



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF PNR # 2011

Date Filmed 1/23/86 Camera No. --- 2

Cameraman AS

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FEDERAL ELECTION COMMISSION

Routing Slip, Conciliation Matters

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

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

Signed

Charles [Signature]

Date

11/1/76

REC 9-21-77

NR # 2041

Sept 5, 1981

Date of Close-out Letters (Mailing Date)

CONTENT CHECK-OFF

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

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Charles W. Snyder

Preparer of the Summary File

Date 11/6/81

File Reviewed by [Signature] 1/86

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

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

(Revised 7/5/83)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 5, 1985

Robert W. Pyle, Treasurer
Political Action Committee of the
Independent Bakers Association
P.O. Box 3731
Washington, D.C. 20007

RE: MUR 2041

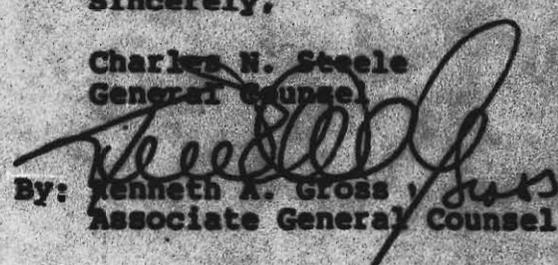
Dear Mr. Pyle:

On August 28, 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)(ii) and (iii), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

186040564156

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
The Political Action Committee)
of the Independent Bakers) MUR 2041
Association and Robert W. Pyle,)
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. Reason to believe has been found that The Political Action Committee of the Independent Bakers Association and Robert W. Pyle, as treasurer ("Respondents") violated 2 U.S.C. §§ 434(a)(4)(A)(ii) and (iii) by failing to file their pre-election and post election reports in a timely manner.

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation, prior to a finding a 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. Respondent The Political Action Committee of the Independent Bakers Association is a non-party political committee affiliated with the Independent Bakers Association, and Respondent Robert N. Pyle is the treasurer of that political committee.

2. Respondents were required by 2 U.S.C. § 434(a)(4)(ii) to file a pre-general election report by October 25, 1984. Respondents failed to file the information needed for the pre-general election report until January 10, 1985.

3. Respondents were required by 2 U.S.C. § 434(a)(4)(iii) to file a post-general election report by December 6, 1984. Respondent failed to file this report until January 10, 1985.

V. Respondents' failure to file their 1984 pre-general and post-general election reports in a timely manner constituted violations of 2 U.S.C. § 434(a)(4)(ii) and (iii).

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of One Hundred Fifty dollars (\$150), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

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

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

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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 W. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

September 5, 1985
Date

FOR THE RESPONDENT:


(Name) Robert W. Pyle
(Position) Treasurer, BakePAC

August 8, 1985
Date

86040564160



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert W. Pyle, Treasurer
Political Action Committee of the
Independent Bakers Association
P.O. Box 3731
Washington, D.C. 20007

RE: MUR 2041

Dear Mr. Pyle:

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)(ii) and (iii), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

Chf

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
The Political Action Committee) MUR 2041
of the Independent Bakers)
Association)
Robert W. Pyle, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 28, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 2041:

1. Accept the conciliation agreement submitted with the General Counsel's Report signed August 22, 1985.
2. Close the file.

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

Attest:

P-29-15

Date

Jody C. Ransom
for Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: Fri., 8-23-85, 5:26
Circulated on 48 hour tally basis: Mon., 8-26-85, 4:00
Deadline for votes: Wed., 8-28-85, 4:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
 FROM: Office of General Counsel *FMS*
 DATE: August 23, 1985
 SUBJECT: MUR 2041 - 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
 Sensitive
 Non-Sensitive
 24 Hour No Objection
 Sensitive
 Non-Sensitive
 Information
 Sensitive
 Non-Sensitive
 Other

DISTRIBUTION

Compliance
 Audit Matters
 Litigation
 Closed MUR Letters
 Status Sheets
 Advisory Opinions
 Other (see distribution
 below)

86040564163

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

In the Matter of)
)
The Political Action Committee)
of the Independent Bakers Association)
and Robert N. Pyle, as treasurer)

MAR 20 1985 AUG 23 P 5: 26

GENERAL COUNSEL'S REPORT

SENSITIVE

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Robert N. Pyle, treasurer of the Political Action Committee of the Independent Bakers Association. A check for the civil penalty has been received.

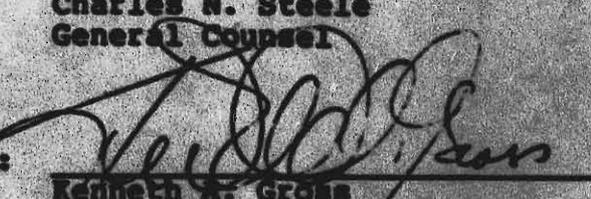
II. RECOMMENDATIONS

The Office of the General Counsel recommends the acceptance of this agreement and the closing of the file.

Charles N. Steele
General Counsel

August 22, 1985
Date

BY:


Kenneth A. Gross
Associate General Counsel

Attachments

- 1. Conciliation Agreement
- 2. Photocopy of civil penalty check
- 3. Proposed letter to Respondents

CS #1

86040564164

attachment 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
The Political Action Committee)	MUR 2041
of the Independent Bakers)	
Association and Robert N. Pyle,)	
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. Reason to believe has been found that The Political Action Committee of the Independent Bakers Association and Robert N. Pyle, as treasurer ("Respondents") violated 2 U.S.C. §§ 434(a)(4)(A)(ii) and (iii) by failing to file their pre-election and post election reports in a timely manner.

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation, prior to a finding a 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. Respondent The Political Action Committee of the Independent Bakers Association is a non-party political committee affiliated with the Independent Bakers Association, and Respondent Robert H. Pyle is the treasurer of that political committee.

2. Respondents were required by 2 U.S.C. § 434(a)(4)(ii) to file a pre-general election report by October 25, 1984. Respondents failed to file the information needed for the pre-general election report until January 10, 1985.

3. Respondents were required by 2 U.S.C. § 434(a)(4)(iii) to file a post-general election report by December 6, 1984. Respondent failed to file this report until January 10, 1985.

V. Respondents' failure to file their 1984 pre-general and post-general election reports in a timely manner constituted violations of 2 U.S.C. § 434(a)(4)(ii) and (iii).

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of One Hundred Fifty dollars (\$150), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

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

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

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BAKEPAC-POLITICAL ACTION COMMITTEE OF THE
INDEPENDENT BAKERS ASSOCIATION

494

Pay to the order of Treasurer of the United States

August 8 1985

us/30

One hundred fifty and no/xx-----

\$ 150.00

FOR MUR 2041

DOLLARS

AMERICAN SECURITY BANK, N.A.
MEMBER FDIC



⑆000494⑆ ⑆054000551⑆23-863 43 316⑆

attachment 3



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert M. Pyle, Treasurer
Political Action Committee of the
Independent Bakers Association
P.O. Box 3731
Washington, D.C. 20007

RE: MUR 2041

Dear Mr. Pyle:

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)(ii) and (iii), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

86040564170

GC# 8286

MEMORANDUM

TO: Retha Dixon

TO: JOAN HARRIS
Retha Dixon

FROM: JOAN HARRIS

FROM:

CHECK NO. 494 (a copy of which is attached) RELATING

TO MUR 2041 AND NAME BAKE PAC

WAS RECEIVED ON Aug. 12, 1985. PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

- BUDGET CLEARING ACCOUNT (\$9583875.16)
- CIVIL PENALTIES ACCOUNT (\$99-1099.160)

OTHER

SIGNATURE

Retha L. Dixon

DATE

8/13/85

86040564171

AKEPAC-POLITICAL ACTION COMMITTEE OF THE
INDEPENDENT BAKERS ASSOCIATION

494

15-21/90

August 8 1985

Pay TO THE ORDER OF Treasurer of the United States \$ *150.00*

One hundred fifty and no/xx----- DOLLARS

For MTR 2041
AMERICAN SECURITY BANK, N.A.
WISCONSIN AND DUNDAS ST AVENUE, S. W. WASHINGTON, D. C.

[Handwritten Signature]
[Handwritten Date: 8/8/85]

⑆000494⑆ ⑆054000551⑆23-863 43 316⑆



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert W. Pyle, Treasurer
Political Action Committee of the
Independent Bakers Association
P.O. Box 3731
Washington, D.C. 20007

RE: MDR 2041
BAKEPAC and Robert W.
Pyle, as treasurer

Dear Mr. Pyle:

On June 17, 1985, the Commission found reason to believe that the Political Action Committee of the Independent Bakers Association and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(ii) and (iii). 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 you agree 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 Charles Snyder, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

86040564173

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 2041
The Political Action Committee)	
of the Independent Bakers)	
Association)	
Robert N. Pyle, as treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 24, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 2041:

1. Enter into conciliation with the Political Action Committee of the Independent Bakers Association and Robert N. Pyle, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement submitted with the General Counsel's Report signed July 18, 1985.
3. Approve and send the letter attached to the General Counsel's Report signed July 18, 1985.

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

Attest:

7/25/85
Date

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

Received in Office of Commission Secretary:	7-22-85, 12:54
Circulated on 40 hour tally basis:	7-22-85, 4:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
 FROM: Office of General Counsel
 DATE: July 22, 1985
 SUBJECT: MUR 2041 - General Counsel's Report

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

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Sensitive	<input checked="" type="checkbox"/>	Audit Matters	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Litigation	<input type="checkbox"/>
24 Hour No Objection	<input type="checkbox"/>	Closed MUR Letters	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>	Status Sheets	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Advisory Opinions	<input type="checkbox"/>
Information	<input type="checkbox"/>	Other (see distribution below)	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>		
Non-Sensitive	<input type="checkbox"/>		
Other	<input type="checkbox"/>		
_____		_____	
_____		_____	
_____		_____	

86040564173

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

In the Matter of)
The Political Action Committee)
of the Independent Bakers Association)
and Robert N. Pyle, as treasurer)

MUR 205 JUL 22 P121 58

GENERAL COUNSEL'S REPORT

SENSITIVE

I. BACKGROUND AND LEGAL ANALYSIS

On June 17, 1985, the Commission voted to open a MUR in this case, which had been referred to the Office of the General Counsel by the Reports Analysis Division, and to find reason to believe that the Political Action Committee of the Independent Bakers Association, "(BAKEPAC)" and Robert N. Pyle, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(ii) and (iii). By a letter received at this Office on July 2, 1985, Respondents requested pre-probable cause conciliation.

Respondents failed to file the 1984 pre-general election report that was due on October 25, 1984. They did file a report, covering the time period pertinent to a pre-general election report, on January 10, 1985. Thus their report was 77 days late.

Respondents also failed to file the post-general election report, due on December 6, 1984, until January 10, 1985. That report was thus 35 days late.

The January 10 report disclosed receipts of \$3,001.50 and disbursements of \$5,850.00. Allocating all transactions to the appropriate reporting period, the total of receipts and disbursements would amount to \$5,675.75 for the pre-general

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election phase, and \$3,175.75 for the post-general election period.^{5/}

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

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^{5/} Respondents itemized \$400 of receipts for the pre-election period (October 1 - October 17) and \$600 for the post-election period (October 18 - November 26). They also itemized \$3,450 in disbursements for the former period, and \$750 for the latter. In addition, they reported non-itemized receipts of \$2,00 in the form of contributions, and \$1,650 for "other receipts." They also listed non-itemized disbursements of \$1,650 for "operating expenditures." For purposes of this General Counsel's Report, the non-itemized disbursements and receipts are allocated equally between the pre-general and post-general election periods.

III. RECOMMENDATIONS

1. Enter into conciliation with the Political Action Committee of the Independent Bakers Association and Robert W. Pyle, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement.
3. Approve and send the attached letter.

Charles H. Steele
General Counsel

July 18, 1965
Date

BY: 
Kenneth A. Gross
Associate General Counsel

Attachments

1. Proposed Conciliation Agreement
2. Letter to Respondents
3. Letter from Respondents

86040564178

attachment 2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert N. Pyle, Treasurer
Political Action Committee of the
Independent Bakers Association
P.O. Box 3731
Washington, D.C. 20007

RE: MUR 2041
BAKEPAC and Robert N.
Pyle, as treasurer

Dear Mr. Pyle:

On June 17, 1985, the Commission found reason to believe that the Political Action Committee of the Independent Bakers Association and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(ii) and (iii). 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 you agree 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 Charles Snyder, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

86040564179

BAKEPAC

POLITICAL ACTION COMMITTEE OF THE INDEPENDENT BAKERS ASSOCIATION

June 17, 1985

BAKEPAC
CHIEF EXECUTIVE OFFICER
DONALD BRYAN, JR.
VICE CHIEF EXECUTIVE OFFICER
LEONARD ANDROSS
TREASURER
ROBERT N. PYLE
GENERAL COUNSEL
LEONARD ANDROSS
LEONARD ANDROSS
LEONARD ANDROSS
LEONARD ANDROSS
LEONARD ANDROSS

BAKEPAC DEVELOPMENT
COMMITTEE
LEONARD ANDROSS
LEONARD ANDROSS
LEONARD ANDROSS
LEONARD ANDROSS
LEONARD ANDROSS

BAKEPAC SOLICITATIONS
COMMITTEE
LEONARD ANDROSS
LEONARD ANDROSS

Mr. Charles Snyder
General Counsel's Office
Federal Election Commission
1325 K St. NW
Washington DC 20463

Dear Mr. Snyder:

In response to the Commission's charge that BakePAC violated 22 U.S.C. 434 (a) (4) (ii) and (iii), I request that pre-probable cause conciliation be started as quickly as possible.

Ms. Nida Emmons, who handled BakePAC's FEC accounts in past years, moved to Hong Kong last fall. Her replacement, Sandra Hurlbert, now with the American Chemical Society, had difficulty in becoming familiar with the Commission's codes in time to make the filing deadline.

We hope the review committee will strongly consider the factor of personnel change in its investigation and will decide to waive all penalties.

Respectfully,

Robert N. Pyle
Treasurer

RNP/slp

RECEIVED
GENERAL COUNSEL
15 JUL 2 1985
FEDERAL ELECTION COMMISSION

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AKEPAC

BOX 3731

WASHINGTON, D.C. 20007

8604056418

Mr. Charles Snyder
General Counsel's Office
Federal Election Commission
1325 K St. NW
Washington DC 20463



85 JUL 2 AM 11:34

RECEIVED AT THE
6-17-85

BAKEPAC

POLITICAL ACTION COMMITTEE OF THE INDEPENDENT BAKERS ASSOCIATION

BAKEPAC

GEORGE BROWN, CHAIRMAN
CHUCK BELAND, VICE CHAIRMAN
ROBERT N. PYLE, TREASURER
BENJAMIN JACOBSON
LEWIS GUY
JOHN FRYERMAN
DONALD SMITH, SR.

June 17, 1985

AUG 20 11

**BAKEPAC DETERMINATION
COMMITTEE**

JACK LEWIS, JR., CHAIRMAN
CHUCK MEYER, VICE CHAIRMAN
HORST G. DEIN
GEORGE ROSENTHAL

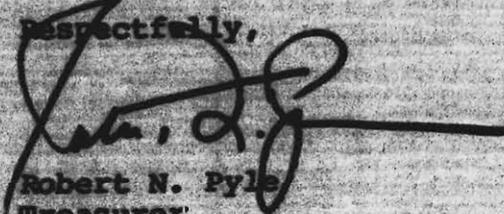
Mr. Charles Snyder
General Counsel's Office
Federal Election Commission
1325 K St. NW
Washington DC 20463

Dear Mr. Snyder:

In response to the Commission's charge that BakePAC violated 22 U.S.C. 434 (a) (4) (ii) and (iii), I request that pre-probable cause conciliation be started as quickly as possible.

Ms. Nida Emmons, who handled BakePAC's FEC accounts in past years, moved to Hong Kong last fall. Her replacement, Sandra Hurlbert, now with the American Chemical Society, had difficulty in becoming familiar with the Commission's codes in time to make the filing deadline.

We hope the review committee will strongly consider the factor of personnel change in its investigation and will decide to waive all penalties.

Respectfully,

Robert N. Pyle
Treasurer

RNP/slp

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
35 JUL 2 1985
12:41

86040564182



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 20, 1985

Robert N. Pyle, treasurer
BAKEPAC - The Political Action Committee
of the Independent Bakers Association
P.O. Box 3731
Washington, D.C. 20007

RE: MUR 2041
BAKEPAC and Robert N. Pyle,
as treasurer

Dear Mr. Pyle:

On June 17, 1985, the Federal Election Commission determined that there is reason to believe The Political Action Committee of the Independent Bakers Association ("BAKEPAC") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(ii) and (iii), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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

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

86040564183

Letter to Robert W. Pyle, treasurer
Page 2

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

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

86040564184

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 2041
STAFF MEMBER: Snyder
TEL. NO. (202) 523-4000

RESPONDENTS: The Political Action Committee of the Independent Bakers Association and Robert W. Pyle, as treasurer

SUMMARY OF ALLEGATIONS

The Reports Analysis Division referred the above-captioned matter to the Office of the General Counsel on the grounds that The Political Action Committee of the Independent Bakers Association ("BAKEPAC") and Robert W. Pyle, as treasurer, failed to file their 30 day post-general election report in a timely manner in 1984.

It appears that BAKEPAC did not file its 30 day post-general election report, which was due on December 6, 1984, until January 10, 1985, in violation of 2 U.S.C. § 434(a)(4)(iii). In addition, BAKEPAC failed to file a 12 day pre-general election report, in violation of 2 U.S.C. § 434(a)(4)(ii).

FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act ("the Act") requires that political committees, such as BAKEPAC, that file quarterly reports with the Commission, shall file, in a year in which a regularly scheduled general election is held,

a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election.....

86040564185

2 U.S.C. § 434(a)(4)(A)(ii). Since Respondents' belatedly filed post-general election report revealed numerous contributions to federal candidates, it appears that they have also violated the Act by failing to file a pre-election report.²

In conclusion, a review of Respondents' reports indicates that they violated the Act by failing to file a pre-election report and by filing their post-general election report 35 days late.

² Respondents' post-general election report included the information that should have gone into the pre-election report. Consequently, the pre-election report may be considered to have been filed 77 days late.

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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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15. 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 1920

86040564188

STATEMENT OF DESIGNATION OF COUNSEL

MIR _____

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: _____

86040564189

28



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert M. Pyle, treasurer
BAKEPAC - The Political Action Committee
of the Independent Bakers Association
P.O. Box 3731
Washington, D.C. 20007

RE: MUR
BAKEPAC and Robert M. Pyle,
as treasurer

Dear Mr. Pyle:

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

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

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

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

86040564190

Letter to Robert N. Pyle, treasurer
Page 2

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

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

ewj

86040564191

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.
STAFF MEMBER: Snyder
TEL. NO. (202) 523-4000

RESPONDENTS: The Political Action Committee of the Independent Bakers Association and Robert W. Pyle, as treasurer

SUMMARY OF ALLEGATIONS

The Reports Analysis Division referred the above-captioned matter to the Office of the General Counsel on the grounds that The Political Action Committee of the Independent Bakers Association ("BAKEPAC") and Robert W. Pyle, as treasurer, failed to file their 30 day post-general election report in a timely manner in 1984.

It appears that BAKEPAC did not file its 30 day post-general election report, which was due on December 6, 1984, until January 10, 1985, in violation of 2 U.S.C. § 434(a)(4)(iii). In addition, BAKEPAC failed to file a 12 day pre-general election report, in violation of 2 U.S.C. § 434(a)(4)(ii).

FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act ("the Act") requires that political committees, such as BAKEPAC, that file quarterly reports with the Commission, shall file, in a year in which a regularly scheduled general election is held,

a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election.....

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2 U.S.C. § 434(a)(4)(A)(ii). Since Respondents' belatedly filed post-general election report revealed numerous contributions to federal candidates, it appears that they have also violated the Act by failing to file a pre-election report.^{2/}

In conclusion, a review of Respondents' reports indicates that they violated the Act by failing to file a pre-election report and by filing their post-general election report 35 days late.

^{2/} Respondents' post-general election report included the information that should have gone into the pre-election report. Consequently, the pre-election report may be considered to have been filed 77 days late.

86040564193



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
 FROM: Office of General Counsel *CT*
 DATE: June 13, 1985
 SUBJECT: RAD 85NF-94: 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
 Sensitive
 Non-Sensitive
 24 Hour No Objection
 Sensitive
 Non-Sensitive
 Information
 Sensitive
 Non-Sensitive
 Other

DISTRIBUTION

Compliance
 Audit Matters
 Litigation
 Closed MUR Letters
 Status Sheets
 Advisory Opinions
 Other (see distribution
 below)

86040564194

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The Political Action Committee)
of the Independent Bakers) BAD 85NF-94
Association and)
Robert N. Pyle, treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 17, 1985, the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

1. Open a MUR.
2. Find reason to believe that the Political Action Committee of the Independent Bakers Association and Robert N. Pyle, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).
3. Find reason to believe that the Political Action Committee of the Independent Bakers Association and Robert N. Pyle, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii).
4. Approve and send the letters and General Counsel's Legal and Factual Analysis attached to the General Counsel's report dated June 12, 1985.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision.

Attest:



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

86040564195

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 13 AIO: 26

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION 6/13/85 RAD REFERRAL # 85HF-94
STAFF MEMBER: Snyder

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENTS' NAMES: The Political Action Committee of the Independent Bakers Association and Robert N. Pyle, treasurer

SENSITIVE

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

INTERNAL REPORTS CHECKED: None

FEDERAL REPORTS CHECKED: None

GENERATION OF THE MATTER

The Reports Analysis Division referred the above-captioned matter to the Office of the General Counsel on the grounds that The Political Action Committee of the Independent Bakers Association ("BAKEPAC") and Robert N. Pyle, as treasurer, failed to file their 30 day post-general election report in a timely manner in 1984.

SUMMARY OF ALLEGATIONS

It appears that BAKEPAC did not file its 30 day post-general election report, which was due on December 6, 1984, until January 10, 1985, in violation of 2 U.S.C. § 434(a)(4)(iii). In addition, BAKEPAC failed to file a 12 day pre-general election report, in violation of 2 U.S.C. § 434(a)(4)(ii).

FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act ("the Act") requires that political committees, such as BAKEPAC, that file quarterly reports

86040564196

with the Commission, shall file, in a year in which a regularly scheduled general election is held,

a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election.....

2 U.S.C. § 434(a)(4)(A)(iii). Since Respondents filed their post-general election report 35 days late, there is reason to believe they have violated the provision of the Act just cited.

In addition, the Act also requires that political committees, given the circumstances discussed above, file

a pre-election report, which shall be filed no later than the 12th day before... any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election, and which shall be complete as of the 20th day before the election.....

2 U.S.C. § 434(a)(4)(A)(ii). Since Respondents' belatedly filed post-general election report revealed numerous contributions to federal candidates, it appears that they have also violated the Act by failing to file a pre-election report.*

In conclusion, a review of Respondents' reports indicates that they violated the Act by failing to file a pre-election report and by filing their post-general election report 35 days late.

* Respondents' post-general election report included the information that should have gone into the pre-election report. Consequently, the pre-election report may be considered to have been filed 77 days late.

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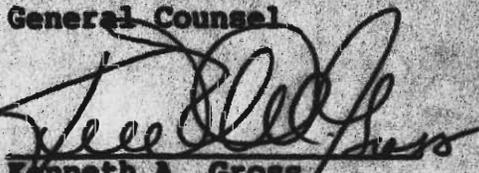
RECOMMENDATIONS

1. Open a NUR.
2. Find reason to believe that the Political Action Committee of the Independent Bakers Association and Robert N. Pyle, as treasurer, violated 2 U.S.C. § 434(a) (4) (A) (ii);
3. Find reason to believe that the Political Action Committee of the Independent Bakers Association and Robert N. Pyle, as treasurer, violated 2 U.S.C. § 434(a) (4) (A) (iii);
4. Approve and send the attached letters and General Counsel's Legal and Factual Analysis.

Charles N. Steele
General Counsel

June 12, 1985
Date

By:


Kenneth A. Gross
Associate General Counsel

Attachments

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

86040564198

Attachment 1



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert N. Pyle, treasurer
BAKEPAC - The Political Action Committee
of the Independent Bakers Association
P.O. Box 3731
Washington, D.C. 20007

RE: MUR
BAKEPAC and Robert N. Pyle,
as treasurer

Dear Mr. Pyle:

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

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

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

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

86040564199

Letter to Robert M. Pyle, treasurer
Page 2

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

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

86040564200

attachment 2

SSNF-23 THROUGH SSNF-111



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

10 May 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: QUARTERLY FILERS (UNAUTHORIZED COMMITTEES) WHICH FAILED
TO SUBMIT TIMELY 1984 12 DAY PRE-GENERAL REPORTS

The attached list of unauthorized committees consists of twenty-three (23) quarterly filers, which failed to submit a 12 Day Pre-General Report by Election Day, November 6, 1984. According to the RAD Review and Referral Procedures for Unauthorized Committees (Standard 3), further examination is required by your office.

Unlike the mandatory reporting requirement placed upon monthly filers, 2 U.S.C. §434(a)(4)(A)(ii) requires quarterly filers to submit 12 Day Pre-General Reports only if the committees make contributions to or expenditures on behalf of Federal candidates involved in the general election.

The Party/Non-Party Branch conducted a thorough examination to identify quarterly filers disclosing contributions or expenditures between October 1 and October 17, 1984. The research revealed committees that submitted either:

- a) 12 Day Pre-General Reports in a untimely manner, or
- b) 30 Day Post-General Reports indicating that 12 Day Pre-General Reports should have been filed.

All unauthorized committees were sent prior notification concerning the pre- and post-general filing requirements on October 1, 1984. In addition, twelve (12) of the committees being referred were sent Non-Filer Notices on December 28, 1984 for failure to file the 30 Day Post-General Report covering October 1 through November 26, 1984.

86040564201

For your information, the pertinent supporting documentation on each committee has been arranged in alphabetical order. If you have any questions, please contact Michael Filler at 523-8048.

Attachments

86040564202

COMMITTEE ID, NAME AND ADDRESS	NOTICES SENT/ CONTACTS WITH FILERS	REPORTS FILED/ RESPONSE(S)
<hr/>		
85NP-89 C00132751 4TH DISTRICT DEMOCRATIC PARTY TREASURER'S NAME: DONNIE BENNER BOX 259/RT2 02 BERRIEN SPRINGS MI 49103	Non-Filer Notice sent 12/28/84	Pre-General Report filed 1/4/85
<hr/>		
85NP-90 C00176867 ADA CAMPAIGN COMMITTEE TREASURER'S NAME: LEON SKULL 1411 K STREET, N.W., SUITE 850 WASHINGTON DC 20005	None	Pre-General Report filed 11/8/84
<hr/>		
85NP-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
<hr/>		
85NP-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
<hr/>		
85NP-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
<hr/>		
85NP-94 C00099754 BAKEPAC - THE POLITICAL ACTION COMMITTEE OF THE INDEPENDENT BAKERS TREASURER'S NAME: ROBERT N. PVLE 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.

86040564204

**BAKEPAC - THE POLITICAL ACTION COMMITTEE OF THE
INDEPENDENT BAKERS ASSOCIATION**

(Attachments 6a - 6d)

8 6 0 4 0 5 6 4 2 0 5

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

DATE 03/20/85
PAGE 7

NON-PARTY RELATED

COMMITTEE	DISCLOSURE	RECEIPTS	DISBURSEMENTS	TYPE OF FILES COVERAGE DATES	# OF PAGES	FILE NUMBER
BAKEPAC - THE POLITICAL ACTION COMMITTEE OF THE INDEPENDENT BAKERS ASSOCIATION CONNECTED ORGANIZATION: BAKERS ASSOCIATION INDEPENDENT						
				NON-PARTY QUALIFIED		IS #C0007754
1983	MID-YEAR REPORT YEAR-END	20,000 11,700	11,530 0,301	1JAN83 - 30JUN83	11	63FEC/218/2015
1984	APRIL QUARTERLY APRIL QUARTERLY - AMENDMENT I JULY QUARTERLY JULY QUARTERLY - AMENDMENT I REQUEST FOR ADDITIONAL INFORMATION REQUEST FOR ADDITIONAL INFORMATION AND OCTOBER QUARTERLY OCTOBER QUARTERLY - AMENDMENT I OCTOBER QUARTERLY - AMENDMENT I REQUEST FOR ADDITIONAL INFORMATION REQUEST FOR ADDITIONAL INFORMATION AND POST-GENERAL NOTICE OF FAILURE TO FILE YEAR-END	11,570 13,070 15,000 13,900 0,532 0,532 0,532 3,001 100	12,227 14,000 11,300 12,500 17,595 17,595 19,020 5,000 1,005	1JAN84 - 31MAY84 1JAN84 - 31MAY84 1JAN84 - 31MAY84 1JAN84 - 31JUN84 1APR84 - 30JUN84 1APR84 - 30JUN84 1APR84 - 30JUN84 1JUL84 - 30SEP84 1JUL84 - 30SEP84 1JUL84 - 30SEP84 1OCT84 - 30NOV84 1OCT84 - 30NOV84 27NOV84 - 31OCT84	4 14 14 4 1 2 4 6 10 1 1 0 1 3	84FEC/310/4000 84FEC/310/4000 84FEC/310/4000 84FEC/310/4000 84FEC/310/4000 84FEC/310/4000 84FEC/310/4000 84FEC/310/4000 84FEC/310/4000 84FEC/310/4000 84FEC/310/4000 84FEC/310/4000 84FEC/310/4000 84FEC/310/4000
	TOTAL	60,000	0 11,607	0	93	TOTAL PAGES

All Reports Reviewed
Ending Cash on Hand as of 12/31/84= \$66.92
Outstanding Debts as of 12/31/84= \$0



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541

October 1, 1984

**GENERAL ELECTION FILING NOTICE
FOR UNAUTHORIZED COMMITTEES**

WHO MUST FILE THE PRE-GENERAL ELECTION REPORT

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

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

WHAT MUST BE REPORTED

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

WHEN TO FILE

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

* * * * *

WHO MUST FILE THE POST-GENERAL ELECTION REPORT

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

WHAT MUST BE REPORTED

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

WHEN TO FILE

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

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

86040564206

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

86040564207



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

EG-7

December 30, 1984

Robert H. Pyle, Treasurer
BAKEPAC - The Political Action
Committee of the Independent
Bakers Association
P.O. Box 3731
Washington, DC 20007

Identification Number: C00099754

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

Dear Mr. Pyle:

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

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DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 278)

Name of Committee on Page 1 NAIATAC (Independent Artists Association)	Reporting Period		
	From 10/1/84	To 11/26/84	
	SCHEDULE A For the Period	SCHEDULE B From Year To Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
11a. Individuals/Persons Other Than Political Committees	\$ 3,000.00	\$ 3,000.00	11a
(Include Every Individual \$ 2,000.00)			
11b. Political Party Committees	0	0	11b
11c. Other Political Committees	0	0	11c
11d. TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)	0	0	11d
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	0	0	12
13. ALL LOANS RECEIVED	0	0	13
14. LOAN REPAYMENTS RECEIVED	0	0	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Retain, etc.)	0	0	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0	16
17. OTHER RECEIPTS (Interest, Rental, etc.)	\$ 1.50	743.41	17
18. TOTAL RECEIPTS (add 11d, 12, 13, 14, 15, 16 and 17)	\$ 3,001.50	743.41	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	1,650.00	2,877.41	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	0	0	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	\$ 4,211.50	49,188.61	21
22. INDEPENDENT EXPENDITURES (see Schedule E)	0	0	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 6407 a-8 - Use Schedule F)	0	0	23
24. LOAN REPAYMENTS MADE	0	0	24
25. LOANS MADE	0	0	25
26. REFUNDS OF CONTRIBUTIONS TO:			
26a. Individuals/Persons Other Than Political Committees	0	0	26a
26b. Political Party Committees	0	0	26b
26c. Other Political Committees	0	0	26c
26d. TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)	0	0	26d
27. OTHER DISBURSEMENTS	0	0	27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26.d and 27)	\$ 5,911.50	52,066.02	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d	3,000.00	35,188.01	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26.d	0	0	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	3,000.00	35,188.01	31
32. TOTAL OPERATING EXPENDITURES from Line 19	1,650.00	2,877.41	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	0	0	33

Page 1 of 2
 Line Number
 Use separate sheets for each category of the Data-rc Summary Page

SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information obtained from such returns and statements may not be sold or used by any person for the purpose of making contributions or for commercial purposes, other than using the name and address of any individual mentioned to solicit contributions from such individual

Name of Recipient (or Full)

BakePAC (Independent Bakers Association)

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month day, year)	Amount of Each Disbursement This Period
Friends of Hill Gross 302 E Street, N.E. Washington, D.C. 20002	campaign contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/1	250.00
Louisa for U.S. Senate Comm. 404 C St., N.E. Washington, D.C. 20002	campaign contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/2	250.00
Lujan Booster Club P.O. Box 2153 Albuquerque, N.M. 87102	campaign contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/2	100.00
Byron for Congress Committee P.O. Box 1188 Frederick, MD 21701	campaign contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/7	100.00
People for Dioguardi 50 Barnard St. Scarsdale, N.Y. 10583	campaign contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/7	250.00
Weldon for Congress Comm. P.O. Box 1984 Media, PA 16003	campaign contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/7	250.00
Row and for Congress Committee 147 N. Main St. Waterbury, CT 06700	campaign contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/15	250.00
Swindall for Congress PO Box 467519 Atlanta, GA 30346	campaign contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/15	500.00
Reese for Senate 150 High St. Morcantown, WI 26505	campaign contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/15	250.00

SUBTOTAL of Disbursements This Page (sections 1-11) 2,000.00

TOTAL This Period (all disbursements) 4,300.00

attachment 3

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.
STAFF MEMBER: Snyder
TEL. NO. (202) 523-4000

RESPONDENTS: The Political Action Committee of the Independent Bakers Association and Robert N. Pyle, as treasurer

SUMMARY OF ALLEGATIONS

The Reports Analysis Division referred the above-captioned matter to the Office of the General Counsel on the grounds that The Political Action Committee of the Independent Bakers Association ("BAKEPAC") and Robert N. Pyle, as treasurer, failed to file their 30 day post-general election report in a timely manner in 1984.

It appears that BAKEPAC did not file its 30 day post-general election report, which was due on December 6, 1984, until January 10, 1985, in violation of 2 U.S.C. § 434(a)(4)(iii). In addition, BAKEPAC failed to file a 12 day pre-general election report, in violation of 2 U.S.C. § 434(a)(4)(ii).

FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act ("the Act") requires that political committees, such as BAKEPAC, that file quarterly reports with the Commission, shall file, in a year in which a regularly scheduled general election is held,

a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election.....

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2 U.S.C. § 434(a)(4)(A)(ii). Since Respondents' belatedly filed post-general election report revealed numerous contributions to federal candidates, it appears that they have also violated the Act by failing to file a pre-election report.

In conclusion, a review of Respondents' reports indicates that they violated the Act by failing to file a pre-election report and by filing their post-general election report 35 days late.

Respondents' post-general election report included the information that should have gone into the pre-election report. Consequently, the pre-election report may be considered to have been filed 77 days late.

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF FUR # 2041

Date Filmed 4/23/86 Camera No. — 2

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