



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 2020

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

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Routing Slip

Consultation Info.

Re Memo from RHD

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

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

Signed J. Sheppard
date 8-28-85

185040550660



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 23, 1985

Randy Goodwin, Treasurer
Robert E. Dolan, Assistant Treasurer
American Citizens for Political Action
140 Little Falls Street
Suite 212
Falls Church, VA 22046

RE: MUR 2020
American Citizens for Political
Action
Randy Goodwin, Treasurer

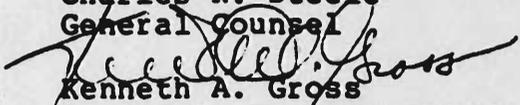
Dear Messrs. Goodwin and Dolan:

On August 16, 1985, the Commission accepted the conciliation agreement signed by Mr. Dolan and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

85040550661

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
American Citizens for) MUR 2020
Political Action)
Randy Goodwin, 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 American Citizens for Political Action and Randy Goodwin, as treasurer, (hereinafter "the Respondents"), violated 2 U.S.C. § 434(a)(4)(A)(ii).

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

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered into pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

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

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

1. American Citizens for Political Action is a political committee registered with the Commission.

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2. Randy Goodwin is the treasurer of American Citizens for Political Action.

3. The Respondents were required to file the 1984 12 Day Pre-General Election Report on October 25, 1984. The report was filed on November 7, 1984, 13 days late.

V. Respondents violated 2 U.S.C. § 434(a) by failing to file timely the 1984 12 Day Pre-General Election Report.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of One Hundred ~~FIFTY~~ ^{\$150} Dollars (), pursuant to 2 U.S.C. § 437g(a)(5)(A). *R. G. L.*

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

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

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

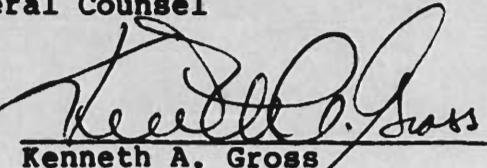
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X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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.

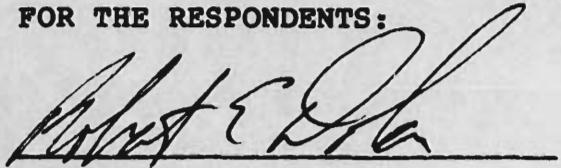
FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

August 22, 1985
Date

FOR THE RESPONDENTS:


ASS'T TREASURER

7/17/85
Date

85040550664



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Randy Goodwin, Treasurer
Robert E. Dolan, Assistant Treasurer
American Citizens for Political Action
140 Little Falls Street
Suite 212
Falls Church, VA 22046

RE: MUR 2020
American Citizens for Political
Action
Randy Goodwin, Treasurer

Dear Messrs. Goodwin and Dolan:

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

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

Handwritten signature/initials
9/2/85

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Randy Goodwin, Treasurer
Robert E. Dolan, Assistant Treasurer
American Citizens for Political Action
140 Little Falls Street
Suite 212
Falls Church, VA 22046

RE: MUR 2020
American Citizens for Political
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Randy Goodwin, Treasurer

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Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 2020
American Citizens for Political)	
Action)	
Randy Goodwin, treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 16, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 2020:

1. Accept the agreement submitted with the General Counsel's Report signed August 9, 1985.
2. Close the file.
3. Send the letter attached to the General Counsel's Report signed August 9, 1985.

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

Attest:

8-19-85

Date

Marjorie W Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Wed., 8-14-85, 9:13
Circulated on 48 hour tally basis:	Wed., 8-14-85, 4:00
Deadline for votes:	Fri., 8-16-85, 4:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Randy Goodwin, Treasurer
Robert E. Dolan, Assistant Treasurer
American Citizens for Political Action
140 Little Falls Street
Suite 212
Falls Church, VA 22046

RE: MUR 2020
American Citizens for Political
Action
Randy Goodwin, Treasurer

Dear Messrs. Goodwin and Dolan:

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Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

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AMERICAN CITIZENS FOR POLITICAL ACTION

1701 MASSACHUSETTS AVENUE, N. W., No. 407

WASHINGTON, D.C. 20036

1130

7/20 1985

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540 02

Treasurer of the UNITED STATES

\$ 150.00

ONE HUNDRED FIFTY AND 00/100

Dollars



SECURITY NATIONAL BANK

WASHINGTON, D. C.

Mar 2020

Robert E. O'Brien

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 13, 1985

Randy Goodwin, Treasurer
American Citizens for Political
Action
140 Little Falls Street
Suite 212
Falls Church, Virginia 22046

RE: MUR 2020

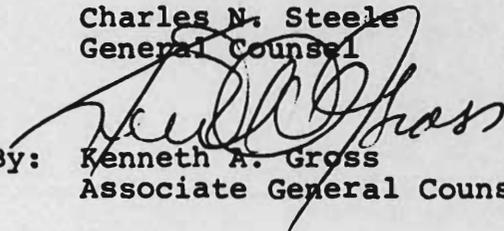
Dear Mr. Goodwin:

Pursuant to a telephone request from Robert Dolan on June 10, 1985, we enclose a copy of a prior notice which was previously sent by the Commission to all unauthorized committees. As you will notice, the letter serves as an alert to the committees of the upcoming report filing dates.

If you have any questions, please contact Judy Thedford at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

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).

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 cannot 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



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Randy Goodwin, Treasurer
American Citizens for Political
Action
140 Little Falls Street
Suite 212
Falls Church, Virginia 22046

RE: MUR 2020

Dear Mr. Goodwin:

Pursuant to a telephone request from Robert Dolan on June 10, 1985, we enclose a copy of a prior notice which was previously sent by the Commission to all unauthorized committees. As you will notice, the letter serves as an alert to the committees of the upcoming report filing dates.

If you have any questions, please contact Judy Thedford at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure

85040550672



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Randy Goodwin, Treasurer
American Citizens for Political
Action
140 Little Falls Street
Suite 212
Falls Church, Virginia 22046

RE: MUR 2020

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If you have any questions, please contact Judy Thedford at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure

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GCC #7715



Robert E. Dolan
Chairman
Randy Goodwin
Treasurer

AMERICAN CITIZENS FOR POLITICAL ACTION
"Financing Tomorrow's Leaders Today"

Richard C. Hahn
President

June 8, 1985

Ms. Judy Thedford
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Thedford;

American Citizens for Political Action is in receipt of letter dated June 6, 1985 which makes reference to MUR 2020.

Upon review of the aforementioned letter and the enclosed materials and upon the review of the records of American Citizens for Political Action it is admitted that the 12 Day Pre-General Election Report was filed on November 7, 1985 as opposed to October 25, 1985.

As your records reflect, American Citizens for Political Action is a new political action committee. As of October 25, 1984 the report, then due, was only the third experience it had complying with the FECA.

As the recently filed amended statement of organization reveals, Robert E. Dolan serves as the assistant treasurer of American Citizens for Political Action and James Burgess Associates, Ltd. operates as the custodian of records for the PAC. This new management structure should allow American Citizens for Political Action to continue using its "best efforts" to comply with the FECA.

It can not be overstated how more financial activity occurred with respect to the PAC than had been anticipated. Clearly our management systems broke down in and around the period of the report in question. However, American Citizens for Political Action and its officers attempted in good faith and with best efforts to comply with the FECA.

Pursuant to 11 C.F.R. section 111.18(d) American Citizens for Political Action requests that the Commission and American Citizens for Political Action manifest an attempt, through negotiations, to enter into a conciliation agreement prior to any finding of probable cause.

Sincerely,

Robert E. Dolan
Assistant Treasurer

Building on Our Reputation • Founded 1984

140 Little Falls Street, Suite 212 Falls Church, VA 22046 (703) 532-ACPA

A copy of our financial report is available from the Federal Election Commission on request.

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RECEIVED
GENERAL INVESTIGATIVE
DIVISION
JUN 11 11 30 AM '85



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

June 6, 1985

Randy Goodwin, Treasurer
American Citizens for Political Action
140 Little Falls Street
Suite 212
Falls Church, VA 22046

RE: MUR 2020

Dear Mr. Goodwin:

On June 3, 1985, the Federal Election Commission determined that there is reason to believe the American Citizens for Political Action and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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OFFICE OF THE
GENERAL COUNSEL
JUN 11 11 38 AM '85

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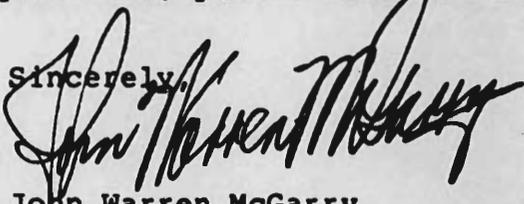
Letter to Randy Goodwin, Treasurer
Page 2

stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Judy Thedford at (202) 523-4000.

Sincerely,


John Warren McGarry
Chairman

Enclosures

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

85040550675



JAMES BURGESS ASSOCIATES, LTD.

2009 North 14th Street Suite 303
Arlington, Virginia 22201
(703) 527-2900

CERTIFIED PUBLIC ACCOUNTANTS

January 24, 1985

Federal Election Commission
Attn: Michael D. Butterfield
Reports Analyst
Reports Analysis Division
1325 "K" Street, N.W.
Washington, D.C. 20463

Dear Mr. Butterfield:

Enclosed please find the amended Post-General Election Report for American Citizens for Political Action as requested.

Sincerely,

JAMES BURGESS ASSOCIATES, LTD.

James E. Burgess
Certified Public Accountant

JEB:1kd
Enclosure

cc Amer. Citizens for Political
Action

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RECEIVED
GENERAL COUNSEL
JUN 11 11:38

MEMBER

STATEMENT OF ORGANIZATION

(see reverse side for instructions)

85 JUN 11 9:33

1. (a) Name of Committee (in Full) Check if name or address is changed. **AMERICAN CITIZENS for POLITICAL ACTION**

2. Date **JUNE 5, 1985**

(b) Address (Number and Street) **140 LITTLE FALLS ST., Suite 212**

3. FEC Identification Number **1001841861**

(c) City, State and ZIP Code **Falls Church VA 22046**

4. Is this an amended Statement? YES NO

5. TYPE OF COMMITTEE (check one):

(a) This committee is a principal campaign committee. (Complete the candidate information below.)

(b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District
-------------------	-----------------------------	---------------	----------------

(c) This committee supports/opposes only one candidate _____ (name of candidate) and is NOT an authorized committee.

(d) This committee is a _____ (National, State or subordinate) committee of the _____ (Democratic, Republican, etc.) Party.

(e) This committee is a separate segregated fund.

(f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

8. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

RECEIVED
GENERAL COUNCIL
JUN 11 11:30

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

Corporation Corporation w/o Capital Stock Labor Organization Membership Organization Trade Association Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position, the person in possession of committee books and records.

Full Name	Mailing Address and ZIP Code	Title or Position
JAMES BURGESS ASSOCIATES	2009 N. 14TH ST. SUITE 303, ARLINGTON VA 22201	ACCOUNTANT

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address and ZIP Code	Title or Position
RANDY DUNDWIN	17832 ORANGETREE RD, JUSTIN CAL, 92680	TREASURER
ROBERT E. DOLAN	140 LITTLE FALLS ST., SUITE 212, FALLS CHURCH VA 22046	ASS'T TREASURER

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
GEORGE MASON BANK	1185 MAIN ST, FAIRFAX VA 22030
SECURITY NATIONAL BANK	1510 K. ST NW, WASHINGTON D.C. 20005

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

ROBERT E. DOLAN *Robert E. Dolan* **JUNE 5, 1985**
 Type or Print Name of Treasurer SIGNATURE OF TREASURER Date

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

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

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AMERICAN CITIZENS FOR POLITICAL ACTION
"Shaping Tomorrow's Leaders Today"
Little Falls Street
Apt 212
Chatham, VA 22046

9ks



JUN 11 11:38

THE COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
American Citizens for Political)	RAD Referral 85NF-93
Action)	
Randy Goodwin, treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 3, 1985, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral 85NF-93:

1. Open a MUR.
2. Find reason to believe the American Citizens for Political Action and Randy Goodwin, as treasurer, violated § 434(a)(4)(A)(ii).
3. Approve and send the letter and factual and legal analysis attached to the First General Counsel's Report signed May 30, 1985.

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

Attest:

6-4-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	5-30-85, 11:50
Circulated on 48 hour tally basis:	5-30-85, 4:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 6, 1985

Randy Goodwin, Treasurer
American Citizens for Political Action
140 Little Falls Street
Suite 212
Falls Church, VA 22046

RE: MUR 2020

Dear Mr. Goodwin:

On June 3, 1985, the Federal Election Commission determined that there is reason to believe the American Citizens for Political Action and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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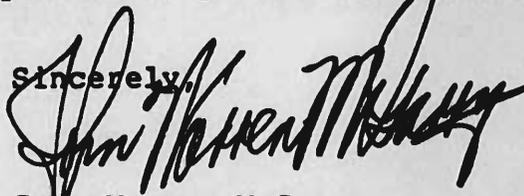
Letter to Randy Goodwin, Treasurer
Page 2

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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Sincerely,



John Warren McGarry
Chairman

Enclosures

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

85040550682

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 2020

RESPONDENT American Citizens for Political Action
Randy Goodwin, Treasurer

SUMMARY OF ALLEGATION

The respondents, the American Citizens for Political Action and Randy Goodwin, as treasurer, failed to file timely the 1984 12 Day Pre-General Election Report as required by 2 U.S.C. § 434(a)(4)(A)(ii). A prior notice was sent to the respondents on October 1, 1984, informing them of the pre- and post-general election filing requirements. The respondents filed the 12 Day Pre-General Election Report on November 7, 1984, 13 days late.

FACTUAL BASIS AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), an unauthorized committee, that files quarterly reports in an election year, is required to file a 12 day pre-general election report if the committee makes contributions to or expenditures on behalf of a Federal candidate involved in the general election during the period October 1 to the 20th day before the general election. The report is due the 12th day before the general election.

For the 1984 general election, the 12 day pre-general election report was due October 25, 1984, covering October 1 through 17, 1984. The respondents made an \$18,343 independent expenditure on October 12, 1984 on behalf of Ronald Reagan. Therefore, the respondents were required to file a 12 day pre-general election report on October 25, 1984. Instead, the 12 day pre-general election reports was filed November 7, 1984.

85040550683

It is recommended that a MUR be opened and reason to believe be found against American Citizens for Political Action and Randy Goodwin, as treasurer.

85040550684 .

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

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

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

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

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STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: _____

ADDRESS: _____

TELEPHONE: _____

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

Date

Signature

RESPONDENT'S NAME: _____

ADDRESS: _____

HOME PHONE: _____

BUSINESS PHONE: _____

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Randy Goodwin, Treasurer
American Citizens for Political Action
140 Little Falls Street
Suite 212
Falls Church, VA 22046

RE: MUR _____

Dear Mr. Goodwin:

On _____, 1985, the Federal Election Commission determined that there is reason to believe the American Citizens for Political Action and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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Letter to Randy Goodwin, Treasurer
Page 2

stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Judy Thedford 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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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Randy Goodwin, Treasurer
American Citizens for Political Action
140 Little Falls Street
Suite 212
Falls Church, VA 22046

RE: MUR _____

Dear Mr. Goodwin:

On _____, 1985, the Federal Election Commission determined that there is reason to believe the American Citizens for Political Action and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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85040550689

Letter to Randy Goodwin, Treasurer
Page 2

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Judy Thedford 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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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel *OC*

DATE: May 30, 1985

SUBJECT: RAD 85NF-93: First General Counsel's Report

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

CIRCULATIONS

48 Hour Tally Vote [X]
 Sensitive [X]
 Non-Sensitive []

24 Hour No Objection []
 Sensitive []
 Non-Sensitive []

Information []
 Sensitive []
 Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

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

RECEIVED
OFFICE OF THE REC
SECRETARY

FIRST GENERAL COUNSEL'S REPORT MAY 30 11:58

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 5/30/85-12:00

MUR #85NF-93
STAFF MEMBER
JUDY THEDFORD

SENSITIVE

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D
RESPONDENT'S NAME: American Citizens for Political Action
Randy Goodwin, Treasurer
RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(ii)
INTERNAL REPORTS CHECKED: American Citizens for Political
Action by RAD
FEDERAL AGENCIES CHECKED: N/A

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Reports Analysis Division on May 10, 1985.

SUMMARY OF ALLEGATION

The respondents, the American Citizens for Political Action and Randy Goodwin, as treasurer, failed to file timely the 1984 12 Day Pre-General Election Report as required by 2 U.S.C. § 434(a)(4)(A)(ii). A prior notice was sent to the respondents on October 1, 1984, informing them of the pre- and post-general election filing requirements. The respondents filed the 12 Day Pre-General Election Report on November 7, 1984, 13 days late.

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), an unauthorized committee, that files quarterly reports in an election year, is required to file a 12 day pre-general election report if the committee makes contributions to or expenditures on behalf of a

85040550692

Federal candidate involved in the general election during the period October 1 to the 20th day before the general election. The report is due the 12th day before the general election.

For the 1984 general election, the 12 day pre-general election report was due October 25, 1984, covering October 1 through 17, 1984. The respondents made an \$18,343 independent expenditure on October 12, 1984 on behalf of Ronald Reagan. Therefore, the respondents were required to file a 12 day pre-general election report on October 25, 1984. Instead, the 12 day pre-general election reports was filed November 7, 1984.

It is recommended that a MUR be opened and reason to believe be found against American Citizens for Political Action and Randy Goodwin, as treasurer.

RECOMMENDATION

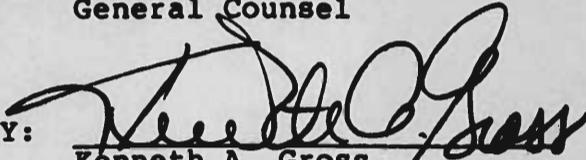
1. Open a MUR.
2. Find reason to believe the American Citizens for Political Action and Randy Goodwin, as treasurer, violated § 434(a)(4)(A)(ii).

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3. Approve and send attached letter and factual and legal analysis.

Charles N. Steele
General Counsel

May 30, 1985
Date

BY: 
Kenneth A. Gross
Associate General Counsel

Attachments:

- Referral
- Proposed Letter
- Proposed Legal & Factual Analysis

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COMMITTEE ID, NAME AND ADDRESS	NOTICES SENT/ CONTACTS WITH FILERS	REPORTS FILED/ RESPONSE(S)
..... 85NF-89 C00132753 4TH DISTRICT DEMOCRATIC PARTY TREASURER'S NAME: BONNIE BENNER BOX 259/RTE #2 BERRIEN SPRINGS MI 49103	Non-Filer Notice sent 12/28/84	Pre-General Report filed 1/4/85
..... 85NF-90 C00176867 ADA CAMPAIGN COMMITTEE TREASURER'S NAME: LEON SHULL 1411 K STREET, N.W., SUITE 850 WASHINGTON DC 20005	None	Pre-General Report filed 11/8/84
..... 85NF-91 C00148601 AMERICAN AGRICULTURE MOVEMENT POLITICAL ACTION COMMITTEE TREASURER'S NAME: JOAN SENTER 100 MARYLAND AVE., N E BOX 69 WASHINGTON DC 20002	None	Pre-General Report filed 11/9/84
..... / 85NF-92 C00173153 AMERICAN ASSOCIATION OF NURSE ANESTHETISTS SEPARATE SEGREGATED FUND TREASURER'S NAME: THOMAS G HEALEY CRNA 216 HIGGINS ROAD PARK RIDGE IL 60068	None	Pre-General Report filed 11/15/84
..... 85NF-93 C00184861 AMERICAN CITIZENS FOR POLITICAL ACTION TREASURER'S NAME: RANDY GOODWIN 140 LITTLE FALLS ST., SUITE 212 * FALLS CHURCH VA 22046	None	Pre-General Report filed 11/7/84
..... 85NF-94 C00099754 BAKEPAC - THE POLITICAL ACTION COMMITTEE OF THE INDEPENDENT BAKERS TREASURER'S NAME: ROBERT N. PYLE P. O. BOX 3731 WASHINGTON DC 20007	Non-Filer Notice sent 12/28/84	Post-General Report (covering 10/1-11/26/84) filed 1/10/85

(5)
*The Committee notified the Commission of an address change in an amended Statement of Organization on 3/13/85.

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AMERICAN CITIZENS FOR POLITICAL ACTION

(Attachments 5a - 5c)

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (HJ-84)

DATE 29APR85
PAGE 5

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILE COVERAGE DATES	# OF PAGES	FILE/FIL# LOCATION
AMERICAN CITIZENS FOR POLITICAL ACTION CONNECTED ORGANIZATION# NONE						NON-PARTY NON-QUALIFIED ID #C00184861
1984	STATEMENT OF ORGANIZATION			21MAY84	2	84FEC/314/4591
	STATEMENT OF ORGANIZATION - AMENDMENT			16JUL84	1	84FEC/321/2206
	STATEMENT OF ORGANIZATION - AMENDMENT			7NOV84	3	84FEC/348/2544
	MISCELLANEOUS NOTICE FROM FEC			30NOV84	1	84FEC/350/1312
	MISCELLANEOUS REPORT			26DEC84 TO FEC	3	84FEC/357/4000
	JULY QUARTERLY	19,374	15,009	22MAY84 -30JUN84	6	84FEC/321/2206
	JULY QUARTERLY - AMENDMENT	18,244	15,086	22MAY84 -30JUN84	6	84FEC/345/4868
	JULY QUARTERLY - AMENDMENT	18,104	15,086	22MAY84 -30JUN84	6	84FEC/351/4000
	REQUEST FOR ADDITIONAL INFORMATION			22MAY84 -30JUN84	2	84FEC/351/3100
	REQUEST FOR ADDITIONAL INFORMATION			22MAY84 -30JUN84	1	84FEC/352/5278
	REQUEST FOR ADDITIONAL INFORMATION 2ND			22MAY84 -30JUN84	1	84FEC/357/5349
	REQUEST FOR ADDITIONAL INFORMATION 2ND			22MAY84 -30JUN84	1	84FEC/357/4709
	OCTOBER QUARTERLY	101,524	79,992	1JUL84 -30SEP84	10	84FEC/345/4007
	OCTOBER QUARTERLY - AMENDMENT	101,528	77,911	1JUL84 -30SEP84	10	84FEC/348/2629
	OCTOBER QUARTERLY - AMENDMENT	102,182	78,998	1JUL84 -30SEP84	14	84FEC/357/4598
	OCTOBER QUARTERLY - AMENDMENT	102,182	79,088	1JUL84 -30SEP84	14	84FEC/359/2047
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 -30SEP84	2	84FEC/351/3158
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 -30SEP84	1	84FEC/352/5279
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL84 -30SEP84	1	84FEC/357/4710
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL84 -30SEP84	1	84FEC/357/4711
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 -30SEP84	1	84FEC/361/0841
	PRE-GENERAL	19,509	20,833	1OCT84 -1/OCT84	10	84FEC/348/2618
	PRE-GENERAL - AMENDMENT	19,509	20,833	1OCT84 -1/OCT84	13	84FEC/357/4577
	PRE-GENERAL - AMENDMENT	19,509	20,833	1OCT84 -1/OCT84	14	84FEC/359/2062
	REQUEST FOR ADDITIONAL INFORMATION			1OCT84 -1/OCT84	2	84FEC/351/3155
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT84 -1/OCT84	1	84FEC/357/4000
	POST-GENERAL	258,035	177,584	18OCT84 -20NOV84	22	84FEC/351/4000
	POST-GENERAL - AMENDMENT	-	-	18OCT84 -20NOV84	2	84FEC/360/3934
	POST-GENERAL - AMENDMENT	262,005	182,585	18OCT84 -20NOV84	27	84FEC/361/4000
	REQUEST FOR ADDITIONAL INFORMATION			18OCT84 -20NOV84	2	84FEC/357/4000
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT84 -20NOV84	3	84FEC/359/0942
	YEAR-END	16,533	13,155	27NOV84 -31DEC84	10	84FEC/363/4481
	YEAR-END - AMENDMENT	17,259	87,935	27NOV84 -31DEC84	16	84FEC/365/2025
	YEAR-END - AMENDMENT	-	-	27NOV84 -31DEC84	2	84FEC/367/5228
	REQUEST FOR ADDITIONAL INFORMATION			27NOV84 -31DEC84	2	84FEC/367/0921
	TOTAL	419,859	0 365,507	0	219	TOTAL PAGES

All Reports Reviewed
Ending Cash on Hand as of 12/31/84= \$54,152.86
Outstanding Debts owed to the Committee= \$30,000.00
Outstanding Debts owed by the Committee= \$22,647.78

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSED DOCUMENTS (FD-385-36)

DATE 8MAY85
PAGE 1

NON PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
AMERICAN CITIZENS FOR POLITICAL ACTION CONNECTED ORGANIZATION: NONE						NON-PARTY NON-QUALIFIED ID #C00184861
	1985 STATEMENT OF ORGANIZATION - AMENDMENT			14MAR85	3	85FEC/368/0403
	STATEMENT OF ORGANIZATION - AMENDMENT			18MAR85	3	85FEC/368/0402
	TOTAL	0	0	0	6	TOTAL PAGES

ATTACHMENT 5a
Page 2 of 2

6



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20540

October 1, 1984

**GENERAL ELECTION FILING NOTICE
FOR UNAUTHORIZED COMMITTEES**

WHO MUST FILE THE PRE-GENERAL ELECTION REPORT

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

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

WHAT MUST BE REPORTED

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

WHEN TO FILE

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

* * * * *

WHO MUST FILE THE POST-GENERAL ELECTION REPORT

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

WHAT MUST BE REPORTED

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

WHEN TO FILE

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

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

-over-

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(7)

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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8

For a Federal Candidate or Officeholder

(Summary Page)

ALICIA AREA

1. Name of Committee (in Full)

AMERICAN CITIZENS FOR
POLITICAL ACTION

Address (Number and Street)

1701 MASSACHUSETTS AVE NW

City, State and ZIP Code

WASHINGTON DC 20036

Check here if address is different than previously reported.

2. FEC Identification Number

C00184861

3. The committee qualified as a multicandidate committee during the Reporting Period on _____

4. TYPE OF REPORT (Check appropriate)

(a) April 15 Quarterly Report ~~Quarterly Report~~
 July 15 Quarterly Report January 31 Year End Report

July 31 2 1/2 Year Report (Non-Election Year Only)

Monthly Report for _____

Twelfth day report preceding General
election on 11/6/84 in the State of VA

Thirtieth day report following the General Election

on _____ in the State of _____

Termination Report

(b) Is this Report an Amendment?

YES NO

RECEIVED
HAND DELIVERED
NOV 17 1984

05040550701

SUMMARY

5. Covering Period 10/1/84 through 10/17/84

6. (a) Cash on hand 1,782.84

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

(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 20)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee
(Itemize all on Schedule C or Schedule D)

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

COLUMN A This Period	COLUMN B Calendar Year-to-Date
	0
26,774.29	
19,509.23	139,281.74
46,283.52	139,281.74
20,033.32	112,831.54
25,450.20	25,450.20
0	
5,213.70	

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

A. CHAIN HART
Type or Print Name of _____

ASST. TREASURER
Type or Print Name of _____

SIGNATURE OF TREASURER ASST. TREASURER

11-7-84
Date

For further information contact:

Federal Election Commission

Toll Free 800-424-9630

Local 702-633-4888

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

All previous versions of FEC FORM 3 and FEC FORM 26 are obsolete and should no longer be used.

--	--	--	--	--	--	--	--

FEC FORM 3X (3/80)

(9)

1984 Citizens for Political Action

From: 10/1/84 To: 10/17/84

85040550702

I. RECEIPTS

11. CONTRIBUTIONS (other than loans from 11(d))

- (a) Individuals/Persons Other Than Political Committees
- (b) Political Party Committees
- (c) Other Political Committees
- (d) TOTAL CONTRIBUTIONS (other than loans from 11(a), 11(b) and 11(c))

COLUMN A Total This Period	COLUMN B Calendar Year To Date	
19,509.23	139,232.77	11(a)
0	0	11(b)
0	0	11(c)
19,509.23	139,232.77	11(d)
0	0	12
0	0	13
0	0	14
0	49.01	15
0	0	16
0	0	17
19,509.23	139,232.77	18

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Political, etc.)

16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES

17. OTHER RECEIPTS (Dividends, Interest, etc.)

18. TOTAL RECEIPTS (Add lines 11(d), 12, 13, 14, 15, 16 and 17)

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES

22. INDEPENDENT EXPENDITURES (Use Schedule E)

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 8411 (d)) (Use Schedule F)

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO

- (a) Individuals/Persons Other Than Political Committees
- (b) Political Party Committees
- (c) Other Political Committees
- (d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))

27. OTHER DISBURSEMENTS

28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)

2,145.23	14,071.00	19
0	0	20
0	0	21
18,342.00	97,119.00	22
0	0	23
0	0	24
0	0	25
125	340	26(a)
0	0	26(b)
0	0	26(c)
125	340	26(d)
0	0	27
20,487.23	112,490.54	28

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans from Line 11(d))

30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)

31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)

19,509.23	139,232.77	29
125.00	340.00	30
19,384.23	138,892.77	31
565	14,071.55	32
0	49.01	33
565	14,120.54	34

10

ITEMIZED INDEPENDENT EXPENDITURES

Page 1 of 1 Pages

(See Reverse Side for Instructions)

Name of Committee (in Full)		I.D. No.		
AMERICAN CITIZENS for POLITICAL ACTION		C00184861		
Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
RESPONSE DYNAMICS 2070 CHATEAU BRIDGE RD. HENNA VA 20180	DIRECT MAIL	10/12/84	18343.00	RONALD REAGAN <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
a) SUBTOTAL of Itemized Independent Expenditures			\$ 18343.00	
b) SUBTOTAL of Unitemized Independent Expenditures			\$ 0	
c) TOTAL Independent Expenditures				\$ 18343.00

9 8 4 5 0 3 4 3 0 1 5 3 5 8 3 9 3

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or reproduction in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this _____ day, 19____

_____ 19____

My Commission expires _____

NOTARY PUBLIC

Signature Date

(11)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Randy Goodwin, Treasurer
American Citizens for Political Action
140 Little Falls Street
Suite 212
Falls Church, VA 22046

RE: MUR _____

Dear Mr. Goodwin:

On _____, 1985, the Federal Election Commission determined that there is reason to believe the American Citizens for Political Action and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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

85040550704

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Letter to Randy Goodwin, Treasurer
Page 2

stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Judy Thedford at (202) 523-4000.

Sincerely,

John Warren McGarry
Chairman

Enclosures

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

85040550705

(13)

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. _____

RESPONDENT American Citizens for Political Action
Randy Goodwin, Treasurer

SUMMARY OF ALLEGATION

The respondents, the American Citizens for Political Action and Randy Goodwin, as treasurer, failed to file timely the 1984 12 Day Pre-General Election Report as required by 2 U.S.C. § 434(a)(4)(A)(ii). A prior notice was sent to the respondents on October 1, 1984, informing them of the pre- and post-general election filing requirements. The respondents filed the 12 Day Pre-General Election Report on November 7, 1984, 13 days late.

FACTUAL BASIS AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), an unauthorized committee, that files quarterly reports in an election year, is required to file a 12 day pre-general election report if the committee makes contributions to or expenditures on behalf of a Federal candidate involved in the general election during the period October 1 to the 20th day before the general election. The report is due the 12th day before the general election.

For the 1984 general election, the 12 day pre-general election report was due October 25, 1984, covering October 1 through 17, 1984. The respondents made an \$18,343 independent expenditure on October 12, 1984 on behalf of Ronald Reagan. Therefore, the respondents were required to file a 12 day pre-general election report on October 25, 1984. Instead, the 12 day pre-general election reports was filed November 7, 1984.

85040550706

It is recommended that a MUR be opened and reason to believe be found against American Citizens for Political Action and Randy Goodwin, as treasurer.

85040550707

(15)



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 2020

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

Cameraman AS

85040550708



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 25, 1985

MEMORANDUM TO: Kent Cooper
FROM: Docket *SCM*
SUBJECT: Additional material to be microfilmed

We have received the attached additional material to be added to the closed MUR file:

MUR 2020

85040552875

Date Received: _____

Date Returned: _____

Chief of Processing: _____



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 24, 1985

To: Public Records

From: Docket *YM*

Please include the attached document from MUR# 2020 to the Public Record.

85040552876

Robert E. Dolan
Chairman



RECEIVED AT THE FEC
GCC# 8925
85 AUG 30 P 3: 28
Richard C. Hoff
President

AMERICAN CITIZENS FOR POLITICAL ACTION

"Financing Tomorrow's Leaders Today"

August 27, 1985

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

RE: MUR 2020

Dear Mr. Steele:

Thank you for your letter of August 23, 1985 and the enclosed executed copy of the pre-probable cause conciliation agreement. Consistent with the applicable rules I would like this letter together with its attachments and my letter of June 8, 1985 to Ms. Thedford to become part of the public record.

On June 13, 1985 you sent me a letter over Mr. Gross's signature. Said letter makes reference to a prior notice of filing dates sent to all unauthorized committees. Within the body of the aforementioned notice no reference is made to fines or the payment of a penalty for first time technical offenses. As you know, despite this fact, ACPA has effectively been fined in the amount of \$150.

My point is that the FEC should not rely on a generic notice sent out to all unauthorized political action committees as a basis for fining a PAC unless some specific reference is made to the amount of minimum fine that will be requested by your staff.

Clearly, this was not the case as regards ACPA and MUR 2020. Perhaps in the future a similiarly situated political committee will be forewarned so that they can be forearmed.

Sincerely;

Robert E. Dolan

Enclosures

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30 P 3: 52
OFFICIAL RECORD
ED



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 13, 1985

Randy Goodwin, Treasurer
American Citizens for Political
Action
140 Little Falls Street
Suite 212
Falls Church, Virginia 22046

RE: MUR 2020

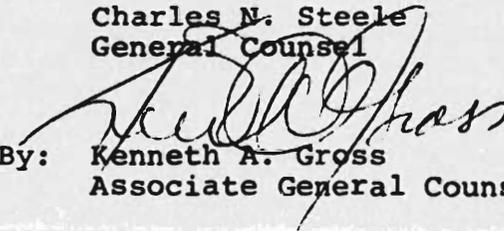
Dear Mr. Goodwin:

Pursuant to a telephone request from Robert Dolan on June 10, 1985, we enclose a copy of a prior notice which was previously sent by the Commission to all unauthorized committees. As you will notice, the letter serves as an alert to the committees of the upcoming report filing dates.

If you have any questions, please contact Judy Thedford at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure

85040552878



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20541

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).

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

Robert E. Dolan
Chairman
Randy Goodwin
Treasurer



AMERICAN CITIZENS FOR POLITICAL ACTION
"Financing Tomorrow's Leaders Today"

Richard C. Hahn
President

June 8, 1985

Ms. Judy Thedford
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Thedford;

American Citizens for Political Action is in receipt of letter dated June 6, 1985 which makes reference to MUR 2020.

Upon review of the aforementioned letter and the enclosed materials and upon the review of the records of American Citizens for Political Action it is admitted that the 12 Day Pre-General Election Report was filed on November 7, 1985 as opposed to October 25, 1985.

As your records reflect, American Citizens for Political Action is a new political action committee. As of October 25, 1984 the report, then due, was only the third experience it had complying with the FECA.

As the recently filed amended statement of organization reveals, Robert E. Dolan serves as the assistant treasurer of American Citizens for Political Action and James Burgess Associates, Ltd. operates as the custodian of records for the PAC. This new management structure should allow American Citizens for Political Action to continue using its "best efforts" to comply with the FECA.

It can not be overstated how more financial activity occurred with respect to the PAC than had been anticipated. Clearly our management systems broke down in and around the period of the report in question. However, American Citizens for Political Action and its officers attempted in good faith and with best efforts to comply with the FECA.

Pursuant to 11 C.F.R. section 111.18(d) American Citizens for Political Action requests that the Commission and American Citizens for Political Action manifest an attempt, through negotiations, to enter into a conciliation agreement prior to any finding of probable cause.

Sincerely,

Robert E. Dolan
Assistant Treasurer

Building on Our Reputation • Founded 1984

140 Little Falls Street, Suite 212 Falls Church, VA 22046 (703) 532-ACPA

A copy of our financial report is available from the Federal Election Commission on request.

8 5 0 4 0 5 5 2 8 8 1

ACPA



AMERICAN CITIZENS FOR POLITICAL ACTION
Empowering Tomorrow's Leaders Today

AMERICAN CITIZENS FOR POLITICAL ACTION
140 Little Falls Street, Suite 212, Falls Church, VA 22046



850405528

FEDERAL ELECTIONS COMMISSION
ATTN - MR. CHARLES N. STEELE
WASHINGTON D.C. 20463