



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20543

THIS IS THE END OF MUR # 1919

Date Filmed 8/14/85 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

Conciliation Information

Routing Slip

Memorandum

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 checked="" type="checkbox"/> (2) Internal rules and practices               | <input checked="" type="checkbox"/> (7) Investigatory files               |
| <input checked="" type="checkbox"/> (3) Exempted by other statute                  | <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 type="checkbox"/> (5) Internal Documents                                    |   |

Signed

J. Shapiro

date

8/1/85

85040542757

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1919
Professional Insurance Agents	)	
Political Action Committee	)	
J. Knox Hillman, Jr., Treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 26, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1919:

1. Accept the conciliation agreement attached to the General Counsel's Report signed June 20, 1985.
2. Close the file.
3. Send the letter attached to the General Counsel's Report signed June 20, 1985.

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

Attest:

6/27/85  
Date

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

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

6-21-85, 1:40  
6-24-85, 11:00

85040542758



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 10, 1985

Jerald A. Jacobs, Esquire  
Leland J. Badger, Esquire  
Jenner & Block  
21 Dupont Circle  
Suite 500  
Washington, D.C. 20036

RE: MUR 1919  
Professional Insurance Agents  
Political Action Committee  
J. Knox Hillman, Treasurer

Dear Messrs. Jacobs and Badger:

On June 26, 1985, the Commission accepted the conciliation agreement signed by your clients and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele  
General Counsel

*Kenneth A. Gross (RWT)*

By: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Conciliation Agreements

85040542759

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Professional Insurance Agents	)	MUR 1919
Political Action Committee	)	
J. Knox Hillman, Jr., treasurer	)	

RECEIVED  
 OFFICE OF THE  
 GENERAL COUNSEL  
 JUN 7 2:14

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 Professional Insurance Agents Political Action Committee and J. Knox Hillman, Jr., as treasurer, ("Respondents") violated 2 U.S.C. §434(a)(4)(A)(ii) by failing to timely file the 1984 12-Day Pre-General Election Report.

RECEIVED  
 OFFICE OF THE  
 GENERAL COUNSEL  
 JUN 5 4:53

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 into 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.

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

1. Respondent, Professional Insurance Agents Political Action Committee, is a political committee registered with the Commission.

2. Respondent, J. Knox Hillman, Jr., is treasurer of the Professional Insurance Agents Political Action Committee.

3. On November 15, 1984, Respondents filed a report disclosing the Respondent Committee's activity for the period October 1-31, 1984.

4. Pursuant to 2 U.S.C. § 434(a)(4)(B), a political committee other than an authorized committee of a candidate which files monthly is required to file pre-general election, post-general election and year-end reports in lieu of monthly reports due in November and December.

5. Pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), the pre-general election report is due no later than 12 days before the general election. For the 1984 general election, the 12-Day Pre-General Election Report was due October 25, 1984 covering October 1-17, 1984.

6. The Respondent Committee disclosed its activity 21 days late for the 12-Day Pre-General Election Report time period, on the report it filed on November 15, 1984.

7. After receiving a notice from the Commission concerning its failure to file the 12-Day Pre-General

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Election Report, Respondents submitted a 12-Day Pre-General Election Report on November 30, 1984 showing Respondent Committee's activity for the October 1-17, 1984 time period only.

V. Respondents violated 2 U.S.C. § 434(a)(4)(A)(ii) by filing the 12-Day Pre-General Election Report late.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of \$175.00 pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

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

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

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IX. 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 (KAG) July 5, 1985  
Kenneth A. Gross Date  
Associate General Counsel

FOR THE RESPONDENTS:

Donald K. Gardner May 30, 1985  
Donald Gardner Date  
Executive Vice President  
National Association of Professional  
Insurance Agents

85040542763



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Jerald A. Jacobs, Esquire  
Leland J. Badger, Esquire  
Jenner & Block  
21 Dupont Circle  
Suite 500  
Washington, D.C. 20036

RE: MUR 1919  
Professional Insurance Agents  
Political Action Committee  
J. Knox Hillman, Treasurer

Dear Messrs. Jacobs and Badger:

On June , 1985, the Commission accepted the conciliation agreement signed by your clients and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Conciliation Agreements

*[Handwritten signature]*  
7/1/85

85040542764

**MEMORANDUM**

*Shedford*

*600#7118A*

TO: CHERYL THOMAS

TO: JOAN HARRIS

FROM: JOAN HARRIS

FROM: CHERYL THOMAS

CHECK NO. 8671 (a copy of which is attached) RELATING

TO MUR 1919 AND NAME Professional Insurance Agents PIA  
4 of Knox Hillman, Jr, Treas

WAS RECEIVED ON June 7, 1985. PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

14 BUDGET CLEARING ACCOUNT (#95F3875.16)

1 / CIVIL PENALTIES ACCOUNT (#95-1099.160)

OTHER \_\_\_\_\_

SIGNATURE

*Cheryl R. Thomas*

DATE

6/10/85

85040542765

*600#7118*

JUN 7 1985 2:14 PM  
RECEIVED  
GENERAL INVEST



NATIONAL ASSOCIATION OF  
**PROFESSIONAL INSURANCE AGENTS**  
400 NORTH WASHINGTON STREET  
ALEXANDRIA, VA. 22314

CHECK DATE	CHECK NUMBER
6/03/85	8671

68-424  
560

**- PIA - I 75**

PAY  
TO  
THE  
ORDER  
OF

TREASURER OF THE **UNITED STATES**

CHECK AMOUNT
\$175.00

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1919
Professional Insurance Agents	)	
Political Action Committee	)	
J. Knox Hillman, Jr., treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 8, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 1919:

1. Enter into conciliation with Professional Insurance Agents Political Action Committee and J. Knox Hillman, as treasurer, prior to a finding of probable cause to believe.
2. Approve and send the conciliation agreement and letter attached to the General Counsel's Report signed May 2, 1985.

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

Attest:

5-8-85

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:	5-3-85, 5:17
Circulated on 48 hour tally basis:	5-6-85, 11:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Jerald A. Jacobs, Esquire  
Leland J. Badger, Esquire  
Jenner & Block  
21 Dupont Circle, NW  
Suite 500  
Washington, D.C. 20036

RE: MUR 1919  
Professional Insurance Agents  
Political Action Committee,  
J. Knox Hillman, Jr.,  
Treasurer

Dear Messrs. Jacobs & Badger:

On March 6, 1985, the Commission found reason to believe that Professional Insurance Agents Political Action Committee and J. Knox Hillman, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii). At your request, the Commission determined on May , 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Judy Thedford, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosures

9/5/85

85040542767



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 13, 1985

Jerald A. Jacobs, Esquire  
Leland J. Badger, Esquire  
Jenner & Block  
21 Dupont Circle, NW  
Suite 500  
Washington, D.C. 20036

RE: MUR 1919  
Professional Insurance Agents  
Political Action Committee,  
J. Knox Hillman, Jr.,  
Treasurer

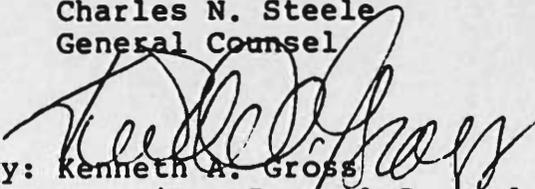
Dear Messrs. Jacobs & Badger:

On March 6, 1985, the Commission found reason to believe that Professional Insurance Agents Political Action Committee and J. Knox Hillman, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii). At your request, the Commission determined on May 8, 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Judy Thedford, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosures

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**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

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FEC  
SECRETARY

In the Matter of )  
 )  
Professional Insurance Agents )  
Political Action Committee )  
J. Knox Hillman, Jr., treasurer )

MUR 1919 MAY 3 5:17

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On March 6, 1985, the Commission found reason to believe Professional Insurance Agents Political Action Committee ("PIA-PAC") and J. Knox Hillman, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii) by filing its 12 Day Pre-General Election Report late. A letter notifying the respondents of the Commission's action was sent on March 19, 1985.

On April 1, 1985, the respondents submitted a response to the Commission (see attachment I). The letter reaffirms the facts previously before the Commission and notes additional background information. Specifically, the respondents note that the PIA-PAC staff was new due to a restructuring of the administration of PIA and that PIA-PAC has no record of receiving the prior notice from the Commission. The respondents request that the case be dismissed or entering into pre-probable cause conciliation.

**II. LEGAL ANALYSIS**

The legal analysis remains unchanged from the legal analysis in the First General Counsel's Report.

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We recommend entering into pre-probable cause conciliation with PIA-PAC and J. Knox Hillman, as treasurer.

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**IV. RECOMMENDATION**

1. Enter into conciliation with Professional Insurance Agents Political Action Committee and J. Knox Hillman, as treasurer, prior to a finding of probable cause to believe.

2. Approve and send the attached conciliation agreement and letter.

Charles N. Steele  
General Counsel

May 2, 1985  
Date

BY:

Kenneth A. Gross  
Associate General Counsel

Attachments

- I. Response
- II. Proposed Agreement
- III. Proposed letter

85040542772

LAW OFFICES

200# 7038  
Thedford

JENNER & BLOCK

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

21 DUPONT CIRCLE, N.W.

WASHINGTON, D.C. 20036

(202) 466-5470

CHICAGO OFFICE

ONE IBM PLAZA

CHICAGO, ILLINOIS 60611

(312) 222-9350

April 1, 1985

JERALD A. JACOBS

APR 1 4  
PS: 40  
COMMUNICATIONS SECTION

By Hand Delivery

Judy Thedford, Esq.  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re - MUR 1919;  
- Response of Professional Insurance Agents Political Action Committee ("PIAPAC") to Commission Notice of Possible Violation of Federal Election Campaign Act of 1971, As Amended.

Dear Ms. Thedford:

The Professional Insurance Agents Political Action Committee ("PIAPAC", including its Treasurer, J. Knox Hillman, Jr.), whom we represent, respectfully requests, for the reasons set forth below, that MUR 1919 be dismissed or, in the alternative, that a conciliation settlement, pursuant to 11 C.F.R. §111.18(d), be agreed upon prior to a finding of probable cause.

According to the Commission's letter notice of MUR 1919 (Attachment A), dated March 19, 1985 and first received and read by the PIAPAC office staff on Monday, March 25 (mailroom clerk stamp is Friday, March 22), MUR 1919 was "internally generated" in light of the late filing, by 12 business days (or 18 days, if weekends are included), of the information required in the "12-day Pre-General Election Report." The "12-Day Report" was due October 25, 1984 for the period October 1 through October 17. All the information required in the 12-Day Report, however, was submitted by PIAPAC in a November monthly report (Attachment B) for the period October 1-31, 1984, which was signed and dated November 13, 1984, well before what PIAPAC staff believed was the due date for such a report.

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(1)

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PIAPAC staff, who were new personnel as the result of a substantial restructuring of the administrative functions of PIA (the Administrator of PIAPAC), believed that reports in 1984 were due by the 20th day of each month for PAC activity during the prior month period (as was true for February-October 1984) and thus filed a report in mid-November for the period October 1-31. PIAPAC staff have no record of receiving any "prior notice letter" from the Commission, which the MUR 1919 statement alleges was mailed on October 1, 1984, advising of a requirement to file a separate "12-Day Report" by October 25, 1984. PIAPAC staff were unaware that a specific "12-Day Report" was due until they received notice on November 19, 1984, by the Commission's letter of November 16 (Attachment C), that such a report was overdue. Consequently, on or about November 19, PIAPAC staff Marie Hixon and Kay Carlisle contacted Alva Smith of the Commission staff, who advised that a "12-Day Report" simply needed to be filed as soon as possible. The "12-Day Report" as such, containing the same information for the October 1-17 period as set forth in PIAPAC's report dated November 13, was then signed and filed on November 27 (Attachment D; received by the Commission on November 30).

The late filing, by a very brief period of time, of the information called for by the "12-Day Report" and of the "12-Day Report" itself thus was simply an inadvertent mistake and actually was remedied, in substance, by PIAPAC's November 13 report even before PIAPAC first received notice on November 19 from the Commission that a "12-Day Report" was required and overdue. PIAPAC, which has acted in good faith at all times and provided all required information to the Commission after only a brief inadvertent delay in 1984, thus respectfully requests that MUR 1919 be dismissed as harmless inadvertent error or that a conciliation settlement be agreed upon to terminate MUR 1919. Even the Commission "General Counsel's Legal and Factual Analysis" for MUR 1919 recommends that PIAPAC's November 13 report (marked received by the Commission on November 15) be treated as the submission of the required information for October 1-17, thus rendering that submission late by simply 12 business days, a very minor and technical filing mistake.

On March 26, 1985, following the receipt by PIAPAC staff on March 25 of the Commission's letter notice of MUR 1919, PIA Legal Counsel Mr. Jay Berman responded by contacting you to discuss a means of promptly resolving the technical filing matter addressed by MUR 1919. You suggested that PIAPAC respond to the allegations of MUR 1919 with any relevant factual or legal materials and also indicated that a conciliation agreement prior to a finding of probable cause was possible.

(2)

It is in light of your discussion with Mr. Jay Berman on March 26 and the above factual information that PIAPAC earnestly seeks a prompt resolution, as noted above, of this matter. Under the circumstances, a dismissal of MUR 1919 would be both justified and appropriate. We appreciate your cooperation in helping resolve this matter and we shall endeavor to provide whatever further information you need in order to permit a termination of MUR 1919.

Thank you very much.

Respectfully,

Professional Insurance Agents  
Political Action Committee

By J. Jacobs  
Jerald A. Jacobs  
Leland J. Badger  
Jenner & Block Law Offices  
Attorneys for PIAPAC

85040542775

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1919

NAME OF COUNSEL: Jerald A. Jacobs

ADDRESS: Leland J. Badger  
Jenner & Block

21 Dupont Circle, N.W.  
Suite 500  
Washington, D.C. 20036

TELEPHONE: (202) 466-5470

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

April 1, 1985  
Date

*Charles W. Wegner, Jr. EJB*  
Signature

Charles W. Wegner, Jr.  
Professional Insurance Agents  
Political Action Committee Representative

RESPONDENT'S NAME: Professional Insurance Agents (including PIAPAC  
Political Action Committee Treasurer)  
ADDRESS: 400 North Washington Street

Alexandria, VA 22314

HOME PHONE: (301) 267-7399

BUSINESS PHONE: (202) 544-8713

85040542776



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Jerald A. Jacobs, Esquire  
Leland J. Badger, Esquire  
Jenner & Block  
21 Dupont Circle, NW  
Suite 500  
Washington, D.C. 20036

RE: MUR 1919  
Professional Insurance Agents  
Political Action Committee,  
J. Knox Hillman, Jr.,  
Treasurer

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Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosures

85040542777

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LCC# 7038  
Thedford

LAW OFFICES

JENNER & BLOCK

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

21 DUPONT CIRCLE, N.W.

WASHINGTON, D.C. 20036

(202) 466-5470

CHICAGO OFFICE

ONE IBM PLAZA

CHICAGO, ILLINOIS 60611

(312) 222-9350

April 1, 1985

JERALD A. JACOBS

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL  
APR 1 5:40

By Hand Delivery

Judy Thedford, Esq.  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re - MUR 1919;  
- Response of Professional Insurance Agents Political Action Committee ("PIAPAC") to Commission Notice of Possible Violation of Federal Election Campaign Act of 1971, As Amended.

Dear Ms. Thedford:

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According to the Commission's letter notice of MUR 1919 (Attachment A), dated March 19, 1985 and first received and read by the PIAPAC office staff on Monday, March 25 (mailroom clerk stamp is Friday, March 22), MUR 1919 was "internally generated" in light of the late filing, by 12 business days (or 18 days, if weekends are included), of the information required in the "12-day Pre-General Election Report." The "12-Day Report" was due October 25, 1984 for the period October 1 through October 17. All the information required in the 12-Day Report, however, was submitted by PIAPAC in a November monthly report (Attachment B) for the period October 1-31, 1984, which was signed and dated November 13, 1984, well before what PIAPAC staff believed was the due date for such a report.

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The late filing, by a very brief period of time, of the information called for by the "12-Day Report" and of the "12-Day Report" itself thus was simply an inadvertent mistake and actually was remedied, in substance, by PIAPAC's November 13 report even before PIAPAC first received notice on November 19 from the Commission that a "12-Day Report" was required and overdue. PIAPAC, which has acted in good faith at all times and provided all required information to the Commission after only a brief inadvertent delay in 1984, thus respectfully requests that MUR 1919 be dismissed as harmless inadvertent error or that a conciliation settlement be agreed upon to terminate MUR 1919. Even the Commission "General Counsel's Legal and Factual Analysis" for MUR 1919 recommends that PIAPAC's November 13 report (marked received by the Commission on November 15) be treated as the submission of the required information for October 1-17, thus rendering that submission late by simply 12 business days, a very minor and technical filing mistake.

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It is in light of your discussion with Mr. Jay Berman on March 26 and the above factual information that PIAPAC earnestly seeks a prompt resolution, as noted above, of this matter. Under the circumstances, a dismissal of MUR 1919 would be both justified and appropriate. We appreciate your cooperation in helping resolve this matter and we shall endeavor to provide whatever further information you need in order to permit a termination of MUR 1919.

Thank you very much.

Respectfully,

Professional Insurance Agents  
Political Action Committee

By 

Jerald A. Jacobs  
Leland J. Badger  
Jenner & Block Law Offices  
Attorneys for PIAPAC

85040542780

**STATEMENT OF DESIGNATION OF COUNSEL**

**MUR** 1919

**NAME OF COUNSEL:** Jerald A. Jacobs

**ADDRESS:** Leland J. Badger  
Jenner & Block

21 Dupont Circle, N.W.  
Suite 500  
Washington, D.C. 20036

**TELEPHONE:** (202) 466-5470

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

April 1, 1985  
Date

Charles W. Wegner, Jr. [Signature]  
Signature  
Charles W. Wegner, Jr.  
Professional Insurance Agents  
Political Action Committee Representative

**RESPONDENT'S NAME:** Professional Insurance Agents (including PIAPAC  
Political Action Committee Treasurer)  
**ADDRESS:** 400 North Washington Street  
Alexandria, VA 22314

**HOME PHONE:** (301) 267-7399

**BUSINESS PHONE:** (202) 544-8713

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RECEIVED MAR 25 1985

MAR 22 1985



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 19, 1985

J. Knox Hillman, Jr., Treasurer  
Professional Insurance Agents Political  
Action Committee  
400 North Washington Street  
Alexandria, Virginia 22314

RE: MUR 1919

Dear Mr. Hillman:

On March 6, 1985, the Federal Election Commission determined that there is reason to believe that the Professional Insurance Agents Political Action Committee, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), 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.

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.

Attachment A

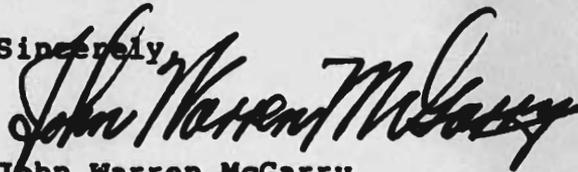
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J. Knox Hillman, Jr., Treasurer  
Page 2

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, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



John Warren McGarry  
Chairman

**Enclosures**

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

8 5 0 4 0 5 4 2 7 8 3

FEDERAL ELECTION COMMISSION  
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR 1919  
STAFF MEMBER(S) & TEL. NO.  
Judy Thedford (202) 523-4000

RESPONDENT Professional Insurance Agents Political  
Action Committee, J. Knox Hillman, Jr.,  
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

The Professional Insurance Agents Political Action Committee and J. Knox Hillman, Jr., as treasurer, ("PIA-PAC") failed to timely file its 12 Day Pre-General Election Report in violation of 2 U.S.C. § 434(a)(4)(A)(ii). The report was due October 25, 1984, covering the period October 1 through October 17. A 12 Day Pre-General Election Report was filed by the respondent on November 30, 1984.

Previously, the respondent incorrectly filed a November Monthly Report on November 15, 1984, disclosing its activity from 10/1-10/31.

PIA-PAC was sent a prior notice on October 1, 1984, which specifically informed it of the requirement to file a 12 Day Pre-General Election Report on October 25, 1984. A non-filer was also sent to PIA-PAC on November 16, 1984, for its failure to file the pre-general election report.

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**LEGAL AND FACTUAL ANALYSIS**

2 U.S.C. § 434(a)(4)(A)(ii) requires an unauthorized committee to file, in an election year, a pre-election report which shall be filed no later than the 12th day before any election in which the committee makes a contribution or expenditure on behalf of a candidate in such election.

PIA-PAC did not file its 12 day Pre-General Election Report on the due date, October 25, 1984. Instead, PIA-PAC filed a November Monthly Report on November 15, 1984, disclosing its activity for the entire month of October. Since the pre-election report coverage dates (10/1-10/17) were included in the coverage dates of the November Monthly report and the activity disclosed, it is recommended that the November Monthly Report filing date be the date used to compute the late filing of the PIA-PAC's 12 Day Pre-General Election Report and not the subsequently filed 12 Day Pre-General Election Report. Therefore, the disclosure of activity for the pre-election time period was filed 21 days late by PIA-PAC. The activity attributable to the pre-election period is \$10,369 in receipts and \$9,503 in expenditures.

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DESCRIPTION OF PRELIMINARY PROCEDURES  
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE  
FEDERAL ELECTION COMMISSION

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of General Counsel where they are assigned a MUR (Matter Under Review) number, and assigned to a staff member.

Following review of the information which generated the MUR, a recommendation on how to proceed on the matter, which shall include preliminary legal and factual analysis, and any information compiled from materials available to the Commission shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act (FECA) may have occurred or is about to occur and that the Commission conduct an investigation of the matter; or (b) that the Commission find no reason to believe that a possible violation of the FECA has occurred and that the Commission close the file on the matter.

Thereafter, if the Commission decides by an affirmative vote of four (4) Commissioners that there is reason to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed, the Office of the General Counsel shall open an investigation into the matter. Upon notification of the Commission's finding(s), within 15 days a respondent(s) may submit any factual or legal materials relevant to the allegations. During the investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order answers to interrogatories. The respondent(s) may be contacted more than once by the Commission in its investigation.

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If, during this period of investigation, the respondent(s) indicate a desire to enter into conciliation, the Office of General Counsel staff may begin the conciliation process prior to a finding of probable cause to believe a violation has been committed. Conciliation is an informal method of conference and persuasion to endeavor to correct or prevent a violation of the Federal Election Campaign Act (FECA). Most often, the result of conciliation is an agreement signed by the Commission and the respondent(s). The Conciliation Agreement must be adopted by four votes of the Commission before it becomes final. After signature by the Commission and the respondent(s), the Commission shall make public the Conciliation Agreement.

[If the investigation warrants], and no conciliation agreement is entered into prior to a probable cause to believe finding, the General Counsel must notify the respondent(s) of his intent to proceed to a vote on probable cause to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed. Included with the notification to the respondent(s) shall be a brief setting forth the position of the General Counsel on the legal and factual issues of the case. Within 15 days of receipt of such brief, the respondent(s) may submit a brief posing the position of respondent(s) and replying to the brief of the General Counsel. Both briefs will then be filed with the Commission Secretary and will be considered by the Commission. Thereafter, if the Commission determines by an affirmative vote of four (4) Commissioners, that there is probable cause to believe that a violation of the FECA has been committed or is about to be committed conciliation must be undertaken for a period of at least 30 days but not more than 90 days. If the Commission is unable to correct or prevent any violation of the FECA through conciliation the Office of General Counsel may recommend that the Commission file a civil suit against the respondent(s) to enforce the Federal Election Campaign Act (FECA). Thereafter, the Commission may, upon an affirmative vote of four (4) Commissioners, institute civil action for relief in the District Court of the United States.

See 2 U.S.C. § 437g, 11 C.F.R. Part 111.

November 1980

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STATEMENT OF DESIGNATION OF COUNSEL

MUR \_\_\_\_\_

NAME OF COUNSEL: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

TELEPHONE: \_\_\_\_\_

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

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

RESPONDENT'S NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

HOME PHONE: \_\_\_\_\_

BUSINESS PHONE: \_\_\_\_\_

85040512788



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

RECEIVED NOV 15 1984

*Pat Wilson*

B

(Summary Page)

<p><b>ALIGN AREA</b></p> <p>1. Name of Committee (In Full) <b>Professional Insurance Agents Political Action Committee</b></p> <hr/> <p>Address (Number and Street) <b>400 North Washington Street</b></p> <hr/> <p>City, State and ZIP Code <b>Alexandria, Virginia 22314</b></p> <p><input type="checkbox"/> Check here if address is different than previously reported.</p> <p>2. FEC Identification Number <b>C-0000-4994</b></p> <p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)</p>	<p><b>ALIGN AREA</b></p> <p>4. TYPE OF REPORT (Check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report    <input type="checkbox"/> October 15 Quarterly Report  <input type="checkbox"/> July 15 Quarterly Report    <input type="checkbox"/> January 31 Year End Report  <input type="checkbox"/> July 31 Mid Year Report (Non-Election Year Only)  <input checked="" type="checkbox"/> Monthly Report for <u>October 1984</u>  <input type="checkbox"/> Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____  <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____  <input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment?  <input type="checkbox"/> YES    <input checked="" type="checkbox"/> NO</p>
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SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>10/1/84</u> through <u>10/31/84</u>		
6. (a) Cash on hand January 1, 19 <u>84</u>		\$ 32,018.64
(b) Cash on Hand at Beginning of Reporting Period	\$ 72,837.72	
(c) Total Receipts (from Line 18)	\$ 17,007.32	\$ 158,120.91
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 89,845.04	\$ 190,139.55
7. Total Disbursements (from Line 28)	\$ 10,295.02	\$ 110,589.53
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 79,550.02	\$ 79,550.02
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

For further information contact:

Federal Election Commission  
Toll Free 800-424-9630  
Local 202-523-4088

John S. Hoyt, Assistant Treasurer  
Type or Print Name of Treasurer

*John S. Hoyt*  
SIGNATURE OF TREASURER

11/13/84  
Date

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

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 B**

**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3X)**

Name of Committee (in Full) <b>Professional Insurance Agents Political Action Committee</b>	Report Covering the Period:		
	From: <u>10/1/84</u>	To: <u>10/31/84</u>	
	<b>COLUMN A Total This Period</b>	<b>COLUMN B Calendar Year-To-Date</b>	
<b>I. RECEIPTS</b>			
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>			
(a) Individuals/Persons Other Than Political Committees . . . . . (Memo Entry Unitized \$ <u>15,783.00</u> )	15,783.00	152,831.75	11(a)
(b) Political Party Committees . . . . .			11(b)
(c) Other Political Committees . . . . .			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c)) . . . . .	15,783.00	152,831.75	11(d)
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES . . . . .</b>			12
<b>13. ALL LOANS RECEIVED . . . . .</b>			13
<b>14. LOAN REPAYMENTS RECEIVED . . . . .</b>			14
<b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) . . . . .</b>			15
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES . . . . .</b>			16
<b>17. OTHER RECEIPTS (Dividends, Interest, etc.) . . . . .</b>	1,224.32	5,289.16	17
<b>18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17) . . . . .</b>	17,007.32	158,120.91	18
<b>II. DISBURSEMENTS</b>			
<b>19. OPERATING EXPENDITURES . . . . .</b>	8,545.02	70,169.53	19
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES . . . . .</b>			20
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES . . . . .</b>	1,750.00	40,350.00	21
<b>22. INDEPENDENT EXPENDITURES (use Schedule E) . . . . .</b>			22
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES . . . . .</b> (2 U.S.C. § 441 a(d)) (Use Schedule F)			23
<b>24. LOAN REPAYMENTS MADE . . . . .</b>			24
<b>25. LOANS MADE . . . . .</b>			25
<b>26. REFUNDS OF CONTRIBUTIONS TO</b>			
(a) Individuals/Persons Other Than Political Committees . . . . .	-0-	70.00	26(a)
(b) Political Party Committees . . . . .			26(b)
(c) Other Political Committees . . . . .			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c)) . . . . .	-0-	70.00	26(d)
<b>27. OTHER DISBURSEMENTS . . . . .</b>			27
<b>28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27) . . . . .</b>	10,295.02	110,589.53	28
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>			
<b>29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d) . . . . .</b>	15,783.00	152,831.75	29
<b>30. TOTAL CONTRIBUTION REFUNDS from Line 26(d) . . . . .</b>	-0-	70.00	30
<b>31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29) . . . . .</b>	15,783.00	152,761.75	31
<b>32. TOTAL OPERATING EXPENDITURES from Line 19 . . . . .</b>	8,545.02	70,169.53	32
<b>33. OFFSETS TO OPERATING EXPENDITURES from Line 15 . . . . .</b>	-0-	-0-	33
<b>34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32) . . . . .</b>	8,545.02	70,169.53	34

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

Any information copied from such Reports or 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)

**Professional Insurance Agents Political Action Committee**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
<b>First American Bank</b> <b>1970 Chain Bridge Road</b> <b>McLean, Virginia 22102</b>	<b>Same</b>	<b>10/12/84</b>	<b>1,224.32</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation <b>Commercial Bank</b>	Aggregate Year-to-Date-\$	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
<b>SUBTOTAL of Receipts This Page (optional)</b> . . . . .			
<b>TOTAL This Period (last page this line number only)</b> . . . . .			<b>1,224.32</b>

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**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

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)

**Professional Insurance Agents Political Action Committee**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Sensenbrenner Committee P.O. Box 95 Mequen, Wisconsin 53092	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/10/84	500.00
B. Full Name, Mailing Address and ZIP Code Democratic Congressional Committee 400 North Capital Street, N. W. Washington, D. C. 20001	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/11/84	500.00
C. Full Name, Mailing Address and ZIP Code Jim Altmeyer For Congress 1017 Box 785 Wheeler, West Virginia 26003	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/18/84	500.00
D. Full Name, Mailing Address and ZIP Code McGregor For Congress P.O. Box 1066 Kalamazoo, Michigan 9005	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/31/84	250.00
E. 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
F. 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
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)			1,750.00
TOTAL This Period (last page this line number only)			10,295.02

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**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

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)

**Professional Insurance Agents Political Action Committee**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<b>First American Bank</b> <b>1970 Chain Bridge Road</b> <b>McLean, Virginia 22206</b>	<b>Bank Service Charge</b>	<b>10/31/84</b>	<b>42.02</b>
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
<b>Smarr Mailing Service</b> <b>204 Thompson Avenue</b> <b>Fredericksburg, VA 22405 224</b>	<b>Special Mailing</b>	<b>10/ 1/84</b>	<b>6,520.00</b>
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
<b>Internal Revenue Service</b> <b>Memphis, Tennessee 37501</b>	<b>1983 Federal Tax</b>	<b>10/ 9/84</b>	<b>870.00</b>
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
<b>Virginia Department of Taxation</b> <b>P.O. Box 1500</b> <b>Richmond, Virginia 23212</b>	<b>1983 Virginia Taxes</b>	<b>10/ 9/84</b>	<b>113.00</b>
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
<b>Odell, Roper &amp; Associates</b> <b>7315 Wisconsin Avenue</b> <b>Bethesda, Maryland 20814</b>	<b>Service Fee</b>	<b>10/11/84</b>	<b>1,000.00</b>
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
<b>SUBTOTAL of Disbursements This Page (optional)</b>			<b>8,545.02</b>
<b>TOTAL This Period (last page this line number only)</b>			

85040512793

Marie Hixon



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED NOV 19 1984

RQ-7

C

November 16, 1984

11/19 copied: Marie Hixon

Effman

J. Knox Hillman, Jr., Treasurer  
Professional Insurance Agents  
Political Action Committee  
400 North Washington Street #622  
Alexandria, VA 22314

Identification Number: C00004994

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

Dear Mr. Hillman:

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 Alva Smith on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

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

Attachment C

Ing. dates received  
for reporting

Form 3X

List of reports - date to be reported - amount

85040542794

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

*11/22/84 report*

(Summary Page)

ALIGN AREA

ALIGN AREA

D

1. Name of Committee (In Full)  
**Professional Insurance Agents  
Political Action Committee**

---

Address (Number and Street)  
**400 North Washington Street**

---

City, State and ZIP Code  
**Alexandria, Virginia 22314**

Check here if address is different than previously reported.

---

2. FEC Identification Number  
**C-0000-4994**

---

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

4. TYPE OF REPORT (Check appropriate boxes)

(a)  April 15 Quarterly Report     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 General  
(Type of Election)  
election on Nov. 6 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

85040542795

**SUMMARY**

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>10/1/84</u> through <u>10/17/84</u>		
6. (a) Cash on hand January 1, 19 <u>84</u>		\$ 32,018.64
(b) Cash on Hand at Beginning of Reporting Period	\$ 72,837.72	
(c) Total Receipts (from Line 18)	\$ 10,369.32	\$ 151,482.91
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 83,207.04	\$ 183,501.55
7. Total Disbursements (from Line 28)	\$ 9,503.00	\$ 109,797.51
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 73,704.04	\$ 73,704.04
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.

John S. Hoyt, Assistant Treasurer  
Type or Print Name of Treasurer

*John S. Hoyt*  
SIGNATURE OF TREASURER

November 27, 1984  
Date

For further information contact:  
Federal Election Commission  
Toll Free 800-424-9530  
Local 202-523-4088

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

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 D*

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 1 of 1 for  
**LINE NUMBER** \_\_\_\_\_  
 (Use separate schedules for each  
 category of the Detailed  
 Summary Page).

Any information copied from such Reports or 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)  
**Professional Insurance Agents Political Action Committee**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
<b>First American Bank</b> <b>1970 Chain Bridge Road</b> <b>McLean, Virginia 22102</b>	<b>SAME</b>		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation <b>Commercial Bank</b>	<b>10/12/84</b>	<b>1,224.32</b>
Aggregate Year-to-Date-\$			
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date-\$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date-\$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date-\$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date-\$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date-\$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date-\$	
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>			
<b>TOTAL This Period (last page this line number only) . . . . .</b>			<b>1,224.32</b>

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**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Page 1 of 2 for  
**LINE NUMBER** \_\_\_\_\_  
 (Use separate schedule(s) 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)  
**Professional Insurance Agents Political Action Committee**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Sensenbrenner Committee P. O. Box 95 Mequen, Wisconsin 53092	contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/10/84	500.00
Democratic Congressional Committee 400 N. Capital St., NW Washington, DC 20001	contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/11/84	500.00
C. 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
D. 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
E. 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
F. 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
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
<b>SUBTOTAL of Disbursements This Page (optional)</b> .....			
<b>TOTAL This Period (last page this line number only)</b> .....			1,000.00

85040542797

SCHEDULE B

ITEMIZED DISBURSEMENTS

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)

Professional Insurance Agents Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Smarr Mailing Service 204 Thompson Avenue Fredericksburg, VA 22405	special mailing	10/01/84	6,520.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Internal Revenue Service Memphis, TN 37501	1983 Federal Tax	10/09/84	870.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
VA. Dept. of Taxation P. O. Box 1500 Richmond, VA 23212	1983 VA Tax	10/09/84	113.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Odell Roper & Associates 7315 Wisconsin Avenue Bethesda, MD 20814	Service Fee	10/11/84	1,000.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional) .....			8,503.00
TOTAL This Period (last page this line number only) .....			9,503.00

85040542793

**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3X)**

Name of Committee (in Full) **Professional Insurance Agents Political Action Committee** Report Covering the Period  
From: **10/1/84** To: **10/17/84**

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
<b>I. RECEIPTS</b>			
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>			
(a) Individuals/Persons Other Than Political Committees . . . . .	9,145.00	146,193.75	11(a)
(b) Political Party Committees . . . . .			11(b)
(c) Other Political Committees . . . . .			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c)) . . . . .	9,145.00	146,193.75	11(d)
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES . . . . .</b>			12
<b>13. ALL LOANS RECEIVED . . . . .</b>			13
<b>14. LOAN REPAYMENTS RECEIVED . . . . .</b>			14
<b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) . . . . .</b>			15
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES . . . . .</b>			16
<b>17. OTHER RECEIPTS (Dividends, Interest, etc.) . . . . .</b>	1,224.32	5,289.16	17
<b>18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17) . . . . .</b>	10,369.32	151,482.91	18
<b>II. DISBURSEMENTS</b>			
<b>19. OPERATING EXPENDITURES . . . . .</b>	8,503.00	70,127.51	19
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES . . . . .</b>			20
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES . . . . .</b>	1,000.00	39,600.00	21
<b>22. INDEPENDENT EXPENDITURES (use Schedule E) . . . . .</b>			22
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES . . . . .</b> (2 U.S.C. § 441 a(d)) (Use Schedule F)			23
<b>24. LOAN REPAYMENTS MADE . . . . .</b>			24
<b>25. LOANS MADE . . . . .</b>			25
<b>26. REFUNDS OF CONTRIBUTIONS TO</b>			
(a) Individuals/Persons Other Than Political Committees . . . . .	-0-	70.00	26(a)
(b) Political Party Committees . . . . .			26(b)
(c) Other Political Committees . . . . .			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c)) . . . . .	-0-	70.00	26(d)
<b>27. OTHER DISBURSEMENTS . . . . .</b>			27
<b>28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27) . . . . .</b>	9,503.00	109,797.51	28
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>			
<b>29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d) . . . . .</b>	9,145.00	146,193.75	29
<b>30. TOTAL CONTRIBUTION REFUNDS from Line 26(d) . . . . .</b>	-0-	70.00	30
<b>31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29) . . . . .</b>	9,145.00	146,123.75	31
<b>32. TOTAL OPERATING EXPENDITURES from Line 19 . . . . .</b>	9,503.00	71,127.51	32
<b>33. OFFSETS TO OPERATING EXPENDITURES from Line 15 . . . . .</b>	-0-	-0-	33
<b>34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32) . . . . .</b>	9,503.00	71,127.51	34

85040542799

**JENNER & BLOCK**

21 DUPONT CIRCLE  
WASHINGTON, D.C. 20036

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LAW OFFICES  
**JENNER & BLOCK**  
ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611

Judy Thedford, Esq.  
Federal Election Committee  
1325 K Street, N.W.  
Washington, D.C.

8 5 0 4 0 5 4 2 8 0 0



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

ED  
THE FEC  
SECRETARY

85 MAR 18 P 1: 57

**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-27

On March 6, 1985 the Commission approved the recommendation that RAD Referral 85NF-27 should become a MUR. Therefore, all documents which had previously been contained in RAD Referral 85NF-27 should now become MUR 1919.

Attachment  
Copy of Certification

85040542801

BEFORE THE FEDERAL ELECTION COMMISSION

*Mur 1919  
Thedford*

In the Matter of	)	
	)	RAD Referral 85NF-27
Professional Insurance Agents	)	
Political Action Committee	)	
J. Knox Hillman, Jr., treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 6, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-27:

1. Open a MUR.
2. Find reason to believe the Professional Insurance Agents Political Action Committee and J. Knox Hillman, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).
3. Approve and send the letter and legal and factual analysis attached to the First General Counsel's Report signed March 1, 1985.

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

Attest:

3-7-85

Date

*Marjorie W Emmons*

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:	3-4-85, 9:01
Circulated on 48 hour tally basis:	3-4-85, 4:00

85040

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	RAD Referral 85NF-27
Professional Insurance Agents	)	
Political Action Committee	)	
J. Knox Hillman, Jr., treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 6, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-27:

1. Open a MUR.
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3. Approve and send the letter and legal and factual analysis attached to the First General Counsel's Report signed March 1, 1985.

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Attest:

3-7-85

Date

Marjorie W Emmons

Marjorie W. Emmons  
Secretary of the Commission

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

3-4-85, 9:01  
3-4-85, 4:00

85040542803



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 19, 1985

J. Knox Hillman, Jr., Treasurer  
Professional Insurance Agents Political  
Action Committee  
400 North Washington Street  
Alexandria, Virginia 22314

RE: MUR 1919

Dear Mr. Hillman:

On March 6, 1985, the Federal Election Commission determined that there is reason to believe that the Professional Insurance Agents Political Action Committee, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), 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.

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.

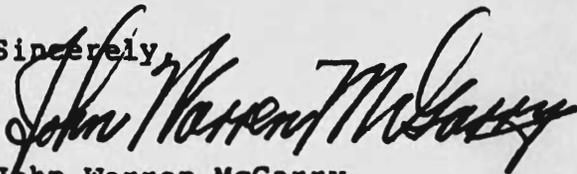
85040542804

J. Knox Hillman, Jr., 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, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



John Warren McGarry  
Chairman

Enclosures

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

85040542805

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR 1919  
STAFF MEMBER(S) & TEL. NO.  
Judy Theford (202) 523-4000

RESPONDENT Professional Insurance Agents Political  
Action Committee, J. Knox Hillman, Jr.,  
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

The Professional Insurance Agents Political Action Committee and J. Knox Hillman, Jr., as treasurer, ("PIA-PAC") failed to timely file its 12 Day Pre-General Election Report in violation of 2 U.S.C. § 434(a)(4)(A)(ii). The report was due October 25, 1984, covering the period October 1 through October 17. A 12 Day Pre-General Election Report was filed by the respondent on November 30, 1984.

Previously, the respondent incorrectly filed a November Monthly Report on November 15, 1984, disclosing its activity from 10/1-10/31.

PIA-PAC was sent a prior notice on October 1, 1984, which specifically informed it of the requirement to file a 12 Day Pre-General Election Report on October 25, 1984. A non-filer was also sent to PIA-PAC on November 16, 1984, for its failure to file the pre-general election report.

85040542806

**LEGAL AND FACTUAL ANALYSIS**

2 U.S.C. § 434(a)(4)(A)(ii) requires an unauthorized committee to file, in an election year, a pre-election report which shall be filed no later than the 12th day before any election in which the committee makes a contribution or expenditure on behalf of a candidate in such election.

PIA-PAC did not file its 12 day Pre-General Election Report on the due date, October 25, 1984. Instead, PIA-PAC filed a November Monthly Report on November 15, 1984, disclosing its activity for the entire month of October. Since the pre-election report coverage dates (10/1-10/17) were included in the coverage dates of the November Monthly report and the activity disclosed, it is recommended that the November Monthly Report filing date be the date used to compute the late filing of the PIA-PAC's 12 Day Pre-General Election Report and not the subsequently filed 12 Day Pre-General Election Report. Therefore, the disclosure of activity for the pre-election time period was filed 21 days late by PIA-PAC. The activity attributable to the pre-election period is \$10,369 in receipts and \$9,503 in expenditures.

85040542807

DESCRIPTION OF PRELIMINARY PROCEDURES  
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE  
FEDERAL ELECTION COMMISSION

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of General Counsel where they are assigned a MUR (Matter Under Review) number, and assigned to a staff member.

Following review of the information which generated the MUR, a recommendation on how to proceed on the matter, which shall include preliminary legal and factual analysis, and any information compiled from materials available to the Commission shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act (FECA) may have occurred or is about to occur and that the Commission conduct an investigation of the matter; or (b) that the Commission find no reason to believe that a possible violation of the FECA has occurred and that the Commission close the file on the matter.

Thereafter, if the Commission decides by an affirmative vote of four (4) Commissioners that there is reason to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed, the Office of the General Counsel shall open an investigation into the matter. Upon notification of the Commission's finding(s), within 15 days a respondent(s) may submit any factual or legal materials relevant to the allegations. During the investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order answers to interrogatories. The respondent(s) may be contacted more than once by the Commission in its investigation.

85040542803

STATEMENT OF DESIGNATION OF COUNSEL

MUR \_\_\_\_\_

NAME OF COUNSEL: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

TELEPHONE: \_\_\_\_\_

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

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

RESPONDENT'S NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

HOME PHONE: \_\_\_\_\_

BUSINESS PHONE: \_\_\_\_\_

85040542809



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

J. Knox Hillman, Jr., Treasurer  
Professional Insurance Agents Political  
Action Committee  
400 North Washington Street  
Alexandria, Virginia 22314

RE: MUR

Dear Mr. Hillman:

On \_\_\_\_\_, 1985, the Federal Election Commission determined that there is reason to believe that the Professional Insurance Agents Political Action Committee, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), 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.

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.

95040542810

J. Knox Hillman, Jr., 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, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

John Warren McGarry  
Chairman

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

85040542811

*JK*  
*3-18-85*

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	RAD Referral 85NF-27
Professional Insurance Agents	)	
Political Action Committee	)	
J. Knox Hillman, Jr., treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 6, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-27:

1. Open a MUR.
2. Find reason to believe the Professional Insurance Agents Political Action Committee and J. Knox Hillman, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).
3. Approve and send the letter and legal and factual analysis attached to the First General Counsel's Report signed March 1, 1985.

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

Attest:

3-7-85

Date

Marjorie W Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:	3-4-85, 9:01
Circulated on 48 hour tally basis:	3-4-85, 4:00

85040542812



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *Cut*  
DATE: March 4, 1985  
SUBJECT: RAD 85NF-27: First General Counsel's Report

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

CIRCULATIONS

48 Hour Tally Vote [X]  
Sensitive [X]  
Non-Sensitive [ ]  
24 Hour No Objection [ ]  
Sensitive [ ]  
Non-Sensitive [ ]  
Information [ ]  
Sensitive [ ]  
Non-Sensitive [ ]

Other [ ]

DISTRIBUTION

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

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**SENSITIVE**

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

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

**FIRST GENERAL COUNSEL'S REPORT**

25 MAR 4 9:01

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION 3/4/85-9:00 RAD REFERRAL 85NF-27 STAFF MEMBER Theford

COMPLAINANT'S NAME: INTERNALLY GENERATED

RESPONDENT'S NAME: Professional Insurance Agents Political Action Committee, J. Knox Hillman, Jr., Treasurer

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

INTERNAL REPORTS CHECKED: Professional Insurance Agents PAC by RAD

FEDERAL AGENCIES CHECKED: N/A

**GENERATION OF MATTER**

This matter was referred to the Office of General Counsel by the Reports Analysis Division on January 15, 1985.

**SUMMARY OF ALLEGATIONS**

The Professional Insurance Agents Political Action Committee and J. Knox Hillman, Jr., as treasurer, ("PIA-PAC") failed to timely file its 12 Day Pre-General Election Report in violation of 2 U.S.C. § 434(a)(4)(A)(ii). The report was due October 25, 1984, covering the period October 1 through October 17. A 12 Day Pre-General Election Report was filed by the respondent on November 30, 1984.

Previously, the respondent incorrectly filed a November Monthly Report on November 15, 1984, disclosing its activity from 10/1-10/31.

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PIA-PAC was sent a prior notice on October 1, 1984, which specifically informed it of the requirement to file a 12 Day Pre-General Election Report on October 25, 1984. A non-filer was also sent to PIA-PAC on November 16, 1984, for its failure to file the pre-general election report.

**LEGAL AND FACTUAL ANALYSIS**

2 U.S.C. § 434(a)(4)(A)(ii) requires an unauthorized committee to file, in an election year, a pre-election report which shall be filed no later than the 12th day before any election in which the committee makes a contribution or expenditure on behalf of a candidate in such election.

PIA-PAC did not file its 12 Day Pre-General Election Report on the due date, October 25, 1984. Instead, PIA-PAC filed a November Monthly Report on November 15, 1984, disclosing its activity for the entire month of October. Since the pre-election report coverage dates (10/1-10/17) were included in the coverage dates of the November Monthly report and the activity disclosed, it is recommended that the November Monthly Report filing date be the date used to compute the late filing of the PIA-PAC's 12 Day Pre-General Election Report and not the subsequently filed 12 Day Pre-General Election Report. Therefore, the disclosure of activity for the pre-election time period was filed 21 days late by PIA-PAC. The activity attributable to the pre-election period is \$10,369 in receipts and \$9,503 in expenditures.

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**RECOMMENDATIONS**

1. Open a MUR.
2. Find reason to believe the Professional Insurance Agents Political Action Committee and J. Knox Hillman, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).
3. Approve and send the attached letter and legal and factual analysis.

Charles N. Steele  
General Counsel

March 1, 1985  
Date

  
BY: Kenneth A. Gross  
Associate General Counsel

**Attachments**

1. Referral
2. Letter
3. Legal and Factual 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. Craig Looke*  
for John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

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(5)

8 5 0 4 0 5 4 2 8 2 0

**PROFESSIONAL INSURANCE AGENTS POLITICAL ACTION COMMITTEE**

**(Attachments 27a - c)**



8 5 0 4 0 5 4 2 8 2 1

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
PROFESSIONAL INSURANCE AGENTS POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: INSURANCE AGENTS; NAT'L ASS'N MUTUAL				NON-PARTY QUALIFIED		ID #C00004994
1983	MISCELLANEOUS REPORT			26JAN83 TO FEC	2	83FEC/262/4852
	MID-YEAR REPORT	51,642	33,800	1JAN83 -30JUN83	13	83FEC/276/3227
	MID-YEAR REPORT - AMENDMENT	51,642	33,800	1JAN83 -30JUN83	13	84FEC/307/2684
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN83 -30JUN83	7	84FEC/307/2684
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN83 -30JUN83	2	84FEC/314/2188
	REQUEST FOR ADDITIONAL INFORMATION			1JAN83 -30JUN83	2	84FEC/306/3158
	REQUEST FOR ADDITIONAL INFORMATION			1JAN83 -30JUN83	1	84FEC/313/4866
	YEAR-END	30,562	31,171	1JUL83 -31DEC83	10	84FEC/291/4334
	YEAR-END - AMENDMENT	-	-	1JUL83 -31DEC83	1	84FEC/307/4857
	YEAR-END - AMENDMENT	30,562	31,171	1JUL83 -31DEC83	10	84FEC/307/2691
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31DEC83	1	84FEC/306/3156
1984	STATEMENT OF ORGANIZATION - AMENDMENT			28JUN84	1	84FEC/318/1811
	FEBRUARY MONTHLY	782	2,046	1JAN84 -31JAN84	6	84FEC/296/4456
	MARCH MONTHLY	615	6,638	1FEB84 -29FEB84	6	84FEC/299/2123
	MARCH MONTHLY - AMENDMENT	615	6,638	1FEB84 -29FEB84	7	84FEC/318/4336
	REQUEST FOR ADDITIONAL INFORMATION			1FEB84 -29FEB84	1	84FEC/317/1928
	APRIL MONTHLY	44,503	10,259	1MAR84 -31MAR84	8	84FEC/311/0156
	APRIL MONTHLY - AMENDMENT	-	-	1MAR84 -31MAR84	-	84FEC/318/1714
	REQUEST FOR ADDITIONAL INFORMATION			1MAR84 -31MAR84	-	84FEC/317/1926
	MAY MONTHLY	17,453	20,387	1APR84 -30APR84	-	84FEC/314/4496
	JUNE MONTHLY	37,392	21,774	1MAY84 -31MAY84	-	84FEC/317/3011
	JULY MONTHLY	4,644	4,451	1JUN84 -30JUN84	-	84FEC/323/4772
	AUGUST MONTHLY	2,341	4,786	1JUL84 -31JUL84	-	84FEC/326/1800
	SEPTEMBER MONTHLY	31,714	2,500	1AUG84 -31AUG84	-	84FEC/329/1800
	SEPTEMBER MONTHLY - AMENDMENT	31,714	2,500	1AUG84 -31AUG84	-	84FEC/349/1800
	REQUEST FOR ADDITIONAL INFORMATION			1AUG84 -31AUG84	-	84FEC/348/2520
	OCTOBER MONTHLY	2,666	26,948	1SEP84 -30SEP84	-	84FEC/341/4794
	PRE-GENERAL	10,369	9,503	1OCT84 -17OCT84	-	84FEC/350/1581
	NOTICE OF FAILURE TO FILE			1OCT84 -17OCT84	-	84FEC/349/0599
	NOVEMBER MONTHLY	-	-	1OCT84 -31OCT84	-	84FEC/348/5222
	POST-GENERAL	8,909	11,042	18OCT84 -26NOV84	-	84FEC/354/2692
	TOTAL	242,592	0 185,805	0		TOTAL PAGES
	ENDING CASH (11/26/84):	\$71,571				
	DEBTS:	\$ 0				

Attachment 27a

(14)

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

RECEIVED AT THE FEC

(Summary Page)

84 NOV 15 01:12  
COLUMN AREA

**ALION AREA**

1 Name of Committee (In Full)  
**Professional Insurance Agents  
Political Action Committee**

Address (Number and Street)  
**400 North Washington Street**

City, State and ZIP Code  
**Alexandria, Virginia 22314**

Check here if address is different than previously reported

2. FEC Identification Number  
**C-0000-4994**

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

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 **October 1984**  
 Twelfth day report preceding \_\_\_\_\_  
 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**

5 Covering Period **10/1/84** through **10/31/84**

6 (a) Cash on hand January 1, 19**84**

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

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

7 Total Disbursements (from Line 28)

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 all on Schedule C or Schedule D)

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

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6 (a)		\$ 32,018.64
6 (b)	\$ 72,837.72	
6 (c)	\$ 17,007.32	\$ 158,120.91
6 (d)	\$ 89,845.04	\$ 190,139.55
7	\$ 10,295.02	\$ 110,589.53
8	\$ 79,550.02	\$ 79,550.02
9	\$	
10	\$	

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

**John S. Hoyt, Assistant Treasurer**  
Type or Print Name of Treasurer

*John S. Hoyt*  
Signature of Treasurer

**11/13/84**  
Date

For further information contact  
Federal Election Commission  
Toll Free 800 426 6926  
Local 703 573 4888

NOTE: Violation of Federal or State laws or regulations may subject the person filing this report to the penalties of 2 U.S.C. § 637e.

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

FEC FORM 3X (3/80)

*B*



METROPOLITAN EMPLOYEES POLITICAL PARTICIPATION FUND A  
 TREASURER'S NAME: MICHAEL KALOK  
 ONE MADISON AVENUE  
 NEW YORK NY 10010  
 85NF-23  
 None  
 November Monthly Report 23b  
 received 11/16/84

NCNB CORPORATION POLITICAL ACTION COMMITTEE (NCNB PAC) \*/  
 TREASURER'S NAME: MARK LEGGETT  
 ONE NCNB PLAZA  
 CHARLOTTE NC 28255  
 85NF-24  
 12/18/84 24b  
 November Monthly Report 24c&24d  
 received 11/15/84  
 Letter received 12/24/84

NORFOLK SOUTHERN CORPORATION TAX ELIGIBLE GOOD GOVERNMENT FUND \*/  
 TREASURER'S NAME: FRANK A. LUCKETT  
 P O BOX 3609  
 NORFOLK VA 23514  
 85NF-25  
 None  
 Pre-General Report 25b  
 received 11/7/84

PLANNING RESEARCH CORPORATION POLITICAL ACTION COMMITTEE \*/  
 TREASURER'S NAME: BERT H CONCKLIN  
 1500 PLANNING RESEARCH DRIVE  
 MCLEAN VA 22102  
 85NF-26  
 None  
 November Monthly Report 26b  
 received 11/23/84

PROFESSIONAL INSURANCE AGENTS POLITICAL ACTION COMMITTEE  
 TREASURER'S NAME: JIMMIE HILLMAN JR  
 400 NORTH WASHINGTON ST.  
 ALEXANDRIA VA 22314  
 85NF-27  
 None  
 November Monthly Report 27b  
 received 11/15/84  
 Pre-General Report 27c  
 received 11/30/84

REPUBLICAN CONGRESSIONAL BOOSTERS CLUB  
 TREASURER'S NAME: EDWARD T TAIT  
 300 FIRST STREET SE (TOP FLOOR)  
 WASHINGTON, DC 20003  
 85NF-28  
 None  
 Letter and Pre-General Report 28b  
 received 11/19/84

SUN COMPANY INC POLITICAL ACTION COMMITTEE  
 TREASURER'S NAME: WILLIAM B PRIESTLEY  
 2000 MARKET ST.  
 PHILADELPHIA PA 19103  
 85NF-29  
 None  
 November Monthly Report 29b&29c  
 received 11/20/84  
 Letter received 11/29/84

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

J. Knox Hillman, Jr., Treasurer  
Professional Insurance Agents Political  
Action Committee  
400 North Washington Street  
Alexandria, Virginia 22314

RE: MUR

Dear Mr. Hillman:

On \_\_\_\_\_, 1985, the Federal Election Commission determined that there is reason to believe that the Professional Insurance Agents Political Action Committee, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), 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.

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.

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J. Knox Hillman, Jr., 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, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

John Warren McGarry  
Chairman

Enclosures

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

85040542826

(12)

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RAD Referral 85NF-27  
STAFF MEMBER(S) & TEL. NO.  
Judy Thedford (202) 523-4000

RESPONDENT Professional Insurance Agents Political  
Action Committee, J. Knox Hillman, Jr.,  
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

The Professional Insurance Agents Political Action Committee and J. Knox Hillman, Jr., as treasurer, ("PIA-PAC") failed to timely file its 12 Day Pre-General Election Report in violation of 2 U.S.C. § 434(a)(4)(A)(ii). The report was due October 25, 1984, covering the period October 1 through October 17. A 12 Day Pre-General Election Report was filed by the respondent on November 30, 1984.

Previously, the respondent incorrectly filed a November Monthly Report on November 15, 1984, disclosing its activity from 10/1-10/31.

PIA-PAC was sent a prior notice on October 1, 1984, which specifically informed it of the requirement to file a 12 Day Pre-General Election Report on October 25, 1984. A non-filer was also sent to PIA-PAC on November 16, 1984, for its failure to file the pre-general election report.

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**LEGAL AND FACTUAL ANALYSIS**

2 U.S.C. § 434(a)(4)(A)(ii) requires an unauthorized committee to file, in an election year, a pre-election report which shall be filed no later than the 12th day before any election in which the committee makes a contribution or expenditure on behalf of a candidate in such election.

PIA-PAC did not file its 12 day Pre-General Election Report on the due date, October 25, 1984. Instead, PIA-PAC filed a November Monthly Report on November 15, 1984, disclosing its activity for the entire month of October. Since the pre-election report coverage dates (10/1-10/17) were included in the coverage dates of the November Monthly report and the activity disclosed, it is recommended that the November Monthly Report filing date be the date used to compute the late filing of the PIA-PAC's 12 Day Pre-General Election Report and not the subsequently filed 12 Day Pre-General Election Report. Therefore, the disclosure of activity for the pre-election time period was filed 21 days late by PIA-PAC. The activity attributable to the pre-election period is \$10,369 in receipts and \$9,503 in expenditures.

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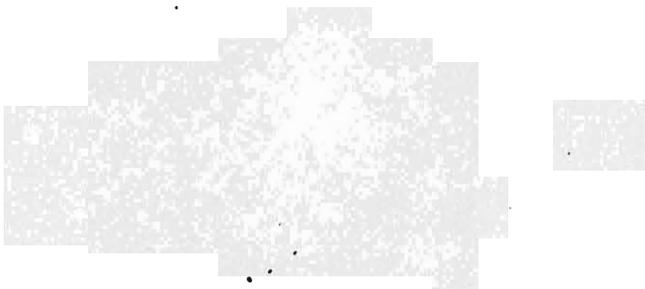
14



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1919

85040542829





FEDERAL ELECTION COMMISSION

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

85040542830

THIS IS THE BEGINNING OF MUR # 1919

Date Filmed 8/14/85 Camera No. --- 2

Cameraman AS