



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2053

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

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FEDERAL ELECTION COMMISSION

routing slips, internal documents, internal
conciliation agreements, request for
conciliation discussion of civil penalty

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 1-24-85

FEC 9-21-77

36040372030



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2053

86040372031



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 2, 1985

James H. Conley, Treasurer
United Association Local 725
Pipefitters-Air Conditioners PAC
13185 NW 45th Avenue
Miami, Florida 33054

Re: MUR 2053
United Association Local 725
Pipefitters-Air Conditioners
PAC
James H. Conley, Treasurer

Dear Mr. Conley:

On September 25, 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

9604072032

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2053
United Association Local 725)
Pipefitters-Air Conditioners)
Political Action Committee)
James H. Conley, treasurer)

CONCILIATION AGREEMENT

36040072035
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 United Association Local 725 Pipefitters-Air Conditioners Political Action Committee and James Conley, as treasurer, "Local 725" 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

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

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

1. Respondent Local 725 is a political committee within the meaning of 2 U.S.C. § 431(4).

2. James Conley is the treasurer of Local 725 .

3. Section 434(a)(4)(A)(ii) of Title 2, United States Code, requires, in a calender 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 15, 1984. Respondent filed the 1984 30 Day Post General Election Report, disclosing activity for the 12 Day Pre-General period, on January 25, 1985. Therefore, the 12 Day Pre-General Report was filed 92 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. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of Two Hundred Twenty-Five Dollars (\$225), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue

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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. 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*
Kenneth A. Gross
Associate General Counsel

October 1, 1985
Date

FOR THE RESPONDENTS:

James Conley
James Conley
Treasurer, United Association
Local 725 Pipefitters Air-Conditioners
Political Action Committee

9-3-85
Date

26040372035

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
United Association Local 725)	MUR 2053
Pipefitters-Air Conditioners)	
PAC)	
James H. Conley, as Treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 25, 1985, the Commission decided by a vote of 4-0 to take the following actions in MUR 2053:

1. Accept the conciliation agreement attached to the General Counsel's Report signed September 19, 1985.
2. Close the file.
3. Approve the letter to the Respondents attached to the General Counsel's Report signed September 19, 1985.

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

Attest:

9-25-85
Date

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

Received in Office of Commission Secretary:	Fri.,	9-20-85,	4:44
Circulated on 48 hour tally basis:	Mon.,	9-23-85,	11:00
Deadline for vote:	Wed.,	9-25-85,	11:00

050405 / 2036

ATTACHMENT 2 of 3

UNITED ASSOCIATION 725 PIPEFITTERS AIR
CONDITIONING POLITICAL ACTION COMMITTEE
MIAMI, FL 33054

No 739

8-20-1985

63-132/670

PAY TO THE
ORDER OF

Treasurer of the United States

\$ 225 ⁰⁰/₁₀₀

Two hundred twenty-five ⁷⁰/₁₀₀

DOLLARS

CENTRAL BANK OF NORTH DADE
MIAMI, FLORIDA

FOR MUR 2053

James H. Conley
James H. Conley

⑈000739⑈ ⑆067001327⑆ ⑈0302110047⑈

EFITTERS LOCAL

NO. 725—AFL-CIO

CONDITIONING • HEATING • REFRIGERATION

1101 W. 4TH AVENUE, MIAMI, FLORIDA 33054

RECEIVED AT THE FEC

85 SEP 6 P 2: 12



Federal Election Commission
Washington, D.C. 20463

T: Craig Engle



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

James H. Conley, Treasurer
United Association Local 725
Pipefitters-Air Conditioners PAC
13185 NW 45th Avenue
Miami, Florida 33054

Re: MUR 2053
United Association Local 725
Pipefitters-Air Conditioners
PAC
James H. Conley, Treasurer

Dear Mr. Conley:

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

85040372039



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

James H. Conley, Treasurer
United Association Local 725
Pipefitters-Air Conditioners PAC
13185 NW 45th Avenue
Miami, Florida 33054

Re: MUR 2053
United Association Local 725
Pipefitters-Air Conditioners
PAC
James H. Conley, Treasurer

Dear Mr. Conley:

On September 25, 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

9604072040

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARY

In the Matter of)
)
United Association Local 725)
Pipefitters-Air Conditioners)
PAC)
James H. Conley, as Treasurer)

85 SEP 20 P 4: 44

MUR 2053

SENSITIVE

GENERAL COUNSEL'S REPORT

BACKGROUND

Attached is a conciliation agreement which has been signed by James Conley, as treasurer of the Pipefitters-Air Conditioners Political Action Committee.

The attached agreement contains no changes from that originally proposed by the Commission. A check for the civil penalty of Two Hundred Twenty-Five Dollars (\$225.00) has been received.

RECOMMENDATIONS

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

The Office of General Counsel recommends the approval of the attached letter to the Respondents.

Charles N. Steele
General Counsel

September 19, 1955
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

- Conciliation Agreement
- Civil Penalty Check
- Letter to Respondents

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 15, 1985

James H. Conley, Treasurer
United Association Local 725
Pipefitters-Air Conditioners Political Action Committee
13185 NW 45th Avenue
Miami, Florida 33054

RE: MUR 2053

Dear Mr. Conley:

On June 26, 1985, the Commission found reason to believe that United Association Local 725 Pipefitters Air-Conditioners PAC violated 2 U.S.C. § 434(a)(4)(A)(ii). At your request, the Commission determined on August 7, 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.

Please note 30 day time period in this matter expires on September 16, 1985. 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

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

Enclosures

35040:72042

5 AUG 26 10:24
P 3:19
RECEIVED AT THE FEC



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

James H. Conley, Treasurer
United Association Local 725
Pipefitters-Air Conditioners Political Action Committee
13185 NW 45th Avenue
Miami, Florida 33054

RE: MUR 2053

Dear Mr. Conley:

On June 26, 1985, the Commission found reason to believe that United Association Local 725 Pipefitters Air-Conditioners PAC violated 2 U.S.C. § 434(a)(4)(A)(ii). 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. Please note 30 day time period in this matter expires on _____, 1985. 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

ACQ

By: Kenneth A. Gross
Associate General Counsel

Enclosures

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

James H. Conley, Treasurer
United Association Local 725
Pipefitters Air Conditioning
Political Action Committee
13185 NW 45th Ave.
Opa Locka, FL 33054

RE: MUR

Dear Mr. Conley:

On , 1985, the Federal Election Commission determined that there is reason to believe United Association Local 725 Pipefitters Air Conditioning 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 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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on

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probable cause have been mailed to the respondent will not be entertained.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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.

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 Andrea C. Quinn, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

John Warren McGarry
Chairman

ALQ

Enclosures

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

86040372045

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 2053
United Association Local 725)	
Pipefitters-Air Conditioners)	
Political Action Committee)	
)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 7, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 2053:

1. Enter into conciliation negotiations with United Association Local 725 Pipefitters-Air Conditioners Political Action Committee and James Conley, 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 August 1, 1985.

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

Attest:

8-7-85
Date

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

Received in Office of Commission Secretary:	8-2-85, 5:03
Circulated on 48 hour tally basis:	8-5-85, 11:00

36040372045



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 15, 1985

James H. Conley, Treasurer
United Association Local 725
Pipefitters-Air Conditioners Political Action Committee
13185 NW 45th Avenue
Miami, Florida 33054

RE: MUR 2053

Dear Mr. Conley:

On June 26, 1985, the Commission found reason to believe that United Association Local 725 Pipefitters Air-Conditioners PAC violated 2 U.S.C. § 434(a)(4)(A)(ii). At your request, the Commission determined on August 7, 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. Please note 30 day time period in this matter expires on September 16, 1985. 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

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

Enclosures

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GCC #8479

SEP 6 1985 P 3: 46

RECEIVED
GENERAL COUNSEL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 11, 1985

James H. Conley, Treasurer
United Association Local 725
Pipefitters Air Conditioning
Political Action Committee
13185 NW 45th Ave.
Opa Locka, FL 33054

RE: MUR 2053

Dear Mr. Conley:

On July 1, 1985, the Federal Election Commission determined that there is reason to believe United Association Local 725 Pipefitters Air Conditioning 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 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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on

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probable cause have been mailed to the respondent will not be entertained.

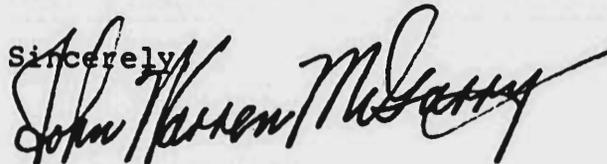
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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.

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 Andrea C. Quinn, the staff member 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

26040372049

BEFORE THE FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 2053
STAFF MEMBER(s) & Tel. No.
Andrea C. Quinn
(202) 523-4000

RESPONDENTS: United Association Local 725 Pipefitters
 Air Conditioning Political Action Committee
 James H. Conley, Treasurer

SUMMARY OF ALLEGATIONS

3504072050
The United Association Local 725 Pipefitters Air Conditioning Political Action Committee ("Local 725") failed to file the 1984 12 Day Pre-General Report of Receipts and Disbursements by Election Day, November 6, 1984.

Local 725 was notified on October 1, 1984 that a 12 Day Pre-General Report was due on October 25, 1984 if contributions and expenditures, which had not previously been reported, were made in connection with the general election during the period ending October 17, 1984.

On December 28, 1984, a Non-Filer Notice was sent to Local 725 for failure to file the 1984 30 Day Post-General Report covering October 1, 1984 through November 26, 1984. On January 25, 1985, the Commission received a report from Local 725 marked as a Year End Report, which disclosed activity covering the period from October 1, 1984 through December 31, 1984. The report also disclosed three (3) contributions to Federal candidates totalling \$2,600 during the October 1 through October 17, 1984 period, which indicated that a 12 Day Pre-General Report should have been filed.

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), all political committees other than authorized committees of a candidate are required to file a pre-election report, which shall be filed no later than the 12th day before an election in which the committee makes a contribution or expenditure on behalf of a candidate in such election and which shall be complete as of the 20th day before such election.

Local 725 was required to file its 1984 12 Day Pre-General Report on October 25, 1984. The Committee filed Year-End Report, which itemized financial activity through the period covered by the 12 Day Pre-General Report, on January 25, 1985. The Committee's failure to comply with the reporting requirement in a timely manner is a violation of 2 U.S.C. § 434(a)(4)(A)(ii). Thus, the Commission finds reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A)(ii).

96040572051

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) RAD Referral 85NF-121
United Association Local 725)
Pipefitters Air Conditioning)
Political Action Committee)
James H. Conley, Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 1, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-121:

1. Open a MUR.
2. Find reason to believe that United Association Local 725 Pipefitters Air Conditioning Political Action Committee and James H. Conley, as Treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).
3. Approve the letter and Factual and Legal Analysis attached to the First General Counsel's Report signed June 26, 1985.

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

Attest:

7-1-85

Date

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

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

6-27-85, 11:17
6-27-85, 4:00

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

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

05 JUN 27 AM : 17

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL BY
OGC TO THE COMMISSION _____

RAD REFERRAL: 85NF-121
STAFF MEMBER:
Andrea C. Quinn

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

SENSITIVE

RESPONDENTS' NAMES: United Association Local 725 Pipefitters
Air Conditioning Political Action
Committee
James H. Conley, Treasurer

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

INTERNAL REPORTS

CHECKED: FEC disclosure documents

FEDERAL AGENCIES

CHECKED: N/A

GENERATION OF MATTER

United Association Local 725 Pipefitters Air Conditioning Political Action Committee ("Local 725") was referred to the Office of General Counsel by the Reports Analysis Division for failing to file its 1984 12 Day Pre-General Election Report of Receipts and Disbursements.

SUMMARY OF ALLEGATIONS

The United Association Local 725 Pipefitters Air Conditioning Political Action Committee ("Local 725") failed to file the 1984 12 Day Pre-General Report of Receipts and Disbursements by Election Day, November 6, 1984.

Local 725 was notified on October 1, 1984 that a 12 Day Pre-General Report was due on October 25, 1984 if contributions and expenditures, which had not previously been reported, were made

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in connection with the general election during the period ending October 17, 1984.

On December 28, 1984, a Non-Filer Notice was sent to Local 725 for failure to file the 1984 30 Day Post-General Report covering October 1, 1984 through November 26, 1984. On January 25, 1985, the Commission received a report from Local 725 marked as a Year End Report, which disclosed activity covering the period from October 1, 1984 through December 31, 1984. The report also disclosed three (3) contributions to Federal candidates totalling \$2,600 during the October 1 through October 17, 1984 period, which indicated that a 12 Day Pre-General Report should have been filed.

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), all political committees other than authorized committee of a candidate are required to file a pre-election report, which shall be filed no later than the 12th day before an election in which the committee makes a contribution or expenditure on behalf of a candidate in such election and which shall be complete as of the 20th day before such election.

Local 725 was required to file its 1984 12 Day Pre-General Report on October 25, 1984. The Committee filed a Year-End Report, which itemized financial activity through the period covered by the 12 Day Pre-General Report, on January 25, 1985. The Committee's failure to comply with the reporting requirement in a timely manner is a violation of 2 U.S.C. § 434(a)(4)(A)(ii).

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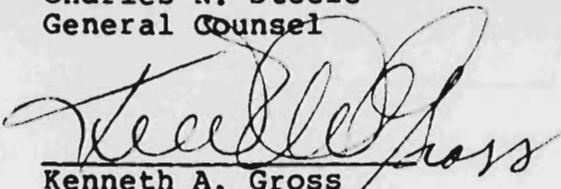
Thus, it is the recommendation of the Office of General Counsel that the Commission find reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A)(ii)

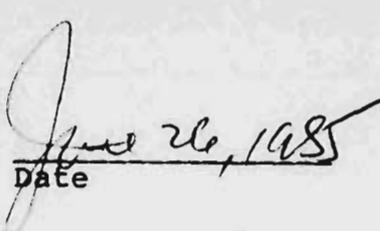
RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that United Association Local 725 Pipefitters Air Conditioning Political Action Committee and James H. Conley, as Treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).
3. Approve the attached letter and factual and legal analysis.

Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel


Date

Attachments

1. Referral
2. Letter and Factual and Legal Analysis

36040772055

REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: 5 June 1985

ANALYST: Doris M. Gardner

I. COMMITTEE: United Association Local 725 Pipefitters
Air Conditioning Political Action
Committee (C00160507)
James H. Conley, Treasurer
13185 NW 45th Avenue
Opa Locka, FL 33054

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(ii)
11 CFR 104.5(c)(1)(ii)

III. BACKGROUND:

Failure to Timely File the 1984 12 Day Pre-General Report

The United Association Local 725 Pipefitters Air Conditioning Political Action Committee ("Local 725") failed to file the 1984 12 Day Pre-General Report of Receipts and Disbursements by Election Day, November 6, 1984.

Local 725 was notified on October 1, 1984 that a 12 Day Pre-General Report was due on October 25, 1984 if contributions and expenditures, which had not previously been reported, were made in connection with the general election during the period ending October 17, 1984 (Attachment 2).

On December 28, 1984, a Non-Filer Notice was sent to Local 725 for failure to file the 1984 30 Day Post-General Report covering October 1, 1984 through November 26, 1984 (Attachment 3). On January 25, 1985, the Commission received a report from Local 725 marked as a Year End Report, which disclosed activity covering the period from October 1, 1984 through December 31, 1984. The report also disclosed three (3) contributions to Federal candidates totalling \$2,600 during the October 1 through October 17, 1984 period, which indicated that a 12 Day Pre-General Report should have been filed (Attachment 4).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

3 6 0 4 0 3 7 2 0 5 6

8 6 0 4 0 3 7 2 0 5 7

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

DATE 30MAY85
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
UNITED ASSOCIATION LOCAL 725 PIPEFITTERS AIR CONDITIONING POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: PLUMBING & PIPEFITTING INDUSTRY				NON-PARTY QUALIFIED		ID #C00160507
1983	MID-YEAR REPORT	40,283	8,590	1JAN83 -30JUN83	10	83FEC/277/2399
	1 ST LETTER INFORMATIONAL NOTICE			1JAN83 -30JUN83	1	84FEC/307/0832
	YEAR-END	33,603	17,251	1JUL83 -31DEC83	12	84FEC/291/1994
	1 ST LETTER INFORMATIONAL NOTICE			1JUL83 -31DEC83	1	84FEC/306/4947
1984	APRIL QUARTERLY	14,068	7,139	1JAN84 -31MAR84	11	84FEC/308/397
	APRIL QUARTERLY - AMENDMENT	14,068	7,409	1JAN84 -31MAR84	4	84FEC/336/0183
	1 ST LETTER INFORMATIONAL NOTICE			1JAN84 -31MAR84	1	84FEC/328/4215
	JULY QUARTERLY	15,867	6,830	1APR84 -30JUN84	8	84FEC/320/2752
	JULY QUARTERLY - AMENDMENT	15,867	6,830	1APR84 -30JUN84	3	84FEC/336/0187
	OCTOBER QUARTERLY	11,780	57,649	1JUL84 -30SEP84	19	84FEC/338/0123
	NOTICE OF FAILURE TO FILE			1OCT84 -26NOV84	1	84FEC/357/4976
	YEAR-END	10,865	18,996	1OCT84 -31DEC84	11	85FEC/361/2712
	TOTAL	126,466	0 116,725	0	82	TOTAL PAGES

Debts owed to the Committee as of 12/31/84: \$0
 Debts owed by the Committee as of 12/31/84: \$0
 Cash on hand as of 12/31/84: \$22,617.00
 All reports have been reviewed.

Attachment 1
 Page 1 of 1
 # 103



1 p 4

October 1, 1984

**GENERAL ELECTION FILING NOTICE
FOR UNAUTHORIZED COMMITTEES**

WHO MUST FILE THE PRE-GENERAL ELECTION REPORT

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

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

WHAT MUST BE REPORTED

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

WHEN TO FILE

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

* * * * *

WHO MUST FILE THE POST-GENERAL ELECTION REPORT

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

WHAT MUST BE REPORTED

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

WHEN TO FILE

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

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

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WHERE AND HOW TO FILE
Committees should consult the instructions on the enclosed FEC form 3X, for details.

QUARTERLY FILERS

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

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

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

MONTHLY FILERS

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

COMPLIANCE

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

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

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#1 p6



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

EQ-7

December 28, 1984

James M. Conley, Treasurer
United Association Local 725 Pipefitters
Air Conditioning Political Action
Committee
13185 NW 45th Avenue
Opa Locka, FL 33054

Identification Number: C00160507

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

Dear Mr. Conley:

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

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

84033774976

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

Attachment 4
Page 1 of 3

(Summary Page)

Article 1, Section 4

1 Name of Committee (in Full)
**United Association Local Union 725
Pipefitters Air Conditioning
Political Action Committee**

Address (Number and Street)

13185 Nw 45th Ave.

City, State and ZIP Code

Opalocka, Florida 33054

Check here if address is different than previously reported

2 FEC Identification Number:
C00160507

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

4 TYPE OF REPORT (Check appropriate boxes)

- (a) April 15 Quarterly Report October 15 Quarterly Report
 July 15 Quarterly Report January 15 Year-End Report
 July 31 Mid-Year Report (Non-Election Year Only)
 Monthly Report for _____ (Type the election on _____ in the State of _____)
 Twelfth day report preceding _____ (Type the election on _____ in the State of _____)
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?

YES NO

SUMMARY

5 Covering Period **October 1, 1984 through December 31, 1984**

6 (a) Cash on Hand January 1, 1984

COLUMN A
This Period

COLUMN B
Calendar Year to Date

\$ 60922.30

(b) Cash on Hand at beginning of Reporting Period

\$ 30748.03

Total Receipts from Line 18

\$ 10865.44 \$ 52581.33

Total Disbursements (add Lines 6(a) and 6(b) for Column A and Lines 6(a) and 6(b) for Column B)

\$ 41613.47 \$ 113503.63

Total Disbursements from Line 28

\$ 18996.33 \$ 90886.49

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

\$ 22617.14 \$ 22617.14

9 Debts and Obligations Owed TO the Committee (itemize on Schedule C or Schedule D)

\$

10 Debts and Obligations Owed BY the Committee (itemize on Schedule C or Schedule D)

\$

I hereby declare that I have prepared this Report and to the best of my knowledge and belief the contents are true and correct.

For further information contact:

James H. Conley

SIGNATURE OF TREASURER

Date **January 23, 1985**

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

United Association Local Union 725 Pipefitters Air Conditioning Political Action Committee C00160507		From 10/1/84	To 12/31/84	
		COLUMN A Total This Period	COLUMN B Calendar Year To Date	
I RECEIPTS				
11 CONTRIBUTIONS (other than loans) FROM				
(a) Individuals/Persons Other Than Political Committees		10015.75	48459.72	11(a)
(Memo Entry Unitemized \$ _____)				
(b) Political Party Committees				11(b)
(c) Other Political Committees				11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))		10015.75	48459.72	11(d)
12 TRANSFERS FROM AFFILIATED OTHER PARTY COMMITTEES				12
13 ALL LOANS RECEIVED				13
14 LOAN REPAYMENTS RECEIVED				14
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			425.67	15
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		600.00	850.00	16
17 OTHER RECEIPTS (Dividends, Interest, etc.)		249.69	2645.94	17
18 TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)		10865.44	52581.33	18
II DISBURSEMENTS				
19 OPERATING EXPENDITURES		891.84	4258.97	19
20 TRANSFERS TO AFFILIATED OTHER PARTY COMMITTEES				20
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	D.G.	4600.00	15810.00	21
22 INDEPENDENT EXPENDITURES (Use Schedule E)				22
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (U.S.C. § 441 and 10 Use Schedule F)				23
24 LOAN REPAYMENTS MADE				24
25 LOANS MADE				25
26 REFUNDS OF CONTRIBUTIONS TO				
(a) Individuals/Persons Other Than Political Committees				26(a)
(b) Political Party Committees				26(b)
(c) Other Political Committees				26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))				26(d)
27 OTHER DISBURSEMENTS		13504.49	70617.50	27
28 TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		18996.33	90886.49	28
III NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES				
29 TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)				29
30 TOTAL CONTRIBUTION REFUNDS from Line 26(d)				30
31 NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)				31
32 TOTAL OPERATING EXPENDITURES from Line 19		891.84	4258.97	32
33 OFFSETS TO OPERATING EXPENDITURES from Line 15			425.67	33
34 NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)		891.84	4833.30	34

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 3 #198
 LINE NUMBER 21
 (Use appropriate schedule(s) for each category of the Detailed Summary Page)

Attachment 4 Page 3 Of 3

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) **United Association Local Union 725 Pipefitters Air Conditioning Political Action Committee C00160507**

96040372063
95033512718

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Claude Pepper 2121 N. Bayshore Dr. #419 Miami, Fl. 33137	US Congress District 18	10/9/84	1000.00
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/23/84	1000.00
Larry Smith 3511 N. 52nd Ave. Hollywood, Fl. 33021	US Congress District 16	10/9/84	600.00
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
Bill Humphrey	US Congress District 15	10/9/84	1000.00
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
1984 Democratic Victory Fund	Donation	10/2/84	1000.00
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional) _____

TOTAL This Period (last page this line number only) **4600.00**

Attachment #2 p1



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

James H. Conley, Treasurer
United Association Local 725
Pipefitters Air Conditioning
Political Action Committee
13185 NW 45th Ave.
Opa Locka, FL 33054

RE: MUR

Dear Mr. Conley:

On _____, 1985, the Federal Election Commission determined that there is reason to believe United Association Local 725 Pipefitters Air Conditioning 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 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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on

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#2 p2

Letter to James H. Conley, Treasurer
Page 2

probable cause have been mailed to the respondent will not be entertained.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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.

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 Andrea C. Quinn, the staff member 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

26040172065

BEFORE THE FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. _____
STAFF MEMBER(s) & Tel. No.
Andrea C. Quinn
(202) 523-4000

RESPONDENTS: United Association Local 725 Pipefitters
Air Conditioning Political Action Committee
James H. Conley, Treasurer

SUMMARY OF ALLEGATIONS

The United Association Local 725 Pipefitters Air Conditioning Political Action Committee ("Local 725") failed to file the 1984 12 Day Pre-General Report of Receipts and Disbursements by Election Day, November 6, 1984.

Local 725 was notified on October 1, 1984 that a 12 Day Pre-General Report was due on October 25, 1984 if contributions and expenditures, which had not previously been reported, were made in connection with the general election during the period ending October 17, 1984.

On December 28, 1984, a Non-Filer Notice was sent to Local 725 for failure to file the 1984 30 Day Post-General Report covering October 1, 1984 through November 26, 1984. On January 25, 1985, the Commission received a report from Local 725 marked as a Year End Report, which disclosed activity covering the period from October 1, 1984 through December 31, 1984. The report also disclosed three (3) contributions to Federal candidates totalling \$2,600 during the October 1 through October 17, 1984 period, which indicated that a 12 Day Pre-General Report should have been filed.

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#2 p4

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), all political committees other than authorized committees of a candidate are required to file a pre-election report, which shall be filed no later than the 12th day before an election in which the committee makes a contribution or expenditure on behalf of a candidate in such election and which shall be complete as of the 20th day before such election.

Local 725 was required to file its 1984 12 Day Pre-General Report on October 25, 1984. The Committee filed Year-End Report, which itemized financial activity through the period covered by the 12 Day Pre-General Report, on January 25, 1985. The Committee's failure to comply with the reporting requirement in a timely manner is a violation of 2 U.S.C. § 434(a)(4)(A)(ii). Thus, the Commission finds reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A)(ii).

25040173057



FEDERAL ELECTION COMMISSION

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

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THIS IS THE BEGINNING OF MUR # 2053

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

Cameraman AS