



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1948

Date Filmed 9/20/85 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

Routing slips & cards

Conciliation correspondence

Conciliation reports

RAD cover memo (thresholds)

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

- (1) Classified Information
- (2) Internal rules and practices
- (3) Exempted by other statute
- (4) Trade secrets and commercial or financial information
- (5) Internal Documents
- (6) Personal privacy
- (7) Investigatory files
- (8) Bank or financial information
- (9) Real information geographic or geophysical

Signed George J. ...  
date 9/13/85

RECEIVED AT THE FED  
GCC# 8064  
85 JUL 22 19: 44

COHEN, WEISS AND SIMON  
COUNSELLORS AT LAW  
330 WEST 42 STREET  
NEW YORK, N. Y. 10036

(212) 563-4100

COUNSEL  
SAMUEL J. COHEN

WASHINGTON, D. C. OFFICE  
4748 WISCONSIN AVENUE, N. W. 20016  
(202) 966-3778

HENRY WEISS  
ROBERT S. SAVELSON

HENRY WEISS  
BRUCE H. SIMON  
STANLEY M. BERMAN  
ROBERT S. SAVELSON  
EUGENE S. FRIEDMAN  
STEPHEN B. MOLDOF  
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PETER HERMAN  
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RICHARD M. SELTZER  
FRANKLIN K. MOSS  
JAMES L. LINSEY  
APRIL D. HARRIS  
SUSAN DAVIS  
BARBARA J. ELLIS  
BABETTE CECOTTI  
SHAILAH T. STEWART  
ANN E. O'SHEA  
CHRISTOPHER N. SOURIS

July 19, 1985

Mr. Charles N. Steele  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: Committee on Letter Carriers Political  
Education (MUR 1948)

Dear Mr. Steele:

In accordance with your letter to me dated July 10, 1985, signed by the Associate General Counsel Kenneth A. Gross, please be advised that respondents wish the following information to become part of the public record in the above matter.

The allegations made by your office were to the effect that on seven occasions the Committee on Letter Carriers Political Education (COLCPE) filed reports of receipts and disbursements later than the deadline for filing such reports. The August, 1984 report was filed late solely because COLCPE Secretary-Treasurer Florence Johnson, whose signature is required, was hospitalized for major surgery at the time the report was due. The report was filed as timely as possible after she was able to sign it. With respect to the 1984 30-day post-general report, Fred Nesbitt of COLCPE's staff telephoned the Commission in November to inquire when the November monthly and 30-day post-general reports were due. He was advised by telephone by a Commission staff person that the

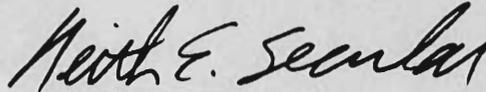
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30-day post-general report could be combined with the November monthly report and filed jointly on or before December 20. COLCPE filed these two reports on December 13 in reliance on this advice.

Sincerely yours,



Keith E. Secular

KES:brd

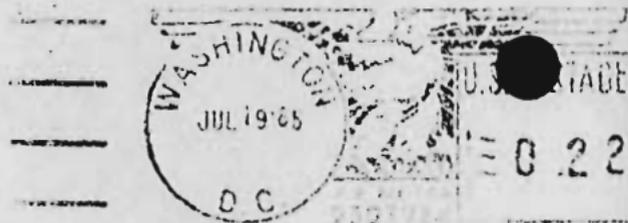
cc: Mark Roth  
Florence Johnson  
Fred Nesbitt  
Jerry Gutshall

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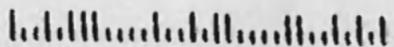
COHEN, WEISS AND SIMON  
330 WEST 42 STREET  
NEW YORK, N. Y. 10036

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Mr. Charles N. Steele  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463



85 JUL 22 A 9: 14



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 1948  
Committee on Letter Carriers )  
Political Education (Letter )  
Carriers Political Action Fund) )  
Florence Johnson, as 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 1948:

1. Accept the conciliation agreement with the Committee on Letter Carriers Political Education (Letter Carriers Political Action Fund) and Florence Johnson, as treasurer attached to the General Counsel's Report signed June 20, 1985.
2. Approve the proposed letter attached to General Counsel's Report signed June 20, 1985.
3. Close the file.

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

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 10, 1985

Keith E. Secular, Esquire  
Cohen, Weiss and Simon  
330 West 42nd Street  
New York, New York 10036

RE: MUR 1948  
Committee on Letter Carriers  
Political Education (Letter  
Carriers Political Action Fund)  
Florence Johnson, as treasurer

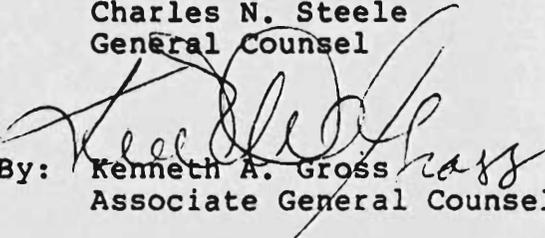
Dear Mr. Secular:

On June 26, 1985, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv), and 2 U.S.C. § 434(a)(4)(B), provisions 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 Agreement

85040552250

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Committee on Letter Carriers ) MUR 1948  
Political Education (Letter )  
Carriers Political Action )  
Fund) )  
Florence Johnson, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Committee on Letter Carriers Political Education (Letter Carriers Political Action Fund) and Florence Johnson, as treasurer ("PAF" or "Respondents") violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv), and 2 U.S.C. § 434(a)(4)(B) by failing to file seven reports in a timely manner.

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

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C.

§ 437g(a)(4)(A)(i).

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

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

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

1. Respondent PAF is a political committee within the meaning of 2 U.S.C. § 431(4)(B).

2. Florence Johnson is the treasurer of PAF.

3. Pursuant to 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv), a political committee in a calendar year in which a regularly scheduled general election is held is required, through its treasurer, to file a post-election report no later than the 30th day after such election. In any other calendar year, the committee is required, through its treasurer, to file a mid-year report no later than July 31 and a year end report no later than January 31 of the following calendar year.

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

5. Respondents' 1983 Mid-Year report was required to be filed on July 31, 1983. Respondents filed the 1983 Mid-Year report on November 10, 1983, which was 102 days late.

6. Respondents' 1984 February Monthly report was required to be filed on February 20, 1984. Respondents filed the 1984 February Monthly report on April 16, 1984, which was 56 days late.

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7. Respondents' 1984 March Monthly report was required to be filed on March 20, 1984. Respondents filed the 1984 March Monthly report on April 16, 1984, which was 27 days late.

8. Respondents' 1984 April Monthly report was required to be filed on April 20, 1984. Respondents filed the 1984 April Monthly report on May 15, 1984, which was 25 days late.

9. Respondents' 1984 May Monthly report was required to be filed on May 20, 1984. Respondents filed the 1984 May Monthly report on June 25, 1984, which was 36 days late.

10. Respondents' 1984 August Monthly report was required to be filed on August 20, 1984. Respondents filed the 1984 August Monthly report on September 4, 1984, which was 15 days late.

11. Respondents' 1984 30 Day Post-General Election report was required to be filed on December 6, 1984. Respondents filed the 1984 30 Day Post-General Election report on December 13, 1984, which was 7 days late.

V. Respondents violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv), and 2 U.S.C. § 434(a)(4)(B) by failing to file the 1983 Mid-Year report, 1984 February Monthly report, 1984 March Monthly report, 1984 April Monthly report, 1984 May Monthly report, 1984 August Monthly report, and 1984 30 Day Post-General Election report in a timely manner.

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VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Eight Hundred Dollars (\$800), 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 requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

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

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

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

FOR THE COMMISSION:

Charles N. Steele  
General Counsel

BY:

*Kenneth A. Gross*  
Kenneth A. Gross  
Associate General Counsel

*July 8, 1985*  
Date

FOR THE RESPONDENTS:

*Keith E. Secular*  
Keith E. Secular  
Attorney for Committee on Letter  
Carriers Political Education  
and Florence Johnson

*6/12/85*  
Date

85040552255



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 22, 1985

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTENTION: KEN GROSS

FROM: SHAWN WOODHEAD *SW*  
SENIOR COMPLIANCE ANALYST  
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: RAD REFERRAL #85NF-39: COMMITTEE ON LETTER  
CARRIERS POLITICAL EDUCATION

Please review the attached Request for Additional Information which is to be sent to the Committee on Letter Carriers Political Education for the 1984 30 Day Post-General Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 3:00 p.m. on Tuesday, February 26, 1985. Thank you.

COMMENTS:

Attachment

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Florence M. Johnson, Treasurer  
Committee on Letter Carriers  
Political Education (Letter  
Carriers Political Action Fund)  
100 Indiana Avenue, NW  
Washington, DC 20001

Identification Number: C00023580

Reference: 30 Day Post-General Report (10/21/84-11/30/84)

Dear Ms. Johnson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. The memo entry portion of the Detailed Summary Page reads \$150,479.89 in contributions unitemized, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. 11 CFR 104.3(a)(2).

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

*Doris M. Gardner*

Doris M. Gardner  
Reports Analyst  
Reports Analysis Division

85040552257



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 22, 1985

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTENTION: SHELLEY GARR

FROM: SHAWN WOODHEAD  
SENIOR COMPLIANCE ANALYST  
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1782: MASSACHUSETTS DEMOCRATIC STATE  
COMMITTEE FEDERAL FUNDS ACCOUNT (MDSC)

Please review the attached Request for Additional Information which is to be sent to the MDSC for the 1984 Year End Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 3:00 p.m. on Tuesday, February 26, 1985. Thank you.

COMMENTS:

Attachment

35040352353



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Barry Y. Weiner, Treasurer  
Massachusetts Democratic State  
Committee Federal Funds Account  
11 Beacon Street Suite 426  
Boston, MA 02108

Identification Number: C00089243

Reference: Year End Report (11/26/84-12/31/84)

Dear Mr. Weiner:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide a Schedule C or D, as appropriate, to support the entry of \$1,189 reported on Line 9 of the Summary Page. Loans and debts must be continuously reported until they are either repaid or settled. 11 CFR 104.3(d).

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Mike Tangney  
Reports Analyst  
Reports Analysis Division

8504055259

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	RAD Referral 85NF-39
Committee on Letter Carriers Political	)	
Education (Letter Carriers Political	)	
Action Fund)	)	
Florence Johnson, treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 20, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-39:

1. Open a MUR.
2. Find reason to believe Committee on Letter Carriers Political Education (Letter Carriers Political Action Fund) and Florence Johnson, as treasurer, violated 2 U.S.C. §§434(a)(4)(A)(iii) and (iv) and 2 U.S.C. § 434(a)(4)(B).
3. Approve the letter and factual and legal analysis attached to the First General Counsel's Report signed March 15, 1985.

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

Attest:

3-21-85

Date

Marjorie W Emmons

Marjorie W. Emmons  
Secretary of the Commission

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

3-18-85, 9:58  
3-18-85, 4:00

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 26, 1985

Florence Johnson, Treasurer  
Committee on Letter Carriers  
Political Education  
100 Indiana Avenue, N.W.  
Washington, D.C. 20001

RE: MUR 1948

Dear Ms. Johnson:

On March 20, 1985, the Federal Election Commission determined that there is reason to believe Committee on Letter Carriers Political Education (Letter Carriers Political Action Fund) ("PAF") and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv) and 2 U.S.C. § 434(a)(4)(B), provisions 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 PAF and you. 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 you, 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.

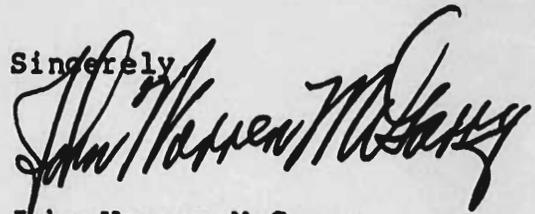
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Florence Johnson, Treasurer  
Page 2

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 George Demougeot, 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 5 2 2 2 6 2

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1948

RESPONDENTS: Committee on Letter Carriers  
Political Education (Letter Carriers  
Political Action Fund)  
Florence Johnson, Treasurer

SUMMARY OF ALLEGATIONS

The Committee on Letter Carriers Political Education (Letter Carriers Political Action Fund) ("PAF") failed to file seven (7) Reports of Receipts and Disbursements in a timely manner for the 1983-1984 election cycle. The reports were filed between 7 and 102 calendar days late:

<u>Report</u>	<u>Due Date</u>	<u>Date Filed</u>	<u>Days Late</u>
1983 Mid-Year	7/31/83	11/10/83	102
1984 February Monthly	2/20/84	4/16/84	56
1984 March Monthly	3/20/84	4/16/84	27
1984 April Monthly	4/20/84	5/15/84	25
1984 May Monthly	5/20/84	6/25/84	36
1984 August Monthly	8/20/84	9/04/84	15
1984 30-Day Post General	12/06/84	12/13/84	7

On June 22, 1984, a Chronic Late Filing Notice was sent to PAF for failing to file the 1983 Mid-Year<sup>\*/</sup> and the 1984 February, March, and April Monthly Reports in a timely manner. The notice advised PAF that any additional late filing of reports may result in legal enforcement action. Subsequent to the Chronic Late Filing Notice, PAF filed the 1984 May Monthly, August Monthly and 30 Day Post-General Reports Late.

<sup>\*/</sup> PAF filed a 1983 July Quarterly Report in lieu of the required semi-annual report.

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Factual and Legal Analysis

Pursuant to 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv), a political committee in a calendar year in which a regularly scheduled general election is held is required, through its treasurer, to file a post-election report no later than the 30th day after such election. In any other calendar year, the committee is required, through its treasurer, to file a mid-year report no later than July 31 and a year end report no later than January 31 of the following calendar year.

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

In view of the fact that PAF has continually failed to file its reports in a timely manner, the Office of General Counsel recommends that the Commission find reason to believe that the Committee on Letter Carriers Political Education and Florence Johnson, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv), and 2 U.S.C. § 434(a)(4)(B).

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
 FROM: Office of General Counsel *CA*  
 DATE: March 18, 1985  
 SUBJECT: RAD 85NF-39: 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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\_\_\_\_\_  
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**SENSITIVE**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Date & Time Transmitted: MONDAY, 3-18-85, 4:00

COMMISSIONER: McGARRY, AIKENS, McDONALD, ELLIOTT, REICHE, HARRIS

RETURN TO COMMISSION SECRETARY BY WEDNESDAY, MARCH 20, 1985, 4:00

SUBJECT: RAD REFERRAL 85NF-39 - First General Counsel's Report signed March 15, 1985

- ( ) I approve the recommendation in the attached report.
- ( ) I object to the recommendation.

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Date: \_\_\_\_\_ Signature: \_\_\_\_\_

ALL BALLOTS MUST BE SIGNED AND DATED. PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY. PLEASE RETURN THE BALLOT NO LATER THAN THE DATE AND TIME SHOWN ABOVE.

From the Office of the Commission Secretary

85040552266

**SENSITIVE**

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

RECEIVED  
THE FEC  
SECRETARY

MAR 18 10:50

**FIRST GENERAL COUNSEL'S REPORT**

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION 3/18/85-9:55

RAD # 85NF-39  
STAFF MEMBER  
George Demougeot

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

RESPONDENTS' NAME: Committee On Letter Carriers Political  
Education (Letter Carriers Political  
Action Fund)  
Florence Johnson, Treasurer

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

INTERNAL REPORTS CHECKED: Committee Reports

FEDERAL AGENCIES CHECKED: None

**SUMMARY OF ALLEGATIONS**

The Committee on Letter Carriers Political Education (Letter Carriers Political Action Fund) ("PAF") failed to file seven (7) Reports of Receipts and Disbursements in a timely manner for the 1983-1984 election cycle. The reports were filed between 7 and 102 calendar days late:

<u>Report</u>	<u>Due Date</u>	<u>Date Filed</u>	<u>Days Late</u>
1983 Mid-Year	7/31/83	11/10/83	102
1984 February Monthly	2/20/84	4/16/84	56
1984 March Monthly	3/20/84	4/16/84	27
1984 April Monthly	4/20/84	5/15/84	25
1984 May Monthly	5/20/84	6/25/84	36
1984 August Monthly	8/20/84	9/04/84	15
1984 30-Day Post General	12/06/84	12/13/84	7

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On June 22, 1984, a Chronic Late Filing Notice was sent to PAF for failing to file the 1983 Mid-Year<sup>\*/</sup> and the 1984 February, March, and April Monthly Reports in a timely manner. The notice advised PAF that any additional late filing of reports may result in legal enforcement action. Subsequent to the Chronic Late Filing Notice, PAF filed the 1984 May Monthly, August Monthly and 30 Day Post-General Reports Late.

**FACTUAL AND LEGAL ANALYSIS**

Pursuant to 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv), a political committee in a calendar year in which a regularly scheduled general election is held is required, through its treasurer, to file a post-election report no later than the 30th day after such election. In any other calendar year, the committee is required, through its treasurer, to file a mid-year report no later than July 31 and a year end report no later than January 31 of the following calendar year.

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

In view of the fact that PAF has continually failed to file its reports in a timely manner, the Office of General Counsel recommends that the Commission find reason to believe that the Committee on Letter Carriers Political Education and Florence Johnson, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv), and 2 U.S.C. § 434(a)(4)(B).

<sup>\*/</sup> PAF filed a 1983 July Quarterly Report in lieu of the required semi-annual report.

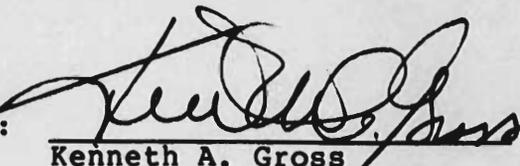
85040552268

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe Committee on Letter Carriers Political Education (Letter Carriers Political Action Fund) and Florence Johnson, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv) and 2 U.S.C. § 434(a)(4)(B).
3. Approve the attached letter and factual and legal analysis.

Charles N. Steele  
General Counsel

March 15, 1985  
Date

BY:   
Kenneth A. Gross  
Associate General Counsel

Attachments

- I. RAD Referral
- II. General Counsel's Factual and Legal Analysis
- III. Proposed Letter

85040552269

REPORTS ANALYSIS REFERRAL  
TO  
OFFICE OF GENERAL COUNSEL

DATE: 29 January 1985

ANALYST: Doris Gardner

I. COMMITTEE: Committee On Letter Carriers Political  
Education (Letter Carriers Political  
Action Fund) (C00023580)  
Florence Johnson, Treasurer  
100 Indiana Avenue, NW  
Washington, DC 20001

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(B)  
11 CFR 104.5(c)(3)(i) and (ii)  
2 U.S.C. §434(a)(4)(A)(iv)  
11 CFR 104.5(c)(2)(i)(A)

III. BACKGROUND:

Failure to Timely File Reports

The Committee on Letter Carriers Political Education (Letter Carriers Political Action Fund) ("PAF") failed to file seven (7) Reports of Receipts and Disbursements in a timely manner for the 1983-1984 election cycle (see attached chart). The reports were filed between 7 and 102 calendar days late.

On June 22, 1984, a Chronic Late Filing Notice was sent to PAF for failing to file the 1983 Mid-Year<sup>\*/</sup> and the 1984 February, March, and April Monthly Reports in a timely manner (Attachment 11). The notice advised PAF that any additional late filing of reports may result in legal enforcement action. Subsequent to the Chronic Late Filing Notice, PAF filed the 1984 May Monthly, August Monthly and 30 Day Post-General Reports late.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

<sup>\*/</sup> PAF filed a 1983 July Quarterly Report, in lieu of the required semi-annual report.

*Attachment I*  
*(2)*

85040552270

## LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1983 Mid-Year (4/1/83-6/30/83)	7/7/83 (Attachment 2)	7/31/83	N/A	11/10/83 (Attachment 3)
1984 February Monthly (1/1/84-1/31/84)	1/7/84 (Attachment 4)	2/20/84	N/A	4/16/84 (Attachment 5)*
1984 March Monthly (2/1/84-2/29/84)	1/7/84 (Attachment 4)	3/20/84	N/A	4/16/84 (Attachment 6)*
1984 April Monthly (3/1/84-3/31/84)	3/22/84 (Attachment 7)	4/20/84	5/11/84 (Attachment 8)	5/15/84 (Attachment 9)*
1984 May Monthly (4/1/84-4/30/84)	3/22/84 (Attachment 7)	5/20/84	6/7/84 (Attachment 10)	6/25/84 (Attachment 12)*
1984 August Monthly (7/1/84-7/31/84)	6/21/84 (Attachment 13)	8/20/84	N/A	9/04/84 (Attachment 14)*
1984 30 Day Post-General (10/18/84-11/26/84)	10/1/84 (Attachment 15)	12/06/84	N/A	12/13/84 (Attachment 16)

\*For the reports noted, the FEC receipt date was used in lieu of the certified date, since it was not possible to determine the date of the U.S. postmark.

Attachment I (3)

COMMITTEE DOCUMENT SUBJECT FUND TYPE DATE RANGE DATE PAGE NUMBER LOCATION

ADMITTED ON LETTER CARRIERS POLITICAL SUBJECT OR LETTER CARRIERS POLITICAL ACTION FUNDS NOW PARTY QUALIFIED IN REGISTERED CONNECTED ORGANIZATION LETTER CARRIERS OR NEWS SERVICE

COMMITTEE DOCUMENT	AMOUNT	FUND	TYPE	DATE RANGE	DATE	PAGE	NUMBER	LOCATION
1983 STATEMENT OF ORGANIZATION - AMENDMENT					1AUG83		1	83FEC/273/3940
MISCELLANEOUS REPORT					10NOV83 TO FEC		1	83FEC/287/0414
MISCELLANEOUS REPORT					10NOV83 TO FEC		1	83FEC/287/0425
APRIL QUARTERLY	37,462	52,058			1JAN83 -31MAR83		11	83FEC/271/5350
APRIL QUARTERLY - AMENDMENT	37,462	52,058			1JAN83 -31MAR83		8	83FEC/287/0455
1'ST LETTER INFORMATIONAL NOTICE					1JAN83 -31MAR83		1	84FEC/307/0834
JULY QUARTERLY	289,716	94,890			1APR83 -30JUN83		21	83FEC/287/0435
1'ST LETTER INFORMATIONAL NOTICE					1APR83 -30JUN83		1	84FEC/307/0833
OCTOBER QUARTERLY	197,616	44,159			1JUL83 -30SEP83		15	83FEC/287/0920
OCTOBER QUARTERLY - AMENDMENT	197,616	44,159			1JUL83 -30SEP83		16	84FEC/310/1633
1'ST LETTER INFORMATIONAL NOTICE					1JUL83 -30SEP83		1	84FEC/306/4920
PRE-RUN-OFF	-	-			20OCT83		1	83FEC/287/0914
PRE-RUN-OFF - AMENDMENT	22,529	10,095			1JAN83 -21OCT83		6	84FEC/311/4351
PRE-RUN-OFF - AMENDMENT	-	-			1OCT83 -21OCT83		3	84FEC/323/2480
REQUEST FOR ADDITIONAL INFORMATION					1OCT83 -21OCT83		1	84FEC/319/4039
POST-SPECIAL	26,324	29,455			21OCT83 -21NOV83		14	84FEC/290/5135
POST-SPECIAL - AMENDMENT	26,324	29,955			1JAN83 -21NOV83		14	84FEC/310/1655
REQUEST FOR ADDITIONAL INFORMATION					22OCT83 -21NOV83		1	84FEC/320/0056
POST-SPECIAL - AMENDMENT	-	-			1JAN83 -22NOV83		2	84FEC/323/2483
YEAR-END	23,482	8,411			1JAN83 -31DEC83		8	84FEC/292/5403
YEAR-END - AMENDMENT	-	-			1JAN83 - 1JAN84		3	84FEC/323/2485
YEAR-END - AMENDMENT	23,482	8,411			1JAN83 -31DEC83		7	84FEC/310/1669
REQUEST FOR ADDITIONAL INFORMATION					22NOV83 -31DEC83		1	84FEC/320/0054
1984 MISCELLANEOUS NOTICE FROM FEC					22JUN84		1	84FEC/317/5358
FEBRUARY MONTHLY	23,254	11,745			1JAN84 -31JAN84		9	84FEC/310/1612
MARCH MONTHLY	17,686	72,505			1JAN84 -29FEB84		9	84FEC/313/5462
MARCH MONTHLY - AMENDMENT	-	-			1JAN84 - 1MAR84		2	84FEC/323/2488
REQUEST FOR ADDITIONAL INFORMATION					1FEB84 -29FEB84		1	84FEC/320/0057
APRIL MONTHLY	37,596	71,675			1JAN84 -31MAR84		15	84FEC/314/1750
NOTICE OF FAILURE TO FILE					1MAR84 -31MAR84		1	84FEC/314/0945
MAY MONTHLY	91,444	56,537			1JAN84 -30APR84		11	84FEC/325/0541
NOTICE OF FAILURE TO FILE					1APR84 -30APR84		1	84FEC/316/2952
JUNE MONTHLY	243,590	135,605			1JAN84 -31MAY84		22	84FEC/318/0775
JULY MONTHLY	56,859	160,918			1JUN84 -30JUN84		16	84FEC/324/1499
AUGUST MONTHLY	34,358	127,326			1JUL84 -31JUL84		12	84FEC/327/3746
SEPTEMBER MONTHLY	21,431	75,510			1AUG84 -31AUG84		8	84FEC/328/2748
OCTOBER MONTHLY	35,322	465,940			1SEP84 -30SEP84		28	84FEC/343/4739
PRE-GENERAL	2,429	146,850			1OCT84 -20OCT84		12	84FEC/347/3880
POST-GENERAL	165,894	29,094			21OCT84 -30NOV84		9	84FEC/356/4886
TOTAL	1,329,861	0 1,593,273	0				295	TOTAL PAGES

ALL REPORTS HAVE BEEN REVIEWED

ENDING CASH 11/30/84: \$1,593,273

DEBTS: 0

Attachment I  
4



FEDERAL ELECTION COMMISSION  
WASHINGTON DC. 20463

July 7, 1983

### SEMIANNUAL REPORT FILING REQUIREMENTS

#### WHO MUST FILE

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

#### WHAT MUST BE REPORTED

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

#### FILING DATE

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

#### WHERE AND HOW TO FILE

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

#### FAILURE TO FILE

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

#### MONTHLY FILERS

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

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

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

Attachment I  
(5)

3  
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2  
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3

**ATTACHMENT 3**  
**REPORT OF RECEIPTS AND DISBURSEMENTS (Page 1 of 2)**  
**For a Political Committee Other Than an Authorized Committee**

11 2:47

(Summary Page)

<p><b>1. Name of Committee (in Full)</b></p> <p><b>COMMITTEE ON LETTER CARRIERS POLITICAL EDUCATION</b></p> <hr/> <p><b>Address (Number and Street)</b></p> <p>100 INDIANA AVE., N.W.</p> <hr/> <p><b>City, State and ZIP Code</b></p> <p>WASHINGTON, D.C. 20001</p> <hr/> <p><input type="checkbox"/> Check if address is different than previously reported.</p>	<p><b>4. TYPE OF REPORT (check appropriate boxes)</b></p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report  <input checked="" type="checkbox"/> July 15 Quarterly Report  <input type="checkbox"/> October 15 Quarterly Report  <input type="checkbox"/> January 31 Year End Report  <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only)  <input type="checkbox"/> Monthly Report for _____  <input type="checkbox"/> Twelfth day report preceding _____ (Type of Session) 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 type="checkbox"/> NO</p>
<p><b>2. FEC Identification Number</b></p> <p>C - 0023580</p>	
<p><b>3. <input type="checkbox"/> This committee qualified as a multi-candidate committee during this Reporting Period on _____ (Date)</b></p>	

	Column A This Period	Column B Calendar Year-to-Date
<b>SUMMARY</b>		
<b>5. Covering Period</b> 4/1/83 Through 6/30/83		
<b>6. (a) Cash on Hand January 1, 1983</b> .....		\$ 457,924.59
<b>(b) Cash on Hand at Beginning of Reporting Period</b> .....	\$ 443,328.00	
<b>(c) Total Receipts (from Line 18)</b> .....	\$ 285,716.65	\$ 323,178.67
<b>(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)</b> .....	\$ 729,044.65	\$ 781,103.26
<b>7. Total Disbursements (from Line 28)</b> .....	\$ 94,890.30	\$ 146,948.91
<b>8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))</b> .....	\$ 634,154.35	\$ 634,154.35
<b>9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)</b> .....	\$	
<b>10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)</b> .....	\$	

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 202-423-4088

FLECKALE M JENNISON  
 Type or Print Name of Treasurer

[Signature]  
 SIGNATURE OF TREASURER

\_\_\_\_\_  
 Date

**NOTE:** Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 18 U.S.C. § 427b.

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

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*Attachment I*  
6

05040532274

**FIRST CLASS MAIL**

ACTING TO SAVE SERVICES TO  
**NATIONAL ASSOCIATION  
OF LETTER CARRIERS**  
100 LINCOLN AVENUE, N.W.  
WASHINGTON, D.C. 20001

**FEDERAL ELECTION COMMISSION**  
1336 K STREET, N.W.  
WASHINGTON, D.C. 20443

**First-Class Mail**

**CERTIFIED**  
P18 8591604

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SANTA ANA CA  
NOV 13 1983 PM

Attachment I  
⑦



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 7, 1984

**JANUARY 31 YEAR-END REPORT NOTICE**

**WHO MUST FILE**

**ALL POLITICAL COMMITTEES** currently registered with the Commission must file a year-end report by January 31, 1984.

**WHAT MUST BE REPORTED**

All financial activity must be disclosed from the last report filed through December 31, 1983. Registered committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration\* through December 31, 1983.

**FILING DATE**

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1984. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1984.

**WHERE TO FILE**

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

**COMPLIANCE**

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

**1984 FILING REQUIREMENTS**

See the January 1984 issue of the FEC Record for filing requirements during 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).

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

*Attachment I*  
⑧

85040552276

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

ATTACHMENT 5  
(Page 1 of 2)

03 APR 16 P2:58

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (No Full)

**COMMITTEE ON LETTER CARRIERS POLITICAL EDUCATION**

Address (Number and Street)

100 INDIANA AVE., N.W.

City, State and ZIP Code

WASHINGTON, D.C. 20001

Check here if address is different than previously reported.

2. FEC Identification Number

C - 0023580

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 January 1984

Twelfth day report preceding \_\_\_\_\_  
(Type of Election)

election on \_\_\_\_\_ in the State of \_\_\_\_\_

Thirtieth day report following the General Election

on \_\_\_\_\_ in the State of \_\_\_\_\_

Termination Report

(b) Is this Report an Amendment?

YES

NO

**SUMMARY**

5. Covering Period JAN - 1 - 84 through JAN - 31-84

6. (a) Cash on hand January 1, 19 84 ..... \$ 811,485.47

(b) Cash on Hand at Beginning of Reporting Period ..... \$ 811,485.47

(c) Total Receipts (from Line 18) ..... \$ 23,254.42

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and  
Lines 6(a) and 6(c) for Column B) ..... \$ 834,739.89

7 Total Disbursements (from Line 28) ..... \$ 11,745.27

8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) ..... \$ 822,994.62

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.

Florence M Johnson

Type or Print Name of Treasurer

*Florence M Johnson*  
SIGNATURE OF TREASURER

4/10/84  
Date

For Form 2 information contact

Federal Election Commission

Toll Free 800 424 9530

Local 202 523 4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person filing this report to the penalties of 2 USC § 437e

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

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FEC FORM 3 (3/70)

*Attachment I*  
*(9)*

35040552277

9 1 7 3 1 5 W C

92:54  
Attachment 10

**FIRST CLASS MAIL**

AFTER 10 DAYS RETURN TO  
**NATIONAL ASSOCIATION  
OF LETTER CARRIERS**  
100 Indiana Avenue, N.W.  
Washington, D.C. 20001

FEDERAL ELECTION COMMISSION  
1325 K STREET, N.W.  
WASHINGTON, D.C. 20463

**First-Class Mail**

**CERTIFIED**  
P18 5594178

8 7 2 2 5 5 0 4 0 5 8

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

RECEIVED AT THE FEC

(Summary Page)

<p><b>ALIGN AREA</b></p> <p>1. Name of Committee (in Full)</p> <p><b>COMMITTEE ON LETTER CARRIERS POLITICAL EDUCATION</b></p> <hr/> <p>Address (Number and Street)</p> <p><b>100 INDIANA AVE., N.W.</b></p> <hr/> <p>City, State and ZIP Code</p> <p><b>WASHINGTON, D.C. 20001</b></p> <p><input type="checkbox"/> Check here if address is different than previously reported.</p> <p>2. FEC Identification Number</p> <p><b>C - 0023580</b></p> <p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during the Reporting Period on _____ (Date)</p>	<p><b>ALIGN AREA</b></p> <p>4. TYPE OF REPORT (Check appropriate box)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report      <input type="checkbox"/> October 15 Quarterly Report</p> <p><input type="checkbox"/> July 15 Quarterly Report      <input type="checkbox"/> January 31 Year End Report</p> <p><input type="checkbox"/> July 31 Mid Year Report (Non-Election Year Only)</p> <p><input checked="" type="checkbox"/> Monthly Report for <u>February 1984</u></p> <p><input type="checkbox"/> Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____</p> <p><input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____</p> <p><input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment?</p> <p><input type="checkbox"/> YES      <input type="checkbox"/> NO</p>
---	--

APR 15 8 18

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>1 - 1 - 84</u> through <u>2 - 29 - 84</u>		
6. (a) Cash on hand January 1, 19 <u>84</u>		\$ 811,485.42
(b) Cash on Hand at Beginning of Reporting Period	\$ 822,994.62	
(c) Total Receipts (from Line 10)	\$ 17,680.37	\$ 40,940.79
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 840,680.99	\$ 852,426.26
7. Total Disbursements (from Line 20)	\$ 72,505.54	\$ 84,250.81
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 768,175.45	\$ 768,175.45
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 or belief it is true, correct and complete

**Florence M. Johnson**  
Type or Print Name of Treasurer

*Florence M. Johnson*      4/10/84  
SIGNATURE OF TREASURER      Date

For further information contact:  
Federal Election Commission  
Toll Free 800-424-9630  
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 3s are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

Attachment I

(11)

85040552230  
71733135170

APR 12 1978  
12:53  
MAIL

# FIRST CLASS MAIL

AFTER 10 DAYS RETURN TO  
NATIONAL ASSOCIATION  
OF LETTER CARRIERS  
100 INDIANA AVENUE, N. W.  
WASHINGTON D. C. 20001

FEDERAL ELECTION COMMISSION  
1325 K STREET, N.W.  
WASHINGTON, D.C. 20463

First-Class Mail

ATTACHMENT 6  
(Page 2 of 2)

P18 H594178

Attachment I  
(12)



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 22, 1984

**APRIL REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES**

**WHO MUST FILE**

ALL unauthorized political committees, except those that file monthly, must file a quarterly report by April 15, 1984. (See below)

**WHAT MUST BE REPORTED**

All financial activity must be disclosed from the last report filed through March 31, 1984. Political committees which have not previously filed a financial disclosure report covering any period in 1984 should report all financial activity from the later of January 1, 1984, or date of registration,\* through March 31, 1984.

**WHEN TO FILE**

Reports sent by registered or certified mail must be postmarked no later than April 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business April 15, 1984.

**WHERE AND HOW TO FILE**

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

**MONTHLY FILERS**

Committees that file on a monthly schedule must file their next report by April 20, 1984, and disclose all financial activity of their committee from March 1 through March 31, 1984. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month.

**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.

\*The first report filed by a committee shall include all amounts received or disbursed in 1984, and 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) Activity which occurred prior to 1984 should be reported separately.

*Attachment I*  
*(13)*

85040552281

A R E M I N D E R

All committees that have made contributions or expenditures (including independent expenditures) in connection with a primary election, which have not previously been reported, must file a pre-election report.

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

85040552282

Attachment 7  
(14)



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 11, 1984

Florence Johnson, Treasurer  
Committee on Letter Carriers  
Political Education (Letter  
Carriers Political Action Fund)  
100 Indiana Avenue, N. W.  
Washington, DC 20001

Identification Number: C00023500

Reference: April Monthly Report (3/1/84-3/31/84)

Dear Ms. Johnson:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

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

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

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Attachment I

(15)

95040552283  
R4033140915

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

RECEIVED  
ATTACHMENT 9  
84 MAY 11 AM: 82

(Summary Page)

ALION AREA

ALION AREA

1. Name of Committee (In Full)

**COMMITTEE ON LETTER CARRIERS  
POLITICAL EDUCATION**

Address (Number and Street)

**100 INDIANA AVENUE, N. W.**

City, State and ZIP Code

**WASHINGTON, D. C. 20001**

Check here if address is different than previously reported.

2. FEC Identification Number

**C - 0023580**

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 March 1984

Twelfth day report preceding \_\_\_\_\_ (Type of Election)

election on \_\_\_\_\_ in the State of \_\_\_\_\_

Thirtieth day report following the General Election

on \_\_\_\_\_ in the State of \_\_\_\_\_

Termination Report

(b) Is this Report an Amendment?

YES  NO

**SUMMARY**

5. Covering Period January 1, 1984 through March 31, 1984

6. (a) Cash on hand January 1, 19\_\_\_\_\_

(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)

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:

• Election Commission

• Free Bu. 424 3-30

• DC 205 4366

**MRS. FLORENCE M. JOHNSON**

SIGNATURE OF TREASURER

*Florence M. Johnson*

Date

5/10/84

Attachment I  
16

8504052284  
R10331417:0

8 5 0 4 0 5 5 2 2 8 5



**FIRST CLASS MAIL**

LETTER TO BE DELIVERED TO  
**NATIONAL ASSOCIATION  
OF LETTER CARRIERS**  
100 BUSINESS AVENUE, N. W.  
WASHINGTON, D. C. 20001

**FEDERAL ELECTION COMMISSION  
1335 K. STREET., N.W.  
WASHINGTON, D.C. 20463**

**First-Class Mail**

ATTACHMENT 9  
Page 2 of 2)

**CERTIFIED**

118

7 5 7 1 7 1 3 3 0 1 8

Attachment I  
17



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

EQ-7

June 7, 1984

Florence Johnson, Treasurer  
Committee on Letter Carriers  
Political Education (Letter  
Carriers Political Action  
Fund)  
100 Indiana Avenue, N.W.  
Washington, DC 20001

Identification Number: C00023580

Reference: May Monthly Report (4/1/84-4/30/84)

Dear Ms. Johnson:

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 A Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

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

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

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Attachment I

(18)

84033162952  
0504055200



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20543

75-1  
June 22, 1984

Florence Johnson, Treasurer  
Committee on Letter Carriers  
Political Education (Letter  
Carriers Political Action Fund)  
100 Indiana Avenue, NW  
Washington, DC 20001

Identification Number: C00023500

Reference: 1983-1984 Election Cycle Reports

Dear Ms. Johnson:

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

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year (4/1/83-6/30/83)	7/31/83	11/10/83
February Monthly (1/1/84-1/31/84)	2/20/84	4/16/84
March Monthly (2/1/84-2/29/84)	3/20/84	4/16/84
April Monthly (3/1/84-3/31/84)	4/20/84	5/15/84

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

If you need assistance or have any questions regarding this matter, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Michael B. Filler  
Chief  
Party/Non-Party Branch

Attachment I

(19)

83040552287  
94033175358



9 5 2 4 0 5 5 2 2 8 7

0 1 1 6 1 5 1 7 5 1

POSTAGE P 1-32



# FIRST CLASS MAIL

AFTER 10 DAYS RETURN TO  
**NATIONAL ASSOCIATION  
OF LETTER CARRIERS**  
100 Indiana Avenue, N. W.  
Washington, D. C. 20001

**FEDERAL ELECTION COMMISSION**  
1325 K ST., N.W.  
WASHINGTON, D.C. 20463

**First-Class Mail**

ATTACHMENT 12  
(Page 2 of 2)

**P 213 307 052**

Attachment I  
(21)



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 21, 1984

**JULY REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES**

**WHO MUST FILE**

ALL unauthorized political committees, except those that file monthly, must file a quarterly report by July 15, 1984. (See below.)

**WHAT MUST BE REPORTED**

All financial activity must be disclosed from the last report filed through June 30, 1984. Political committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration,\* through June 30, 1984.

**WHEN TO FILE**

Reports sent by registered or certified mail must be postmarked no later than midnight July 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business July 15, 1984.

**WHERE AND HOW TO FILE**

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

**MONTHLY FILERS**

Committees that file on a monthly schedule must file their next report by July 20, 1984, and disclose all financial activity of their committee from June 1 through June 30, 1984. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month.

**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.

\*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).

Attachment I  
22

85040552290

A R E M I N D E R F O R Q U A R T E R L F I L E R S

All committees that have made contributions or expenditures (including independent expenditures) in connection with a primary election which have not previously been reported must file a pre-election report.

8 5 0 4 0 5 5 2 2 9 1

Attachment I  
23

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

RECEIVED  
ATTACHMENT 14  
(Page 1 of 2)

(Summary Page)

ALION AREA

ALION AREA

1. Name of Committee (in Full)  
**COMMITTEE ON LETTER CARRIERS  
POLITICAL EDUCATION**

---

Address (Number and Street)  
**100 INDIANA AVE., N.W.**

---

City, State and ZIP Code  
**WASHINGTON, D.C. 20001**

Check here if address is different than previously reported.

2. FEC Identification Number  
**C- 0023580**

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 JULY 1984  
 Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Thirtieth day report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Termination Report

(b) Is this Report an Amendment?  
 YES     NO

85040552292  
71033:73746

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Covering Period <u>JULY 1, 1984</u> through <u>JULY 31, 1984</u>			
6. (a) Cash on hand January 1, 19 <u>84</u>			\$ 811,485.47
(b) Cash on Hand at Beginning of Reporting Period		\$ 71,919.66	
(c) Total Receipts (from Line 18)		\$ 34,358.49	\$ 504,779.56
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 807,278.15	\$ 1,316,265.03
7. Total Disbursements (from Line 28)		\$ 127,326.00	\$ 636,312.88
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 3(d))		\$ 679,952.15	\$ 679,952.15
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	

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:  
 U.S. Election Commission  
 Toll Free 800-424-6530  
 Local 707-623-4888

Mrs. Florence M. Johnson  
 Type or Print Name of Treasurer  
  
 SIGNATURE OF TREASURER

8/28/84  
 Date

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

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

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FEC FORM 3 (3/80)  
 Attachment I  
 (24)

8 5 2 1 0 5 5 2 2 9 3  
4 1 7 7 7

P 1:13



# FIRST CLASS MAIL

AFTER 10 DAYS RETURN TO  
**NATIONAL ASSOCIATION  
OF LETTER CARRIERS**  
100 INDIANA AVENUE, N. W.  
WASHINGTON, D. C. 20001

FEDERAL ELECTION COMMISSION  
1325 K STREET, N.W.  
WASHINGTON, D.C. 20463

**First-Class Mail**

ATTACHMENT 14  
(Page 2 of 2)

P 213 303 044  
M 6

Attachment I  
(25)



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).

-over-

Attachment I  
26

35040552294

**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

*Attachment I*  
**(27)**

35040552295

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

RECEIVED AT THE FEC

(Summary Page)

84 DEC 13 4:11:57

85040552296  
R 4033-6496

1. Name of Committee (in Full)  
**COMMITTEE ON LETTER CARRIERS  
POLITICAL EDUCATION**

Address (Number and Street)  
**100 INDIANA AVE., N.W.**

City, State and ZIP Code  
**WASHINGTON, D.C. 20001**

Check if address is different than previously reported.

2. FEC Identification Number  
**C - 0023580**

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

4. TYPE OF REPORT (check appropriate boxes)

(a)  April 15 Quarterly Report  
 July 15 Quarterly Report  
 October 15 Quarterly Report  
 January 31 Year End Report  
 July 31 Mid Year Report (Non-election Year Only)  
 Monthly Report for \_\_\_\_\_  
 Twelfth day report preceding \_\_\_\_\_ (Type of Session) election on \_\_\_\_\_ in the State of \_\_\_\_\_

Thirtieth day report following the General Election on 11-6-1984 in the State of All

Termination Report

(b) Is this Report an Amendment?  
 YES  NO

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>OCTOBER 21 1984</u> Through <u>NOVEMBER 30, 1984</u>			
6. (a) Cash on Hand January 1, 1984	.....		\$ 811,485.47
(b) Cash on Hand at Beginning of Reporting Period	.....	\$ 57,911.00	
(c) Total Receipts (from Line 18)	.....	\$ 165,694.41	\$ 736,735.82
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	.....	\$ 223,608.41	\$ 1,548,221.29
7. Total Disbursements (from Line 28)	.....	\$ 29,094.95	\$ 1,353,707.83
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	.....	\$ 194,513.46	\$ 194,513.46
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	.....	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	.....	\$ -0-	

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:

Florence M. Johnson  
Type or Print Name of Treasurer  
Florence M. Johnson  
SIGNATURE OF TREASURER

U.S. Election Commission  
Toll Free 800-424-9630  
Local 202-623-4088

Attachment I  
28

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 4276

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# FIRST CLASS MAIL

AFTER 10 DAYS RETN IN TO  
NATIONAL ASSOCIATION  
OF LETTER CARRIERS  
100 INDIANA AVENUE, N. W.  
WASHINGTON, D. C 20001

FEDERAL ELECTION COMMISSION  
1325 K STREET., N.W.  
WASHINGTON, D.C. 20463

**First-Class Mail**

ATTACHMENT 16  
(Page 2 of 2)

Attachment I  
(29)

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.

RESPONDENTS: Committee on Letter Carriers  
Political Education (Letter Carriers  
Political Action Fund)  
Florence Johnson, Treasurer

SUMMARY OF ALLEGATIONS

The Committee on Letter Carriers Political Education (Letter Carriers Political Action Fund) ("PAF") failed to file seven (7) Reports of Receipts and Disbursements in a timely manner for the 1983-1984 election cycle. The reports were filed between 7 and 102 calendar days late:

<u>Report</u>	<u>Due Date</u>	<u>Date Filed</u>	<u>Days Late</u>
1983 Mid-Year	7/31/83	11/10/83	102
1984 February Monthly	2/20/84	4/16/84	56
1984 March Monthly	3/20/84	4/16/84	27
1984 April Monthly	4/20/84	5/15/84	25
1984 May Monthly	5/20/84	6/25/84	36
1984 August Monthly	8/20/84	9/04/84	15
1984 30-Day Post General	12/06/84	12/13/84	7

On June 22, 1984, a Chronic Late Filing Notice was sent to PAF for failing to file the 1983 Mid-Year<sup>\*/</sup> and the 1984 February, March, and April Monthly Reports in a timely manner. The notice advised PAF that any additional late filing of reports may result in legal enforcement action. Subsequent to the Chronic Late Filing Notice, PAF filed the 1984 May Monthly, August Monthly and 30 Day Post-General Reports Late.

<sup>\*/</sup> PAF filed a 1983 July Quarterly Report in lieu of the required semi-annual report.

Attachment II  
30

85040552293

Factual and Legal Analysis

Pursuant to 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv), a political committee in a calendar year in which a regularly scheduled general election is held is required, through its treasurer, to file a post-election report no later than the 30th day after such election. In any other calendar year, the committee is required, through its treasurer, to file a mid-year report no later than July 31 and a year end report no later than January 31 of the following calendar year.

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

In view of the fact that PAF has continually failed to file its reports in a timely manner, the Office of General Counsel recommends that the Commission find reason to believe that the Committee on Letter Carriers Political Education and Florence Johnson, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv), and 2 U.S.C. § 434(a)(4)(B).

85040552299



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Florence Johnson, Treasurer  
Committee on Letter Carriers  
Political Education  
100 Indiana Avenue, N.W.  
Washington, D.C. 20001

RE: MUR

Dear Ms. Johnson:

On \_\_\_\_\_, 1985, the Federal Election Commission determined that there is reason to believe Committee on Letter Carriers Political Education (Letter Carriers Political Action Fund) ("PAF") and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv) and 2 U.S.C. § 434(a)(4)(B), provisions 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 PAF and you. 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 you, 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 III  
32

85040552300

Florence Johnson, 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 proceduress for handling possible violations of the Act. If you have any questions, please contact George Demougeot, 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

85040552301

Attachment III  
33

**SENSITIVE**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

10  
FEC  
COMMISSION SECRETARY

25 MAR 25 09:03

March 25, 1985

MEMORANDUM TO: The Commission  
FROM: Charles N. Steele  
General Counsel  
By: Kenneth A. Gross  
Associate General Counsel  
SUBJECT: RAD Referral 85NF-39

On March 20, 1985 the Commission approved the recommendation that RAD Referral 85NF-39 should become a MUR. Therefore, all documents which had previously been contained in RAD Referral 85NF-39 should now become MUR 1948.

Attachment  
Copy of Certification

85040552300

11/9/88  
Demanded

In the Matter of	)	
	)	
Committee on Letter Carriers Political	)	RAD Referral 85NF-39
Education (Letter Carriers Political	)	
Action Fund)	)	
Florence Johnson, treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 20, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-39:

1. Open a MUR.
2. Find reason to believe Committee on Letter Carriers Political Education (Letter Carriers Political Action Fund) and Florence Johnson, as treasurer, violated 2 U.S.C. §§434(a)(4)(A)(iii) and (iv) and 2 U.S.C. § 434(a)(4)(B).
3. Approve the letter and factual and legal analysis attached to the First General Counsel's Report signed March 15, 1985.

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

Attest:

3-21-85  
Date

Marjorie W Emmons  
Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:	3-18-85, 9:58
Circulated on 48 hour tally basis:	3-18-85, 4:00

85040552303



FEDERAL ELECTION COMMISSION

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

85040552304

THIS IS THE BEGINNING OF MUR # 1948

Date Filmed 9/20/85 Camera No. --- 2

Cameraman AS