violated 2 U.S.C. § 434(a)(4)(A)(iv) by filing its 1983 Mid-Year and Year-End Reports late.
3. Approve and send the letter and General Counsel's Legal and Factual Analysis to the respondents as submitted with the First General Counsel's Report dated June 19, 1984.

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

Attest:

6-21-84  
Date

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

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

6-19-84, 10:00  
6-19-84, 4:00

84040480013



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 26, 1984

Oscar M. McCallum, M.D., Treasurer  
Independent Medicine's Political Action  
Committee-Tennessee  
112 Louise Avenue  
Nashville, Tennessee 37203

RE: MUR 1728

Dear Mr. McCallum:

On June 21, 1984, the Federal Election Commission determined that there is reason to believe Independent Medicine's Political Action Committee-Tennessee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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. You may 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 your committee and you, as treasurer, 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 so desired. See 11 C.F.R. § 111.18(d).

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

84040480014

Oscar M. McCallum, M.D., Treasurer  
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 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 Judy Thedford, at (202)523-4000.

Sincerely,



Lee Ann Elliott  
Chairman

Enclosures

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

84040480015

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1728

RESPONDENT: Independent Medicine's Political Action  
Committee-Tennessee

SUMMARY OF ALLEGATIONS

The Independent Medicine's Political Action Committee-Tennessee ("IMPACT") failed to timely file the 1983-Mid-Year Report of Receipts and Disbursements.<sup>1/</sup> IMPACT was notified on July 7, 1983, that the report was due on July 31, 1983.

A non-filer notice sent on November 23, 1983, was returned to the Commission.<sup>2/</sup> On December 21, 1983, the non-filer notice was re-mailed to another address.

On March 5, 1984, the Reports Analysis Division ("RAD") analyst telephoned IMPACT's treasurer, James C. Bradshaw to inquire why a response had not been received. The treasurer's secretary stated that Dr. Bradshaw would not be in the office until the following day and would return the telephone call at that time.

---

<sup>1/</sup> James C. Bradshaw, Jr. was the treasurer of record during 1982 and 1983; however an amended Statement of Organization was received on May 9, 1984, noting the appointment of the new treasurer, Dr. Oscar M. McCallum.

<sup>2/</sup> Upon receipt of the returned notice, it was learned that the Commission's data base had not been updated to reflect IMPACT's change of address.

84040480016

When a return call was not received by March 9, 1984, the RAD analyst contacted Dr. Bradshaw's secretary and was informed that Dr. Bradshaw was no longer treasurer. Based upon the information received from this conversation, a telephone call was made to Mr. Jack Fosbinder of the Tennessee Medical Association. Mr. Fosbinder stated that he had recently become responsible for the reporting of IMPACT's political activity and was not aware of the Federal reporting requirements. He stated that a new treasurer has been appointed and asked that forms be provided, so that the reports and an amended Statement of Organization could be filed.

The 1983 Mid-Year Report, which was signed by Mr. Fosbinder as Assistant Secretary-Treasurer was received by the Commission on March 26, 1984.

IMPACT was sent a chronic late filing notice on May 7, 1984, because the 1983 Mid-Year and Year End reports had not been timely filed.

#### FACTUAL BASIS AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), in a non-election year, an unauthorized committee is required to file a report covering January 1 through June 30 which shall be filed no later than July 31 and a report covering July 1 through December 31 which shall be filed no later than January 31 of the following year.

84040480017

IMPACT failed to timely file both reports for 1983, the Mid-Year and Year-End. Below is a chart disclosing the report, days late, and total financial activity disclosed on the report.

REPORT	DAYS LATE	TOTAL FINANCIAL ACTIVITY
1983 Mid-Year	239	\$57,621
1983 Year-End	55	\$15,946

The Office of General Counsel recommends opening a MUR and finding reason to believe that IMPACT and its treasurer violated 2 U.S.C. § 434(a)(4)(A)(iv).

84040480018



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Oscar N. McCallum, M.D., Treasurer  
Independent Medicine's Political Action  
Committee-Tennessee  
112 Louise Avenue  
Nashville, Tennessee 37203

RE: MUR

Dear Mr. McCallum:

On , 1984, the Federal Election Commission determined that there is reason to believe Independent Medicine's Political Action Committee-Tennessee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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. You may 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 your committee and you, as treasurer, 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 so desired. See 11 C.F.R. § 111.18(d).

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

84040480019

Oscar M. McCallum, M.D., Treasurer  
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 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 Judy Thedford, at (202)523-4000.

Sincerely,

Enclosures

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

84040480020

*h*  
6/25/84

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	RAD Referral 84NF-35
Independent Medicine's Political	)	
Action Committee-Tennessee	)	
Oscar M. McCallum, M.D., Treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 21, 1984, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 84NF-35:

1. Open a MUR.
2. Find reason to believe Independent Medicine's Political Action Committee-Tennessee and its treasurer, Oscar M. McCallum, M.D., violated 2 U.S.C. § 434(a)(4)(A)(iv) by filing its 1983 Mid-Year and Year-End Reports late.
3. Approve and send the letter and General Counsel's Legal and Factual Analysis to the respondents as submitted with the First General Counsel's Report dated June 19, 1984.

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

Attest:

6-21-84  
Date

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

84040480021

Received in Office of Commission Secretary:	6-19-84, 10:00
Circulated on 48 hour tally basis:	6-19-84, 4:00



**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 JUN 19 A10:00

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION 6/19/84 - 10:00

██████████ 84NF-35  
STAFF MEMBER  
Judy Thedford

SOURCE OF MUR: Internally Generated

RESPONDENT'S NAME: Independent Medicine's Political Action  
Committee-Tennessee  
Oscar M. McCallum, M.D., Treasurer

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

INTERNAL REPORTS CHECKED: IMPACT By RAD

FEDERAL AGENCIES CHECKED: N/A

**GENERATION OF THE MATTER**

This matter was referred to the General Counsel's Office by the Report Analysis Division on May 16, 1984.

**SUMMARY OF ALLEGATIONS**

The Independent Medicine's Political Action Committee-Tennessee ("IMPACT") failed to timely file the 1983-Mid-Year Report of Receipts and Disbursements.<sup>1/</sup> IMPACT was notified on July 7, 1983, that the report was due on July 31, 1983.

A non-filer notice sent on November 23, 1983, was returned to the Commission.<sup>2/</sup> On December 21, 1983, the non-filer notice was re-mailed to another address.

<sup>1/</sup> James C. Bradshaw, Jr. was the treasurer of record during 1982 and 1983; however an amended Statement of Organization was received on May 9, 1984, noting the appointment of the new treasurer, Dr. Oscar M. McCallum.

<sup>2/</sup> Upon receipt of the returned notice, it was learned that the Commission's data base had not been updated to reflect IMPACT's change of address.

84040480023

On March 5, 1984, the Reports Analysis Division ("RAD") analyst telephoned IMPACT's treasurer, James C. Bradshaw to inquire why a response had not been received. The treasurer's secretary stated that Dr. Bradshaw would not be in the office until the following day and would return the telephone call at that time.

When a return call was not received by March 9, 1984, the RAD analyst contacted Dr. Bradshaw's secretary and was informed that Dr. Bradshaw was no longer treasurer. Based upon the information received from this conversation, a telephone call was made to Mr. Jack Fosbinder of the Tennessee Medical Association. Mr. Fosbinder stated that he had recently become responsible for the reporting of IMPACT's political activity and was not aware of the Federal reporting requirements. He stated that a new treasurer has been appointed and asked that forms be provided, so that the reports and an amended Statement of Organization could be filed.

The 1983 Mid-Year Report, which was signed by Mr. Fosbinder as Assistant Secretary-Treasurer was received by the Commission on March 26, 1984.

IMPACT was sent a chronic late filing notice on May 7, 1984, because the 1983 Mid-Year and Year End reports had not been timely filed.

#### FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), in a non-election year, an unauthorized committee is required to file a report

84040480024

covering January 1 through June 30 which shall be filed no later than July 31 and a report covering July 1 through December 31 which shall be filed no later than January 31 of the following year.

IMPACT failed to timely file both reports for 1983, the Mid-Year and Year-End. Below is a chart disclosing the report, days late, and total financial activity disclosed on the report.

REPORT	DAYS LATE	TOTAL FINANCIAL ACTIVITY
1983 Mid-Year	239	\$57,621
1983 Year-End	55	\$15,946

The Office of General Counsel recommends opening a MUR and finding reason to believe that IMPACT and its treasurer violated 2 U.S.C. § 434(a)(4)(A)(iv).

**RECOMMENDATION**

1. Open a MUR.

2. Find reason to believe Independent Medicine's Political Action Committee-Tennessee and its treasurer, Oscar M. McCallum, M.D., violated 2 U.S.C. § 434(a)(4)(A)(iv) by filing its 1983 Mid-Year and Year-End Reports late.

3. Approve and send the attached letter and General Counsel's Legal and Factual Analysis to the respondents.

Charles N. Steele  
General Counsel

June 18, 1984  
Date

By: Kenneth A. Gross  
Kenneth A. Gross  
Associate General Counsel

- Attachments
- Referral
- Letter
- Factual and Legal Analysis

84040480025

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 15 May 1984

ANALYST: Mike Tangney

I. COMMITTEE: Independent Medicine's Political Action  
Committee-Tennessee (C00001354)  
Oscar M. McCallum, M.D.<sup>1/</sup>  
112 Louise Avenue  
Nashville, TN 37203

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

III. BACKGROUND:

Non-Filing of Mid-Year Report - 2 U.S.C. 434(a)(4)(A)(iv)  
11 CFR 104.5(c)(2)(i)(A)

The Independent Medicine's Political Action Committee-Tennessee ("IMPACT") failed to file the 1983 Mid-Year Report of Receipts and Disbursements. IMPACT was notified on July 7, 1983 that the report was due on July 31, 1983 (Attachment 2).

IMPACT was mailed a non-filer notice on November 23, 1983 which was returned to the Commission (Attachment 3).<sup>2/</sup> On December 21, 1983, the non-filer notice was re-mailed to another address (Attachment 4).

On March 5, 1984 the Reports Analysis Division ("RAD") analyst telephoned IMPACT's treasurer, James C. Bradshaw to inquire why a response had not been received. The treasurer's secretary stated that Dr. Bradshaw would not be in the office until the following day and would return the telephone call at that time (Attachment 5).

---

<sup>1/</sup> James C. Bradshaw, Jr. was the treasurer of record during 1982 and 1983; however, an amended Statement of Organization was received on May 9, 1984 noting the appointment of the new treasurer, Dr. Oscar M. McCallum.

<sup>2/</sup> Upon receipt of the returned notice, it was learned that the Commission's data base had not been updated to reflect IMPACT's change of address.

84040480026

2

INDEPENDENT MEDICAL SOCIETY'S POLITICAL ACTION  
COMMITTEE TENNESSEE  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2

When a return call was not received by March 9, 1984, the RAD analyst contacted Dr. Bradshaw's secretary and was informed that Dr. Bradshaw was no longer treasurer. Based upon the information received from this conversation, a telephone call was made to Mr. Jack Fosbinder of the Tennessee Medical Association. Mr. Fosbinder stated that he had recently become responsible for the reporting of IMPACT's political activity and was not aware of the Federal reporting requirements.<sup>3/</sup> He stated that he had not seen the non-filer notice and expressed concern that there might be a problem with receiving mail from the FEC, since IMPACT no longer maintained the post office box that had been used as their mailing address. He also stated that a new treasurer had been appointed and asked that forms be provided, so that the reports and an amended Statement of Organization could be filed (Attachment 6).

The 1983 Mid-Year Report, which was signed by Mr. Fosbinder as Assistant Secretary-Treasurer, was received by the Commission on March 26, 1984 (Attachment 7).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

IMPACT was sent a chronic late filing notice on May 7, 1984 because the 1983 Mid-Year and Year End reports had not been timely filed (Attachment 8).

---

<sup>3/</sup> Commission records indicate that Mr. Fosbinder signed IMPACT's 1981 Year End and the 1982 April and July Quarterly Reports. In addition, Mr. Fosbinder signed the 1982 October Quarterly, 30 Day Post-General, and Year End Reports which were received in March of 1984.

84040480027

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILED COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
INDEPENDENT MEDICINE'S POLITICAL ACTION COMMITTEE - TENNESSEE CONNECTED ORGANIZATION: MEDICAL ASS'N; TENNESSEE (AMPAC)				NON-PARTY QUALIFIED		ID 800001354
1981	MID-YEAR REPORT	22,436	16,515	1JAN81 - 30JUN81	8	81FEC/203/1127
	MID-YEAR REPORT - AMENDMENT	-	16,315	1JAN81 - 30JUN81	2	82FEC/226/2294
	YEAR-END	25,503	14,910	1JUL81 - 31DEC81	6	82FEC/221/5502
	YEAR-END - AMENDMENT	25,503	14,910	1JUL81 - 31DEC81	3	83FEC/227/3522
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 - 31DEC81	1	82FEC/225/6671
1982	APRIL QUARTERLY	22,438	13,960	1JAN82 - 31MAR82	5	82FEC/226/2297
	JULY QUARTERLY	5,013	24,530	1APR82 - 30JUN82	8	82FEC/225/0166
	OCTOBER QUARTERLY	6,217	32,670	1JUL82 - 30SEP82	12	84FEC/296/2747
	NOTICE OF FAILURE TO FILE			1JUL82 - 30SEP82	1	84FEC/299/1946
	POST-GENERAL	5,453	3,970	1OCT82 - 22NOV82	6	84FEC/296/2691
	NOTICE OF FAILURE TO FILE			1OCT82 - 22NOV82	1	84FEC/299/1947
	YEAR-END	169	2,720	23NOV82 - 31DEC82	8	84FEC/296/2901
	NOTICE OF FAILURE TO FILE			23NOV82 - 31DEC82	1	84FEC/299/1957
	<b>TOTAL</b>	<b>87,229</b>	<b>0 98,075</b>		<b>60</b>	<b>TOTAL PAGES</b>

All reports have received basic review except the 1982 October Quarterly, 30 Day Post-General and Year End Reports.  
 Ending cash-on-hand as of December 31, 1982: \$7,052  
 Outstanding debts owed by the committee as of December 31, 1982: \$0  
 Outstanding debts owed to the committee as of December 31, 1982: \$0

(4)

Amended  
 (Eng 1 of 2)

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	IDENTIFIER LOCATION
INDEPENDENT MEDICINE'S POLITICAL ACTION COMMITTEE-TN (IMPACT) CONNECTED ORGANIZATION: MEDICAL ASS'N; TENNESSEE (AMPAC)				NON-PARTY QUALIFIED		ID #C00001354
1983	MID-YEAR REPORT	34,111	23,510	1JAN83 -30JUN83	9	84FEC/204/1821
	NOTICE OF FAILURE TO FILE YEAR-END	10,741	5,205	1JAN83 -30JUN83	1	83FEC/204/1590
	NOTICE OF FAILURE TO FILE			1JUL83 -31DEC83	5	84FEC/204/1819
1984	MISCELLANEOUS NOTICE FROM FEC			1JUL83 -31DEC83	1	84FEC/217/2053
	STATEMENT OF ORGANIZATION - AMENDMENT			7MAY84	1	84FEC/213/40
	APRIL QUARTERLY	12,670	11,460	9MAY84	2	84FEC/213/40
				1JAN84 -31MAR84	7	84FEC/213/7
	TOTAL	57,522	40,175		26	TOTAL PAGES

All reports except the 1984 April Quarterly Report have received basic review.  
 Ending cash-on-hand as of March 31, 1984: \$24,505  
 Outstanding debts owed to the committee as of March 31, 1984: \$ .00  
 Outstanding debts owed by the committee as of March 31, 1984: \$ .00

9



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 7, 1983

SEMIANNUAL REPORT FILING REQUIREMENTS

WHO MUST FILE

ALL POLITICAL COMMITTEES currently registered with the Commission (except committees filing monthly) must file a semiannual report by July 31, 1983.

WHAT MUST BE REPORTED

Committees must disclose all financial activity of the committee from the later of, the last report filed or the date of registration,\* through June 30, 1983.

FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight July 31, 1983. Reports hand delivered or mailed first class must be received no later than close of business July 31, 1983.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed form for details.

FAILURE TO FILE

According to Commission policy, political committees will not necessarily receive notification of their failure to file reports. However, they remain fully liable for failure to file any report required under the Act. In addition, failure to file required reports may result in compliance proceedings. Committees must submit legible reports which can be reproduced clearly. Illegible documents will not be accepted as reports, and committees filing such documents will be required to refile.

MONTHLY FILERS

Committees filing on a monthly schedule need not file a semiannual report. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month. The next monthly report must be filed by July 20, 1983, and disclose all financial activity of the committee from June 1 through June 30, 1983.

\* The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

FOR INFORMATION CALL: Office of Public Communications  
202/513-4868  
800/424-9530

84040480030

6

Attachment 3



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20541

23 November 1983

BQ-7

James C. Bradshaw, Jr., Treasurer  
Independent Medicine's Political  
Action Committee Tennessee  
P.O. Box 22645  
Nashville, TN 37202

Identification Number: C00001354

Reference: Mid-Year Report (1/1/83-6/30/83)

Dear Dr. Bradshaw:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. 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, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Alva Smith on our toll-free number (800) 424-9530. Our local number is (202) 357-0026.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

8 JA 10n43024n 8a 01 0r 3h

7



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

23 November 1983

RQ-7

Revised December 21, 1983

*Attachment 4*

James C. Bradshaw, Jr., Treasurer  
Independent Medicine's Political  
Action Committee Tennessee  
112 Louise Avenue  
Nashville, TN 37203

Identification Number: C00001354

Reference: Mid-Year Report (1/1/83-6/30/83)

Dear Dr. Bradshaw:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. 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, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Alva Smith on our toll-free number (800) 424-9530. Our local number is (202) 357-0026.

Sincerely,

*John D. Gibson*

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

3  
2  
3  
0  
0  
8  
4  
0  
4  
0  
4  
0  
8  
4  
0

8

TELECON

ANALYST HIM TANGRAY

Secretary to  
TELECON WITH: James C. Bradshaw, Treasurer

Candidate/Committee: Independent Medicine's Political Action Committee Tennessee

DATE: March 5, 1984

SUBJECT(S): Failure to file 1983 Mid Year Report

---

I telephoned the treasurer to determine why a report had not been filed in response to the non-filer notice that had been sent to the committee. Dr. Bradshaw's secretary stated that he would not be in until the following day and that she would have him call me.

84040480033

9

ATTACHED

TELECON

ANALYST Mike Tannev

Secretary to  
TELECON WITH: James C. Bradshaw, Treasurer and Jack Fosbinder, Tennessee Medical Association

Candidate/Committee: Independent Medicine's Political Action Committee Tennessee

DATE: March 9, 1984

SUBJECT(S): Failure to file 1983 Mid Year Report

I spoke with Dr. Bradshaw's secretary and was informed that he was no longer treasurer of the committee. She referred me to Mr. Jack Fosbinder of the Tennessee Medical Association. Mr. Fosbinder stated that he had recently become responsible for the reporting of the committee's political activity and was not aware of the federal reporting requirement. He stated that he had not seen the non-filer notice and expressed concern that there might be a problem with receiving the mail from the FEC, since the committee no longer maintained the post office box that had been used for sometime as their mailing address. He also stated that a new treasurer had been appointed and asked that forms be provided to supply this information and to report the committee's financial activity. I informed him that the forms and other necessary information would be mailed today and that their Statement of Organization should be amended to reflect the new treasurer and any change in address.

84040480034

10

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

11FC  
**ATTACHMENT 7**

84 MAR 25 09:17

(Summary Page)

ALIGNED AREA

ALIGN AREA

1 Name of Committee (in Full)  
**IMMEDIATE MEDICINE'S POLITICAL ACTION  
COMMITTEE - TENNESSEE (IMPACT)**

4. TYPE OF REPORT (Check appropriate boxes)

(a)  April 15 Quarterly Report     October 15 Quarterly Report  
 July 15 Quarterly Report     January 31 Year End Report  
 July 31 Mid Year Report (Non Election Year Only)  
 Monthly Report for \_\_\_\_\_  
 Twelfth day report preceding \_\_\_\_\_  
\_\_\_\_\_ (Year 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

Address (Number and Street)  
**112 Louise Avenue**

City, State and ZIP Code  
**Nashville, TN 37203**

Check here if address is different than previously reported

2 FEC Identification Number  
**C00001354**

3  This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_  
\_\_\_\_\_ (Year)

**SUMMARY**

5 Covering Period 1-1-83 through 6-30-83

6 (a) Cash on hand January 1, 1983

(b) Cash on hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

(d) Subtotal (add Lines 6 b and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

(e) Total Disbursements (from Line 20)

8 Cash on hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9 Debts and Obligations Owed TO The Committee  
(Itemize as on Schedule C or Schedule D)

10 Debts and Obligations Owed BY the Committee  
(Itemize as on Schedule C or Schedule D)

	COLUMN A This Period	COLUMN B Calendar Year to Date
6 (a)		\$ 7,156.19
(b)	\$ 7,156.19	
(c)	\$4,111.92	\$4,111.92
(d)	\$ 11,268.11	\$ 11,268.11
(e)	\$ 23,510.00	\$ 23,510.00
8	\$ 17,758.11	\$ 17,758.11
9	\$	
10	\$	

I, the undersigned, have examined this Report and to the best of my knowledge and belief the same is correct and complete.

Jack Foshinier, Asst. Secretary-Treasurer  
(Type or Print Name of Treasurer)

\_\_\_\_\_  
 SIGNATURE OF TREASURER

March 21, 1984  
 Date

For further information contact  
 Federal Election Commission  
 Te: 1-800-426-9930  
 Local: 202-523-4080

This report is required by the Federal Election Campaign Act of 1971, as amended, and the regulations thereunder, and the penalty for failure to file is provided in 18 U.S.C. 610.

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

FEC FORM 3A (3-80)

84d404800351

11



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MS-L

May 7, 1984

Jack Fosbinder, Assistant Secretary-  
Treasurer  
Independent Medicine's Political  
Action Committee Tennessee  
112 Louise Avenue  
Nashville, TN 37203

Identification Number: C00001354

Reference: 1983-84 Election Cycle Reports

Dear Mr. Fosbinder:

This letter is prompted by the Commission's review of the reports filed by your committee. The following is a list of reports your committee has failed to file in a timely manner.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>	
1983 Mid-Year (1/1/83-6/30/83)	7/31/83	3/26/84	239
1983 Year End (7/1/83-12/31/83)	1/31/84	3/26/84	55

Timely filing is a specific requirement of the Federal Election Campaign Act and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views late filing as a serious violation of the Act. This communication is to advise you that any additional late filing of a required report by your committee may result in the Commission initiating legal enforcement action.

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) 523-4048.

Sincerely,

Michael B. Filler  
Chief  
Party/Non-Party Branch

(12)

84040480036



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Oscar M. McCallum, M.D., Treasurer  
Independent Medicine's Political Action  
Committee-Tennessee  
112 Louise Avenue  
Nashville, Tennessee 37203

RE: MUR

Dear Mr. McCallum:

On , 1984, the Federal Election Commission determined that there is reason to believe Independent Medicine's Political Action Committee-Tennessee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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. You may 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 your committee and you, as treasurer, 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 so desired. See 11 C.F.R. § 111.18(d).

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

84040480037

(B)

Oscar M. McCallum, M.D., Treasurer  
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 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 Judy Thedford, at (202)523-4000.

Sincerely,

Enclosures

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

84040480038



FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.

RESPONDENT: Independent Medicine's Political Action  
Committee-Tennessee

SUMMARY OF ALLEGATIONS

The Independent Medicine's Political Action Committee-Tennessee ("IMPACT") failed to timely file the 1983-Mid-Year Report of Receipts and Disbursements.<sup>1/</sup> IMPACT was notified on July 7, 1983, that the report was due on July 31, 1983.

A non-filer notice sent on November 23, 1983, was returned to the Commission.<sup>2/</sup> On December 21, 1983, the non-filer notice was re-mailed to another address.

On March 5, 1984, the Reports Analysis Division ("RAD") analyst telephoned IMPACT's treasurer, James C. Bradshaw to inquire why a response had not been received. The treasurer's secretary stated that Dr. Bradshaw would not be in the office until the following day and would return the telephone call at that time.

---

<sup>1/</sup> James C. Bradshaw, Jr. was the treasurer of record during 1982 and 1983; however an amended Statement of Organization was received on May 9, 1984, noting the appointment of the new treasurer, Dr. Oscar M. McCallum.

<sup>2/</sup> Upon receipt of the returned notice, it was learned that the Commission's data base had not been updated to reflect IMPACT's change of address.

84040480039

(5)

When a return call was not received by March 9, 1984, the RAD analyst contacted Dr. Bradshaw's secretary and was informed that Dr. Bradshaw was no longer treasurer. Based upon the information received from this conversation, a telephone call was made to Mr. Jack Fosbinder of the Tennessee Medical Association. Mr. Fosbinder stated that he had recently become responsible for the reporting of IMPACT's political activity and was not aware of the Federal reporting requirements. He stated that a new treasurer has been appointed and asked that forms be provided, so that the reports and an amended Statement of Organization could be filed.

The 1983 Mid-Year Report, which was signed by Mr. Fosbinder as Assistant Secretary-Treasurer was received by the Commission on March 26, 1984.

IMPACT was sent a chronic late filing notice on May 7, 1984, because the 1983 Mid-Year and Year End reports had not been timely filed.

#### FACTUAL BASIS AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), in a non-election year, an unauthorized committee is required to file a report covering January 1 through June 30 which shall be filed no later than July 31 and a report covering July 1 through December 31 which shall be filed no later than January 31 of the following year.

84040480040

(16)

IMPACT failed to timely file both reports for 1983, the Mid-Year and Year-End. Below is a chart disclosing the report, days late, and total financial activity disclosed on the report.

REPORT	DAYS LATE	TOTAL FINANCIAL ACTIVITY
1983 Mid-Year	239	\$57,621
1983 Year-End	55	\$15,946

The Office of General Counsel recommends opening a MUR and finding reason to believe that IMPACT and its treasurer violated 2 U.S.C. § 434(a)(4)(A)(iv).

84040480041

17

## REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 15 May 1984ANALYST: Mike Tangney

I. COMMITTEE: Independent Medicine's Political Action  
Committee-Tennessee (C00001354)  
Oscar M. McCallum, M.D.<sup>1/</sup>  
112 Louise Avenue  
Nashville, TN 37203

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

## III. BACKGROUND:

Non-Filing of Mid-Year Report - 2 U.S.C. 434(a)(4)(A)(iv)  
11 CFR 104.5(c)(2)(i)(A)

The Independent Medicine's Political Action Committee-Tennessee ("IMPACT") failed to file the 1983 Mid-Year Report of Receipts and Disbursements. IMPACT was notified on July 7, 1983 that the report was due on July 31, 1983 (Attachment 2).

IMPACT was mailed a non-filer notice on November 23, 1983 which was returned to the Commission (Attachment 3).<sup>2/</sup> On December 21, 1983, the non-filer notice was re-mailed to another address (Attachment 4).

On March 5, 1984 the Reports Analysis Division ("RAD") analyst telephoned IMPACT's treasurer, James C. Bradshaw to inquire why a response had not been received. The treasurer's secretary stated that Dr. Bradshaw would not be in the office until the following day and would return the telephone call at that time (Attachment 5).

---

<sup>1/</sup> James C. Bradshaw, Jr. was the treasurer of record during 1982 and 1983; however, an amended Statement of Organization was received on May 9, 1984 noting the appointment of the new treasurer, Dr. Oscar M. McCallum.

<sup>2/</sup> Upon receipt of the returned notice, it was learned that the Commission's data base had not been updated to reflect IMPACT's change of address.

84040480042

INDEPENDENT MEDICINE'S POLITICAL ACTION  
COMMITTEE TENNESSEE  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2

When a return call was not received by March 9, 1984, the RAD analyst contacted Dr. Bradshaw's secretary and was informed that Dr. Bradshaw was no longer treasurer. Based upon the information received from this conversation, a telephone call was made to Mr. Jack Fosbinder of the Tennessee Medical Association. Mr. Fosbinder stated that he had recently become responsible for the reporting of IMPACT's political activity and was not aware of the Federal reporting requirements.<sup>3/</sup> He stated that he had not seen the non-filer notice and expressed concern that there might be a problem with receiving mail from the FEC, since IMPACT no longer maintained the post office box that had been used as their mailing address. He also stated that a new treasurer had been appointed and asked that forms be provided, so that the reports and an amended Statement of Organization could be filed (Attachment 6).

The 1983 Mid-Year Report, which was signed by Mr. Fosbinder as Assistant Secretary-Treasurer, was received by the Commission on March 26, 1984 (Attachment 7).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

IMPACT was sent a chronic late filing notice on May 7, 1984 because the 1983 Mid-Year and Year End reports had not been timely filed (Attachment 8).

---

<sup>3/</sup> Commission records indicate that Mr. Fosbinder signed IMPACT's 1981 Year End and the 1982 April and July Quarterly Reports. In addition, Mr. Fosbinder signed the 1982 October Quarterly, 30 Day Post-General, and Year End Reports which were received in March of 1984.

84040480043

84040480014

FEDERAL ELECTION COMMISSION  
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 3/14/84  
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
INDEPENDENT MEDICINE'S POLITICAL ACTION COMMITTEE	TENNESSEE			NON-PARTY QUALIFIED		ID #C00001354
CONNECTED ORGANIZATION:	MEDICAL ASS'N; TENNESSEE [AMPAC]					
1981	MID-YEAR REPORT	22,436	16,515	1JAN81 -30JUN81	8	82FEC/202/1137
	MID-YEAR REPORT - AMENDMENT	-	16,315	1JAN81 -30JUN81	3	82FEC/226/2254
	YEAR-END	25,503	14,910	1JUL81 -31DEC81	4	82FEC/221/5542
	YEAR-END - AMENDMENT	25,503	14,910	1JUL81 -31DEC81	2	82FEC/237/3533
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31DEC81	1	82FEC/235/0471
1982	APRIL QUARTERLY	22,438	13,960	1JAN82 -31MAY82	5	82FEC/226/2297
	JULY QUARTERLY	5,013	24,530	1APR82 -30JUN82	8	82FEC/235/0166
	OCTOBER QUARTERLY	6,217	22,670	1JUL82 -30SEP82	12	84FEC/306/2747
	NOTICE OF FAILURE TO FILE			1JUL82 -30SEP82	1	84FEC/299/1946
	POST-GENERAL	5,453	2,970	1OCT82 -22NOV82	6	84FEC/306/2651
	NOTICE OF FAILURE TO FILE			1OCT82 -22NOV82	1	84FEC/299/1947
	YEAR-END	169	2,720	23NOV82 -21DEC82	8	84FEC/306/2801
	NOTICE OF FAILURE TO FILE			23NOV82 -31DEC82	1	84FEC/299/1757
	TOTAL	87,229	0 98,075	0	60	TOTAL PAGES

All reports have received basic review except the 1982 October Quarterly, 30 Day Post-General and Year End Reports.  
 Ending cash-on-hand as of December 31, 1982: \$7,052  
 Outstanding debts owed by the committee as of December 31, 1982: \$0  
 Outstanding debts owed to the committee as of December 31, 1982: \$0

Amended  
 (Page 1 of 2)

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
INDEPENDENT MEDICINE'S POLITICAL ACTION COMMITTEE-TN (IMPACT) CONNECTED ORGANIZATION: MEDICAL ASS'N; TENNESSEE [CAMPAC]				NON-PARTY QUALIFIED		ID #C00001334
1983	MID-YEAR REPORT	34,111	23,510	1JAN83 - 30JUN83	9	84FEC/306/1821
	NOTICE OF FAILURE TO FILE			1JAN83 - 30JUN83	1	83FEC/288/1590
	YEAR-END	10,741	5,205	1JUL83 - 31DEC83	5	84FEC/306/1816
	NOTICE OF FAILURE TO FILE			1JUL83 - 31DEC83	1	84FEC/297/1808
1984	MISCELLANEOUS NOTICE FROM FEC			7MAY84	1	84FEC/312/1811
	STATEMENT OF ORGANIZATION - AMENDMENT			9MAY84	2	84FEC/312/1811
	APRIL QUARTERLY	12,670	11,460	1JAN84 - 31MAR84	7	84FEC/312/1811
	TOTAL	57,522	40,175		26	TOTAL PAGES

All reports except the 1984 April Quarterly Report have received basic review.  
 Ending cash-on-hand as of March 31, 1984: \$24,505  
 Outstanding debts owed to the committee as of March 31, 1984: \$ .00  
 Outstanding debts owed by the committee as of March 31, 1984: \$ .00



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

July 7, 1983

**SEMIANNUAL REPORT FILING REQUIREMENTS**

**WHO MUST FILE**

ALL POLITICAL COMMITTEES currently registered with the Commission (except committees filing monthly) must file a semiannual report by July 31, 1983.

**WHAT MUST BE REPORTED**

Committees must disclose all financial activity of the committee from the later of, the last report filed or the date of registration,\* through June 30, 1983.

**FILING DATE**

Reports sent by registered or certified mail must be postmarked no later than midnight July 31, 1983. Reports hand delivered or mailed first class must be received no later than close of business July 31, 1983.

**WHERE AND HOW TO FILE**

Committees should consult the instructions on the enclosed form for details.

**FAILURE TO FILE**

According to Commission policy, political committees will not necessarily receive notification of their failure to file reports. However, they remain fully liable for failure to file any report required under the Act. In addition, failure to file required reports may result in compliance proceedings. Committees must submit legible reports which can be reproduced clearly. Illegible documents will not be accepted as reports, and committees filing such documents will be required to refile.

**MONTHLY FILERS**

Committees filing on a monthly schedule need not file a semiannual report. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month. The next monthly report must be filed by July 20, 1983, and disclose all financial activity of the committee from June 1 through June 30, 1983.

\* The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

FOR INFORMATION CALL: Office of Public Communications.  
202/513-4068  
800/414-9530

84040480046

Attachment 3



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20541

23 November 1983

EO-7

James C. Bradshaw, Jr., Treasurer  
Independent Medicine's Political  
Action Committee Tennessee  
P.O. Box 22645  
Nashville, TN 37202

Identification Number: C00001354

Reference: Mid-Year Report (1/1/83-6/30/83)

Dear Dr. Bradshaw:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. 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, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Alva Smith on our toll-free number (800) 424-9530. Our local number is (202) 357-0026.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

83A104304804A7



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

*Attachment 4*

23 November 1983 RQ-7

Remailed December 21, 1983

James C. Bradshaw, Jr., Treasurer  
Independent Medicine's Political  
Action Committee Tennessee  
112 Louise Avenue  
Nashville, TN 37203

Identification Number: C00001354

Reference: Mid-Year Report (1/1/83-6/30/83)

Dear Dr. Bradshaw:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. 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, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Alva Smith on our toll-free number (800) 424-9530. Our local number is (202) 357-0026.

Sincerely,

*John D. Gibson*

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

84040480048

TELECON

ANALYST Nike Tangut

Secretary to  
TELECON WITH: James C. Bradshaw, Treasurer

Candidate/Committee: Independent Medicine's Political Action Committee Tennessee

DATE: March 5, 1984

SUBJECT(S): Failure to file 1983 Mid Year Report

---

I telephoned the treasurer to determine why a report had not been filed in response to the non-filer notice that had been sent to the committee. Dr. Bradshaw's secretary stated that he would not be in until the following day and that she would have him call me.

84040480049

TELECON

ANALYST Mike Togney

TELECON WITH: Secretary to James C. Bradshaw, Treasurer and Jack Fosbinder, Tennessee Medical Association

Candidate/Committee: Independent Medicine's Political Action Committee Tennessee

DATE: March 9, 1984

SUBJECT(S): Failure to file 1983 Mid Year Report

I spoke with Dr. Bradshaw's secretary and was informed that he was no longer treasurer of the committee. She referred me to Mr. Jack Fosbinder of the Tennessee Medical Association. Mr. Fosbinder stated that he had recently become responsible for the reporting of the committee's political activity and was not aware of the federal reporting requirement. He stated that he had not seen the non-filer notice and expressed concern that there might be a problem with receiving the mail from the FEC, since the committee no longer maintained the post office box that had been used for sometime as their mailing address. He also stated that a new treasurer had been appointed and asked that forms be provided to supply this information and to report the committee's financial activity. I informed him that the forms and other necessary information would be mailed today and that their Statement of Organization should be amended to reflect the new treasurer and any change in address.

84040480050





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MS-L

May 7, 1984

Jack Fosbinder, Assistant Secretary-  
Treasurer  
Independent Medicine's Political  
Action Committee Tennessee  
112 Louise Avenue  
Nashville, TN 37203

Identification Number: C00001354

Reference: 1983-84 Election Cycle Reports

Dear Mr. Fosbinder:

This letter is prompted by the Commission's review of the reports filed by your committee. The following is a list of reports your committee has failed to file in a timely manner.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
1983 Mid-Year (1/1/83-6/30/83)	7/31/83	3/26/84
1983 Year End (7/1/83-12/31/83)	1/31/84	3/26/84

Timely filing is a specific requirement of the Federal Election Campaign Act and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views late filing as a serious violation of the Act. This communication is to advise you that any additional late filing of a required report by your committee may result in the Commission initiating legal enforcement action.

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) 523-4048.

Sincerely,

Michael B. Filler  
Chief  
Party/Non-Party Branch

84040480052



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

84040480053

THIS IS THE BEGINNING OF MUR # 1728

Date Filmed 9/26/84 Camera No. --- 4

Cameraman JRL