



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1908

Date Filmed 6/21/85 Camera No. --- 4

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MUR 1908

FEDERAL ELECTION COMMISSION

All routing slips

Documents relating to conciliation

Original page 2 of General Counsel's Report dated 4/11/85

First 3 pages of RAD Referral

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):

- | | | | |
|-------------------------------------|---|--------------------------|--|
| <input type="checkbox"/> | (1) Classified Information | <input type="checkbox"/> | (6) Personal privacy |
| <input type="checkbox"/> | (2) Internal rules and practices | <input type="checkbox"/> | (7) Investigatory files |
| <input checked="" type="checkbox"/> | (3) Exempted by other statute 2 U.S.C. 5437g | <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 Maibeth Tavant
date 5/21/85

8504052437

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 1908
Planning Research Corporation)	
Political Action Committee)	
Bert M. Concklin, as treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 14, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1908:

1. Accept the agreement attached to the General Counsel's Report signed May 8, 1985.
2. Close the file.
3. Approve the letter attached to the General Counsel's Report signed May 8, 1985.

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

Attest:

5-14-85
Date

Jody C. Ransom
for Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	5-9-85, 8:25
Circulated on 48 hour tally basis:	5-9-85, 4:00

85040524375



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 16, 1985

Bert M. Concklin, Treasurer
Planning Research Corporation
Political Action Committee
1500 Planning Research Drive
McLean, VA 22102

Re: MUR 1908

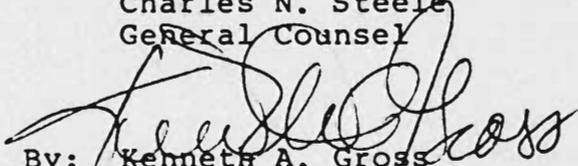
Dear Mr. Concklin:

On May 14, 1985, 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)(B), 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 respondents 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

By: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

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RECEIVED
OFFICE OF THE
GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

85 APR 29 P 1: 40

In the Matter of
Planning Research Corporation)
Political Action Committee)
Bert M. Concklin, as treasurer)
MAY 1 P12: 23
MUR 1908

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 the Planning Research Corporation Political Action Committee and Bert M. Concklin, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(B) by failing to timely file the 1984 12 Day Pre-General Election Report.

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. Planning Research Corporation Political Action Committee is a political committee pursuant to 2 U.S.C. § 431(4)(B).

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2. Bert M. Concklin is the treasurer of Planning Research Corporation Political Action Committee.

3. The 1984 12 Day Pre-General Election Report, covering October 1-October 17, 1984, was due October 25, 1984.

4. On November 23, 1984, the Respondents filed a November Monthly Report which covered the pre-general election reporting period.

V. Pursuant to 2 U.S.C. § 434(a)(4)(B), a political committee filing monthly reports is required, through its treasurer, to file such reports no later than the 20th day after the last day of the month, except that, in lieu of filing the reports otherwise due in November and December of any year in which a regularly scheduled general election is held, a pre-general election report is required to be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) the general election and is to be complete as of the 20th day before the election, a post-general election report is required to be filed no later than the 30th day after the general election and a year end report is required to be filed no later than January 31 of the following calendar year.

VI. By failing to timely file a 1984 12 Day Pre-General Election Report, the Respondents violated 2 U.S.C. § 434(a)(4)(B).

VII. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of one hundred and seventy-five dollars (\$175), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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VIII. 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.

IX. 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.

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

XI. 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.

XII. 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*
Kenneth A. Gross
Associate General Counsel

May 15, 1985
Date

FOR THE RESPONDENTS:

Bert M. Concklin
(Name) Bert M. Concklin
(Position) Treasurer, PRC PAC

4/24/85
Date

35040524330

85040524331

PLANNING RESEARCH CORPORATION
POLITICAL ACTION COMMITTEE
1500 PLANNING RESEARCH DR. 703-556-1520
MC LEAN, VA. 22102

248

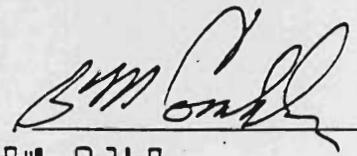
4/25/1985

68-760
560 15

PAY TO THE ORDER OF U.S. Treasury \$ 175.00

One hundred seventy five dollars and -----xx/100 DOLLARS

 Dominion National Bank
of Northern Virginia
Vienna, Virginia 22180



MEMO
⑆1056007604⑆ 158⑈09638⑈ 0248

Attachment 2

5

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1908
Planning Research Corporation)
Political Action Committee)
Bert M. Concklin, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 17, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1908:

1. Enter into pre-probable cause conciliation with Planning Research Corporation Political Action Committee and Bert M. Concklin, as treasurer.
2. Approve the conciliation agreement submitted with the General Counsel's Report signed April 11, 1985.
3. Approve the letter attached to the General Counsel's Report signed April 11, 1985.

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

Attest:

4-17-85

Date

Marjorie W Emmons

Marjorie W. Emmons
Secretary of the Commission

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

4-12-85, 12:34
4-15-85, 11:00

85040514330



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *W*
DATE: April 12, 1985
SUBJECT: MUR 1908 - General Counsel's Report

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

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Sensitive	<input checked="" type="checkbox"/>	Audit Matters	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Litigation	<input type="checkbox"/>
24 Hour No Objection	<input type="checkbox"/>	Closed MUR Letters	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>	Status Sheets	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Advisory Opinions	<input type="checkbox"/>
Information	<input type="checkbox"/>	Other (see distribution below)	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>		
Non-Sensitive	<input type="checkbox"/>		
Other	<input type="checkbox"/>		
_____		_____	
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_____		_____	

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

In the Matter of)
)
Planning Research Corporation)
Political Action Committee)
Bert M. Concklin, as treasurer)

MUR 1908

APR 12 12:34

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter was referred to the Office of the General Counsel by the Reports Analysis Division ("RAD"). On March 1, 1985, the Commission voted to open a MUR and found reason to believe that the Planning Research Corporation Political Action Committee ("Committee") and Bert M. Concklin, as treasurer, violated 2 U.S.C. § 434(a)(4)(B). On March 21, 1985, this Office received a response from Mr. Concklin requesting pre-probable cause conciliation. See Attachment 1.

II. ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(B), a political committee filing monthly reports is required, through its treasurer, to file, in a year in which a regularly scheduled general election is held, a pre-general election report no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) the general election, which is to be complete as of the 20th day before the election. The 1984 12 Day Pre-General Election Report was due October 25, 1984 and should have covered October 1-October 17, 1984. On November 23, 1984, the Respondents filed a November Monthly report which covered the month of October. See Attachment 2.

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According to Mr. Concklin, a notification letter regarding the due date of the pre-election report which was sent by RAD on October 1, 1984, was never received by the Committee. In addition, Mr. Concklin stated that the Committee was not aware that the filing requirements in an election year were different from those in a non-election year.

In light of Mr. Concklin's request, the Office of the General Counsel recommends that the Commission enter into pre-probable cause conciliation with the Respondents.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

IV. RECOMMENDATIONS

1. Enter into pre-probable cause conciliation with Planning Research Corporation Political Action Committee and Bert M. Concklin, as treasurer.

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2. Approve the attached conciliation agreement.
3. Approve the attached letter.

Charles N. Steele
General Counsel

April 11, 1985
Date

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

Attachments

1. Letter from Concklin
2. Report
3. Proposed conciliation agreement
4. Proposed letter

35040524386



Planning Research Corporation

1500 Planning Research Drive
McLean, VA 22102

GC# 6948

Tarrant

March 20, 1985

Federal Election Commission
Office of the General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

VIA COURIER

Attention: Marybeth Tarrant

Re: MUR No. 1908

Gentlemen:

On March 11, 1985, I received your March 7, 1985, letter notifying me as Treasurer of the Planning Research Corporation Political Action Committee ("PRC/PAC") that the Federal Election Commission ("FEC") has determined that there is a reason to believe the PRC/PAC had violated 2 U.S.C. Section 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). According to your Factual and Legal Analysis of MUR No. 1908, the PRC/PAC failed to timely file a 12 Day Pre-General Election Report required by the Act.

In reviewing our reports to the FEC and the regulations for filing such reports, I agree that the PRC/PAC did not timely file the 12 Day Pre-Election Report.

As you know, the PRC/PAC files its reports with the FEC monthly. The PRC/PAC's decision to file monthly was made primarily so a violation of this nature would not be made. However, we were not aware that reports made in a general election year were filed differently than those filed in any other year. You noted in your Analysis that on October 1, 1984, the PRC/PAC was sent prior notification which specifically informed monthly filers of the requirement to file a 12 Day Pre-Election Report. Such a notification was never received or seen by the PRC/PAC or any of the employees providing administrative services to the PRC/PAC.

In the absence of such notification, the PRC/PAC continued in good faith to file reports monthly with the FEC reporting all moneys received and expended by the PRC/PAC. It has always been our intent to comply with all government reporting regulations, and now that we are aware of the proper reporting procedures, we have taken

15 MAR 21 12:40 PM '85

GENERAL COUNSEL

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Attachment 1

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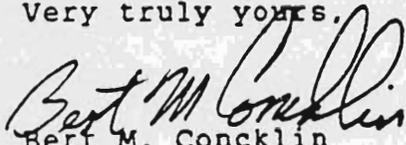
Federal Election Commission
Office of the General Counsel
March 20, 1985
Page Two

steps to insure that these reporting procedures are followed in the future.

In a telephone conversation between Robert Holcombe, General Counsel of Planning Research Corporation, and Marybeth Tarrant, a member of your staff, the PRC/PAC was informed that the FEC does not require the PRC/PAC to file any additional reports to clear up this matter, since all income and expense transactions have already been reported for the time period in question. Accordingly, the PRC/PAC now requests pre-probable cause conciliation of this matter.

It is my understanding that, upon agreement with this request, your office will proceed to draft a proposed Conciliation Agreement for review by the Commission and the PRC/PAC. In drafting said Agreement, I would appreciate your taking into consideration the above mitigating points made on behalf of the PRC/PAC. Thank you for your consideration in this matter.

Very truly yours,



Bert M. Concklin
Treasurer
Planning Research Corporation
Political Action Committee

BMC/der

35040524333

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

84 NOV 23 8:54

(Summary Page)

1. Name of Committee (in Full)
Planning Research Corporation Political Action Committee

Address (Number and Street)
1500 Planning Research Drive

City, State and ZIP Code
McLean, VA 22102

Check if address is different than previously reported.

2. FEC Identification Number
C00120022

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

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for October 1984
 Twelfth day report preceding _____ (Type of National 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>October 1</u> Through <u>October 31, 1984</u>		
6. (a) Cash on Hand January 1, 1984		\$ 27,690.28
(b) Cash on Hand at Beginning of Reporting Period	\$ 18,493.28	
(c) Total Receipts (from Line 1B)	\$ 4,869.00	\$ 19,387.00
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 23,362.28	\$ 47,077.28
7. Total Disbursements (from Line 2B)	\$ 5,900.00	\$ 29,615.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 17,462.28	\$ 17,462.28
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 800-435-6820
Local 202-633-4889

Bert M. Concklin
Type in Print Name of Treasurer

SIGNATURE OF TREASURER

11/19/84
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. §437c.

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 3X (3/80)

Attachment 2 (3)

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COVERED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FSC FORM 280)

Name of Committee (in Full)	Report Covering the Period:	
	From: 10/1	To: 10/31/84
Planning Research Corporation Political Action Committee	DEBITED A Total This Period	CREDITED Quoted Verbatim
I. RECEIPTS		
11 CONTRIBUTIONS (other than loans) FROM	4,869.00	19,387.00
a) Individuals (Persons Other Than Political Committees)		
Name: Every Member (.....)		
b) Political Party Committees		
c) Other Political Committees		
d) TOTAL CONTRIBUTIONS (other than loans) (Lines 11a, 11b and 11c)	4,869.00	19,387.00
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13 ALL LOANS RECEIVED		
14 LOAN REPAYMENTS RECEIVED		
15 OFFSETS TO OPERATING EXPENDITURES (Interest, Rental, etc.)		
16 RECEIPTS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17 OTHER RECEIPTS (Donations, Interest, etc.)		
18 TOTAL RECEIPTS (Lines 11, 12, 13, 14, 15, 16 and 17)	4,869.00	19,387.00
II. DISBURSEMENTS		
19 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
20 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	5,900.00	29,615.00
21 INDEPENDENT EXPENDITURES (See Statute E)		
22 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (7 U.S.C. (4471a-1)) (See Statute F)		
23 LOAN REPAYMENTS MADE		
24 LOANS MADE		
25 REFUNDS OF CONTRIBUTIONS TO		
a) Individuals (Persons Other Than Political Committees)		
b) Political Party Committees		
c) Other Political Committees		
d) TOTAL CONTRIBUTION REFUNDS (Lines 25a, 25b and 25c)		
27 OTHER DISBURSEMENTS	5,900	29,615.00
28 TOTAL DISBURSEMENTS (Lines 19, 20, 21, 22, 23, 24, 25, 26 and 27)		
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29 TOTAL CONTRIBUTIONS (other than loans) from Line 11b	4,869.00	19,387.00
30 TOTAL CONTRIBUTION REFUNDS from Line 25d		
31 NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	4,869.00	19,387.00
32 TOTAL OPERATING EXPENDITURES from Line 19		
33 OFFSETS TO OPERATING EXPENDITURES from Line 15		
34 NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)		

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 14031

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page _____ of _____ for
LINE RELEASE A
 (Use separate schedules for each category of the Detailed Summary Page)

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

Name of Committee (in Full)			
Planning Research Corporation Political Action Committee			
A. Full Name, Mailing Address and ZIP Code Maryland Victory '84 (R) 11227A Lockwood Drive Silver Spring, MD 20901	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/3/84	Amount of Each Disbursement This Period \$400.00
B. Full Name, Mailing Address and ZIP Code Friends of Frank Wolf (V) 130 Cannon House Office Bldg., Rm 130 Washington, DC 20515	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/5/84	Amount of Each Disbursement This Period 2000.00
C. Full Name, Mailing Address and ZIP Code Parris for Congress 121 North Henry Street Alexandria, VA 22134	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/5/84	Amount of Each Disbursement This Period 2000.00
D. Full Name, Mailing Address and ZIP Code Bethune for Senate P. O. Box 3060 Little Rock, Arkansas 72203	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/22/84	Amount of Each Disbursement This Period 500.00
E. Full Name, Mailing Address and ZIP Code Hal Daub for Congress P. O. Box 6333 Omaha, Nebraska 68106	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/23/84	Amount of Each Disbursement This Period 500.00
F. Full Name, Mailing Address and ZIP Code McDade for Congress P. O. Box 972 Scranton, PA 18501	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/30/84	Amount of Each Disbursement This Period 500.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

8504054371 R 403314550

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Planning Research Corporation

LC# 6948

Tarrant

1500 Planning Research Drive
McLean, VA 22102

March 20, 1985

Federal Election Commission
Office of the General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

VIA COURIER

Attention: Marybeth Tarrant

Re: MUR No. 1908

Gentlemen:

On March 11, 1985, I received your March 7, 1985, letter notifying me as Treasurer of the Planning Research Corporation Political Action Committee ("PRC/PAC") that the Federal Election Commission ("FEC") has determined that there is a reason to believe the PRC/PAC had violated 2 U.S.C. Section 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). According to your Factual and Legal Analysis of MUR No. 1908, the PRC/PAC failed to timely file a 12 Day Pre-General Election Report required by the Act.

In reviewing our reports to the FEC and the regulations for filing such reports, I agree that the PRC/PAC did not timely file the 12 Day Pre-Election Report.

As you know, the PRC/PAC files its reports with the FEC monthly. The PRC/PAC's decision to file monthly was made primarily so a violation of this nature would not be made. However, we were not aware that reports made in a general election year were filed differently than those filed in any other year. You noted in your Analysis that on October 1, 1984, the PRC/PAC was sent prior notification which specifically informed monthly filers of the requirement to file a 12 Day Pre-Election Report. Such a notification was never received or seen by the PRC/PAC or any of the employees providing administrative services to the PRC/PAC.

In the absence of such notification, the PRC/PAC continued in good faith to file reports monthly with the FEC reporting all moneys received and expended by the PRC/PAC. It has always been our intent to comply with all government reporting regulations, and now that we are aware of the proper reporting procedures, we have taken

35040524392

15 MAR 21 11:48 AM '85

COMMUNICATIONS SECTION

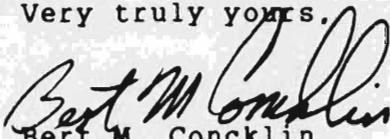
Federal Election Commission
Office of the General Counsel
March 20, 1985
Page Two

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In a telephone conversation between Robert Holcombe, General Counsel of Planning Research Corporation, and Marybeth Tarrant, a member of your staff, the PRC/PAC was informed that the FEC does not require the PRC/PAC to file any additional reports to clear up this matter, since all income and expense transactions have already been reported for the time period in question. Accordingly, the PRC/PAC now requests pre-probable cause conciliation of this matter.

It is my understanding that, upon agreement with this request, your office will proceed to draft a proposed Conciliation Agreement for review by the Commission and the PRC/PAC. In drafting said Agreement, I would appreciate your taking into consideration the above mitigating points made on behalf of the PRC/PAC. Thank you for your consideration in this matter.

Very truly yours,



Bert M. Concklin
Treasurer
Planning Research Corporation
Political Action Committee

BMC/der

85040524393

prc

Planning Research Corporation

1500 Planning Research Drive
McLean VA 22102

HAND-DELIVERED

Federal Election Commission
Office of the General Counsel
1325 K Street, N.W.
Washington, DC 20463

1 6 2 4 2 5 0 4 0 5 8



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

15 MAR 18 P 1: 56

SENSITIVE

March 18, 1985

MEMORANDUM TO: The Commission
FROM: Charles N. Steele
General Counsel
By: Kenneth A. Gross
Associate General Counsel *KAG*
SUBJECT: RAD Referral 85NF-26

On March 1, 1985 the Commission approved the recommendation that RAD Referral 85NF-26 should become a MUR. Therefore, all documents which had previously been contained in RAD Referral 85NF-26 should now become MUR 1908.

Attachment
Copy of Certification

35040524395

BEFORE THE FEDERAL ELECTION COMMISSION

M 1908
Tarrant

In the Matter of)	
)	RAD Referral #85NF-26
Planning Research Corporation)	
Political Action Committee and)	
Bert M. Concklin, as treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 1, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral #85NF-26:

1. Open a MUR. .
2. Find reason to believe that the Planning Research Corporation Political Action Committee and Bert M. Concklin, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).
3. Approve the letter attached to the First General Counsel's Report signed February 26, 1985.

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

Attest:

3-4-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

2-27-85, 12:21
2-27-85, 4:00

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
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I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 1, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral #85NF-26:

1. Open a MUR.
2. Find reason to believe that the Planning Research Corporation Political Action Committee and Bert M. Concklin, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).
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Received in Office of Commission Secretary:
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2-27-85, 12:21
2-27-85, 4:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 7, 1985

Bert M. Concklin, Treasurer
Planning Research Corporation
Political Action Committee
1500 Planning Research Drive
McLean, VA 22102

Re: MUR 1908

Dear Mr. Concklin:

On March 1, 1985, the Federal Election Commission determined that there is reason to believe the Planning Research Corporation Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The 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. Please submit any such materials within ten days of your receipt of this letter. Statements should be submitted under oath.

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.

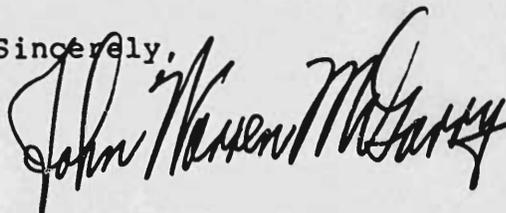
The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

85040524393

Letter to Bert M. Concklin
Page 2

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)523-4143.

Sincerely,



John Warren McGarry
Chairman

Enclosures

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

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FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE March, 1985

MUR No. 1908
STAFF MEMBER & TEL. NO.
Marybeth Tarrant
(202) 523-4143

RESPONDENTS: Planning Research Corporation Political Action
Committee and Bert M. Concklin, as 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

It is alleged that the Planning Research Corporation Political Action Committee (the "Committee") and Bert M. Concklin, as treasurer, failed to timely file the 1984 12 Day Pre-General Election Report in violation of 2 U.S.C. § 434(a)(4)(B).

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(B), a political committee filing monthly reports, is required, through its treasurer, to file such reports no later than the 20th day after the last day of the month and the reports are to be complete as of the last day of the month, except that, in lieu of filing the reports otherwise due in November and December of any year in which a regularly scheduled general election is held, a pre-general election report is required to be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) the general election, a post-general

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election report is required to be filed no later than the 30th day after the general election, and a year end report is required to be filed no later than January 31 of the following calendar year.

On October 1, 1984, the Committee was sent prior notification which specifically informed monthly filers of the requirement to file a 12 Day Pre-Election Report. On November 23, 1984, the Respondents filed a November Monthly Report which covered the month of October. In light of this late filing, the Office of the General Counsel recommends that the Commission open a MUR and find reason to believe the Respondents violated 2 U.S.C. § 434(a)(4)(B).

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cut*
DATE: February 27, 1985
SUBJECT: RAD 85NF-26: First General Counsel's Report

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

CIRCULATIONS

DISTRIBUTION

48 Hour Tally Vote	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Sensitive	<input checked="" type="checkbox"/>	Audit Matters	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Litigation	<input type="checkbox"/>
24 Hour No Objection	<input type="checkbox"/>	Closed MUR Letters	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>	Status Sheets	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Advisory Opinions	<input type="checkbox"/>
Information	<input type="checkbox"/>	Other (see distribution below)	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>		
Non-Sensitive	<input type="checkbox"/>		
Other	<input type="checkbox"/>		

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SENSITIVE

FEDERAL ELECTION COMMISSION OF THE FEC
1325 K Street, N.W. COMMISSION SECRETARY
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT 27 12:21

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION 2/27/85-12:30 RAD REFERRAL #85NF-26
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: Planning Research Corporation Political Action Committee and Bert M. Concklin, as treasurer

INTERNAL REPORTS CHECKED: Reports filed by Respondents

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of the General Counsel by the Reports Analysis Division ("RAD").

SUMMARY OF ALLEGATIONS

It is alleged that the Planning Research Corporation Political Action Committee (the "Committee") and Bert M. Concklin, as treasurer, failed to timely file the 1984 12 Day Pre-General Election Report in violation of 2 U.S.C. § 434(a)(4)(B).

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(B), a political committee filing monthly reports, is required, through its treasurer, to file such reports no later than the 20th day after the last day of the month and the reports are to be complete as of the last

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day of the month, except that, in lieu of filing the reports otherwise due in November and December of any year in which a regularly scheduled general election is held, a pre-general election report is required to be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) the general election, a post-general election report is required to be filed no later than the 30th day after the general election, and a year end report is required to be filed no later than January 31 of the following calendar year.

On October 1, 1984, the Committee was sent prior notification which specifically informed monthly filers of the requirement to file a 12 Day Pre-Election Report. On November 23, 1984, the Respondents filed a November Monthly Report which covered the month of October. In light of this late filing, the Office of the General Counsel recommends that the Commission open a MUR and find reason to believe the Respondents violated 2 U.S.C. § 434(a)(4)(B).

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Planning Research Corporation Political Action Committee and Bert M. Concklin, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).

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3. Approve attached letter.

Charles N. Steele
General Counsel

February 26, 1985
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. RAD Referral
2. Proposed letter
3. General Counsel's Factual & Legal Analysis

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FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20463

October 1, 1984

GENERAL ELECTION FILING NOTICE
FOR UNAUTHORIZED COMMITTEES

WHO MUST FILE THE PRE-GENERAL ELECTION REPORT

All committees that file monthly reports must file the pre-general election report due October 25, 1984.

In addition all quarterly filing committees that have made contributions or expenditures (including independent expenditures) in connection with the general election must file a pre-election report, if such activity has not previously been reported. See below for post-general filing information.

WHAT MUST BE REPORTED

The report must disclose all financial activity of the committee from the later of, the last report filed or the date of registration* through October 17, 1984. (Monthly filers must disclose all financial activity from the later of October 1 or the date of registration* through October 17, 1984.)

WHEN TO FILE

Pre-general election reports sent registered or certified mail must be postmarked no later than October 22, 1984. Reports hand delivered or mailed first class must be received no later than close of business October 25, 1984.

* * * * *

WHO MUST FILE THE POST-GENERAL ELECTION REPORT

All committees must file the post-general election report due December 6, 1984, regardless of election activity.

WHAT MUST BE REPORTED

The post-general election report must cover all financial activity of the committee from either the date of the last report filed or the date of registration, whichever is later* through November 26, 1984.

WHEN TO FILE

Post-general election reports sent by registered or certified mail must be postmarked no later than December 6, 1984. Reports hand delivered or mailed first class must be received no later than close of business December 6, 1984.

*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).

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WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC form 3X, for details.

QUARTERLY FILERS

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
3rd Q-Report	07/01* - 09/30	10/15/84	10/15/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General**	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

*Or from date of registration, or the close of books of the last report filed, whichever is later.

**Reports filed by committees that did not file the pre-General report should cover all financial activity from the last report filed through November 26, 1984.

* * *

MONTHLY FILERS

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
Oct. Monthly	09/01 - 09/30	10/20/84	10/20/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

FOR INFORMATION CALL: Office Of Public Communications
800/424-9530 or 202/523-4068

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RQ-7

November 16, 1984

Identification Number:

Reference: 12 Day Pre-General Report (10/1/84-10/17/84)

Dear

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

If the report in question was filed, please submit documentation for the public record. Although the Commission may take further legal steps concerning this matter, your prompt response will be taken into consideration.

If you have any questions, please contact _____ on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

E. D. Gibson
John D. Gibson
Assistant Staff Director
Reports Analysis Division

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PLANNING RESEARCH CORPORATION POLITICAL ACTION COMMITTEE

(Attachments 26a - b)

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)DATE 11JAN85
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
PLANNING RESEARCH CORPORATION POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: PLANNING RESEARCH CORPORATION				NON-PARTY QUALIFIED		ID #C00120022
1983	FEBRUARY MONTHLY	0	0	1JAN83 -31JAN83	4	83FEC/266/4200
	REQUEST FOR ADDITIONAL INFORMATION			1JAN83 -31JAN83	1	85FEC/358/145
	MARCH MONTHLY	0	0	1FEB83 -28FEB83	4	83FEC/268/451
	REQUEST FOR ADDITIONAL INFORMATION			1FEB83 -28FEB83	1	85FEC/358/1437
	APRIL MONTHLY	800	800	1MAR83 -31MAR83	5	83FEC/271/0180
	REQUEST FOR ADDITIONAL INFORMATION			1MAR83 -31MAR83	1	85FEC/358/1438
	MAY MONTHLY	610	400	1APR83 -30APR83	6	83FEC/273/3026
	MAY MONTHLY - AMENDMENT	610	400	1APR83 -30APR83	6	83FEC/274/5446
	REQUEST FOR ADDITIONAL INFORMATION			1APR83 -30APR83	1	85FEC/358/1439
	JUNE MONTHLY	400	1,450	1MAY83 -31MAY83	5	83FEC/273/3032
	JUNE MONTHLY - AMENDMENT	400	1,450	1MAY83 -31MAY83	6	83FEC/274/5440
	REQUEST FOR ADDITIONAL INFORMATION			1MAY83 -31MAY83	1	85FEC/358/1440
	JULY MONTHLY	5,653	1,200	1JUN83 -30JUN83	7	83FEC/274/5433
	JULY MONTHLY - AMENDMENT	5,653	1,200	1JUN83 -30JUN83	5	83FEC/278/4935
	REQUEST FOR ADDITIONAL INFORMATION			1JUN83 -30JUN83	1	85FEC/358/1441
	AUGUST MONTHLY	2,920	3,954	1JUL83 -27JUL83	6	83FEC/278/4868
	AUGUST MONTHLY - AMENDMENT	2,920	3,978	1JUL83 -30JUL83	5	83FEC/282/1113
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31JUL83	1	85FEC/358/1442
	SEPTEMBER MONTHLY	2,695	7,776	1AUG83 -22AUG83	6	83FEC/282/1118
	SEPTEMBER MONTHLY - AMENDMENT	3,400	35	1AUG83 -31AUG83	6	83FEC/282
	REQUEST FOR ADDITIONAL INFORMATION			1AUG83 -31AUG83	1	85FEC/358
	OCTOBER MONTHLY	5,435	2,204	1SEP83 -27SEP83	7	83FEC/282
	REQUEST FOR ADDITIONAL INFORMATION			1SEP83 -30SEP83	1	85FEC/358
	NOVEMBER MONTHLY	8,365	516	1OCT83 -31OCT83	8	83FEC/282
	REQUEST FOR ADDITIONAL INFORMATION			1OCT83 -31OCT83	1	85FEC/358
	DECEMBER MONTHLY	11,505	5,060	1NOV83 -30NOV83	9	83FEC/282
	DECEMBER MONTHLY - AMENDMENT	11,505	5,060	1NOV83 -30NOV83	9	84FEC/291
	REQUEST FOR ADDITIONAL INFORMATION			1NOV83 -30NOV83	1	85FEC/358
	YEAR-END	1,995	310	1DEC83 -31DEC83	27	84FEC/292
	REQUEST FOR ADDITIONAL INFORMATION			1DEC83 -31DEC83	2	84FEC/358
1984	FEBRUARY MONTHLY	1,095	750	1JAN84 -31JAN84	6	84FEC/297
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31JAN84	1	85FEC/358
	MARCH MONTHLY	1,702	250	1FEB84 -29FEB84	6	84FEC/306
	MARCH MONTHLY - AMENDMENT	1,702	250	1FEB84 -29FEB84	5	84FEC/308
	REQUEST FOR ADDITIONAL INFORMATION			1FEB84 -29FEB84	1	85FEC/358
	APRIL MONTHLY	1,100	2,850	1MAR84 -31MAR84	5	84FEC/308
	REQUEST FOR ADDITIONAL INFORMATION			1MAR84 -31MAR84	1	85FEC/358
	MAY MONTHLY	1,557	1,000	1APR84 -30APR84	6	84FEC/315
	MAY MONTHLY - AMENDMENT	1,557	1,000	1APR84 -30APR84	6	84FEC/317
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30APR84	1	85FEC/358
	JUNE MONTHLY	552	5,500	1MAY84 -31MAY84	7	84FEC/317
	REQUEST FOR ADDITIONAL INFORMATION			1MAY84 -31MAY84	1	85FEC/358
	JULY MONTHLY	1,102	3,900	1JUN84 -30JUN84	6	84FEC/318
	REQUEST FOR ADDITIONAL INFORMATION			1JUN84 -30JUN84	1	85FEC/358

Attachment 26a

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)DATE 11JAN85
PAGE 2

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	AUGUST MONTHLY REQUEST FOR ADDITIONAL INFORMATION	1,090	215	1JUL84 -31JUL84	6	84FEC/325/4845
	SEPTEMBER MONTHLY REQUEST FOR ADDITIONAL INFORMATION	2,182	1,250	1JUL84 -31JUL84 1AUG84 -31AUG84	1 6	85FEC/358/1449 84FEC/329/2287
	OCTOBER MONTHLY REQUEST FOR ADDITIONAL INFORMATION	4,138	8,000	1AUG84 -31AUG84 1SEP84 -30SEP84	1 8	85FEC/358/1448 84FEC/345/3062
	NOVEMBER MONTHLY REQUEST FOR ADDITIONAL INFORMATION	4,869	5,900	1SEP84 -30SEP84 1OCT84 -31OCT84	1 7	85FEC/358/1447 84FEC/349/2541
	NOTICE OF FAILURE TO FILE			1OCT84 -31OCT84	5	84FEC/358/0503
	DECEMBER MONTHLY	3,455	2,500	1NOV84 -26NOV84 1NOV84 -30NOV84	1 6	84FEC/357/4944 84FEC/358/0349
1985	MISCELLANEOUS REPORT			4JAN85 TO FEC	2	85FEC/358/1199
	TOTAL	63,925	0	48,068	0	241 TOTAL PAGES
	ENDING CASH (11/30/84):	\$18,417				
	DEBTS:	\$ 0				

8

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

24 NOV 23 8:54

(Summary Page)

<p>1 Name of Committee (in full) Planning Research Corporation Political Action Committee</p> <hr/> <p>Address (Number and Street) 1500 Planning Research Drive</p> <hr/> <p>City, State and ZIP Code McLean, VA 22102</p> <hr/> <p><input type="checkbox"/> Check if address is different than previously reported.</p>	<p>4 TYPE OF REPORT (check appropriate box)</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 type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Election Year Only) <input checked="" type="checkbox"/> Monthly Report for <u>October 1984</u> <input type="checkbox"/> Twelfth day report preceding _____ (Name of Election) election on _____ in the State of _____ <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____ <input 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 000120022</p>	<p>3 <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (State)</p>

SUMMARY

6 Covering Period <u>October 1</u> Through <u>October 31, 1984</u>	Column A This Period	Column B Calendar Year-to-Date
7 a. Cash on Hand January 1, 1984		\$ 27,690.28
7 b. Cash on Hand at Beginning of Reporting Period	\$ 18,493.28	
7 c. Total Receipts (from Line 18)	\$ 4,869.20	\$ 19,357.00
7 d. Schedule Debt (lines 6c and 6k for Column A and lines 6a and 6k for Column B)	\$ 23,362.28	\$ 47,077.28
7 e. Total Disbursements (from Line 28)	\$ 5,902.00	\$ 29,615.00
7 f. Cash on Hand at Close of Reporting Period (subtract line 7 from 6d)	\$ 17,462.28	\$ 17,462.28
8 Debts and Obligations Owed TO the Committee (itemize all on Schedule C or Schedule D)	\$	
9 Debts and Obligations Owed BY the Committee (itemize all on Schedule C or Schedule D)	\$	

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
Tel. From 800-424-9537
Local 202-673-6087

[Signature]

SIGNATURE OF TREASURER

11-19-84
Date

NOTE: Submission of false information or incomplete information may subject the person signing this Report to the penalties...

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

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9



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bert M. Concklin, Treasurer
Planning Research Corporation
Political Action Committee
1500 Planning Research Drive
McLean, VA 22102

Re: MUR

Dear Mr. Concklin:

On March , 1985, the Federal Election Commission determined that there is reason to believe the Planning Research Corporation Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The 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. Please submit any such materials within ten days of your receipt of this letter. Statements should be submitted under oath.

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.

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.

Attachment 2 (10)

35040524413

Letter to Bert M. Concklin
Page 2

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)523-4143.

Sincerely,

John Warren McGarry
Chairman

Enclosures

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

85040524411

(11)

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE _____

MUR No. _____
STAFF MEMBER & TEL. NO.
Marybeth Tarrant
(202)523-4143

RESPONDENTS: Planning Research Corporation Political Action
Committee and Bert M. Concklin, as 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

It is alleged that the Planning Research Corporation Political Action Committee (the "Committee") and Bert M. Concklin, as treasurer, failed to timely file the 1984 12 Day Pre-General Election Report in violation of 2 U.S.C. § 434(a)(4)(B).

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(B), a political committee filing monthly reports, is required, through its treasurer, to file such reports no later than the 20th day after the last day of the month and the reports are to be complete as of the last day of the month, except that, in lieu of filing the reports otherwise due in November and December of any year in which a regularly scheduled general election is held, a pre-general election report is required to be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) the general election, a post-general

85040524415

Attachment 3

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election report is required to be filed no later than the 30th day after the general election, and a year end report is required to be filed no later than January 31 of the following calendar year.

On October 1, 1984, the Committee was sent prior notification which specifically informed monthly filers of the requirement to file a 12 Day Pre-Election Report. On November 23, 1984, the Respondents filed a November Monthly Report which covered the month of October. In light of this late filing, the Office of the General Counsel recommends that the Commission open a MUR and find reason to believe the Respondents violated 2 U.S.C. § 434(a)(4)(B).

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FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20543

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THIS IS THE BEGINNING OF MUR # 1908,

Date Filmed 6/21/85 Camera No. --- 4

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