



FEDERAL ELECTION COMMISSION

1325 K STREET NW  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2039

Date Filmed 3/26/86 Camera No. --- 2

Cameraman AS

65040571959

FEDERAL ELECTION COMMISSION

Meeting slips, internal documents, internal

conciliation agreements, ~~Report for~~

~~and other~~ discussion of civil penalty

PAD P.S. Standards

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

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

Signed [Signature]

date [Date]

3086

FEC 9-21-77

95040371950



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2039

86040371951



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 10, 1985

David Ifshin, Esquire  
Manatt, Phelps, Rothenburg & Tunney  
1200 New Hampshire Avenue, N.W.  
Suite 200  
Washington, D.C. 20036

RE: MUR 2039  
Roundtable Political  
Action Committee  
Susan Gwertzman, as Treasurer

Dear Mr. Ifshin:

On October 3, 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

26040371962

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Roundtable Political ) MUR 2039  
Action Committee )  
Susan Gwertzman, as treasurer )

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Roundtable Political Action Committee and its treasurer, ("Roundtable PAC" or "Respondents") violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file its 12 Day Pre-general Election Report in a timely manner.

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

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

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

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

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

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

25040:71955

2. Susan Gwertzman is the treasurer of Roundtable PAC.

3. Section 434(a)(4)(A)(ii) of Title 2, United States Code, requires, in a calendar year in which a regularly scheduled general election is held, that a pre-general election report be filed no later than the 12th day before any election in which the committee makes a contribution to or an expenditure on behalf of a candidate.

4. Respondent's 1984 12 Day Pre-General Report was required to be filed on October 25, 1984. Respondents filed the 1984 30 Day Post General Election Report, disclosing activity for the 12 Day Pre-General Period, on January 11, 1985. Therefore, the 12 Day Pre-General Report was filed 68 days late.

V. Respondents violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file the 1984 12 Day Pre-General Report in a timely manner.

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

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

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any

850403/1954

requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

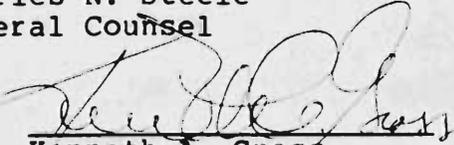
IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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

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:

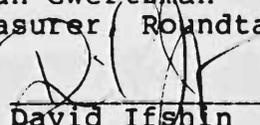
Charles N. Steele  
General Counsel

BY:   
Kenneth A. Gross  
Associate General Counsel

October 9, 1985  
Date

FOR THE RESPONDENTS:

Susan Gwertzman  
Treasurer, Roundtable PAC

BY:   
David Ifshin  
Counsel for Roundtable PAC  
and Susan Gwertzman,  
as treasurer

Sept 19, 1985  
Date

9504071045



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

David Ifshin, Esquire  
Manatt, Phelps, Rothenburg & Tunney  
1200 New Hampshire Avenue, N.W.  
Suite 200  
Washington, D.C. 20036

RE: MUR 2039  
Roundtable Political  
Action Committee  
Susan Gwertzman, as Treasurer

Dear Mr. Ifshin:

On October 3, 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

96040371055

A handwritten signature in the bottom right corner of the page.



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

David Ifshin, Esquire  
Manatt, Phelps, Rothenburg & Tunney  
1200 New Hampshire Avenue, N.W.  
Suite 200  
Washington, D.C. 20036

RE: MUR 2039  
Roundtable Political  
Action Committee  
Susan Gwertzman, as Treasurer

Dear Mr. Ifshin:

On October 3, 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

2504071957

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 2039  
Roundtable Political Action )  
Committee )  
Susan Gwertzman, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 3, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 2039:

1. Accept the conciliation agreement submitted with the General Counsel's Report signed September 30, 1985.
2. Approve the letter attached to the General Counsel's Report signed September 30, 1985.
3. Close the file.

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

Attest:

10-4-85

Date

Marjorie W Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary: Tues., 10-1-85, 11:47  
Circulated on 48 hour tally basis: Tues., 10-1-85, 4:00  
Deadline for votes: Thur., 10-3-85, 4:00

85040:71958

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Roundtable Political )  
Action Committee )  
Susan Gwertzman, as treasurer )

05 OCT 1 11:47  
MUR 2039

GENERAL COUNSEL'S REPORT

**SENSITIVE**

**BACKGROUND**

Attached is a conciliation agreement which has been signed by the counsel to the Roundtable Political Action Committee.

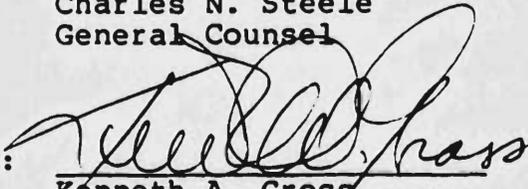
85040571959

**RECOMMENDATIONS**

The Office of General Counsel recommends that the Commission accept the conciliation agreement, approve the attached letter to the Respondents, and close the file.

Charles N. Steele  
General Counsel

Sept 30, 1985  
Date

BY:   
Kenneth A. Gross  
Associate General Counsel

- Attachments  
Conciliation Agreement  
Check for Civil Penalty  
Letter to Respondents

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
	)	MUR 2039
Roundtable Political	)	
Action Committee	)	
Susan Gwertzman, as treasurer	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Roundtable Political Action Committee and its treasurer, ("Roundtable PAC" or "Respondents") violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file its 12 Day Pre-general Election Report in a timely manner.

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

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

§ 437g(a)(4)(A)(i).

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

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

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

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

86040371970

2. Susan Gwertzman is the treasurer of Roundtable PAC.

3. Section 434(a)(4)(A)(ii) of Title 2, United States Code, requires, in a calendar year in which a regularly scheduled general election is held, that a pre-general election report be filed no later than the 12th day before any election in which the committee makes a contribution to or an expenditure on behalf of a candidate.

4. Respondent's 1984 12 Day Pre-General Report was required to be filed on October 25, 1984. Respondents filed the 1984 30 Day Post General Election Report, disclosing activity for the 12 Day Pre-General Period, on January 11, 1985. Therefore, the 12 Day Pre-General Report was filed 68 days late.

V. Respondents violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file the 1984 12 Day Pre-General Report in a timely manner.

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

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

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any

36040371971

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.

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

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:

Susan Gwertzman  
Treasurer Roundtable PAC  
BY: \_\_\_\_\_  
David Ifshin  
Counsel for Roundtable PAC  
and Susan Gwertzman,  
as treasurer

Sept 19, 1985  
\_\_\_\_\_ Date

06040371972

ATTACHMENT 2 of 3

ROUNDTABLE POLITICAL ACTION COMMITTEE

1569

666 FIFTH AVE.  
NEW YORK, NY 10103

1-108/210

Sept. 18 - 19 85

8400311

PAY TO THE ORDER OF Federal Election Commission

\$ 200.00

Two Hundred 00/100

DOLLARS



82ND STREET OFFICE  
MARINE MIDLAND BANK, N.A.  
NEW YORK, NEW YORK 10103

FOR CIVIL PENALTY - MUR 2039

*James S. T. L.*

⑆001569⑆ ⑆021001088⑆ 011⑆76735⑆9⑆



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

David Ifshin, Esquire  
Manatt, Phelps, Rothenburg & Tunney  
1200 New Hampshire Avenue, N.W.  
Suite 200  
Washington, D.C. 20036

RE: MUR 2039  
Roundtable Political  
Action Committee  
Susan Gwertzman, as Treasurer

Dear Mr. Ifshin:

On 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

ATTACHMENT 3 of 3

26040371074

MEMORANDUM

TO: RETHA DIXON

TO: JOAN HARRIS

FROM: JOAN HARRIS

FROM: RETHA DIXON

CHECK NO. 1569 (a copy of which is attached) RELATING  
TO MUR 2039 AND NAME Roundtable Political Action  
WAS RECEIVED ON 9-20-85. PLEASE INDICATE THE SAVINGS ACCOUNT INTO  
WHICH IT SHOULD BE DEPOSITED:

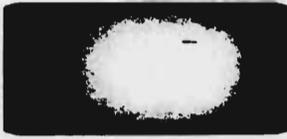
\* BUDGET CLEARING ACCOUNT (#95F3875-16)

/ CIVIL PENALTIES ACCOUNT (#95-1099-160)

/ OTHER \_\_\_\_\_

SIGNATURE Robert M Bishop DATE 9-23-85

3504057127



ROUNDTABLE POLITICAL ACTION COMMITTEE  
666 FIFTH AVE.  
NEW YORK, NY 10103

1569

1-108/210

Sept. 18 19 85

PAY TO THE ORDER OF

Federal Election Commission

\$ 200.00

Two Hundred <sup>00</sup>/<sub>100</sub>

DOLLARS



52ND STREET OFFICE  
MARINE MIDLAND BANK, N.A.  
NEW YORK, NEW YORK 10103

FOR CIVIL PENALTY MUR 2039

*James S. T. L.*

⑈001569⑈ ⑆021001088⑆ 011⑈76735⑈9⑈



MANATT, PHELPS, ROTHENBERG, TUNNEY & EVANS

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AT LAW

1200 NEW HAMPSHIRE AVENUE, N. W.

SUITE 200

WASHINGTON, D. C. 20036

TELEPHONE (202) 463-4300

LOS ANGELES

1136 WEST OLYMPIC BOULEVARD  
LOS ANGELES, CALIFORNIA 90064

(213) 312-4000

September 19, 1985

Craig Engle, Esq.  
General Counsel's Office  
Federal Election Commission  
1325 K Street, N.W.  
7th floor  
Washington, D.C. 20463

SEP 20 11:51

8  
7  
1  
9  
7  
8

Dear Craig:

Pursuant to our agreement, enclosed is the Conciliation Agreement  
a check for the civil penalty

It is our understanding that the Commission will have this matter presented to it by next week so that the file may be closed promptly. I appreciate your assistance and the guidance of Kenneth Gross in this matter.

Sincerely,

David M. Ifshin  
Manatt, Phelps, Rothenberg,  
Tunney & Evans

DMI/ppl  
Enclosures

cc: Kenneth Gross



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 11, 1985

David Ifshin, Esquire  
Manatt, Phelps, Rothenburg & Tunney  
1200 New Hampshire Avenue, N.W.  
Suite 200  
Washington, D.C. 20036

RE: MUR 2039  
Roundtable Political Action  
Committee  
Susan Gwertzman, as treasurer

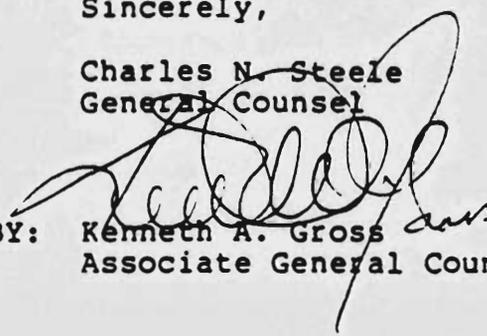
Dear Mr. Ifshin:

Enclosed is a conciliation agreement which we are prepared to recommend to the Commission for approval.

We will look forward to hearing from you shortly, so that this matter may be resolved expeditiously. If you have any questions, please contact Craig Engle, the attorney recently assigned to this case.

Sincerely,

Charles N. Steele  
General Counsel

BY:   
Kenneth A. Gross  
Associate General Counsel

Enclosure  
Conciliation Agreement

36040571979



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 23, 1985

David Ifshin  
Manatt, Phelps, Rothenburg & Tunney  
1200 New Hampshire Avenue, N.W.  
Suite 200  
Washington, D.C. 20036

RE: MUR 2039

Dear Mr. Ifshin:

This is to confirm your conversation with Andrea Quinn on August 20, 1985, regarding Roundtable PAC's Conciliation Agreement with the Commission.

We look forward to hearing from you within ten days if you wish to continue pre-probable cause conciliation negotiations.

Sincerely,

Charles N. Steele  
General Counsel

BY:

  
Kenneth A. Gross  
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 14, 1985

David Ifshin  
Manatt, Phelps, Rothenburg & Tunney  
1200 New Hampshire Ave., N.W.  
Suite 200  
Washington, D.C. 20036

RE: MUR 2039

Dear Mr. Ifshin:

On June 12, 1985, the Commission found reason to believe that Roundtable Political Action Committee violated 2 U.S.C. §434(a)(4)(A)(i). At your request, the Commission determined on August 2, 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your client agrees with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Andrea Quinn, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

A handwritten signature in black ink, appearing to read "Kenneth A. Gross".

By: Kenneth A. Gross  
Associate General Counsel

Enclosures



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

David Ifshin  
Manatt, Phelps, Rothenburg & Tunney  
1200 New Hampshire Ave., N.W.  
Suite 200  
Washington, D.C. 20036

RE: MUR 2039

Dear Mr. Ifshin:

On June 12, 1985, the Commission found reason to believe that Roundtable Political Action Committee violated 2 U.S.C. §434(a)(4)(A)(i). At your request, the Commission determined on ,1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your client agrees with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Andrea Quinn, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

A handwritten signature in dark ink, appearing to be "CS", written over the typed name of Charles N. Steele.

By: Kenneth A. Gross  
Associate General Counsel

Enclosures

25040371032



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

David Ifshin  
Manatt, Phelps, Rothenburg & Tunney  
1200 New Hampshire Ave., N.W.  
Suite 200  
Washington, D.C. 20036

RE: MUR 2039

Dear Mr. Ifshin:

On June 12, 1985, the Commission found reason to believe that Roundtable Political Action Committee violated 2 U.S.C. §434(a)(4)(A)(i). At your request, the Commission determined on ,1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your client agrees with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Andrea Quinn, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosures

95040371983

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Roundtable Political Action ) MUR 2039  
Committee )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 2, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 2039:

1. Enter into conciliation negotiations with Roundtable Political Action Committee and James Tisch, as treasurer, prior to a finding of probable cause to believe.
2. Approve the conciliation agreement and letter attached to the General Counsel's Report signed July 26, 1985.

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

Attest:

8/5/85  
Date

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

Received in Office of Commission Secretary: 7-30-85, 5:46  
Circulated on 48 hour tally basis: 7-31-85, 4:00

86040371294

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED  
OFFICE OF THE  
COMMISSIONER OF THE FEC  
SECRETARY

In the Matter of  
Roundtable Political  
Action Committee

)  
)  
)  
)  
)  
)

MUR 85 2689 30 P 5: 46

**SENSITIVE**

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On June 12, 1985, the Commission found reason to believe that Roundtable Political Action Committee and James Tisch, as treasurer, violated 2 U.S.C. §434(a)(4)(A)(ii) by failing to file the 12 Day Pre-General Election Report in a timely manner.

Notification of the Commission's finding was mailed to the respondents on June 20, 1985. By letter dated July 2, 1985, the Committee's attorney requested to settle this matter prior to a finding of probable cause to believe.

**II. Discussion of Conciliation**

250403/10

III. General Counsel's Recommendations

1. Enter into conciliation negotiations with Roundtable Political Action Committee and James Tisch, as treasurer, prior to finding probable cause to believe.

2. Approve the attached conciliation agreement and letter.

Charles N. Steele  
General Counsel

July 20, 1985  
Date

BY: Kenneth A. Gross  
Kenneth A. Gross  
Associate General Counsel

36040571996

Attachments

1. Roundtable PAC's letter requesting conciliation.
2. Proposed agreement and letter.

RECEIVED BY THE FEC

MANATT, PHELPS, ROTHENBERG & TUNNEY

85 JUL 3 10:54

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS  
ATTORNEYS AT LAW

1200 NEW HAMPSHIRE AVENUE, N.W.  
SUITE 200  
WASHINGTON, D.C. 20036  
TELEPHONE (202) 463-4300

July 2, 1985

WESTSIDE OFFICE  
1388 WEST OLYMPIC BOULEVARD  
LOS ANGELES, CALIFORNIA 90064  
(213) 318-4000  
SAN FRANCISCO OFFICE  
FOUR EMBARCADERO CENTER  
SAN FRANCISCO, CALIFORNIA 94111  
(415) 981-7840  
LOS ANGELES (DOWNTOWN)  
811 WEST SEVENTH STREET  
LOS ANGELES, CALIFORNIA 90017  
(213) 488-8800

Deborah Curry, Esq.  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: Roundtable Political Action Committee  
MUR 2039

Dear Ms. Curry:

Enclosed is a designation of counsel from the Roundtable Political Action Committee in MUR 2039. As we discussed on Friday, we are prepared to discuss pre-probable cause conciliation of this matter.

While the Commission's letter refers to enclosed interrogatories, it is my understanding from you that no interrogatories were included with the Commission's letter of June 20, 1985 nor have any been ordered sent by either the Commission or the Commission's Office of General Counsel.

I look forward to meeting with you soon to discuss whether we can promptly resolve this matter.

Sincerely,

David M. Ifshin  
of Manatt, Phelps,  
Rothenberg & Tunney

DMI:mp  
Enclosure

RECEIVED  
GENERAL COUNSEL  
15 JUL 3 10:58  
A10:58

7  
9  
1  
7  
5  
0  
4  
0  
9  
8

Attachment 1



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

David Ifshin  
Manatt, Phelps, Rothenburg & Tunney  
1200 New Hampshire Ave., N.W.  
Suite 200  
Washington, D.C. 20036

RE: MUR 2039

Dear Mr. Ifshin:

On June 12, 1985, the Commission found reason to believe that Roundtable Political Action Committee violated 2 U.S.C. §434(a)(4)(A)(i). At your request, the Commission determined on ,1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your client agrees with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Andrea Quinn, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosures

Attachment 384

6-227915  
RECEIVED AT THE FEC

**MANATT, PHELPS, ROTHENBERG & TUNNEY**

85 JUL 3 10:54

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AT LAW

1200 NEW HAMPSHIRE AVENUE, N.W.

SUITE 200

WASHINGTON, D.C. 20036

TELEPHONE (202) 463-4300

July 2, 1985

WESTSIDE OFFICE

11355 WEST OLYMPIC BOULEVARD  
LOS ANGELES, CALIFORNIA 90064  
(213) 312-4000

SAN FRANCISCO OFFICE

FOUR EMBARCADERO CENTER  
SAN FRANCISCO, CALIFORNIA 94111  
(415) 981-7540

LOS ANGELES (DOWNTOWN)

811 WEST SEVENTH STREET  
LOS ANGELES, CALIFORNIA 90017  
(213) 486-5500

Deborah Curry, Esq.  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: Roundtable Political Action Committee  
MUR 2039

Dear Ms. Curry:

Enclosed is a designation of counsel from the Roundtable Political Action Committee in MUR 2039. As we discussed on Friday, we are prepared to discuss pre-probable cause conciliation of this matter.

While the Commission's letter refers to enclosed interrogatories, it is my understanding from you that no interrogatories were included with the Commission's letter of June 20, 1985 nor have any been ordered sent by either the Commission or the Commission's Office of General Counsel.

I look forward to meeting with you soon to discuss whether we can promptly resolve this matter.

Sincerely,

David M. Fishin  
of Manatt, Phelps,  
Rothenberg & Tunney

DMI:mp  
Enclosure

68617:CP096

5 JUL 3 10:58  
A10:58  
RECEIVED  
GENERAL COUNSEL

6667915

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2039

NAME OF COUNSEL: David Ifshin

ADDRESS: Suite 200

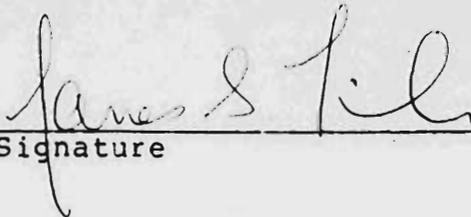
. 1200 New Hampshire Ave. N.W.

Washington, D.C. 20036

TELEPHONE: 202-463-4300

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.

July 1, 1985  
Date

  
Signature

RESPONDENT'S NAME: James S. Tisch

ADDRESS: 666 Fifth Avenue

New York, N.Y. 10103

HOME PHONE: 212-879-9414

BUSINESS PHONE: 212-841-1000

86040:71990

MANATT, PHELPS, ROTHENBERG & TUNNEY

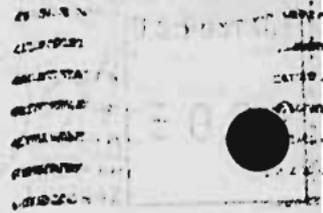
ATTORNEYS AT LAW

1200 NEW HAMPSHIRE AVENUE, N.W.

SUITE 200

WASHINGTON, D.C. 20036

1991 / 7 / 04 03 60



Deborah Curry, Esq.  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

JUL 3 1991 10:54



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 20, 1985

James S. Tisch, Treasurer  
Roundtable Political Action Committee  
666 Fifth Avenue  
New York, New York 10103

RE: MJR 2039  
Roundtable Political Action  
Committee  
James S. Tisch, as treasurer

Dear Mr. Tisch:

On June 12, 1985, the Federal Election Commission determined that there is reason to believe that Roundtable Political Action Committee 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, along with your answers to the enclosed questions, within ten days of your receipt of this letter.

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

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form

95040571992

Letter to James S. Tisch, 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 Deborah Curry, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

  
John Warren McGarry  
Chairman

Enclosures

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

36040571993

**GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

MUR NO. 2039

RESPONDENTS: Roundtable Political Action Committee and James S. Tisch, as treasurer

**SUMMARY OF ALLEGATIONS**

The Roundtable Political Action Committee (hereinafter "Roundtable PAC") and James S. Tisch, as treasurer, failed to file timely its 12 Day Pre-General Election Report in violation of 2 U.S.C. § 434(a)(4)(A)(ii). The report was due October 25, 1984, covering the period October 1 through October 17, 1984. A 30 Day Post General Election Report was filed on January 11, 1985 disclosing activity from 10/1-11/26/84.

This report also disclosed contributions or expenditures on behalf of Federal candidates involved in the general election.

Roundtable PAC was sent a prior notice on October 1, 1984, which specifically informed it of the requirement to file a 12 Day Pre-General Election Report on October 25, 1984. A non-filer notice was also sent to Roundtable PAC on December 28, 1984, due to its failure to file the 30 Day Post-General Election Report.

**FACTUAL BASIS AND LEGAL ANALYSIS**

2 U.S.C. § 434(a)(4)(A)(ii) requires an unauthorized committee to file, in an election year, a pre-election report. It is required that the report be filed no later than the 12th day before any election in which the committee makes a contribution or expenditure on behalf of a candidate in such election.

95040371994

Roundtable PAC filed a 30 Day Post General Election Report, disclosing its activity from 10/1-11/26/84. Roundtable PAC's 30 Day Post-General Election Report indicates that a 12 Day Pre-General Election Report should have been filed. Roundtable PAC did not file the 12 Day Pre-General Election Report on the due date, October 25, 1984.

86040:71995

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.

6504071996

If, during this period of investigation, the respondent(s) indicate a desire to enter into conciliation, the Office of General Counsel staff may begin the conciliation process prior to a finding of probable cause to believe a violation has been committed. Conciliation is an informal method of conference and persuasion to endeavor to correct or prevent a violation of the Federal Election Campaign Act (FECA). Most often, the result of conciliation is an agreement signed by the Commission and the respondent(s). The Conciliation Agreement must be adopted by four votes of the Commission before it becomes final. After signature by the Commission and the respondent(s), the Commission shall make public the Conciliation Agreement.

[If the investigation warrants], and no conciliation agreement is entered into prior to a probable cause to believe finding, the General Counsel must notify the respondent(s) of his intent to proceed to a vote on probable cause to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed. Included with the notification to the respondent(s) shall be a brief setting forth the position of the General Counsel on the legal and factual issues of the case. Within 15 days of receipt of such brief, the respondent(s) may submit a brief posing the position of respondent(s) and replying to the brief of the General Counsel. Both briefs will then be filed with the Commission Secretary and will be considered by the Commission. Thereafter, if the Commission determines by an affirmative vote of four (4) Commissioners, that there is probable cause to believe that a violation of the FECA has been committed or is about to be committed conciliation must be undertaken for a period of at least 30 days but not more than 90 days. If the Commission is unable to correct or prevent any violation of the FECA through conciliation the Office of General Counsel may recommend that the Commission file a civil suit against the respondent(s) to enforce the Federal Election Campaign Act (FECA). Thereafter, the Commission may, upon an affirmative vote of four (4) Commissioners, institute civil action for relief in the District Court of the United States.

See 2 U.S.C. § 437g, 11 C.F.R. Part 111.

November 1980

3504071007

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: \_\_\_\_\_

8 5 0 4 0 3 7 1 0 9 8

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
Roundtable Political Action	)	RAD Referral 85NF-108
Committee	)	
James S. Tisch, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 12, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-108:

1. Open a MUR.
2. Find reason to believe Roundtable Political Action Committee and James S. Tisch, 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 June 6, 1985.

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

Attest:

6-12-85

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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

6-7-85, 9:51  
6-7-85, 2:00

35040371299

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

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

85 JUN 7 A 9: 51

DATE AND TIME OF TRANSMITTAL BY  
OGC TO THE COMMISSION \_\_\_\_\_

RAD REFERRAL: 85NF-108  
STAFF MEMBER: Curry

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

**SENSITIVE**

RESPONDENTS' NAMES: Roundtable Political Action Committee and  
James S. Tisch, as treasurer

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

INTERNAL REPORTS CHECKED: Roundtable Political Action Committee  
by RAD

FEDERAL AGENCIES CHECKED: None

**GENERATION OF MATTER**

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

**SUMMARY OF ALLEGATIONS**

The Roundtable Political Action Committee (hereinafter  
"Roundtable PAC") and James S. Tisch, as treasurer, failed to  
file timely its 12 Day Pre-General Election Report in violation  
of 2 U.S.C. § 434(a)(4)(A)(ii). The report was due October 25,  
1984, covering the period October 1 through October 17, 1984. A  
30 Day Post General Election Report was filed on January 11, 1985  
disclosing activity from 10/1-11/26/84.

This report also disclosed contributions or  
expenditures on behalf of Federal candidates involved in the  
general election.

Roundtable PAC was sent a prior notice on October 1,  
1984, which specifically informed it of the requirement to file a  
12 Day Pre-General Election Report on October 25, 1984. A non-

00007200

filer notice was also sent to Roundtable PAC on December 28, 1984, due to its failure to file the 30 Day Post-General Election Report.

**FACTUAL BASIS AND LEGAL ANALYSIS**

2 U.S.C. § 434(a)(4)(A)(ii) requires an unauthorized committee to file, in an election year, a pre-election report. It is required that the report be filed no later than the 12th day before any election in which the committee makes a contribution or expenditure on behalf of a candidate in such election.

Roundtable PAC filed a 30 Day Post General Election Report, disclosing its activity from 10/1-11/26/84. Roundtable PAC's 30 Day Post-General Election Report indicates that a 12 Day Pre-General Election Report should have been filed. Roundtable PAC did not file the 12 Day Pre-General Election Report on the due date, October 25, 1984.

3604071001

**RECOMMENDATIONS**

The Office of General Counsel recommends that the

Commission:

1. Open a MUR;
2. Find reason to believe Roundtable Political Action Committee and James S. Tisch, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii); and
3. Approve and send the attached letter and factual and legal analysis.

Charles N. Steele  
General Counsel

Date

June 6, 1985

BY:

Kenneth A. Gross  
Kenneth A. Gross  
Associate General Counsel

**Attachments**

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

96040372002

3 6 0 4 0 3 / 2 0 0 3

COMMITTEE ID. NAME AND ADDRESS	NOTICES SENT/ CONTACTS WITH FILERS	REPORTS FILED/ RESPONSE(S)
..... 85NF-107  C00016683 PFIZER PAC TREASURER'S NAME: JOHN J MORRISON 235 EAST 42ND STREET NEW YORK NY 10017	None	Post-General Report (covering 10/1-11/30/84) filed 12/3/84
..... 85NF-108  C00143891 ROUNDTABLE POLITICAL ACTION COMMITTEE TREASURER'S NAME: JAMES S TISCH 666 FIFTH AVENUE NEW YORK NY 10103	Non-Filer Notice sent 12/28/84	Post-General Report (covering 10/1-11/26/84) filed 1/11/85
..... 85NF-109  C00108290 SCHERING - PLOUGH CORPORATION BETTER GOVERNMENT FUND TREASURER'S NAME: WILLIAM J. O'HARA 1 GIRALDA FARM * MADISON NJ 07940	Non-Filer Notice sent 12/28/84  Phone conversation on 1/3/85	Pre-General Report filed 1/10/85
..... 85NF-110  C00162214 THOMSON MCKINNON SECURITIES INC POLITICAL ACTION COMMITTEE (TMSI-PAC) TREASURER'S NAME: JOSEPH F MARINO ONE NEW YORK PLAZA NEW YORK NY 10004	None	Post-General Report (covering 10/1-12/6/84) filed 12/6/84
..... 85NF-111  C00113001 VFW POLITICAL ACTION COMMITTEE TREASURER'S NAME: RONALD A DUCHIN 200 MARYLAND AVENUE, NE SUITE 506 WASHINGTON DC 20002	None	Post-General Report (covering 10/1-11/18/84) filed 11/16/84

\* The Committee notified the Commission of an address change in a telephone conversation on 1/3/85; however, an amended Statement of Organization has not been filed.

W

4

85040372004

**ROUNDTABLE POLITICAL ACTION COMMITTEE**

(Attachments 20a - 20d)

**R 5 D 4 0 7 0 9 1 3 1 0 5**  
 FEDERAL ELECTION COMMISSION  
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE: 2/28/85  
 PAGE: 29

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILE COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
ROUNDTABLE POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: PLANK				NON-PARTY QUALIFIED		10 #C00143891
1983	MISCELLANEOUS REPORT			17OCT83 TO FEC	2	83FEC/285/0470
	APRIL QUARTERLY	1,025	6,181	1JAN83 -30MAR83	5	83FEC/210/2238
	JULY QUARTERLY	24,975	10,353	1JAN83 -30JUN83	11	83FEC/215/4814
	YEAR-END	101,782	49,888	1JUL83 -31DEC83	29	84FEC/273/3575
	YEAR-END - AMENDMENT	101,782	49,888	1JUL83 -31DEC83	5	84FEC/308/3075
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31DEC83	1	84FEC/306/3075
1984	APRIL QUARTERLY	18,750	38,996	1JAN84 -31MAR84	13	84FEC/311/2558
	APRIL QUARTERLY - AMENDMENT	18,750	38,996	1JAN84 -31MAR84	3	84FEC/321/1426
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31MAR84	2	84FEC/325/3357
	JULY QUARTERLY	11,125	25,153	1APR84 -30JUN84	10	84FEC/322/5458
	JULY QUARTERLY - AMENDMENT	11,125	25,153	1APR84 -30JUN84	5	84FEC/321/1421
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30JUN84	1	84FEC/325/3414
	OCTOBER QUARTERLY	26,815	34,007	1JUL84 -30SEP84	15	84FEC/340/0459
	POST-GENERAL	40,203	60,300	1OCT84 -26NOV84	27	85FEC/354/2803
	NOTICE OF FAILURE TO FILE			1OCT84 -26NOV84	1	84FEC/351/4184
	YEAR-END	16,750	12,710	27NOV84 -31DEC84	12	85FEC/364/2889
1985	MISCELLANEOUS NOTICE FROM FEC			25JAN85	2	85FEC/361/3692
	TOTAL	241,945	0 237,616	0	144	TOTAL PAGES

All Reports Reviewed  
 Ending Cash on Hand as of 12/31/84= \$29,299.60  
 Outstanding Debts as of 12/31/84= \$0

ATTACHMENT 20a

5

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).

35040372006

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

7  
0  
0  
7  
7  
0  
0  
4  
0  
4  
0  
0  
7

8



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

RQ-7

December 28, 1984

James S. Tisch, Treasurer  
Roundtable Political Action  
Committee  
666 Fifth Avenue  
New York, NY 10103

Identification Number: C00143871

Reference: 30 Day Post-General Report (10/1/84-11/26/84)

Dear Mr. Tisch:

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

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

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

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

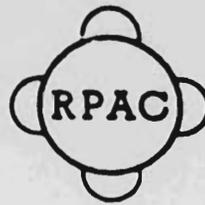
Sincerely,

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

84033374784

9

85 JAN 14 11:01



# ROUNDTABLE POLITICAL ACTION COMMITTEE

January 11, 1985

Re: 20 Day Post General Report. (10/1/84 - 11/26/84)  
ID # C05143891

Dear Mr. Raymond,

Enclosed is the FEC filing referenced above.

The filing is late because we have received notice that  
such filing was due. We are sorry for any inconvenience  
this may have caused you.

If you have any questions, please call me  
(212)  
at 551-6274

Sincerely,  
James J. Ferguson  
Executive Director  
RPAC

850333592863

**ATTACHMENT 20d**  
**Page 2 of 9**  
**REPORT OF RECEIPTS AND DISBURSES**  
**For a Political Committee Other Than an Authorized Committee**

10

05/11/84 11:01

(Summary Page)

ALIGN AREA

NAME

1 Name of Committee (In Full)  
**Randall Political Action Committee**

Address (Number and Street)  
**666 Fifth Avenue - 17<sup>th</sup> floor**

City, State and ZIP Code  
**NY, NY 10103**

Check here if address is different than previously reported

2 FEC Identification Number  
**C 00143891**

This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ Date \_\_\_\_\_

4 TYPE OF REPORT (Check appropriate base)

(a)  April 15 Quarterly Report  October 15 Quarterly Report  
 July 15 Quarterly Report  January 31 Year End Report  
 July 31 Mid Year Report (Non Election Year Only)  
 Monthly Report for \_\_\_\_\_  
 Twelfth day report (Election Year) \_\_\_\_\_  
 Thirtieth day report following the General Election on 11/6/84 in the State of NY  
 Termination Report \_\_\_\_\_  
 Is this Report an Amendment?  YES  NO

**SUMMARY**

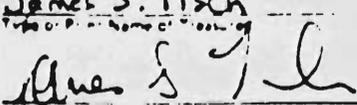
6 Covering Period 10/1/84 through 11/26/84

7 (a) Cash on hand January 1, 19 84  
 (b) Cash on Hand at Beginning of Reporting Period  
 (c) Total Receipts (from Line 1B)  
 (d) Subtotal (add Lines 8(b) and 8(c) for Column A and Lines 8(a) and 8(c) for Column B)  
 7 Total Disbursements (from Line 2B)  
 8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6:d)

Column A This Period	Column B Calendar Year-to-Date
\$ 86,803.05	
\$ 45,355.59	
\$ 40,203.75	\$ 96,919.75
\$ 85,559.34	\$ 183,716.80
\$ 60,300.07	\$ 158,457.53
\$ 25,259.27	\$ 25,259.27
\$	
\$ 2365	

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

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

**James S. Tisch**  
 Type or Print Name of Treasurer  
  
 SIGNATURE OF TREASURER  
 Date 11/11/85

For more information contact  
 Federal Election Commission  
 Washington, D.C. 20543

NOTE: Submit this report to the Federal Election Commission at the address shown on the back of this form.

11

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

Name of Committee (in Full)		Report Covering the Period	
Roundtable Political Action Committee		From 10/1/84	To 11/26/84
		COLUMN A Total This Period	COLUMN B Calendar Year To-Date
<b>I. RECEIPTS</b>			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	31,713.75	40,023.75	96,733.75
(b) Political Party Committees			
(c) Other Political Committees			
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))		40,023.75	96,733.75
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			
13. ALL LOANS RECEIVED			
14. LOAN REPAYMENTS RECEIVED			
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	180		180
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			
17. OTHER RECEIPTS (Dividends, Interest, etc.)			
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)		40,203.75	96,913.75
<b>II. DISBURSEMENTS</b>			
19. OPERATING EXPENDITURES		23,050.07	65,947.44
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		37,250.00	90,000.00
22. INDEPENDENT EXPENDITURES (Use Schedule E)			
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 6441 (d)) (Use Schedule F)			
24. LOAN REPAYMENTS MADE			
25. LOANS MADE			
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			1,000.00
(b) Political Party Committees			
(c) Other Political Committees			
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			1,000.00
27. OTHER DISBURSEMENTS			150.00
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		60,300.07	158,457.44
<b>III: NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)		40,023.75	96,733.75
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)		0	1,000.00
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)		40,023.75	95,733.75
32. TOTAL OPERATING EXPENDITURES from Line 19		23,050.07	65,947.44
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		180.00	180.00
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)		22,870.07	65,767.44

12

SCHEDULE B, ITEMIZED DISBURSEMENTS

Any information copied from such Reports and Statements may not be used or disclosed by any person for the purpose of soliciting contributions for any purpose, other than using the name and address of a donor to contact the committee to solicit contributions from such donor.

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<b>ROUNDTABLE POLITICAL ACTION COMMITTEE</b> Kostmayer for Congress c/o Robert A. Golder One Independence Plaza Room 4104 Philadelphia, Pa. 19106	Cong - Pa. Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify	10/11/84	2,000
Committee to Reelect Harry Reid c/o Arthur Marshall Marshall - Room 250 2100 Industrial Rd. Las Vegas, Nevada 89102	Cong - Nevada Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify	10/11/84	1,000.00
Edgar for Congress Committee 212 W. Front St. Media, Pa. 19063	Cong - Pa. Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify	10/11/84	250.00
Carrie Francke for Congress 201 E. Cherry, Suite A Columbia, Missouri	Cong - Missouri Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify	10/11/84	1000.00
Committee to Re-elect Clarence D. Long P.O. Box 6781 Towson, Maryland 21284	Cong - Maryland Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify	10/11/84	1500.00
Congressman Bruce A. Harrison Re-election Committee P.O. Box 303 New Haven, Conn. 06502	Cong - Conn. Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify	10/11/84	500.00
Jim Atmayer for Congress Committee 117 Edgington Lane Wheeling, W. Va. 26003	Cong - W. Va. Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify	10/11/84	1250.00
Harold Wolpe for Congress 246 E. Kilgore Kalamazoo, Michigan 49001	Cong - Michigan Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify	10/11/84	1000.00
Bill Cobey for Congress P.O. Box 1984 Apex, N.C. 27502	Cong - N.C. Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify	10/11/84	500.00

SUBTOTAL of Disbursements This Page (col one) 9000.00

TOTAL of Disbursements This Page (col one)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60  
61  
62  
63  
64  
65  
66  
67  
68  
69  
70  
71  
72  
73  
74  
75  
76  
77  
78  
79  
80  
81  
82  
83  
84  
85  
86  
87  
88  
89  
90  
91  
92  
93  
94  
95  
96  
97  
98  
99  
100

13

SCHEDULE B ITEMIZED DISBURSEMENTS

Information reported from such Reports and Statements may not be disclosed by any person for the purpose of soliciting contributions or gifts, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee in Full:

Roundtable Political Action Committee

2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60  
61  
62  
63  
64  
65  
66  
67  
68  
69  
70  
71  
72  
73  
74  
75  
76  
77  
78  
79  
80  
81  
82  
83  
84  
85  
86  
87  
88  
89  
90  
91  
92  
93  
94  
95  
96  
97  
98  
99  
100

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ed Feigler for Congress Committee 15401 Detroit Ave Lakewood, Ohio 44107	Cong - Ohio Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify	10/11/84	500.00
Committee to Re-elect Congressman Dan Mica P.O. Box 4 Boynton Beach, Florida 33425	Cong - Florida Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify	10/11/84	500.00
Friends of Keith Spear Committee 1539 9th Ave N.E. Rochester, Minnesota 55909	Cong - Minn Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify	10/11/84	500.00
Bill Schuette for Congress P.O. Draw 351 Midland, Michigan 48640	Cong - Michigan Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify	10/11/84	250.00
Dudley for Congress Committee P.O. Box 2601 Manchester, N.H. 03105	Cong - N.H. Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify	10/11/84	500.00
Friends of Dick Sasser P.O. Box 1254 Springfield, Va. 22151	Cong - Va Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify	10/11/84	250.00
William Ratchford for Congress Committee P.O. Box 334 Danbury, Conn 06810	Cong - Conn Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify	10/11/84	500.00
New Mexicans of Bill Richardson P.O. Box 518 Santa Fe, N. Mexico 87504	Cong - N. Mexico Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify	10/11/84	250.00
Larry Ann Willis for Cong. Committee Rt. 2 Box 2674 Tule, Oregon	Cong - Oregon Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify	10/11/84	500.00

SUBTOTAL of Disbursements This Page: 4250.00

TOTAL of Disbursements This Page: 4250.00

14

SCHEDULE B

ITEMIZED DISBURSEMENTS

Information reported from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions from such committees, other than as on the name and address of any political committee to solicit contributions from such committees.

Name of Committee (in Full)

Roundtable Political Action Committee

2. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Durbin for Congress Committee P.O. Box 1949 Springfield, Ill. 62705	Cong - Ill. Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> Other (specify)	10/11/04	500.00
Friends of Clay Shaw P.O. Box 11903 Fort Lauderdale, Florida 33329	Cong - Florida Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> Other (specify)	10/11/04	500.00
McNulty for Congress Committee P.O. Box 30508 Tucson, Arizona 85751	Cong - Arizona Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/1/04	250.00
John Mills for Congress 2404 Third Ave Seattle, Washington 98121	Cong - Washington Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/04	500.00
McIntyre for Congress Committee P.O. Box 1105 Evansville, Indiana 47706	Cong - Indiana Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/04	1000.00
Committee for Sam Gibbons 2701 Eddy Drive Tampa, Florida	Cong - Florida Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/04	500.00
Paul Sam for Senate 30 W. Washington Chicago, Illinois 60602	Cong - Senate - Ill. Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/04	1000.00
Friends of Hartin Committee 3213 Southwest 9th St Des Moines, Iowa 50315	Senate - Iowa Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/04	500.00
Friends of Max Baucus P.O. Box 8216 Helena, Montana 59624	Senate - Montana Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/04	500.00

7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20

TOTAL of Disbursements This Period: 5250.00  
TOTAL This Period: 5250.00

15

SCHEDULE B

ITEMIZED DISBURSEMENTS

LINE NUMBER 21  
(Use separate schedules for each category of the Data on Summary Page)

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

Name of Committee (in Full)  
**Roundtable Political Action Committee**

	A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	<b>Friends of Sen. Carl Levin c/o Robert W. Anthony, Treas. 32 Cambridge Pleasant Ridge Michigan 4769</b>	<b>Senate - Michigan</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>10/11/84</b>	<b>1000.00</b>
	<b>Friends of Jay Rockefeller P.O. Box 840 Charleston, W. Va 25323</b>	<b>Senate - W. Va.</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>10/11/84</b>	<b>1000.00</b>
7	<b>David Pryor for Senate Campaign Committee P.O. Box 3026 Alexandria, Va. 22302</b>	<b>Senate - Arkansas</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>10/11/84</b>	<b>500.00</b>
8	<b>David Pryor for Senate Campaign Committee P.O. Box 3026 Alexandria, Va. 22302</b>	<b>Senate - Arkansas</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>10/15/84</b>	<b>500.00</b>
9	<b>Eddie Harrison for U.S. Senate 7305 Babery Lane Norfolk, Va. 23505</b>	<b>Senate - Va.</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>10/15/84</b>	<b>250</b>
10	<b>Friends of Bob Carr P.O. Box 1552 E Lansing, Michigan 48823</b>	<b>Cong. Mich.</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>10/26/84</b>	<b>250.00</b>
11	<b>Texas for Mac Swiney 40 San Kene P.O. Box 9254 Coppell, Texas 75408</b>	<b>Cong - TX</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>10/26/84</b>	<b>500.00</b>
12	<b>Stu Linder for Congress PO Box 674 Jamestown, NY 14701</b>	<b>Cong - NY</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>10/29/84</b>	<b>500.00</b>
13	<b>Friends of M.H. McHugh PO Box 61 Ithaca, NY 14851</b>	<b>Cong - NY</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>10/29/84</b>	<b>500.00</b>

SUBTOTAL of Disbursements This Period: **5,000.00**

TOTAL This Period: **5,000.00**

16

SCHEDULE B

ITEMIZED DISBURSEMENTS

(Use separate schedule for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

Roundtable Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Judy Petty for Congress P.O. Box 55175 Helena, Montana Little Rock, Arkansas 72225	Cong. - Arkansas Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/1/84	\$ 250
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			250
TOTAL This Period (last page this line number only)			37,250.00

R 5 0 3 3 7 4 9 9 7

New York, N.Y. 10017

85033992889



**RETURN  
RECEIPT  
REQUESTED**

*Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20543*

*Attention: Anthony Raymond*

**CERTIFIED**  
P 693 843 553  
**MAIL**

ATTACHMENT 204  
page 9 of 9

17



Attachment 2  
FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

18

James S. Tisch, Treasurer  
Roundtable Political Action Committee  
666 Fifth Avenue  
New York, New York 10103

RE: MUR  
Roundtable Political Action  
Committee  
James S. Tisch, as treasurer

Dear Mr. Tisch:

On , 1985, the Federal Election Commission determined that there is reason to believe that Roundtable Political Action Committee 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, along with your answers to the enclosed questions, within ten days of your receipt of this letter.

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

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form

8  
1  
0  
7  
7  
0  
4  
0  
5  
0  
8

Letter to James S. Tisch, Treasurer  
Page 2

19

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 Deborah Curry, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

John Warren McGarry  
Chairman

Enclosures

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

35040372019

H. Hochment

30

20

**GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

MUR NO. \_\_\_\_\_

**RESPONDENTS:** Roundtable Political Action Committee and James S. Tisch, as treasurer

**SUMMARY OF ALLEGATIONS**

The Roundtable Political Action Committee (hereinafter "Roundtable PAC") and James S. Tisch, as treasurer, failed to file timely its 12 Day Pre-General Election Report in violation of 2 U.S.C. § 434(a)(4)(A)(ii). The report was due October 25, 1984, covering the period October 1 through October 17, 1984. A 30 Day Post General Election Report was filed on January 11, 1985 disclosing activity from 10/1-11/26/84.

This report also disclosed contributions or expenditures on behalf of Federal candidates involved in the general election.

Roundtable PAC was sent a prior notice on October 1, 1984, which specifically informed it of the requirement to file a 12 Day Pre-General Election Report on October 25, 1984. A non-filer notice was also sent to Roundtable PAC on December 28, 1984, due to its failure to file the 30 Day Post-General Election Report.

**FACTUAL BASIS AND LEGAL ANALYSIS**

2 U.S.C. § 434(a)(4)(A)(ii) requires an unauthorized committee to file, in an election year, a pre-election report. It is required that the report be filed no later than the 12th day before any election in which the committee makes a contribution or expenditure on behalf of a candidate in such election.

05040172920

21

Roundtable PAC filed a 30 Day Post General Election Report, disclosing its activity from 10/1-11/26/84. Roundtable PAC's 30 Day Post-General Election Report indicates that a 12 Day Pre-General Election Report should have been filed. Roundtable PAC did not file the 12 Day Pre-General Election Report on the due date, October 25, 1984.

860403/2021



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

James S. Tisch, Treasurer  
Roundtable Political Action Committee  
666 Fifth Avenue  
New York, New York 10103

RE: MUR  
Roundtable Political Action  
Committee  
James S. Tisch, as treasurer

Dear Mr. Tisch:

On , 1985, the Federal Election Commission determined that there is reason to believe that Roundtable Political Action Committee 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, along with your answers to the enclosed questions, within ten days of your receipt of this letter.

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

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form

05040572022

Letter to James S. Tisch, 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 Deborah Curry, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

John Warren McGarry  
Chairman

Enclosures

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

85040372023



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

James S. Tisch, Treasurer  
Roundtable Political Action Committee  
666 Fifth Avenue  
New York, New York 10103

RE: MUR  
Roundtable Political Action  
Committee  
James S. Tisch, as treasurer

Dear Mr. Tisch:

On , 1985, the Federal Election Commission determined that there is reason to believe that Roundtable Political Action Committee 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, along with your answers to the enclosed questions, within ten days of your receipt of this letter.

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

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form

25040572024

Letter to James S. Tisch, 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 Deborah Curry, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

John Warren McGarry  
Chairman

Enclosures

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

86040372025

**GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

MUR NO. \_\_\_\_\_

RESPONDENTS: Roundtable Political Action Committee and James S. Tisch, as treasurer

**SUMMARY OF ALLEGATIONS**

The Roundtable Political Action Committee (hereinafter "Roundtable PAC") and James S. Tisch, as treasurer, failed to file timely its 12 Day Pre-General Election Report in violation of 2 U.S.C. § 434(a)(4)(A)(ii). The report was due October 25, 1984, covering the period October 1 through October 17, 1984. A 30 Day Post General Election Report was filed on January 11, 1985 disclosing activity from 10/1-11/26/84.

This report also disclosed contributions or expenditures on behalf of Federal candidates involved in the general election.

Roundtable PAC was sent a prior notice on October 1, 1984, which specifically informed it of the requirement to file a 12 Day Pre-General Election Report on October 25, 1984. A non-filer notice was also sent to Roundtable PAC on December 28, 1984, due to its failure to file the 30 Day Post-General Election Report.

**FACTUAL BASIS AND LEGAL ANALYSIS**

2 U.S.C. § 434(a)(4)(A)(ii) requires an unauthorized committee to file, in an election year, a pre-election report. It is required that the report be filed no later than the 12th day before any election in which the committee makes a contribution or expenditure on behalf of a candidate in such election.

95040:72026

Roundtable PAC filed a 30 Day Post General Election Report, disclosing its activity from 10/1-11/26/84. Roundtable PAC's 30 Day Post-General Election Report indicates that a 12 Day Pre-General Election Report should have been filed. Roundtable PAC did not file the 12 Day Pre-General Election Report on the due date, October 25, 1984.

Since the pre-election report coverage dates (10/1-10/17) were included in the coverage dates of the 30 Day Post General Election Report and activity disclosed, it is recommended that the 30 Day Post General Election Report filing date be the date used to compute the late filing of Roundtable PAC's 12 Day Pre-General Election Report.

Therefore, the disclosure of activity for the pre-election time period was filed 78 days late by Roundtable PAC. It is difficult to attribute activity to the pre-election period since the coverage dates of the 30 Day Post General Election were 10/1-11/26/84. However, the activity attributable to the entire period covered by the 30 Day Post General Election Report was \$40,203.75 in receipts and \$60,300.07 in expenditures.

96040372027



FEDERAL ELECTION COMMISSION

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

86040:72028

THIS IS THE BEGINNING OF MUR # 2039

Date Filmed 3/26/86 Camera No. --- 2

Cameraman AS