



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20543

THIS IS THE END OF TLR # 2021

Date Filmed 12/5/85 Camera No. --- 2

Cameraman AS

85040562947

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 2021
American Association of)	
Nurse Anesthetists)	
Separate Segregated Fund)	
Thomas G. Healey, CRNA,)	
Treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 4, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 2021:

1. Accept the conciliation agreement submitted with the General Counsel's Report signed August 28, 1985.
2. Close the file.
3. Send the letter attached to the General Counsel's Report signed August 28, 1985.

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

Attest:

9-5-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Thurs., 8-29-85, 2:48
Circulated on 48 hour tally basis:	Fri., 8-30-85, 2:00
Deadline for votes:	Wed., 9-4-85, 4:00

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 2021
American Association of)	
Nurse Anesthetists)	
Separate Segregated Fund)	
Thomas G. Healey, CRNA,)	
Treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 4, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 2021:

1. Accept the conciliation agreement submitted with the General Counsel's Report signed August 28, 1985.
2. Close the file.
3. Send the letter attached to the General Counsel's Report signed August 28, 1985.

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

Attest:

9-5-85
Date

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

Received in Office of Commission Secretary:	Thurs., 8-29-85, 2:48
Circulated on 48 hour tally basis:	Fri., 8-30-85, 2:00
Deadline for votes:	Wed., 9-4-85, 4:00

185040562949



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 11, 1985

Joseph G. Nicosia, Esquire
Government Affairs Director
American Association of Nurse Anesthetists
216 Higgins Road
Park Ridge, Illinois 60068

RE: MUR 2021

Dear Mr. Nicosia:

On September 4, 1985, the Commission accepted the conciliation agreement signed by you 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

85040562950

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
American Association of Nurse) MUR 2021
Anesthetists Separate)
Segregated Fund)
Thomas G. Healey, CRNA,)
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 American Association of Nurse Anesthetists Separate Segregated Fund and Thomas G. Healey, CRNA, 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 pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

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

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

1. The American Association of Nurse Anesthetists Separate Segregated Fund is a political committee registered with the Commission.

2. Thomas G. Healey, CRNA, is the treasurer of the American Association of Nurse Anesthetists Separate Segregated Fund.

3. The Respondents were required to file the 12 Day Pre-General Election Report by October 25, 1984. The report was filed on November 15, 1984, 21 days late.

V. Respondents violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file timely the 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 Dollars (\$100), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

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

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

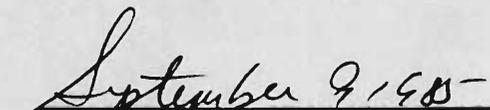
XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

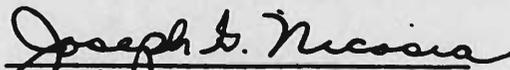
Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel


Date

FOR THE RESPONDENTS:


Joseph G. Nicosia
Government Affairs Director


Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Joseph G. Nicosia, JD.
Government Affairs Director
American Association of Nurse Anesthetists
216 Higgins Road
Park Ridge, Illinois 60068

RE: MUR 2021

Dear Mr. Nicosia:

On August , 1985, the Commission accepted the conciliation agreement signed by you 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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

**Joseph G. Nicosia, JD.
Government Affairs Director
American Association of Nurse Anesthetists
216 Higgins Road
Park Ridge, Illinois 60068**

RE: MUR 2021

Dear Mr. Nicosia:

On August , 1985, the Commission accepted the conciliation agreement signed by you 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**

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GCC# 8373

MEMORANDUM

TO: RETHA DIXON

TO: JOAN HARRIS

FROM: JOAN HARRIS

FROM: RETHA DIXON

CHECK NO. 002077 (a copy of which is attached) RELATING

TO MUR 2021 AND NAME AANA CRNA PAC

WAS RECEIVED ON August 13, 1985. 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 8-23-85

GCC# 7774



RECEIVED
OFFICE OF THE REC
COMMISSION SECRETARY

85 JUN 17 P2: 15

June 13, 1985

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

RE: MUR 2021

Dear Mr. McGarry:

I am writing in response to a letter you sent on June 6, 1985, to Thomas Healey, CRNA, Treasurer of the American Association of Nurse Anesthetists Separate Segregated Fund. The letter concerned a possible violation of the Federal Election Campaign Act of 1981 by the inadvertent and unintentional late filing of the 12 day Pre-General Election Report that was due on October 25, 1984. This report was in fact filed and received by the Commission on November 15, 1984.

We regret the inadvertent error to timely file this report, which had been one of the responsibilities of a former employee of the Association.

I spoke to Judy Thedford on June 12, 1985, as indicated in your letter, and am requesting to enter into a pre-probable cause conciliation agreement. I would like to know whether such an agreement can be entered into by me as Government Affairs Director for the American Association of Nurse Anesthetists or whether the execution of the agreement requires the signature of Mr. Healey, who resides and works at another location.

I anticipate hearing from your office so that we may rectify this matter promptly.

Sincerely,

Joseph G. Nicosia

Joseph G. Nicosia, JD
Government Affairs Director

JGN/clw

cc: Judy Thedford

Thomas Healey, CRNA, MA
Treasurer, CRNA-PAC

85 JUN 18 P3: 40

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

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216 Higgins Road
Park Ridge, Illinois 60068

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

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U.S. POSTAGE

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216 Higgins Road
Park Ridge, Illinois 60068

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

05 JUN 85 11:10



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
American Association of Nurse)	RAD Referral 85NF-92
Anesthetists Separate)	
Segregated Fund)	
Thomas G. Healey, CRNA, 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-92:

1. Open a MUR.
2. Find reason to believe the American Association of Nurse Anesthetists Separate Segregated Fund and Thomas G. Healey, CRNA, as treasurer, violated 2 U.S.C. § 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, 11:59
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

Thomas G. Healey, CRNA, Treasurer
American Association of Nurse Anesthetists
Separate Segregated Fund
216 Higgins Road
Park Ridge, Illinois 60068

RE: MUR 2021

Dear Mr. Healey:

On June 3, 1985, the Federal Election Commission determined that there is reason to believe the American Association of Nurse Anesthetists Separate Segregated Fund 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

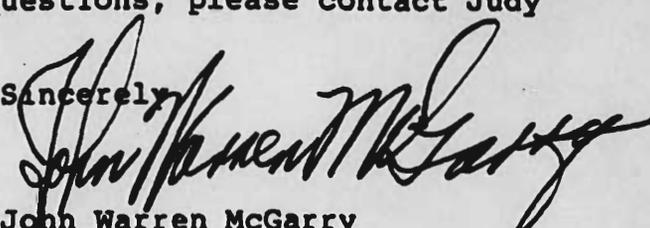
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stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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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GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 2021

RESPONDENT American Association of Nurse Anesthetists
Separate Segregated Fund
Thomas G. Healey, CRNA, Treasurer

SUMMARY OF ALLEGATION

The respondents, the American Association of Nurse Anesthetists Separate Segregated Fund and Thomas G. Healey, CRNA, 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 15, 1984, 21 days late

FACTUAL BASIS AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), an unauthorized committee, which 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 1-17, 1984. The respondents made a \$250 contribution to the candidacy of Berkley Bedell on October 12, 1984. Mr. Bedell was a candidate in the general election for the U.S. House of

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Representatives. 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 report was filed November 15, 1984.

It is recommended that a MUR be opened and reason to believe be found against the American Association of Nurse Anesthetists Separate Segregated Fund and Thomas G. Healey, CRNA, as treasurer.

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

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

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

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

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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

Thomas G. Healey, CRNA, Treasurer
American Association of Nurse Anesthetists
Separate Segregated Fund
216 Higgins Road
Park Ridge, Illinois 60068

RE: MUR _____

Dear Mr. Healey:

On _____, 1985, the Federal Election Commission determined that there is reason to believe the American Association of Nurse Anesthetists Separate Segregated Fund 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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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

Thomas G. Healey, CRNA, Treasurer
American Association of Nurse Anesthetists
Separate Segregated Fund
216 Higgins Road
Park Ridge, Illinois 60068

RE: MUR _____

Dear Mr. Healey:

On _____, 1985, the Federal Election Commission determined that there is reason to believe the American Association of Nurse Anesthetists Separate Segregated Fund 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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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 Thomas G. Healey, CRNA, 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

85040562971



FEDERAL ELECTION COMMISSION
 WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
 FROM: Office of General Counsel *Cut*
 DATE: May 30, 1985
 SUBJECT: RAD 85NF-92: 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

FIRST GENERAL COUNSEL'S REPORT

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

MUR #85NF-92
STAFF MEMBER
JUDY THEDFORD

RECEIVED
MAY 30 AM: 50
SENSITIVE

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME: American Association of Nurse Anesthetists
Separate Segregated Fund
Thomas G. Healey, CRNA, treasurer

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

INTERNAL REPORTS CHECKED: American Association of Nurse
Anesthetists Separate Segregated
Fund 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 Association of Nurse Anesthetists Separate Segregated Fund and Thomas G. Healey, CRNA, 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 15, 1984, 21 days late

FACTUAL AND LEGAL ANALYSIS

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

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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 October 17, 1984. The respondents made a \$250 contribution to the candidacy of Berkley Bedell on October 12, 1984. Mr. Bedell was a candidate in the general election for the U.S. House of Representatives. 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 report was filed November 15, 1984.

It is recommended that a MUR be opened and reason to believe be found against the American Association of Nurse Anesthetists Separate Segregated Fund and Thomas G. Healey, CRNA, as treasurer.

RECOMMENDATION

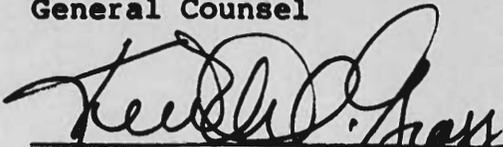
1. Open a MUR.
2. Find reason to believe the American Association of Nurse Anesthetists Separate Segregated Fund and Thomas G. Healey, CRNA, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).

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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

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

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**AMERICAN ASSOCIATION OF NURSE ANESTHETISTS
SEPARATE SEGREGATED FUND**

(Attachments 4a - 4c)

8 5 0 4 0 5 6 2 9 7 8

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)DATE 24APR85
PAGE

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILE COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
AMERICAN ASSOCIATION OF NURSE ANESTHETISTS SEPARATE SEGREGATED FUND (CAVA-PAC)						10 8000173153
CONNECTED ORGANIZATION: NURSE ANESTHETISTS, AMERICAN ASS'N						
1983	STATEMENT OF ORGANIZATION			10ECS3	3	83FEC/288/2192
	STATEMENT OF ORGANIZATION - AMENDMENT			12DEC83	4	83FEC/288/4959
	YEAR-END	1,210	0	10ECS3 -31DEC83	5	84FEC/292/4156
1984	STATEMENT OF ORGANIZATION - AMENDMENT			30JAN84	1	84FEC/292/4157
	STATEMENT OF ORGANIZATION - AMENDMENT			11MAY84	3	84FEC/314/0000
	APRIL QUARTERLY	20,459	8	1JAN84 -31MAR84	3	84FEC/308/3600
	JULY QUARTERLY	28,995	47,500	1APR84 -30JUN84	11	84FEC/319/1700
	JULY QUARTERLY - AMENDMENT	28,995	27,500	1APR84 -30JUN84	13	84FEC/348/3500
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30JUN84	2	84FEC/345/1753
	OCTOBER QUARTERLY	16,919	3,250	1JUL84 -30SEP84	5	84FEC/339/0980
	OCTOBER QUARTERLY - AMENDMENT	17,257	3,000	1JUL84 -30SEP84	6	84FEC/348/3612
	PRE-GENERAL	4,538	250	1OCT84 -1/OCT84	4	84FEC/348/5218
	POST-GENERAL	9,416	-	18OCT84 -26NOV84	4	84FEC/350/2008
	YEAR-END	4,124	-	27NOV84 -31DEC84	4	85FEC/361/1410
	TOTAL	85,999	0 30,758	0	68	TOTAL PAGES

All Reports Reviewed
Ending Cash on Hand as of 12/31/84= \$55,241.95
Outstanding Debts as of 12/31/84= \$0



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).

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WHERE AND HOW TO FILE

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

QUARTERLY FILERS

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
3rd Q-Report	07/01* - 09/30	10/15/84	10/15/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General**	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

*Or from date of registration, or the close of books of the last report filed, whichever is later.

**Reports filed by committees that did not file the pre-General report should cover all financial activity from the last report filed through November 26, 1984.

MONTHLY FILERS

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
Oct. Monthly	09/01 - 09/30	10/20/84	10/20/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

COMPLIANCE

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

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

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

NOV 14 11:14
ALIGN AREA

(Summary Page)

ALIGN AREA

1 Name of Committee (in Full)
AMERICAN ASSOCIATION OF NURSE ANESTHETISTS SEPARATE SEGREGATED FUND AKA CRNA PAC

Address (Number and Street)
216 W. HIGGINS ROAD

City, State and ZIP Code
PARK RIDGE, ILLINOIS 60068

Check here if address is different than previously reported

2 FEC Identification Number
100173153

3 This committee qualified as a multi-candidate 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 (Not Effective Year End)

Monthly Report for _____

Twelfth day report preceding **GENERAL** Year of **USA**
election on **NOV. 6 '84** in the State of **USA**

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

Termination Report

Is this Report an Amendment? YES NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year to Date
6 Total Contributions during 10-1-84 through 10-17-84		1210.00
7 Total Receipts Beginning of Reporting Period	37,412.28	
8 Total Disbursements (Line 18)	4,538.00	71,249.17
9 Total Receipts (Lines 6, 7, and 8) (For Column A and Column B)	41,950.28	72,459.17
10 Total Disbursements (Line 8)	250.00	30,758.89
11 Total Receipts (Line 9) minus Total Disbursements (Line 10) (For Column A and Column B)	41,700.28	41,700.28
12 Total Receipts (Line 7) minus Total Disbursements (Line 8) (For Column A and Column B)	-	
13 Total Receipts (Line 9) minus Total Disbursements (Line 10) (For Column A and Column B)	-	

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Handwritten signature and date

8

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

Name of Committee: **AMERICAN ASSOCIATION OF NURSE
ANESTHETISTS SEPARATE SEGREGATED FUND
AKA CRNA PAC**
C00173153

From **10-1-84** To **10-7-84**
COLUMN A
Total This Period
COLUMN B
Calendar Year To Date

I. RECEIPTS

11 CONTRIBUTIONS (other than loans) FROM		
(a) Individuals, Persons Other Than Political Committees (Memo Entry Uniformized \$ 4538.00)	4538.00	70,661.00
(b) Political Party Committees (Other Political Committees)		
11 TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	4538.00	70,661.00
12 TRANSFERS FROM AFFILIATED OTHER PARTY COMMITTEES		
13 ALL LOANS RECEIVED		
14 LOAN REPAYMENTS RECEIVED		
15 PROFITS FROM OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16 PROFITS FROM CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17 OTHER RECEIPTS (Dividends, Interest, etc.)		588.17
18 TOTAL RECEIPTS (Add lines 12, 13, 14, 15, 16 and 17)	4538.00	71,249.17

II. DISBURSEMENTS

19 CONTRIBUTING EXPENDITURES		
20 TRANSFERS TO AFFILIATED OTHER PARTY COMMITTEES		
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	250.00	30,750.00
22 CONTRIBUTING EXPENDITURES (Use Schedule E)		
23 CONTRIBUTING EXPENDITURES MADE BY PARTY COMMITTEES (Use Schedule E)		
24 CONTRIBUTING EXPENDITURES		
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4538.00 70,661.00
4538.00 70,661.00
- 8.84
- 8.84

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Page 1 of 1
LINE NUMBER 21
DATE 10/12/84
AMOUNT \$250.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

CONTRIBUTIONS for Federal Candidates

Any information derived from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions for commercial purposes, other than using the name and address of any political committee to solicit contributions from its contributors.

Name of Committee or Fund: **American Association of Nurse Anesthetists
Separate Segregated Fund aka CRNA PAC** C00173153

A Full Name, Mailing Address and ZIP Code: **Committee to Re-elect Bedell
P. O. Box 1204
Sioux City, IA 51102**
 Purpose of Disbursement: **Contribution to Berkley Bedell
House Candidate, 6th Dist.,
State**
 Date: **10/12/84**
 Amount: **\$250.00**
 Statement for: **1984**

B Full Name, Mailing Address and ZIP Code

C Full Name, Mailing Address and ZIP Code

D Full Name, Mailing Address and ZIP Code

E Full Name, Mailing Address and ZIP Code

F Full Name, Mailing Address and ZIP Code

G Full Name, Mailing Address and ZIP Code

H Full Name, Mailing Address and ZIP Code

I Full Name, Mailing Address and ZIP Code

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\$250.00
\$250.00

10



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Thomas G. Healey, CRNA, Treasurer
American Association of Nurse Anesthetists
Separate Segregated Fund
216 Higgins Road
Park Ridge, Illinois 60068

RE: MUR _____

Dear Mr. Healey:

On _____, 1985, the Federal Election Commission determined that there is reason to believe the American Association of Nurse Anesthetists Separate Segregated Fund 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

8 5 0 4 0 5 6 2 9 8 4

(11)

Letter to Thomas G. Healey, CRNA, 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

8 5 0 4 0 5 6 2 9 3 5

12

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. _____

RESPONDENT American Association of Nurse Anesthetists
Separate Segregated Fund
Thomas G. Healey, CRNA, Treasurer

SUMMARY OF ALLEGATION

The respondents, the American Association of Nurse Anesthetists Separate Segregated Fund and Thomas G. Healey, CRNA, 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 15, 1984, 21 days late

FACTUAL BASIS AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), an unauthorized committee, which 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 1-17, 1984. The respondents made a \$250 contribution to the candidacy of Berkley Bedell on October 12, 1984. Mr. Bedell was a candidate in the general election for the U.S. House of

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Representatives. 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 report was filed November 15, 1984.

It is recommended that a MUR be opened and reason to believe be found against the American Association of Nurse Anesthetists Separate Segregated Fund and Thomas G. Healey, CRNA, as treasurer.

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14



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20543

THIS IS THE BEGINNING OF MUR # 2021

Date Filmed 12/5/85 Camera No. --- 2

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