



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20543

THIS IS THE END OF MUR # 1969

Date Filmed 9/11/85 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

Routing slips internal memo, G.C. report;

Communication agreement, request for consultation,

Re-brief comment sheet

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):

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

Signed Eric Blumenthal
date 8/28/85



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

13 August 1985

Bruce E. Nordstrom, Treasurer
International Chiropractors Political
Action Committee
1901 L Street, N.W., Suite 800
Washington, D.C. 20036

RE: MUR 1969
International Chiropractors
Political Action Committee and
Bruce E. Nordstrom, treasurer

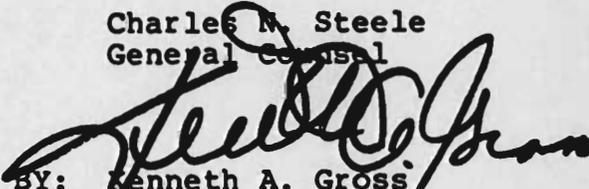
Dear Mr. Nordstrom:

On August 1, 1985, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. § 434(a)(4)(B) and § 434(a)(2)(A)(i) 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 M. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

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GCC# 705B

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
International Chiropractors)	MUR 1969
Political Action Committee)	
Bruce E. Nordstrom,)	
treasurer)	

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GENERAL COUNSEL

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 probable cause to believe that the International Chiropractors Political Action Committee ("Respondent") violated 2 U.S.C. § 434(a)(4)(B) and § 434(a)(2)(A)(i) by failing to file its 1984 Pre-general Election Report in a timely manner.

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) do hereby agree as follows:

- I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding.
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. Respondent enters voluntarily into this agreement with the Commission.
- IV. The pertinent facts in this matter are as follows:
 - 1. Respondent International Chiropractors Political Action Committee is a political committee within the meaning of 2 U.S.C. § 431(4).

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2. Respondent Bruce E. Nordstrom currently serves as treasurer for respondent International Chiropractors Political Action Committee.

3. Respondent was required to file a 12 Day Pre-general Election Report with the Commission by October 25, 1984.

4. Respondent filed its 12 Day Pre-general Election Report with the Commission on December 19, 1984.

5. Sections 434(a)(4)(B) and 434(a)(2)(A)(i), Title 2, United States Code, require unauthorized political committees, which are monthly filers, to file a Pre-general Election Report no later than the 12th day before any general election in which the committee makes a contribution or expenditure.

V. Respondent violated 2 U.S.C. § 434(a)(4)(B) and § 434(a)(2)(A)(i) by filing its 12 Day Pre-general Election Report on December 19, 1984, fifty-five (55) days late.

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of Two Hundred Dollars (\$200), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree not to 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.

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

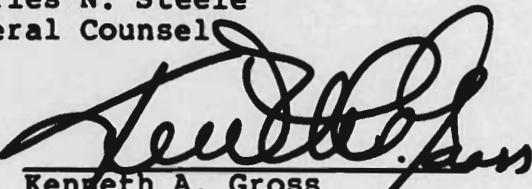
X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel

August 9, 1985
Date

FOR THE RESPONDENTS:

B. E. Nordstrom, Jr.
Bruce E. Nordstrom
Treasurer

July 19, 1985
Date

Ronald M. Hendrickson
Ronald M. Hendrickson
PAC Director

July 19, 1985
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bruce E. Nordstrom, Treasurer
International Chiropractors Political
Action Committee
1901 L Street, N.W., Suite 800
Washington, D.C. 20036

RE: MUR 1969
International Chiropractors
Political Action Committee and
Bruce E. Nordstrom, treasurer

Dear Mr. Nordstrom:

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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 1969
International Chiropractors)	
Political Action Committee)	
Bruce E. Nordstrom, treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 1, 1985, the Commission decided by a vote of 4-0 to take the following actions in MUR 1969:

1. Accept the conciliation agreement signed by Bruce E. Nordstrom, the treasurer of the International Chiropractors Political Action Committee, submitted with the General Counsel's Report signed July 25, 1985.
2. Approve the letter attached to the General Counsel's Report signed July 25, 1985.
3. Close the file.

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

Attest:

8-1-85
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FILED
OFFICE OF THE FEC
COMMUNICATIONS SECRETARY

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May 13, 1985

SENSITIVE

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele *CS*
General Counsel

SUBJECT: MUR #1969

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on May 13, 1985. following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
International Chiropractors) MUR 1969
Political Action Committee)
Robert E. Nordstrom,)
treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

The International Chiropractors Political Action Committee ("Committee") and Bruce E. Nordstrom, treasurer, were referred to the Office of General Counsel by the Reports Analysis Division ("RAD") for failing to file their 1984 Pre-general and Post-general Election Reports in a timely manner.

On April 3, 1985, the Federal Election Commission ("Commission") determined there is reason to believe that the Committee and Bruce E. Nordstrom, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and § 434(a)(2)(A)(i), for failing to make a timely filing of their Pre-general Election Report. The Commission, also on April 3, 1985, determined there is reason to believe that the Committee and Bruce E. Nordstrom, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and § 434(a)(2)(A)(ii), for failing to make a timely filing of their Post-general Election Report.

A letter notifying respondents of the reason to believe determinations was mailed on April 12, 1985. As of the date of this writing, no response has been received from the Committee.

II. LEGAL ANALYSIS

Section 434(a)(4)(B) and Section 434(a)(2)(A)(i) of Title 2, United States Code, provides that an unauthorized political

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committee which is a monthly filer must file a pre-general election report by the 12th day before any election in which the committee makes a contribution or expenditure, in those calendar years in which a regularly scheduled general election is held. Section 434(a)(4)(B) and section 434(a)(2)(A)(ii) of Title 2, United States Code, require an unauthorized committee which is a monthly filer to file a post-general election report no later than the 30th day following such a general election.

The International Chiropractors Political Action Committee is not an authorized committee for any candidate. The Committee files reports on a monthly basis. A regularly scheduled general election was held in 1984 on November 6. On October 1, 1984, the Committee was sent notification that its 12 Day Pre-General Election Report was due on October 25, 1984.

The Committee's amended 12-Day Pre-General Election Report was received by the Federal Election Commission on December 19, 1984. The Commission did not receive the Committee's original Pre-General Election Report until December 21, 1984, after the amended report had been received. The Committee's 30 Day Post-General Election Report was also received by the Commission on December 21, 1984.

Thus, the Committee failed to make timely filings of either its 12 Day Pre-General or 30 Day Post-general Election Reports. The Pre-general was fifty-five (55) days late, and the Post-general was fifteen (15) days late. The Committee has failed to respond in this matter. Accordingly, the Office of General

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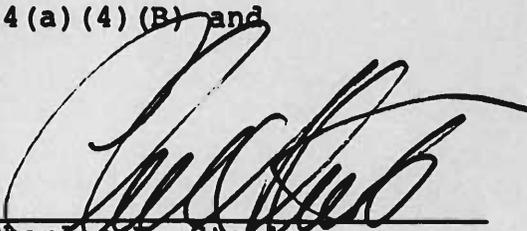
Counsel recommends that the Commission find probable cause to believe that the International Chiropractors Political Action Committee and Bruce E. Nordstrom, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and § 434(a)(2)(A)(i) and (ii).

III. GENERAL COUNSEL'S RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. Find probable cause to believe that the International Chiropractors Political Action Committee and Bruce E. Nordstrom, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and § 434(a)(2)(A)(i) and (ii).

13 May 1965
Date



Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 13, 1985

Bruce E. Nordstrom, treasurer
International Chiropractors Political
Action Committee
1901 L Street, N.W., Suite 800
Washington, D.C. 20036

Re: MUR 1969
International Chiropractors
Political Action Committee and
Bruce E. Nordstrom, as
treasurer

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on April 3, 1985, found reason to believe that the International Chiropractors Political Action Committee and you, as treasurer, have violated 2 U.S.C. § 434(a)(4)(B) and 434(a)(2)(A)(i) and (ii), and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

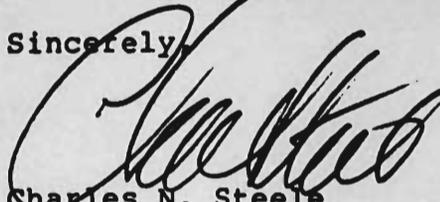
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Bruce E. Nordstrom, treasurer
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Eric Kleinfeld the attorney assigned to handle this matter, at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

M 1969
Kleinfield

In the Matter of)	
)	
International Chiropractors)	RAD Referral 85NF-20
Political Action Committee)	
Bruce E. Nordstrom, treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 3, 1985, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral 85NF-20:

1. Open a MUR.
2. Find reason to believe that the International Chiropractors Political Action Committee and Bruce E. Nordstrom, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).
3. Find reason to believe that the International Chiropractors Political Action Committee and Bruce E. Nordstrom, as treasurer, violated 2 U.S.C. § 434(a)(2)(i) and (ii).
4. Approve and send the letter and factual and legal analysis attached to the First General Counsel's Report signed March 29, 1985.

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

Attest:

4-3-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
International Chiropractors)	RAD Referral 85NF-20
Political Action Committee)	
Bruce E. Nordstrom, treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 3, 1985, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral 85NF-20:

1. Open a MUR.
2. Find reason to believe that the International Chiropractors Political Action Committee and Bruce E. Nordstrom, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).
3. Find reason to believe that the International Chiropractors Political Action Committee and Bruce E. Nordstrom, as treasurer, violated 2 U.S.C. § 434(a)(2)(i) and (ii).
4. Approve and send the letter and factual and legal analysis attached to the First General Counsel's Report signed March 29, 1985.

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

Attest:

4-3-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 12, 1985

Bruce E. Nordstrom, Treasurer
International Chiropractors Political
Action Committee
1901 L Street, N.W., Suite 800
Washington, D.C. 20036

RE: MUR 1969

Dear Mr. Nordstrom:

On April 3, 1985, the Federal Election Commission determined that there is reason to believe that the International Chiropractors Political Action Committee, and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(B) and 434(a)(2)(i) and (ii), 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 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.

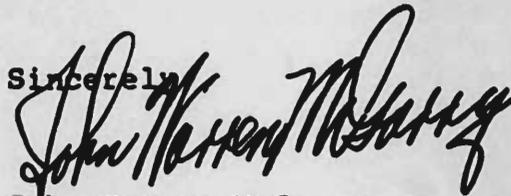
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Bruce E. Nordstrom, Treasurer
Page 2

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 Eric Kleinfeld, the attorney 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

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GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT International Chiropractors
Political Action Committee
Bruce E. Nordstrom, treasurer

MUR NO. 1969

SUMMARY OF ALLEGATIONS

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") on January 16, 1985, based on information obtained in the normal course of its supervisory duties under the Federal Election Campaign Act ("Act") of 1971, as amended.

The International Chiropractors Political Action Committee ("Committee") and Bruce E. Nordstrom, as treasurer, failed to file their 1984 Pre-General and Post-General Election Reports in a timely manner.

FACTUAL AND LEGAL ANALYSIS

Section 434(a)(4)(B) and Section 434(a)(2)(i) of Title 2, United States Code, provides that an unauthorized political committee which is a monthly filer must file a pre-general election report by the 12th day before any election in which the committee makes a contribution or expenditure, in those calendar years in which a regularly scheduled general election is held. Section 434(a)(4)(B) and section 434(a)(2)(ii) of Title 2, United States Code, require an unauthorized committee which is a monthly filer to file a post-general election report no later than the 30th day following such general election.

The International Chiropractors Political Action Committee is not an authorized committee for any candidate. The Committee

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files reports on a monthly basis. A regularly scheduled general election was held in 1984 on November 6. On October 1, 1984, the Committee was sent notification that its 12 Day Pre-General Election Report was due on October 25, 1984.

The Committee's amended 12 Day Pre-General Election Report was received by the Federal Election Commission ("Commission") on December 19, 1984. The Commission did not receive the Committee's original Pre-General Election Report until December 21, 1984, after the amended report had been received. The Committee's 30 Day Post-General Election Report was also received by the Commission on December 21, 1984.

Thus, the Committee failed to make timely filings of either its 12 Day Pre-General or 30 Day Post-General Election Reports, the former being fifty-seven (57) days late and the latter fifteen (15) days late. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that the International Chiropractors Political Action Committee and Bruce E. Nordstrom, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(B) and 434(a)(2)(i) and (ii).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

OK 4/8

Bruce E. Nordstrom, Treasurer
International Chiropractors Political
Action Committee
1901 L Street, N.W., Suite 800
Washington, D.C. 20036

RE: MUR

Dear Mr. Nordstrom:

On _____, 1985, the Federal Election Commission determined that there is reason to believe that the International Chiropractors Political Action Committee, and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(B) and 434(a)(2)(i) and (ii), 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 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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Bruce E. Nordstrom, 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 Eric Kleinfeld, the attorney 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

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SENSITIVE

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

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FEDERAL ELECTION COMMISSION
SECRETARY

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FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL BY RAD Referral No. 85NF-20
OGC TO THE COMMISSION 3/29/85-11:55 STAFF
Eric Kleinfeld

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

RESPONDENT'S NAME: International Chiropractors Political
Action Committee
Bruce E. Nordstrom, treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(B)
2 U.S.C. § 434(a)(2)(i) and (ii)

INTERNAL REPORTS
CHECKED: Committee Reports

FEDERAL AGENCIES
CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") on January 16, 1985, based on information obtained in the normal course of its supervisory duties under the Federal Election Campaign Act ("Act") of 1971, as amended.

SUMMARY OF ALLEGATIONS

The International Chiropractors Political Action Committee ("Committee") and Bruce E. Nordstrom, as treasurer, failed to file their 1984 Pre-General and Post-General Election Reports in a timely manner.

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FACTUAL AND LEGAL ANALYSIS

Section 434(a)(4)(B) and section 434(a)(2)(i) of Title 2, United States Code, provide that an unauthorized political committee which is a monthly filer must file a pre-general election report by the 12th day before any election in which the committee makes a contribution or expenditure, in those calendar years in which a regularly scheduled general election is held. Section 434(a)(4)(B) and section 434(A)(2)(ii) of Title 2, United States Code, require an unauthorized committee which is a monthly filer to file a post-general election report no later than the 30th day following such general election.

The International Chiropractors Political Action Committee is not an authorized committee for any candidate. The Committee files reports on a monthly basis. A regularly scheduled general election was held in 1984 on November 6. On October 1, 1984, the Committee was sent notification that its 12 Day Pre-General Election Report was due on October 25, 1984.

The Committee's amended 12 Day Pre-General Election Report was received by the Federal Election Commission ("Commission") on December 19, 1984. The Commission did not receive the Committee's original Pre-General Election Report until December 21, 1984, after the amended report had been received. The Committee's 30 Day Post-General Election Report was also received by the Commission on December 21, 1984.

Thus, the Committee failed to make timely filings of either its 12 Day Pre-General or 30 Day Post-General Election Reports, the former being fifty-seven (57) days late and the latter

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fifteen (15) days late. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that the International Chiropractors Political Action Committee and Bruce E. Nordstrom, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(B) and 434(a)(2)(i) and (ii).

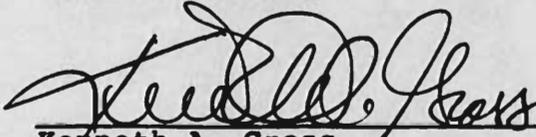
RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. Open a MUR.
2. Find reason to believe that the International Chiropractors Political Action Committee and Bruce E. Nordstrom, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).
3. Find reason to believe that the International Chiropractors Political Action Committee and Bruce E. Nordstrom, as treasurer, violated 2 U.S.C. § 434(a)(2)(i) and (ii).
4. Approve and send the attached letter and factual and legal analysis.

Charles N. Steele
General Counsel

March 29, 1985
Date

BY: 
Kenneth A. Gross
Associate General Counsel

Attachments

1. Referral Materials
2. Proposed letter
3. General Counsel's Factual and Legal Analysis

85040550571



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 15, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: NON-FILER REFERRALS OF MONTHLY UNAUTHORIZED COMMITTEES

In accordance with Standard 3 of the RAD Review and Referral Procedures for Unauthorized Committees, the attached list of monthly filers is being forwarded to your offices, for failing to file a report covering the pre-election period by election day.

Since the number of committees being referred is relatively large, we felt it best to arrange the information in chart format. You will note that the attached printouts list the names, addresses, and treasurers for thirty-five (35) committees with "C" Indices provided for each. ^{1/} Any telephonic communications have been referenced under Contacts with Filers. The Summary Pages of the late filed reports and/or explanatory letters have been referenced under Response(s).

Two committees have been deleted from the list, because they meet the expedited audit referral threshold. Should the Commission not approve to audit these committees, they will be referred to your office at a later date. The attachments for these committees have also been deleted causing two gaps in the sequence.

All unauthorized committees were sent prior notification on October 1, 1984, which specifically informed monthly filers of the requirement to file a 12 Day Pre-General Election Report by October 25, 1984 (Attachment 38). The committees, which failed to submit either a 12 Day Pre-General Report or a November Monthly Report, were sent Non-Filer Notices on November 16, 1984

^{1/} In some cases, the aggregate receipt and disbursement figures may be inflated because committees submitted reports covering portions of the same periods (e.g., a November Monthly covering October 1, 1984 through October 31, 1984 and a Pre-General Report covering October 1, 1984 through October 17, 1984.)

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PAGE 2

(see copy of notice - Attachment 39). Certain committees (i.e., those noted with an asterisk on the attached computer printouts) were not sent Non-Filer Notices because a) a report covering the pre-election period was indexed by November 15, 1984, or b) the committee had not been assigned at the time the non-filer printout was generated.

If you have any questions, please contact Michael Filler at 523-4048.

Attachments

85040550573



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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(4)

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

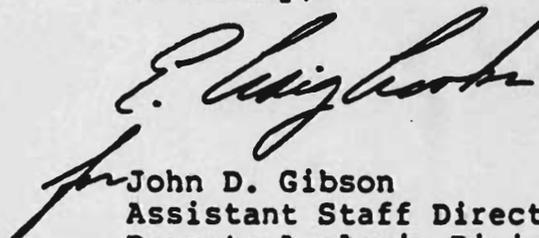
It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

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,


John D. Gibson
Assistant Staff Director
Reports Analysis Division

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INTERNATIONAL CHIROPRACTORS POLITICAL ACTION COMMITTEE

(Attachments 20a - e)

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

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
INTERNATIONAL CHIROPRACTORS POLITICAL ACTION COMMITTEE						
CONNECTED ORGANIZATION: CHIROPRACTORS ASSOCIATION; INT'L						
NON-PARTY QUALIFIED						
ID #C00000026						
1983	FEBRUARY MONTHLY	4,991	8,045	1JAN83 -31JAN83	5	83FEC/271/3477
	FEBRUARY MONTHLY - AMENDMENT	4,991	8,045	1JAN83 -31JAN83	5	84FEC/299/2943
	FEBRUARY MONTHLY - AMENDMENT	-	-	1JAN83 -31JAN83	1	84FEC/299/47
	FEBRUARY MONTHLY - AMENDMENT	-	-	1JAN83 -31MAR83	3	84FEC/336/45
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JAN83 -31JAN83	1	84FEC/299/42
	MARCH MONTHLY	3,096	814	1FEB83 -28FEB83	4	83FEC/271/3482
	MARCH MONTHLY - AMENDMENT	3,096	814	1FEB83 -28FEB83	4	84FEC/299/2939
	MARCH MONTHLY - AMENDMENT	-	-	1FEB83 -28FEB83	1	84FEC/299/4744
	MARCH MONTHLY - AMENDMENT	-	-	1FEB83 -28FEB83	1	84FEC/336/4536
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1FEB83 -28FEB83	1	84FEC/299/4204
	APRIL MONTHLY	538	5,655	1MAR83 -31MAR83	4	83FEC/271/3486
	APRIL MONTHLY - AMENDMENT	538	5,655	1MAR83 -31MAR83	4	84FEC/299/2935
	APRIL MONTHLY - AMENDMENT	-	-	1MAR83 -31MAR83	1	84FEC/299/4745
	APRIL MONTHLY - AMENDMENT	-	-	1MAR83 -31MAR83	1	84FEC/336/4537
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1MAR83 -31MAR83	1	84FEC/299/4203
	MAY MONTHLY	5,793	7,678	1APR83 -30APR83	5	83FEC/278/4452
	MAY MONTHLY - AMENDMENT	5,793	7,678	1APR83 -30APR83	5	84FEC/299/2930
	MAY MONTHLY - AMENDMENT	-	-	1APR83 -30APR83	1	84FEC/336/4538
	JUNE MONTHLY	130	21,894	1MAY83 -31MAY83	6	83FEC/278/4457
	JUNE MONTHLY - AMENDMENT	130	21,894	1MAY83 -31MAY83	6	84FEC/299/2924
	JUNE MONTHLY - AMENDMENT	-	-	1MAY83 -31MAY83	1	84FEC/299/2924
	JUNE MONTHLY - AMENDMENT	-	-	1MAY83 -31MAY83	1	84FEC/336/4539
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1MAY83 -31MAY83	1	84FEC/299/2924
	JULY MONTHLY	2,829	100-	1JUN83 -30JUN83	4	83FEC/271/3487
	JULY MONTHLY - AMENDMENT	2,829	100-	1JUN83 -30JUN83	4	84FEC/299/2931
	JULY MONTHLY - AMENDMENT	-	-	1JUN83 -30JUN83	1	84FEC/299/2931
	JULY MONTHLY - AMENDMENT	-	-	1JUN83 -30JUN83	1	84FEC/336/4540
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JUN83 -30JUN83	1	84FEC/299/2931
	AUGUST MONTHLY	5,421	6,468	1JUL83 -31JUL83	5	83FEC/271/3488
	AUGUST MONTHLY - AMENDMENT	5,421	6,468	1JUL83 -31JUL83	5	84FEC/299/2932
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL83 -31JUL83	1	84FEC/336/4541
	NOTICE OF FAILURE TO FILE	-	-	1JUL83 -31JUL83	1	83FEC/271/3488
	SEPTEMBER MONTHLY	7	275-	1AUG83 -31AUG83	4	83FEC/271/3489
	SEPTEMBER MONTHLY - AMENDMENT	7	275-	1AUG83 -31AUG83	4	84FEC/299/2933
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG83 -31AUG83	1	84FEC/299/2933
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG83 -31AUG83	1	84FEC/336/4542
	NOTICE OF FAILURE TO FILE	-	-	1AUG83 -31AUG83	1	83FEC/271/3489
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1AUG83 -31AUG83	2	84FEC/299/2933
	OCTOBER MONTHLY	2,517	2,002	1SEP83 -30SEP83	3	83FEC/271/3490
	OCTOBER MONTHLY - AMENDMENT	2,517	2,002	1SEP83 -30SEP83	3	84FEC/299/2934
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP83 -30SEP83	1	84FEC/336/4543
	NOTICE OF FAILURE TO FILE	-	-	1SEP83 -30SEP83	1	83FEC/271/3490
	NOVEMBER MONTHLY	1,311	2,467	1OCT83 -31OCT83	4	83FEC/271/3491
	NOVEMBER MONTHLY - AMENDMENT	1,311	2,467	1OCT83 -31OCT83	4	84FEC/299/2935

Attachment 20A

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

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	DECEMBER MONTHLY	4,612	830	1NOV83 -30NOV83	4	84FEC/296/3035
	DECEMBER MONTHLY - AMENDMENT	4,612	830	1NOV83 -30NOV83	4	84FEC/299/2900
	DECEMBER MONTHLY - AMENDMENT	-	-	1NOV83 -30NOV83	1	84FEC/336/4544
	NOTICE OF FAILURE TO FILE			1NOV83 -30NOV83	1	84FEC/290/2621
	YEAR-END	2,425	2,560	1DEC83 -31DEC83	4	84FEC/296/3039
	YEAR-END - AMENDMENT	2,425	2,560	1DEC83 -31DEC83	8	84FEC/299/2892
	YEAR-END - AMENDMENT	-	-	1DEC83 -31DEC83	1	84FEC/336/4545
1984	MISCELLANEOUS NOTICE FROM FEC			9MAR84	2	84FEC/299/0474
	MISCELLANEOUS REPORT			19MAR84 TO FEC	2	84FEC/299/2868
	FERRUARY MONTHLY	663	1,638	1JAN84 -31JAN84	5	84FEC/299/2411
	FERRUARY MONTHLY - AMENDMENT	-	-	1JAN84 -31JAN84	2	84FEC/314/3606
	FERRUARY MONTHLY - AMENDMENT	-	-	1JAN84 -31JAN84	2	84FEC/336/4546
	NOTICE OF FAILURE TO FILE			1JAN84 -31JAN84	1	84FEC/299/1743
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31JAN84	1	84FEC/314/2161
	MARCH MONTHLY	7	2,086	1FEB84 -29FEB84	7	84FEC/309/4521
	MARCH MONTHLY - AMENDMENT	7	2,086	1FEB84 -29FEB84	5	84FEC/314/3608
	MARCH MONTHLY - AMENDMENT	7	2,086	1FEB84 -29FEB84	6	84FEC/315/4196
	NOTICE OF FAILURE TO FILE			1FEB84 -29FEB84	1	84FEC/307/5477
	1'ST LETTER INFORMATIONAL NOTICE			1FEB84 -29FEB84	1	84FEC/314/4355
	APRIL MONTHLY	15,904	16,750	1MAR84 -31MAR84	4	84FEC/312/1950
	APRIL MONTHLY - AMENDMENT	15,904	16,750	1MAR84 -31MAR84	6	84FEC/315/4190
	APRIL MONTHLY - AMENDMENT	-	-	1MAR84 -31MAR84	1	84FEC/336/4548
	1'ST LETTER INFORMATIONAL NOTICE			1MAR84 -31MAR84	1	84FEC/314/4357
	MAY MONTHLY	9,662	6,698	1APR84 -30APR84	7	84FEC/315/4163
	MAY MONTHLY - AMENDMENT	-	-	1APR84 -30APR84	1	84FEC/336/4549
	JUNE MONTHLY	4,051	4,724	1MAY84 -31MAY84	5	84FEC/318/0234
	JUNE MONTHLY - AMENDMENT	-	-	1MAY84 -31MAY84	5	84FEC/325/3475
	JUNE MONTHLY - AMENDMENT	-	-	1MAY84 -31MAY84	1	84FEC/336/4550
	REQUEST FOR ADDITIONAL INFORMATION			1MAY84 -31MAY84	3	84FEC/324/1800
	1'ST LETTER INFORMATIONAL NOTICE			1MAY84 -31MAY84	1	84FEC/327/2366
	JULY MONTHLY	1,090	1,477	1JUN84 -30JUN84	5	84FEC/324/0957
	JULY MONTHLY - AMENDMENT	-	-	1JUN84 -30JUN84	1	84FEC/336/4551
	AUGUST MONTHLY	10,415	12,768	1JUL84 -31JUL84	6	84FEC/328/3408
	AUGUST MONTHLY - AMENDMENT	10,415	12,768	1JUL84 -31JUL84	8	84FEC/351/1346
	NOTICE OF FAILURE TO FILE			1JUL84 -31JUL84	1	84FEC/328/0277
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 -31JUL84	1	84FEC/349/2123
	SEPTEMBER MONTHLY	6,182	5,612	1AUG84 -31AUG84	6	84FEC/328/4319
	SEPTEMBER MONTHLY - AMENDMENT	6,182	5,612	1AUG84 -31AUG84	8	84FEC/351/4294
	REQUEST FOR ADDITIONAL INFORMATION			1AUG84 -31AUG84	1	84FEC/349/2125
	OCTOBER MONTHLY	1,105	687	1SEP84 -30SEP84	5	84FEC/342/5240
-	PRE-GENERAL	8,206	9,050	1OCT84 -25OCT84	7	84FEC/357/2190
	PRE-GENERAL - AMENDMENT	8,706	9,062	1OCT84 -25OCT84	8	84FEC/357/1084
	PRE-GENERAL - AMENDMENT	8,706	9,062	1OCT84 -25OCT84	7	84FEC/357/2198
	NOTICE OF FAILURE TO FILE			1OCT84 -17OCT84	1	84FEC/349/0585
-	POST-GENERAL	6,300	5,719	26OCT84 - 6DEC84	4	84FEC/357/2206
	NOTICE OF FAILURE TO FILE			26OCT84 -26NOV84	1	84FEC/357/4956
	TOTAL	97,755	0 125,259	0	278	TOTAL PAGES
	ENDING CASH (12/06/84):	\$1,335				

ANALYST: Lisa Stolaruk
CONVERSATION WITH: Bruce Nordstrom, Treasurer
COMMITTEE: International Chiropractors Political Action Committee
DATE: 12/19/84
SUBJECT(S): Non-Filing of the 12 Day Pre-General and 30 Day Post-General Reports

I called Mr. Nordstrom this morning to remind him that we have not received the 12 Day and 30 Day Election Reports. The last report that we have on file is the October Monthly Report which covers the month of September. Mr. Nordstrom said that he would speak with Ron Hendrickson, the person in charge with preparing the reports, and have Mr. Hendrickson call me back.

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ANALYST: Lisa Stolaruk

CONVERSATION WITH: Ron Hendrickson

COMMITTEE: International Chiropractors Political Action Committee

DATE: 12/19/84

SUBJECT(S): Non-Filing of the 12 Day Pre-General and 30 Day Post-General Reports

Mr. Hendrickson called this afternoon and stated that the committee had indeed filed the 12 Day and 30 Day Election Reports. I stated that the last report that we have on file is the October Monthly Report which covers the month of September. Mr. Hendrickson insisted that the reports had been sent and that an amended 12 Day Pre-General Report had also been mailed. I recommended that the committee forward copies of the reports. Mr. Hendrickson said that he would hand-deliver the reports tomorrow.

85040550581

11

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

(Summary Page)

<p>ALIGN AREA <input type="checkbox"/></p> <p>1. Name of Committee (in Full) INTERNATIONAL CHIROPRACTORS POLITICAL ACTION COMMITTEE</p> <hr/> <p>Address (Number and Street) 1901 L Street, N.W. Suite 800</p> <hr/> <p>City, State and ZIP Code Washington, D.C. 20036</p> <hr/> <p><input type="checkbox"/> Check here if address is different than previously reported.</p> <p>2. FEC Identification Number C 000 000 26</p> <p>3. <input type="checkbox"/> This committee qualified as a non-federally financed committee during this Reporting Period on _____</p>	<p>4. TYPE OF REPORT (Check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report <input checked="" 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 (Election Year Only)</p> <p><input type="checkbox"/> Monthly Report for _____</p> <p><input checked="" type="checkbox"/> Twelfth day report preceding <u>General</u> election on <u>Nov. 6, '84</u> in the State of <u>Nationwide</u></p> <p><input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____</p> <p><input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input 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>10-25-'84</u>		
6. (a) Cash on hand January 1, 19 <u>84</u>		\$ 4,473.55
(b) Cash on Hand at Beginning of Reporting Period	1,111.71	
(c) Total Receipts (from Line 1B)	8,206.10	\$ 51,669.53
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	9,317.81	\$ 56,143.08
7. Total Disbursements (from Line 2B)	9,050.00	\$ 55,869.44
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	267.81	\$ 267.81
9. Debts and Obligations Owed TO The Committee (Provide #1 on Schedule C or Schedule D)	-----	
10. Debts and Obligations Owed BY the Committee (Provide #1 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.

Bruce E. Nordstrom, D.C.
Type or Print Name of Treasurer
B Nordstrom
Signature of Treasurer 11/16/84

For Further Information Contact:
Federal Election Commission
Toll Free 800-424-9540
Local 202-453-4225

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FUND TO KEEP AMERICA #1 1/ TREASURER'S NAME: TIMOTHY S CAREY 214 MASSACHUSETTS AVENUE, NE SUITE 205 WASHINGTON DC 20002	85 NF-16	None	November Monthly Report 16a received 11/20/84
GTE CORPORATION GOOD GOVERNMENT CLUB TREASURER'S NAME: MARILYN PEARSON ONE STAMFORD FORUM STAMFORD CT 06904	85NF-17	11/19/84 17b	November Monthly Report 17c&17d received 11/12/84 Letter received 11/21/84
HOUSTON NATURAL GAS CORPORATION POLITICAL ACTION COMMITTEE TREASURER'S NAME: DEBORAH S MCCALED P.O. BOX 1188 HOUSTON TX 77001	85NF-18	None	November Monthly Report 18b received 11/13/84 Pre-General Report received 11/19/84
ICG (ILLINOIS CENTRAL GULF RAILROAD CO) GOOD GOVERNMENT FUND #/ TREASURER'S NAME: SANDOR A LOEVY 233 NORTH MICHIGAN AVENUE CHICAGO IL 60601	85NF-19	None	November Monthly Report 19b received 11/8/84
INTERNATIONAL CHIROPRACTORS POLITICAL ACTION COMMITTEE 2/ TREASURER'S NAME: BRUCE E. NORDSTROM 1901 L STREET, N.W. SUITE 800 WASHINGTON DC 20036	85 NF-20	12/19/84 20b&20c	Pre-General Report 20d&20e received 12/21/84 Amended Pre-General Report received 12/19/84
ICE COMMITTEE ON POLITICAL EDUCATION TREASURER'S NAME: EDWARD FIRE 1126 16TH STREET NW WASHINGTON DC 20036	85 NF-21	11/28/84 21b	November Monthly Report 21 received 11/20/84 Letter and Pre-General Report received 11/28/84
MALONE & HYDE COMMITTEE FOR RESPONSIBLE GOVERNMENT TREASURER'S NAME: ANDREW CLARKSON 1991 CORPORATE AVE MEMPHIS TN 38132	85NF-22	None	Letter and Pre-General Report 22b&22c received 11/21/84

1/Please note that the Non-Filer Notice was returned, because the Fund moved from New York to Washington. Furthermore, the Fund is currently involved in MUR 1872, which was generated from RAD referral 84L-26.

2/Please note that the Commission approved an audit of this committee on July 10, 1984, based upon RAD referral A84-1. The final audit report was released on October 11, 1984. Subsequent to release of the audit report, the committee was assessed two points for late filing.

(15)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bruce E. Nordstrom, Treasurer
International Chiropractors Political
Action Committee
1901 L Street, N.W., Suite 800
Washington, D.C. 20036

RE: MUR

Dear Mr. Nordstrom:

On , 1985, the Federal Election Commission determined that there is reason to believe that the International Chiropractors Political Action Committee, and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(B) and 434(a)(2)(i) and (ii), 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 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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Bruce E. Nordstrom, 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 Eric Kleinfeld, the attorney 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

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GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT International Chiropractors MUR NO.
Political Action Committee
Bruce E. Nordstrom, treasurer

SUMMARY OF ALLEGATIONS

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") on January 16, 1985, based on information obtained in the normal course of its supervisory duties under the Federal Election Campaign Act ("Act") of 1971, as amended.

The International Chiropractors Political Action Committee ("Committee") and Bruce E. Nordstrom, as treasurer, failed to file their 1984 Pre-General and Post-General Election Reports in a timely manner.

FACTUAL AND LEGAL ANALYSIS

Section 434(a)(4)(B) and Section 434(a)(2)(i) of Title 2, United States Code, provides that an unauthorized political committee which is a monthly filer must file a pre-general election report by the 12th day before any election in which the committee makes a contribution or expenditure, in those calendar years in which a regularly scheduled general election is held. Section 434(a)(4)(B) and section 434(a)(2)(ii) of Title 2, United States Code, require an unauthorized committee which is a monthly filer to file a post-general election report no later than the 30th day following such general election.

The International Chiropractors Political Action Committee is not an authorized committee for any candidate. The Committee

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files reports on a monthly basis. A regularly scheduled general election was held in 1984 on November 6. On October 1, 1984, the Committee was sent notification that its 12 Day Pre-General Election Report was due on October 25, 1984.

The Committee's amended 12 Day Pre-General Election Report was received by the Federal Election Commission ("Commission") on December 19, 1984. The Commission did not receive the Committee's original Pre-General Election Report until December 21, 1984, after the amended report had been received. The Committee's 30 Day Post-General Election Report was also received by the Commission on December 21, 1984.

Thus, the Committee failed to make timely filings of either its 12 Day Pre-General or 30 Day Post-General Election Reports, the former being fifty-seven (57) days late and the latter fifteen (15) days late. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that the International Chiropractors Political Action Committee and Bruce E. Nordstrom, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(B) and 434(a)(2)(i) and (ii).

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FEDERAL ELECTION COMMISSION

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

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