



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 19, 1985

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 1990 .
Mid-Manhattan PAC

copy of check for \$525.00.

85040561783

MID - MANHATTAN PAC

GC# 8923 1014

1-8587
276587

PAY
TO THE
ORDER OF

Five Hundred Twenty Five Dollars

\$ 525.00

Five Hundred Twenty Five Dollars

DOLLARS

CITIBANK, N.A.
300 Park Avenue
New York, N.Y.
10043

CITIBANK

[Handwritten Signature]
[Handwritten Signature]

FOR

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GC# 8923

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MEMORANDUM

TO: RETHA DIXON

TO: JOAN HARRIS

FROM: JOAN HARRIS

FROM: RETHA DIXON

CHECK NO. 1014 (a copy of which is attached) RELATING

TO MUR 1990 AND NAME Mid-Manhattan

WAS RECEIVED ON 11-13-85 . PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

- / * / BUDGET CLEARING ACCOUNT (\$95F3875.16)
- / / CIVIL PENALTIES ACCOUNT (\$95-1099.160)
- / / OTHER _____

SIGNATURE Robyn M Bishop DATE 11-13-85

NOV 13 1985
AID: 33

GENERAL INVESTMENT



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1990

Date Filmed 2/21/86 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

Blue routing cards; reports + correspondence pertaining
to conciliation; draft conciliation agreements;
references to internal procedures (RAD).

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

- | | | | |
|-------------------------------------|---|--------------------------|--|
| <input type="checkbox"/> | (1) Classified Information | <input type="checkbox"/> | (6) Personal privacy |
| <input checked="" type="checkbox"/> | (2) Internal rules and practices | <input 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 Lawrence E. Tobey
date February 12, 1986

FEC 9-21-77

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2/14/86

86010570556

SUMMARY FILE CHECK-OFF

MUR # 1990

February 3, 1986 Date of Close-out Letters (Mail..)

CONTENT CHECK-OFF

- X Close-Out Letter(s)
- X Final OGC Report or Memorandum or Conciliation Agreement(s)
- n/a Respondent(s) Reply to Brief(s)
- n/a General Counsel's Brief(s)
- X Respondent's Reply to RTB Finding
- X First General Counsel's Report
- n/a Respondent's Reply to the Complaint
- n/a Original Complaint(s) (If Any)
- X Other Report or Correspondence*
- X All Certifications**

Lawrence E. Tobey Preparer of the Summary File

Date February 12, 1986 File Reviewed by _____

* To be included if, in the opinion of the staff member, it is important.

** Certifications of Commission actions should be placed in the Summary File prior to the documents which formed the basis of the action and in reverse chronological order.

36910570557

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1990
Mid-Manhattan Political Action Committee)
)
Anton A. Weiss, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 29, 1986, the Commission decided by a vote of 5-0 to take the following actions in MUR 1990:

1. Accept the conciliation agreement and civil penalty with the amendments proposed by the Respondents, as recommended in the General Counsel's Report signed January 23, 1986.
2. Close the file.

Commissioners Aikens, Elliott, Harris, Josefiak and McGarry voted affirmatively for this decision; Commissioner McDonald did not cast a vote.

Attest:

1-29-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: Fri., 1-24-86, 1:00
Circulated on 48 hour tally basis: Mon., 1-27-86, 11:00
Deadline for vote: Wed., 1-29-86, 11:00

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BEFORE THE FEDERAL ELECTION COMMISSION

| | | |
|------------------------------|---|----------|
| In the Matter of |) | |
| |) | MUR 1990 |
| Mid-Manhattan Political |) | |
| Action Committee |) | |
| Anton A. Weiss, as treasurer |) | |

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 17, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 1990:

1. Enter into conciliation with the Mid-Manhattan Political Action Committee and Anton A. Weiss, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation and letter attached to the General Counsel's Report signed July 12, 1985.

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

Attest:

7-18-85
Date

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

| | |
|---|----------------|
| Received in Office of Commission Secretary: | 7-15-85, 12:00 |
| Circulated on 48 hour tally basis: | 7-15-85, 4:00 |

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Mid-Manhattan Political) RAD Referral 85NF-73
Action Committee)
Eugene Roshwalb, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 1, 1985, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral 85NF-73:

1. Open a MUR.
2. Find reason to believe that the Mid-Manhattan Political Action Committee and Eugene Roshwalb, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), (iii) and (iv).
3. Approve the General Counsel's Factual and Legal Analysis attached to the First General Counsel's Report signed April 25, 1985.
4. Approve and send the letter attached to the First General Counsel's Report signed April 25, 1985.

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

Attest:

5-1-85

Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 3, 1986

Anton A. Weiss, Treasurer
Mid-Manhattan Political
Action Committee
1 Rockefeller Plaza
New York, New York 10020

RE: MUR 1990
Mid-Manhattan Political
Action Committee,
and Anton A. Weiss,
as treasurer

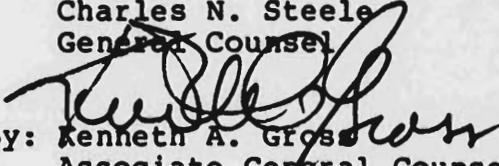
Dear Mr. Weiss:

On January 29, 1986, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of violations of 2 U.S.C. §§ 434(a)(4)(A)(i), (iii) and (iv), 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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Mid-Manhattan Political Action Committee) MUR 1990
Anton A. Weiss, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Mid-Manhattan Political Action Committee and its treasurer (hereinafter "the Respondent") violated 2 U.S.C.

§§ 434(a)(4)(A)(i), (iii), and (iv).

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

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

§ 437g(a)(4)(A)(i).

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

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

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

1. The Mid-Manhattan Political Action Committee is an unauthorized political committee registered with the Commission.

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2. Eugene Roshwalb was the treasurer of the Mid-Manhattan Political Action Committee at the time the violations referred to herein occurred. Anton A. Weiss is the current treasurer.

3. The Respondent was required to file the 1983 mid-year report by July 31, 1983. The report was filed on March 12, 1984, 225 days late.

4. The Respondent was required to file the 1983 year end report by January 31, 1984. The report was filed on March 12, 1984, 41 days late.

5. The Respondent was required to file the 1984 April quarterly report by April 15, 1984. The report was filed on July 25, 1984, 101 days late.

6. The Respondent was required to file the 1984 July quarterly report on July 15, 1984. The report was filed on September 25, 1984, 72 days late.

7. The Respondent was required to file the 1984 October quarterly report on October 15, 1984. The report was filed on January 11, 1985, 88 days late.

8. The Respondent was required to file the 1984 30 day post general report on December 6, 1984. The report was filed on February 14, 1985, 70 days late.

9. The Respondent was required to file the 1984 year end report on January 31, 1985. The report was filed on February 14, 1985, 14 days late.

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V. Respondent violated 2 U.S.C. §§ 434(a)(4)(A)(i), (iii) and (iv) by failing to file the aforementioned reports in a timely manner.

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Two Hundred and Fifty Dollars (\$1,250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

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

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

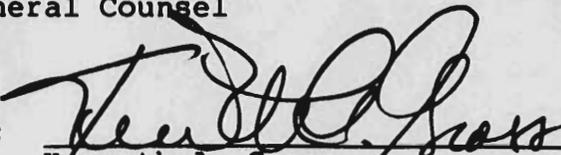
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XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement either written or oral, made by either party or by agents of either party, that is not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

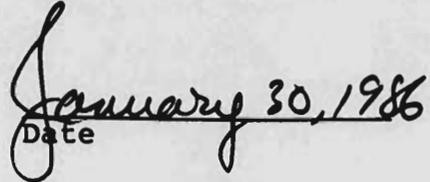
FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY:



Kenneth A. Gross
Associate General Counsel



Date

FOR THE RESPONDENT:
Mid-Manhattan Political Action Committee



Anton A. Weiss
(Current) Treasurer



Date

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

In the Matter of
Mid-Manhattan Political Action Committee
Anton A. Weiss, as treasurer¹/

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) 95 JUL 15 1990 12:00
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GENERAL COUNSEL'S REPORT

I. BACKGROUND

On May 1, 1985, the Commission determined that there is reason to believe the Mid-Manhattan Political Action Committee and Anton A. Weiss, as treasurer (hereinafter "MID-PAC" or "Respondent"), violated 2 U.S.C. §§ 434(a)(4)(A)(i), (iii) and (iv) by failing to file seven reports in a timely manner during the 1983-84 election cycle. Respondent requested that this matter be settled through conciliation prior to a finding of probable cause to believe (Attachment 1).

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III. GENERAL COUNSEL'S RECOMMENDATIONS

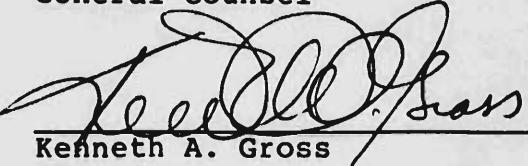
1. Enter into conciliation with the Mid-Manhattan Political Action Committee and Anton A. Weiss, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Charles N. Steele
General Counsel

Date

July 12, 1985

BY:


Kenneth A. Gross
Associate General Counsel

Attachments

- Letter from Respondent
- Proposed conciliation agreement
- Letter to Respondent

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MID-PAC

The Mid-Manhattan Political Action Committee

CO-CHAIRMEN

Ben Hauben
Walter Koppel
Jean Lindenbaum
Charles S. Ramat

TREASURER

Anton A. Weiss

DIRECTORS

Debrah Charatan-Berger
James Goren
Dr. Samuel Klagsbrun
Stephen Kule
Andre Marcus
Gail Propp
Bernice Stern

SPONSORS*

Debrah & Bradley
Charatan-Berger
Ruth & Hans Clapper
Manuela & James Goren
Joyce & Richard Hirsch
Lana & Ben Hauben
Dr. Samuel Klagsbrun
Jean & Armand
Lindenbaum
Andre Marcus
Ora & Charles S. Ramat
Diane & Ira Riklis
Leonard Stern
Mrs. Max Stern

FRIENDS*

Jerome Jakobovitz
Gerri & David Kule
Wilma & Stephen Kule
Bertram Podell
Herbert Podell
Gail & Ephraim Propp
Judith & Joel Schreiber
Dr. Mars in Sinkoff
Evelyn & Arthur Udell
Dr. Albert M. Waitman

* (In Formation)

May 28, 1985

Mr. John Warren McGarry, Chairman
Federal Election Commission
Washington, D. C. 20463

RE: MUR 1990

Dear Mr. McGarry:

I would like to reply herewith to your letter of May 8, 1985 to Mr. Eugene Roshwalb, the former Treasurer of the Mid-Manhattan Political Action Committee (MID-PAC).

As indicated in our letter of May 17, 1985 to Mr. Stephen Levine, copy of which is attached, the extra week extension we had requested was due to a delay in having the materials properly forwarded to us.

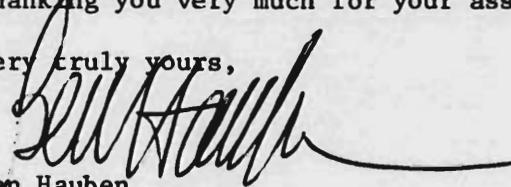
We recognize the fact that since our inception we have not been filing our reports with F.E.C. in a timely fashion. In fact, it was because Mr. Roshwalb was unable to deliver our reports to you on schedule, that he was replaced as Treasurer by Mr. Anton Weiss as per our letter to you of February 26, 1985.

We sincerely regret our delayed filing pattern. As you are aware, however, our records were all eventually completed and filed with you, albeit late. I believe that our new Treasurer has been receiving specific guidance from Mr. Hunter Bryan of the F.E.C. staff to insure that our filing henceforth will be done in a timely manner and in compliance with F.E.C. rules and regulations.

We, therefore, would like to respectfully request a pre-probable cause conciliation of this matter. In order to be assured that this matter is effectively resolved, we look forward to hearing from you at your earliest convenience.

Thanking you very much for your assistance and understanding.

Very truly yours,



Ben Hauben
Co-Chairman
MID-PAC I.D. #C00165944

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GENERAL COUNSEL

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MID-PAC

THE Mid-Manhattan Political Action Committee

CO-CHAIRMEN

Ben Hauben
Walter Koppel
Jean Lindenbaum
Charles S. Ramat

TREASURER

Anton A. Weiss

DIRECTORS

Debrah Charatan-Berger
James Goren
Dr. Samuel Klagsbrun
Stephen Kule
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Herbert Podell
Gail & Ephraim Propp
Judith & Joel Schreiber
Dr. Marvin Sinkoff
Evelyn & Arthur Udell
Dr. Albert M. Waitman

* (In Formation)

May 17, 1985

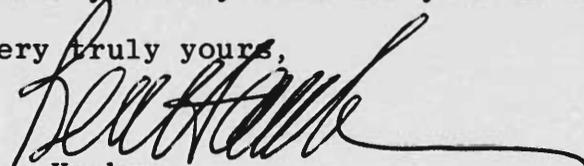
Mr. Stephen Levin
Federal Election Commission
Washington, D. C. 20463

Dear Mr. Levin:

In accordance with your conversation of yesterday with our new treasurer, Mr. Anton Weiss, I would respectfully request an extension of one week to reply to Mr. John Warren McGarry's letter to our former treasurer, Mr. Eugene Roshwalb, of May 8, 1985.

Thank you very much for your understanding.

Very truly yours,


Ben Hauben
Co-Chairman

BH:en1



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 8, 1985

Eugene Roshwalb, Treasurer
Mid-Manhattan Political Action Committee
598 Madison Avenue
New York, New York 10022

RE: MUR 1990

Dear Mr. Roshwalb:

On May 1, 1985, the Federal Election Commission determined that there is reason to believe the Mid-Manhattan Political Action Committee and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), (iii) and (iv), 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 findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

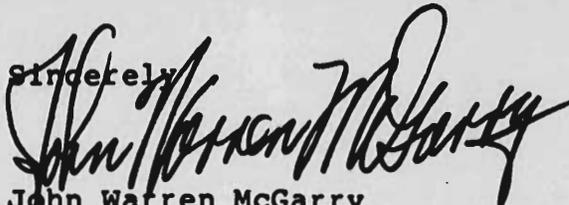
If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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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 Stephen Levin, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,



John Warren McGarry
Chairman

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

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SENSITIVE

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF
TRANSMITTAL BY OGC
TO THE COMMISSION:

RAD REFERRAL NO.: 85NF-73
STAFF MEMBER: Stephen Levin

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: Mid-Manhattan Political Action Committee
Eugene Roshwalb, as treasurer

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

INTERNAL REPORTS
CHECKED: Committee Reports

GENERATION OF MATTER

This matter arose out of a referral from the Reports Analysis Division ("RAD") to the Office of General Counsel on March 20, 1985,

. The referral alleges that the Mid-Manhattan Political Action Committee and Eugene Roshwalb, as treasurer ("MID-PAC" or "Respondent"), an unauthorized political committee, violated 2 U.S.C. §§ 434(a)(4)(A)(i), (iii) and (iv) by failing to file seven reports in a timely manner during the 1983-84 election cycle.

FACTUAL AND LEGAL ANALYSIS

All political committees, other than authorized committees, are required to file quarterly or monthly reports, a pre-election report and a post-general election report in a year in which an election is held and a mid-year report and a year-end report or monthly reports in a year in which an election is not held. The quarterly reports, the mid-year and year-end reports are

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required in lieu of the committee filing monthly reports if it so chooses. In the matter at hand, MID-PAC chose to file quarterly reports. The quarterly reports must be filed no later than the 15th day after the last day of each calendar quarter except for the report for the quarter ending on December 31, which must be filed no later than January 31 of the following year. A pre-election report need only be filed before an election in which the committee made a contribution to or expenditure on behalf of a candidate in such election. A post-general election report must be filed no later than the 30th day after the general election. The mid-year report (covering the period beginning January 1 and ending June 30) must be filed no later than July 31 and the year-end report (covering the period beginning July 1 and ending December 31) must be filed no later than January 31 of the following year. 2 U.S.C. § 434(a)(4).

In this matter, MID-PAC did not make a contribution to or expenditure on behalf of any candidate in a 1984 election. Therefore, it was not required to file a pre-election report. However, Respondent was required to file all of the other reports listed above for 1983 (a year in which no election was held) and 1984 (a year in which elections were held). A total of seven such reports were required to be filed during that period. MID-PAC eventually filed reports covering the entire period in question but each report was filed late, with the delinquency period ranging from 14 to 225 days.

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Respondent's 1983 mid-year report was due to be filed on July 31, 1983. RAD sent Respondent notice of that fact on July 7, 1983. However, MID-PAC did not file a report covering that period until March 12, 1984.

Respondent's 1983 year-end report was due to be filed on January 31, 1984. RAD sent MID-PAC notice of that fact on January 7, 1984. However, Respondent did not file a report covering that period until March 12, 1984.

MID-PAC's 1984 April quarterly report was due to be filed on April 15, 1984. RAD sent Respondent prior notice of that fact on March 22, 1984 and then, on June 15, 1984, RAD notified MID-PAC of its failure to file that report. Respondent finally filed its 1984 April quarterly report on July 25, 1984.

MID-PAC's 1984 July quarterly report was due to be filed on July 15, 1984. Respondent was sent prior notice of that fact in a letter from RAD dated June 21, 1984. However, MID-PAC did not file its 1984 July quarterly report until September 25, 1984.

On September 21, 1984, RAD sent Respondent prior notice of the fact that MID-PAC's 1984 October quarterly report would be due on October 15, 1984. When that report was not filed in a timely manner, on January 3, 1985, RAD notified Respondent of its failure to file the required 1984 October quarterly report. MID-PAC filed that report on January 11, 1985.

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Respondent's 30 day post-general election report was due on December 6, 1984. RAD sent MID-PAC prior notice of that fact on October 1, 1984. After Respondent failed to file that report in a timely manner, RAD notified MID-PAC of its failure to file in a letter dated December 28, 1984. Respondent subsequently filed a report covering that period on February 14, 1985.

On January 7, 1985, RAD sent MID-PAC prior notice that Respondent's 1984 year-end report would be due on January 31, 1985. MID-PAC did not file a report covering that period until February 14, 1985. See chart.

| <u>Report</u> | <u>Period Covered</u> | <u>Date Due</u> | <u>Date Report Filed</u> | <u>Days Late</u> |
|--|-----------------------|-----------------|--------------------------|------------------|
| 1983 Mid-Year | 3-4-83*- 6-30-83 | 7-31-83 | 3-12-84 <u>1/</u> | 225 |
| 1983 Year-End | 3-4-83- 12-31-83 | 1-31-84 | 3-12-84 <u>2/</u> | 41 |
| 1984 April Quarterly | 1-1-84- 3-31-84 | 4-15-84 | 7-25-84 | 101 |
| 1984 July Quarterly | 4-1-84- 6-30-84 | 7-15-84 | 9-25-84 | 72 |
| 1984 October Quarterly | 7-1-84- 9-30-84 | 10-15-84 | 1-11-85 | 88 |
| 1984 30 Day Post-General Election | 10-1-84- 11-26-84 | 12-6-84 | 2-14-85 <u>3/</u> | 70 |

* MID-PAC registered with the Commission in March, 1983.

1/ On March 12, 1984, MID-PAC filed one report disclosing activity from March 4, 1983 through December 31, 1983.

2/ See footnote 1.

3/ On February 14, 1985, MID-PAC filed one report disclosing activity from October 1, 1984 through December 31, 1984.

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| <u>Report</u> | <u>Period Covered</u> | <u>Date Due</u> | <u>Date Report Filed</u> | <u>Days Late</u> |
|------------------|-----------------------|-----------------|--------------------------|------------------|
| 1984 Year-End | 11-27-84- 12-31-84 | 1-31-85 | 2-14-85 4/ | 14 |

By filing its reports in an habitually delinquent manner, Respondent violated the statutory provisions which require that such reports be filed in a timely manner. As such, this Office recommends that the Commission open a matter under review and find reason to believe that the Mid-Manhattan Political Action Committee and Eugene Roshwalb, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), (iii) and (iv).

RECOMMENDATIONS

1. Open a Matter Under Review
2. Find reason to believe that the Mid-Manhattan Political Action Committee and Eugene Roshwalb, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), (iii) and (iv).
3. Approve the General Counsel's Factual and Legal Analysis.
4. Approve and send the attached letter.

Charles N. Steele
General Counsel

April 25, 1985
Date

BY: 
Kenneth A. Gross
Associate General Counsel

Attachment
Letter to Respondent
General Counsel's Factual and Legal Analysis

4/ See footnote 3.

26040570577



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

20 March 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: REFERRAL OF THE MID-MANHATTAN POLITICAL ACTION
COMMITTEE

This is a referral of the Mid-Manhattan Political Action Committee ("MID-PAC") for failing to file seven (7) reports in a timely manner during the 1983-1984 election cycle. One of these submissions, the 1984 October Quarterly Report, was not filed by Election Day, November 6, 1984. Furthermore, the 1984 April Quarterly and 1984 30 Day Post-General Election Reports were not filed within thirty (30) calendar days of the respective Non-Filer Notices.

For your information, MID-PAC registered with the Commission in March of 1983, and did not meet the threshold for non-filer tracking purposes until late in the election cycle. These factors affected the timing of certain notices referenced in the referral.

If you have any questions, please contact J. Hunter Bryan or Michael Filler at 523-4048.

Attachment

86740570578

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 20 March 1985

ANALYST: J. Hunter Bryan

I. COMMITTEE: Mid-Manhattan Political Action Committee
C00165944
Eugene Roshwalb, Treasurer
598 Madison Avenue
New York, NY 10022

II. RELEVANT STATUTE: 2 U.S.C. §§434(a)(4)(A)(i), (iii) and
(iv)
11 CFR 104.5(c)(1) and (c)(2)

III. BACKGROUND:

Failure to Timely File Reports

The Mid-Manhattan Political Action Committee ("MID-PAC") failed to file seven (7) reports in a timely manner during the 1983-1984 election cycle (see chart on page 3). In addition, the 1984 October Quarterly Report was not filed as of Election Day, November 6, 1984. The reports were filed between 14 and 225 calendar days late.

On June 15, 1984, a Non-Filer Notice was sent to MID-PAC for failure to file the 1984 April Quarterly Report (Attachment 6).*/ The Reports Analysis Division ("RAD") analyst called the treasurer, Mr. Eugene Roshwalb, on July 9, 1984 (Attachment 8). Mr. Roshwalb stated that he would have the report to the Commission by July 17, 1984; however, it was not received until July 25, 1984 (Attachment 9).

On November 30, 1984, a Chronic Late Filing Notice was sent to MID-PAC for failing to file the 1983 Year End, 1984 April Quarterly, and the 1984 July Quarterly Reports in a timely manner (Attachment 13). The notice advised MID-PAC that any additional late filing of reports may result in legal enforcement action.

*/ In researching an apparent excessive contribution from MID-PAC, which was disclosed on Congressman Long's 1984 April Quarterly Report, RAD learned that MID-PAC had not filed a report for the period in question. Therefore, in an effort to obtain disclosure and to verify MID-PAC's status as a qualified multicandidate committee, a Non-Filer Notice was mailed.

6 2 9 4 0 5 7 0 5 7 9

MID-MANHATTAN POLITICAL
ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

Subsequent to the Chronic Late Filing Notice, MID-PAC failed to file the 1984 October Quarterly, 30 Day Post-General, and Year End Reports in a timely manner. Non-Filer Notices were mailed on December 28, 1984 for the omitted 30 Day Post-General Report, and on January 3, 1985 for the omitted October Quarterly Report (Attachments 14 and 15, respectively). MID-PAC filed its October Quarterly Report on January 11, 1985 (Attachment 17).

The RAD analyst called Mr. Roshwalb on January 22, 1985, concerning the omitted 30 Day Post-General Report (Attachment 18). Mr. Roshwalb stated that he was unaware that such a report needed to be filed. On February 5, 1985, the RAD analyst again contacted Mr. Roshwalb, who stated that he had a consultant working on the report and was surprised it had not been submitted (Attachment 19). On February 12, 1985, Mr. Roshwalb called concerning the coverage dates for the unfiled reports (Attachment 20). The RAD analyst provided the information and also advised Mr. Roshwalb that the Year End Report was overdue. Mr. Roshwalb responded that all reports would be submitted as soon as possible.

On February 14, 1985, MID-PAC filed one report disclosing activity from October 1, 1984 through December 31, 1984 (Attachment 21).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

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LATE FILING HISTORY

MID-MANHATTAN POLITICAL
ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 3

| REPORT TYPE | PRIOR NOTICE | DATE DUE | NON-FILER NOTICE | DATE FILED |
|--|-------------------------|----------|--------------------------|---------------------------------------|
| 1983 Mid-Year (3/4/83 - 6/30/83) | 7/7/83 (Attachment 2) | 7/31/83 | N/A | 3/12/84 (Attachment 4) ^{1/} |
| 1983 Year End (3/4/83-12/31/83) | 1/7/84 (Attachment 3) | 1/31/84 | N/A | 3/12/84 (Attachment 4) ^{1/} |
| 1984 April Quarterly (1/1/84-3/31/84) | 3/22/84 (Attachment 5) | 4/15/84 | 6/15/84 (Attachment 6) | 7/25/84 (Attachment 9) |
| 1984 July Quarterly (4/1/84-6/30/84) | 6/21/84 (Attachment 7) | 7/15/84 | N/A | 9/25/84 (Attachment 11) |
| 1984 October Quarterly (7/1/84-9/30/84) | 9/21/84 (Attachment 10) | 10/15/84 | 1/3/85 (Attachment 15) | 1/11/85 (Attachment 17) |
| 1984 30 Day Post-General (10/1/84-11/26/84) | 10/1/84 (Attachment 12) | 12/6/84 | 12/28/84 (Attachment 14) | 2/14/85 (Attachment 21) ^{2/} |
| 1984 Year End (11/27/84-12/31/84) | 1/7/85 (Attachment 16) | 1/31/85 | N/A | 2/14/85 (Attachment 21) ^{2/} |

^{1/} MID-PAC filed one report disclosing activity from March 4, 1983 through December 31, 1983.

^{2/} MID-PAC filed one report disclosing activity from October 1, 1984 through December 31, 1984.

3 6 7 4 0 5 7 0 5 3 2

FEDERAL ELECTION COMMISSION
COMMITTED INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 19MAR85
PAGE 1

NON-PARTY RELATED

| COMMITTEE | DOCUMENT | RECEIPTS | DISBURSEMENTS | TYPE OF FILE COVERAGE DATES | # OF PAGES | MICROFILM LOCATION |
|--|--|----------|---------------|--------------------------------|---------------|----------------------------------|
| MID MANHATTAN POLITICAL ACTION COMMITTEE (MID PAC) | | | | NON-PARTY QUALIFIED | | ID #C00165944 |
| CONNECTED ORGANIZATION: | NONE | | | | | |
| 1983 | STATEMENT OF ORGANIZATION YEAR-END | 24,418 | 3,643 | 4MAR83 31DEC83 | 3 15 | 83FEC/267/0345 84FEC/299/0741 |
| | 1ST LETTER INFORMATIONAL NOTICE | | | 11AN83 -31DEC83 | 2 | 85FEC/360/2554 |
| 1984 | STATEMENT OF ORGANIZATION - AMENDMENT | | | 261AN84 | 2 | 84FEC/292/1835 |
| | MISCELLANEOUS NOTICE FROM FEC | | | 30NOV84 | 1 | 84FEC/359/1849 |
| | APRIL QUARTERLY | 9,647 | 26,266 | 11AN84 - 1MAR84 | 10 | 84FEC/324/1902 |
| | NOTICE OF FAILURE TO FILE | | | 11AN84 -31MAR84 | 1 | 84FEC/317/0349 |
| | JULY QUARTERLY | 22,923 | 12,911 | 1APR84 -30JUN84 | 24 | 84FEC/329/4091 |
| | JULY QUARTERLY - AMENDMENT | - | - | 1APR84 -30JUN84 | 1 | 85FEC/366/0578 |
| | REQUEST FOR ADDITIONAL INFORMATION | | | 1APR84 -30JUN84 | 1 | 85FEC/360/0472 |
| | REQUEST FOR ADDITIONAL INFORMATION 2ND | | | 1APR84 -30JUN84 | 2 | 85FEC/365/0217 |
| | OCTOBER QUARTERLY | 12,607 | 24,978 | 1JUL84 -30SEP84 | 12 | 85FEC/359/0419 |
| | OCTOBER QUARTERLY - AMENDMENT | - | - | 1JUL84 -30SEP84 | 1 | 85FEC/366/0706 |
| | OCTOBER QUARTERLY - AMENDMENT | 12,607 | 24,978 | 1JUL84 -30SEP84 | 13 | 85FEC/368/1416 |
| | NOTICE OF FAILURE TO FILE | | | 1JUL84 -30SEP84 | 1 | 85FEC/353/1195 |
| | REQUEST FOR ADDITIONAL INFORMATION | | | 1JUL84 -30SEP84 | 2 | 85FEC/362/2661 |
| | REQUEST FOR ADDITIONAL INFORMATION 2ND | | | 1JUL84 -30SEP84 | 2 | 85FEC/366/4237 |
| | PPE-GENERAL | - | - | 1OCT84 -17OCT84 | 1 | 85FEC/366/0704 |
| | PST-GENERAL | - | - | 18OCT84 -26NOV84 | 1 | 85FEC/366/0705 |
| | NOTICE OF FAILURE TO FILE | | | 1OCT84 -26NOV84 | 1 | 84FEC/357/4942 |
| | YEAR-END | 6,505 | 4,860 | 1OCT84 -31DEC84 | 9 | 85FEC/366/0579 |
| | TOTAL | 76,100 | 0 | 72,758 | 0 | 105 TOTAL PAGES |

Cash on Hand as of 12/31/84: \$3,342
 Debts and Obligations owed to the Committee: \$-0-
 Debts and Obligations owed by the Committee: \$-0-

All reports reviewed through the 1984 Year End.

Attach next 1



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachment 2

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

86040570533



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

Attachment 3

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

06740570534

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

Attachment 4

(Summary Page)

MAR 12, A B: 58
ALIGN AREA

ALIGN AREA

1 Name of Committee (No Full)

MID-WINTER POLITICAL ACTION COMMITTEE

Address Number and Street

c/o Eugene Rosenthal
598 Madison Avenue
New York, N.Y. 10022

City, State and ZIP Code

Check here if address is different than previously reported

2 FEC Identification Number

C00165944

3 This committee qualified as a multicandidate committee during the Reporting Period on 3/9/83

4 TYPE OF REPORT (Check appropriate boxes)

(a) April 15 Quarterly Report October 15 Quarterly Report

July 15 Quarterly Report January 31 Year End Report

July 31 Mid Year Report (Non Election Year Only)

Monthly Report for

Twelfth day report preceding _____ (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 _____ through _____

6 (a) Cash on hand January 1, 19 **83**

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1B)

(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 2B)

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

Eugene Rosenthal

Type or Print Name of Treasurer

Eugene Rosenthal

SIGNATURE OF TREASURER

Date

3/10/83



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachment 5

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.

367405705335

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**

8 5 7 4 0 5 7 0 5 3 7

Attachment 6



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JUN 15 1984

20-7

Eugene Roshwalb, Treasurer
Mid-Manhattan PAC
c/o 598 Madison Avenue
New York, NY 10022

Identification Number: C00165944

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

Dear Mr. Roshwalb:

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

Sincerely,

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

84033170349



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachment 7

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).

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A REMINDER FOR QUARTERLY FILERS

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.

36040570590

TELECON

ANALYST Jameson
initiated call? X

TELECON WITH: Eugene Roshwalb
initiated call? _____

Attachment 8

Candidate/Committee: Mid-Manhattan C00165944

DATE: 7/9/84

SUBJECT(S): Failure to file April Quarterly Report

Mr. Roshwalb was told he should file the Committee's April Quarterly Report immediately. He stated that he was in the process of filling out the April Quarterly Report as well as the July Quarterly Report and would have them to the Commission by Tus. 7/17/84.

86740570591

Attachment 10



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 21, 1984

OCTOBER REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES

WHO MUST FILE

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

WHAT MUST BE REPORTED

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

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than October 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business October 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 October 20, 1984, and disclose all financial activity of their committee from September 1 through September 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).

-over-

96740570593

A R E M I N D E R

All committees that have made contributions or expenditures (including independent expenditures) in connection with an election, which have not previously been disclosed, must file a pre-election report for that election. (Although some committees may not be required to file pre-election reports, all committees, are required to file a post-general election report.)

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

8 6 0 4 0 5 7 0 5 9 4



**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).

83040570596

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

05740570597

Attachment 13



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20543

NOV 30 1984

MS-L

Eugene Roshwalb, Treasurer
Mid-Manhattan Political
Action Committee
598 Madison Avenue
New York, NY 10022

Identification Number: C00165944

Reference: 1983-1984 Election Cycle Reports

Dear Mr. Roshwalb:

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

| <u>Report Type</u> | <u>Due Date</u> | <u>Date Filed</u> |
|--|-----------------|-------------------|
| 1983 Year End (7/1/83-12/31/83) | 1/31/84 | 3/12/84 |
| 1984 April Quarterly (1/1/84-3/31/84) | 4/15/84 | 7/25/84 |
| 1984 July Quarterly (4/1/84-6/30/84) | 7/15/84 | 9/25/84 |

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 failure to timely file reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending with the Commission, any additional failure to timely file a required report by your committee may result in the Commission initiating legal enforcement or audit 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

34033701340

Attachment 14



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

EQ-7

December 28, 1984

Eugene Roshwalb, Treasurer
Mid Manhattan Political Action
Committee (MID-PAC)
598 Madison Avenue
New York, NY 10022

Identification Number: C00165944

Reference: 30 Day Post-General Report (10/01/84-11/26/84)

Dear Mr. Roshwalb:

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 J. Hunter Bryan on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

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

66040570599
84033574942

Attachment 15



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

JUN 3 1985

90-7

Eugene Roshwalb, Treasurer
Mid-Manhattan Political
Action Committee
598 Madison Avenue
New York, NY 10022

Identification Number: C00165944

Reference: October Quarterly Report (7/1/84-9/30/84)

Dear Mr. Roshwalb:

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).

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 J. Hunter Bryan on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

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

86040570600
95033781195



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachment 16

January 7, 1985

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, 1985.

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through December 31, 1984. Political committees that have not previously filed a financial report should report all financial activity from the date of registration* through December 31, 1984.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1985. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1985.

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. 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.

1985 FILING REQUIREMENTS

See the January 1985 issue of the FEC Record for filing requirements during 1985.

*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

8 6 7 4 0 5 7 0 6 0 1

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

Attachment 17

35 JAN 11 9 00
ALIGN AREA

(Summary Page)

ALIGN AREA

1 Name of Committee (In Full)

**MID-MANHATTAN POLITICAL
ACTION COMMITTEE**

Address (Number and Street)

**C/O E. Rosenthal
598 Madison Avenue
New York, N.Y. 10022**

City, State and ZIP Code

Check here if address is different than previously reported

2 FEC Identification Number

C00165944

3 This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

- (a) April 15 Quarterly Report October 15 Quarterly Report
 July 15 Quarterly Report January 31 Year End Report
 July 31 Mid Year Report (Non Election Year Only)
 Monthly Report for _____
 Twelfth day report preceding _____ (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 7/1 through 9/30/84

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

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1B)

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

Total Disbursements (from Line 2B)

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 on Schedule C or Schedule D

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

**COLUMN A
This Period**

**COLUMN B
Calendar Year-to-Date**

| | | |
|---------------------|----|--------|
| | \$ | 20,775 |
| (b) | \$ | 14,068 |
| (c) | \$ | 12,607 |
| (d) | \$ | 26,675 |
| Total Disbursements | \$ | 24,978 |
| 8 | \$ | 1,697 |
| 9 | \$ | -0- |
| 10 | \$ | -0- |

I certify that I have examined this Report and to the best of my knowledge and belief the figures are true and complete.

For further information contact:

Eugene Rosenthal

Treasurer

Eugene Rosenthal
SIGNATURE OF TREASURER

1/5/84

Date

95040570602
95033:90449

Attachment 18

TELECON

ANALYST Bryan
initiated call? ~~xx~~
~~xyes~~

TELECON WITH: Eugene Roshwalb
initiated call? _____

Candidate/Committee: Mid-Manhattan PAC

DATE: 1-22-85

SUBJECT(S): Non-filing of 30 Day Post General

Mr. Roshwalb was not aware that a 30-Day Post-General Report needed to be filed. He asked about administrative expenses, explaining that the Committee had only printing costs and it had been included in consulting fees.

I advised him to send the FEC a letter of explanation and also to file the 30G before 1-25-85.

86040570603

Attachment 19

TELECON

ANALYST Bryan
initiated call? yes

TELECON WITH: Eugene Roshwalb
initiated call? _____

Candidate/Committee: Mid-Manhattan PAC

DATE: 2-5-85

SUBJECT(S): Non-filing of 30G

I called Mr. Roshwalb again to ask him to file the 30G report and the previously discussed letter of explanation. He stated that he had a consultant working on it and was surprised that it was not completed and submitted to the FEC. He said he would call the consultant and promised to get right on it.

86040670604

Attachment 20

TELECON

ANALYST Bryan
initiated call?

TELECON WITH: Eugene Roshwalb
initiated call? yes

Candidate/Committee: Mid-Manhattan PAC

DATE: 2-12-85

SUBJECT(S): coverage dates for remaining reports.

Mr. Roshwalb called to ask about coverage dates and other reports. I explained that if the committee had any federal activity during 10-1-84 through 10-17-84, the committee must also file a 12-Day Pre-General Report. I also mentioned that now the committee's Year-End report was also overdue. He plans to submit all three reports right away.

66140570605

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

Attachment 21

(Summary Page)

ACTION AREA

FEDERAL ELECTION AREA

1. Name of Committee (do not print name of candidate)

MID MANHATTAN POLITICAL ACTION COMMITTEE

Address (Number and Street)

**e/o Roshwalb
598 Madison Avenue
New York, N.Y. 10022**

City, State and ZIP Code

Check here if address is different than previously reported.

2. FEC Identification Number

C00165944

3. This committee qualified as a multi-candidate 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 _____

Twelfth day report preceding _____
Election on _____ in the State of _____

Thirtieth day report following the General Election
on _____ in the State of _____

Termination Report

(b) Is this Report an Amendment?

YES NO

9 1 3 0 3 3 5 6 0 5 7 9

| SUMMARY | | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|-------------------------------------|-------------------------|-----------------------------------|
| 5. Covering Period | <u>10/1</u> through <u>12/31/84</u> | | |
| 6. (a) Cash on hand January 1, 19 <u>84</u> | | | \$ 20,775 |
| (b) Cash on Hand at Beginning of Reporting Period | | \$ 1,697 | |
| (c) Total Receipts (from Line 1B) | | \$ 6,505 | \$ 51,682 |
| (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | | \$ 8,202 | \$ 72,457 |
| 7 Total Disbursements (from Line 2B) | | \$ 4,860 | \$ 69,115 |
| 8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | | \$ 3,342 | \$ 3,342 |
| 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.

Eugene Roshwalb

Title or Print Name of Treasurer

Eugene Roshwalb

Signature of Treasurer

Date 2/10/85

For further information contact
Federal Election Commission
Toll Free 800-424-9530
Local 202-573-4088

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 637c.

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



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

86040570607

THIS IS THE BEGINNING OF MUR # 1990

Date Filmed 2/21/86 Camera No. --- 2

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