



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF TAP # 2067

Date Filmed 2/8/86 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

- Routing Slips
- Conculation
- Index and File Tabs

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 type="checkbox"/>            | (5) Internal Documents                                    |                          |  |

Signed Michelle D. Brown  
 date 1/29/86



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

December 2, 1985

**Ellen Sue Devaney**  
Treasurer  
National Organization for Women  
Political Action Committee  
1401 New York Avenue, N.W.  
Suite 800  
Washington, D.C. 20005-2102

**RE: MUR 2067**  
National Organization for  
Women Political Action  
Committee  
Ellen Sue Devaney, as  
treasurer

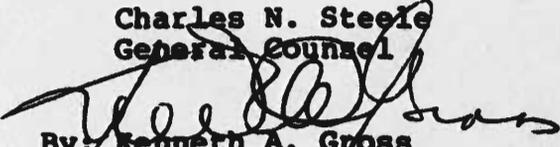
Dear Ms. Devaney:

On November 20, 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)(B), 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

86040564450

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
National Organization for Women ) MUR 2067  
Political Action Committee )  
Ellen Sue Devaney, as treasurer )

**CONCILIATION AGREEMENT**

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that National Organization for Women Political Action Committee and Ellen Sue Devaney, as treasurer, (hereinafter "the Respondents") violated 2 U.S.C. § 434(a).

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

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

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

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

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

1. National Organization for Women Political Action Committee (NOW/PAC) is a political committee registered with the Commission.

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2. Ellen Sue Devaney is the treasurer of NOW/PAC.

3. The Respondents were required to file the 1985 February Monthly Report by March 20, 1985. The report was filed on April 19, 1985, 30 days late.

V. Respondents violated 2 U.S.C. § 434(a) by failing to file timely the 1985 February Monthly Report.

VI. Respondents 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).

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 the same and the Commission has approved the entire agreement.

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

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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

Dec. 2, 1985  
Date

NOV 6  
AIO: 27  
GENERAL COUNSEL

FOR THE RESPONDENTS:

*Ellen Sue Dwaney*  
Treasurer

10-31-85  
Date

36040564453

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2067
National Organization for Women	)	
Political Action Committee	)	
Ellen Sue Devaney, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 20, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 2067:

1. Accept the conciliation agreement attached to the General Counsel's Report signed November 14, 1985.
2. Close the file.

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

Attest:

11-20-85

Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:	Fri.,	11-15-85,	12:17
Circulated on 48 hour tally basis:	MON.,	11-18-85,	11:00
Deadline for vote:	Wed.,	11-20-85,	11:00

36040564454

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2067
National Organization for Women	)	
Political Action Committee	)	
Ellen Sue Devaney, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 20, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 2067:

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2. Close the file.

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

Attest:

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Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:	Fri.,	11-15-85,	12:17
Circulated on 48 hour tally basis:	MON.,	11-18-85,	11:00
Deadline for vote:	Wed.,	11-20-85,	11:00

36040564455

NOW/PAC  
NATIONAL ORGANIZATION FOR WOMEN  
POLITICAL ACTION COMMITTEE  
P. O. BOX 317  
WASHINGTON, D. C. 20044

MUR2067

A

879

C

15-52  
540

October 31,

19 85

PAY One Hundred Fifty and 00/100 DOLLARS \$150.00

Treasurer of the United States

*Ellen Sue Dwaney*  
*Ellen Sue Dwaney*

⑆000879⑆ ⑈056000633⑈

REC-8873

MEMORANDUM

TO: RETHA DIXON TO: JOAN HARRIS  
FROM: JOAN HARRIS FROM: RETHA DIXON

CHECK NO. 879 (a copy of which is attached) RELATING

TO MUR 2067 AND NAME NOW/PAC national organization for women

WAS RECEIVED ON 11-6-85 PAC, Ellen Sue Dwaney, Treasurer PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

- /  BUDGET CLEARING ACCOUNT (\$95F3875.76)
- / / CIVIL PENALTIES ACCOUNT (\$95-1099.160)
- / / OTHER \_\_\_\_\_

SIGNATURE Robyn M. Bishop DATE 11-6-85

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
National Organization for Women	)	MUR 2067
Political Action Committee	)	
Ellen Sue Devaney, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 21, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 2067:

1. Enter into conciliation agreement with the National Organization for Women Political Action Committee prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter attached to the General Counsel's Report signed October 16, 1985.

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

Attest:

10-21-85  
Date

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

Received in Office of Commission Secretary:	Thurs.,	10-17-85,	9:59
Circulated on 48 hour tally basis:	Thurs.,	10-17-85,	4:00
Deadline for vote:	Mon.,	10-21-85,	4:00

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 25, 1985

Ellen Sue Devaney  
Treasurer  
National Organization for Women Political  
Action Committee  
1401 New York Avenue, N.W.  
Suite 800  
Washington, D.C. 20005-2102

RE: MUR 2067  
National Organization for  
Women Political Action  
Committee  
Ellen Sue Devaney, as  
treasurer

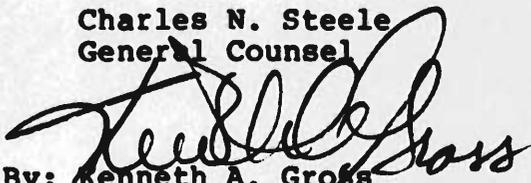
Dear Ms. Devaney:

On July 29, 1985, the Commission found reason to believe that National Organization for Women Political Action Committee violated 2 U.S.C. § 434(a)(4)(B). At your request, the Commission determined on October 21, 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 Michele Brown, the staff member assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosure

3 6 0 4 0 5 6 4 4 5 8



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Ellen Sue Devaney  
Treasurer  
National Organization for Women Political  
Action Committee  
1401 New York Avenue, N.W.  
Suite 800  
Washington, D.C. 20005-2102

RE: MUR 2067  
National Organization for  
Women Political Action  
Committee  
Ellen Sue Devaney, as  
treasurer

Dear Ms. Devaney:

On July 29, 1985, the Commission found reason to believe that National Organization for Women Political Action Committee violated 2 U.S.C. § 434(a)(4)(B). At your request, the Commission determined on October 21, 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.

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Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

mb 10/23  
Enclosure

36040564459



**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 )  
National Organization for Women )  
Political Action Committee )  
Ellen Sue Devaney, as treasurer )

MUR 2067

05 OCT 17 9:59

RECEIVED  
OFFICE OF THE  
COMMISSIONER  
FEDERAL ELECTION  
COMMISSION

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On July 29, 1985, the Commission determined that there is reason to believe the National Organization for Women Political Action Committee (NOW/PAC) and Ellen Sue Devaney, as treasurer,\*/ violated 2 U.S.C. § 434(a)(4)(B) by failing to file the 1985 February Monthly Report in a timely manner. By letter dated October 2, 1985, Ellen Sue Devaney requested to settle this matter prior to a finding of probable cause to believe (Attachment 1).

**II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY**

\*/ The Commission found reason to believe against NOW/PAC and Alice Chapman, as treasurer. Since that time, Ellen Sue Devaney has been elected treasurer of NOW/PAC.

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**III. GENERAL COUNSEL'S RECOMMENDATIONS**

1. Enter into conciliation with the National Organization for Women Political Action Committee prior to a finding of probable cause to believe.

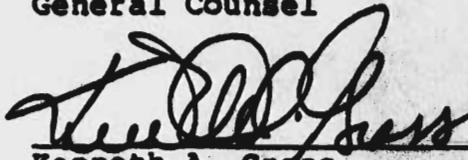
2. Approve the attached proposed conciliation agreement and letter.

Charles N. Steele  
General Counsel

October 16, 1985

Date

BY:



Kenneth A. Gross  
Associate General Counsel

**Attachments**

1. Letter from Ellen Sue Devaney, treasurer, NOW/PAC
2. Proposed agreement and letter

36040564462

GCH 8673



# National Organization for Women, Inc.

1401 New York Avenue, N.W., Suite 800 • Washington, D.C. 20005-2102 • (202) 347-2279

October 2, 1985

85 OCT 3 11:33  
RECEIVED  
OFFICE OF THE SEC  
COMMISSIONER SEITZMAN

Mr. John Warren McGarry  
Chairman  
FEC/General Counsel  
Washington, D.C. 20463

Dear Mr. McGarry:

RE: MUR2067

In response to your letter of September 19, 1985 and in reviewing Ms. Chapman's correspondence with the FEC, enclosed please find copies of correspondence from this office and the FEC, a written request for <sup>probable</sup> cause reconciliation and a copy of Mr. Filler's letter granting permission to file semi-annual PAC reports.

In reviewing Ms. Chapman's files, I found a letter sent to Ms. Lisa Stolaruk dated January 21, 1985 requesting permission to file semi-annual reports. Unfortunately, according to Ms. Stolaruk, the letter was never received.

In April, Ms. Stolaruk sent a letter to Ms. Chapman indicating that the above mentioned request had not been received and that several reports were late. At that time, Ms. Chapman filed reports for January, February and March and sent a letter informing the FEC that the reports had been filed and again requesting permission to file semi-annually. It is not clear to me why ~~only~~ the February report is in question; it is obvious that if the February report was late, the January report was also late.

In May, Ms. Chapman received a letter from Mr. Michael B. Filler, Chief, Party/Non-Party Branch, Reports Analysis Division, granting the NOW/PAC permission to file semi-annually. The arrival of Mr. Filler's letter led Ms. Chapman to believe that the entire matter of late reports and semi-annual filing had been settled.

As newly elected treasurer of NOW, I would like to request pre-probable cause reconciliation in order to finalize any pending claims against this organization.

I look forward to hearing from you in the near future.

Cordially,

*Ellen Sue Devaney*

Ellen Sue Devaney  
Treasurer

85 OCT 4 11:11  
RECEIVED  
OFFICE OF THE SEC  
GENERAL COUNSEL

36040564463

ESD/dm  
Enclosures

CC: Lisa Stolaruk

January 21, 1985

Lisa Stolaruk  
Federal Elections Commission  
Washington, D.C. 20463

Identification Number C00092247

Dear Ms. Stolaruk:

In 1984 the NOM/PAC was required to file  
monthly reports with your commission.

Since there will be very little or no  
activity in 1985, I am requesting that we  
be given permission to file on June 30th  
and on Dec. 31st.

Yours truly,

Alice J. Chapman  
Treasurer

AJC/dm

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GENERAL COUNCIL  
15 AUG 13 P 2:32



**National Organization for Women, Inc.**

1401 New York Avenue, N.W., Suite 600 • Washington, D.C. 20004-2102 • (202) 462-2279

Aug 13 55

15 AUG 13 1955 P 2: 32

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

Joyce Cullinan  
J.E.C.  
Washington DC 20463

Dear Ms. Cullinan

Attached is a copy of the letter  
which we discussed on the phone  
yesterday.

This letter was typed on Jan 21  
and delivered by mail sometime in  
that week. I was unaware that it  
had not been received by Lisa Stolaruk  
until I received her letter in April  
I sincerely hope this copy will  
clarify my actions

Sincerely,  
Alice [Signature]  
Treasurer NWOPC

86040569504098



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MSF

MAY 3 1985

Alice Chapman, Treasurer  
NOW/PAC (National Organization for  
Women Political Action Committee)  
1401 New York Avenue, NW, Suite 800  
Washington, DC 20005

Identification Number: C00092247

Reference: Change To Semi-Annual Filer

Dear Ms. Chapman:

The Commission has received your notification to change to a Semi-Annual filer of receipts and disbursements. Please be advised that under Section 104.5(c) of the Commission regulations, a committee may change its filing frequency no more than once per calendar year. A reporting schedule is provided below for the remainder of the 1985 calendar year.

Report Type	Coverage Dates	Reports Due For Filing
Mid-Year Report	4/1/85-6/30/85	July 31, 1985
Year End Report	7/1/85-12/31/85	January 31, 1986

If the Commission can be of further assistance to you in this matter, please do not hesitate to write or call (202) 523-4048. Our toll free number is (800) 424-9530.

Sincerely,

Michael B. Filler  
Chief, Party/Non-Party Branch  
Reports Analysis Division

36040564460

National Organization for Women  
Political Action Committee  
1401 New York Avenue, N.W., Suite 800  
Washington, D.C. 20005-2102

**NOW/PAC**

April 24, 1985

Lisa Stolaruk  
Federal Election Commission  
Washington, D.C. 20463

Identification Number: C00092247

Dear Ms. Stolaruk:

In January 1985, I stated that there would be very little activity in our NOW/PAC and therefore requested that we be permitted to file on June 30th and on December 31st for 1985 reporting.

Your letter of April 10th, 1985 and our subsequent telephone conversation indicates that this letter was not received by you at that time.

I have satisfied the requests in your April letter and have filed reports for the months of January, February, and March. At this time, I would like to repeat my request and file again for the periods ending June 30th and December 31st.

I would appreciate a reply to this request in writing and will abide by your decision.

Yours truly,

Alice J. Chapman  
Treasurer

AJC/dm

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National Organization for Women  
Political Action Committee  
P. O. Box 317  
Washington, DC 20044

NOW/PAC

January 21, 1985

Lisa Stolaruk  
Federal Elections Commission  
Washington, D.C. 20463

Identification Number C00092247

Dear Ms. Stolaruk:

In 1984 the NOW/PAC was required to file  
monthly reports with your commission.

Since there will be very little or no  
activity in 1985, I am requesting that we  
be given permission to file on June 30th  
and on Dec. 31st.

Yours truly,

Alice J. Chapman  
Treasurer

AJC/dm

860405-4168



National NOW Action Center  
1401 New York Avenue, N.W., Suite 800  
Washington, D.C. 20005-2102



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

85 OCT 3 10:14

**National Organization for Women, Inc.**

1401 New York Avenue, N.W., Suite 800 • Washington, D.C. 20005-2102 • (202) 347-2270



October 2, 1985

Mr. John Warren McGarry  
Chairman  
FEC/General Counsel  
Washington, D.C. 20463

Dear Mr. McGarry:

RE: MUR2067

In response to your letter of September 19, 1985 and in reviewing Ms. Chapman's correspondence with the FEC, enclosed please find copies of correspondence from this office and the FEC, a written request for <sup>prob</sup>probable cause reconciliation and a copy of Mr. Filler's letter granting permission to file semi-annual PAC reports.

In reviewing Ms. Chapman's files, I found a letter sent to Ms. Lisa Stolaruk dated January 21, 1985 requesting permission to file semi-annual reports. Unfortunately, according to Ms. Stolaruk, the letter was never received.

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As newly elected treasurer of NOW, I would like to request pre-probable cause reconciliation in order to finalize any pending claims against this organization.

I look forward to hearing from you in the near future.

Cordially,

Ellen Sue Devaney  
Treasurer

ESD/dm  
Enclosures

CC: Lisa Stolaruk

36040564470

National Organization for Women  
Political Action Committee  
P. O. Box 317  
Washington, DC 20044

NOW/PAC

January 21, 1985

Lisa Stolaruk  
Federal Elections Commission  
Washington, D.C. 20463

Identification Number C00092247

Dear Ms. Stolaruk:

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and on Dec. 31st.

Yours truly,

Alice J. Chapman  
Treasurer

AJC/dm

36040564471

National Organization for Women  
Political Action Committee  
1401 New York Avenue, N.W., Suite 600  
Washington, D.C. 20005-2102

NOW/PAC

April 24, 1985

Lisa Stolaruk  
Federal Election Commission  
Washington, D.C. 20463

Identification Number: C00092247

Dear Ms. Stolaruk:

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I would appreciate a reply to this request in writing and will abide by your decision.

Yours truly,

Alice J. Chapman  
Treasurer

AJC/dm

86040564A72



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MSF

MAY 3 1985

Alice Chapman, Treasurer  
NOW/PAC (National Organization for  
Women Political Action Committee)  
1401 New York Avenue, NW, Suite 800  
Washington, DC 20005

Identification Number: C00092247

Reference: Change To Semi-Annual Filer

Dear Ms. Chapman:

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Year End Report	7/1/85-12/31/85	January 31, 1986

If the Commission can be of further assistance to you in this matter, please do not hesitate to write or call (202) 523-4048. Our toll free number is (800) 424-9530.

Sincerely,

Michael B. Filler  
Chief, Party/Non-Party Branch  
Reports Analysis Division

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**National Organization for Women, Inc.**

1481 New York Avenue, N.W., Suite 800 • Washington, D.C. 20005-2102 • (202) 347-2279

Aug 13 1973

5 AUG 13 P 2:32

GENERAL COUNCIL

Joyce Cullinan  
J.E.C.  
Washington DC 20463

Dear Ms. Cullinan

Attached is a copy of the letter which we discussed on the phone yesterday.

This letter was typed on June 21 and delivered by mail sometime in that week. I was unaware that it had not been received by Fred Stolarick until I received his letter on August 1. I sincerely hope this copy will clarify my actions.

Sincerely,  
[Signature]

36040564474

January 21, 1985

Lisa Stolaruk  
Federal Elections Commission  
Washington, D.C. 20463

Identification Number C00092247

Dear Ms. Stolaruk:

In 1984 the NOW/PAC was required to file  
monthly reports with your commission.

Since there will be very little or no  
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be given permission to file on June 30th  
and on Dec. 31st.

Yours truly,

Alice J. Chapman  
Treasurer

AJC/dm

5 AUG 13 P 2: 32

36040564475



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 19, 1985

Ms. Sue Devaney  
National Organization for Women  
Political Action Committee  
1401 New York Avenue, N.W.  
Suite 800  
Washington, D.C. 20005-2102

Re: MUR 2067

Dear Ms. Devaney:

As you requested in your telephone conversation on September 10, 1985 with Michele Brown of my staff, I am enclosing a copy of the letter and other materials the Commission sent to Ms. Alice Chapman, the former treasurer, on August 9, 1985. The Commission would like to resolve this matter expeditiously.

If you have any questions, please contact Ms. Brown, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

  
Kenneth A. Gross  
Associate General Counsel

Enclosures

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

86043564476



**National Organization for Women, Inc.**

1401 New York Avenue, N.W., Suite 900 • Washington, D.C. 20005-2102 • (202) 347-2279

GCC # 8295

~~SECRET~~

~~SECRET~~  
H2067

Aug 13 '85

15 AUG 13 P 2:33

Joyce Cullinan  
J. E. C.  
Washington DC 20463

Dear Ms. Cullinan.

Attached is a copy of the letter which we discussed on the phone yesterday.

This letter was typed on Jan 21 and delivered by mail sometime in that week. I was unaware that it had not been received by Lisa Stolaruk until I received her letter in April. I sincerely hope this copy will clarify my actions.

Sincerely,  
Alice J. Chapman  
Treasurer NOW/PAC

GCC # 8295

~~SECRET~~



# National Organization for Women, Inc.

1401 New York Avenue, N.W., Suite 800 • Washington, D.C. 20005-2102 • (202) 347-2279

SECRET  
#2067

Aug 13 '85

05 AUG 13 P 2: 33

GENERAL COUNCIL

Joyce Cullinan  
F.E.C.  
Washington DC 20463

Dear Ms. Cullinan.

Attached is a copy of the letter which we discussed on the phone yesterday.

This letter was typed on Jan 21 and delivered by mail sometime in that week. I was unaware that it had not been received by Lisa Stolaruk until I received her letter in April. I sincerely hope this copy will clarify my actions.

Sincerely,  
Alice J. Chipman  
Treasurer NOW/PAC

86040564478

GCC 8295

NOW/PAC

Subject: ...  
Date: ...  
Washington, DC 20463

January 21, 1985

Lisa Stolaruk  
Federal Elections Commission  
Washington, D.C. 20463

Identification Number C00092247

Dear Ms. Stolaruk:

In 1984 the NOW/PAC was required to file  
monthly reports with your commission.

Since there will be very little or no  
activity in 1985, I am requesting that we  
be given permission to file on June 30th  
and on Dec. 31st.

Yours truly,

Alice J. Chapman  
Treasurer

AJC/dm

15 AUG 13 P 2: 33  
GENERAL INVESTIGATIVE  
DIVISION

86040564479

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 National Organization for )  
 Women Political Action )  
 Committee ("NOW/PAC") )  
 Alice Chapman, as treasurer )

RAD Referral 85NF-123

M2067

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 29, 1985, the Commission decided by a vote of 4-0 to take the following actions in RAD Referral 85NF-123:

1. Open a MUR.
2. Find reason to believe that the National Organization for Women Political Action Committee ("NOW/PAC") and Alice Chapman, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).
3. Approve the letter and Factual and Legal Analysis attached to the First General Counsel's Report signed July 22, 1985.

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

Attest:

7/30/85

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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

7-25-85, 10:18  
 7-25-85, 4:00

86040564480



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

9 August 1985

NOW/PAC  
Alice Chapman, as treasurer  
1401 New York Avenue, N.W.  
Suite 800  
Washington, D.C. 20005

RE: MUR 2067  
NOW/PAC and Alice Chapman,  
as treasurer

Dear Ms. Chapman:

On July 29 , 1985, the Federal Election Commission determined that there is reason to believe NOW/PAC and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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

86040564482

Letter to NOW/PAC and  
Alice Chapman, as treasurer  
Page 2

pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

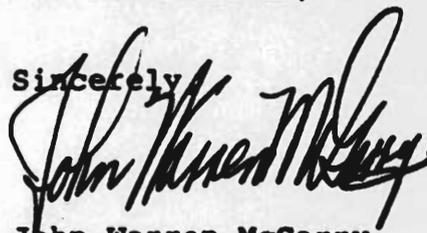
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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 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 Joyce Cullinan, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,



John Warren McGarry  
Chairman

Enclosures

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

86040564483

**FEDERAL ELECTION COMMISSION**  
**GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

MUR No. 2067  
Staff Member: Cullinan

**RESPONDENT:** National Organization for Women Political Action  
Committee ("NOW/PAC") and  
Alice Chapman, as treasurer

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

The Reports Analysis Division referred this matter to the Office of the General Counsel on July 3, 1985. The reason for this referral is the late filing of the 1985 February Monthly Report by NOW/PAC.

The Act requires all unauthorized committees filing monthly reports to do so no later than 20 days after the last day of the month.

NOW/PAC, a political committee filing on a monthly basis, failed to submit the report in a timely manner. The February Monthly Report was required to be filed within 20 days after the last day of the month, or by March 20, 1985. The report was not filed with the Commission until April 19, 1985.

After receiving notice of the late report, the treasurer of NOW/PAC told Commission staff that in January she had sent a letter requesting permission to file on a semi-annual basis. The Commission has no record of a request by NOW/PAC to report on a semi-annual basis; neither has the Commission granted NOW/PAC that privilege. Therefore, this Office recommends that the Commission find reason to believe that NOW/PAC violated 2 U.S.C. § 434(a)(4)(B).

86040564484



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

*gc*

NOW/PAC  
Alice Chapman, as treasurer  
1401 New York Avenue, N.W.  
Suite 800  
Washington, D.C. 20005

RE: MUR 2067  
NOW/PAC and Alice Chapman,  
as treasurer

Dear Ms. Chapman:

On July 29, 1985, the Federal Election Commission determined that there is reason to believe NOW/PAC and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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86040564485

Letter to NOW/PAC and  
Alice Chapman, as treasurer  
Page 2

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Sincerely,

John Warren McGarry  
Chairman

**Enclosures**

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

86040564486

FEDERAL ELECTION COMMISSION  
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 2067  
Staff Member: Cullinan

RESPONDENT: National Organization for Women Political Action  
Committee ("NOW/PAC") and  
Alice Chapman, as treasurer

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

The Reports Analysis Division referred this matter to the Office of the General Counsel on July 3, 1985. The reason for this referral is the late filing of the 1985 February Monthly Report by NOW/PAC.

The Act requires all unauthorized committees filing monthly reports to do so no later than 20 days after the last day of the month.

NOW/PAC, a political committee filing on a monthly basis, failed to submit the report in a timely manner. The February Monthly Report was required to be filed within 20 days after the last day of the month, or by March 20, 1985. The report was not filed with the Commission until April 19, 1985.

After receiving notice of the late report, the treasurer of NOW/PAC told Commission staff that in January she had sent a letter requesting permission to file on a semi-annual basis. The Commission has no record of a request by NOW/PAC to report on a semi-annual basis; neither has the Commission granted NOW/PAC that privilege. Therefore, this Office recommends that the Commission find reason to believe that NOW/PAC violated 2 U.S.C. § 434(a)(4)(B).

86040564487



**SENSITIVE**

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

85 JUL 25 A10:19

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

**FIRST GENERAL COUNSEL'S REPORT**

DATE AND TIME TRANSMITTED BY  
OGC TO THE COMMISSION \_\_\_\_\_

RAD#: 85NF-12  
STAFF MEMBER:  
Joyce Cullinan

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

RESPONDENTS' NAMES: National Organization for  
Women Political Action Committee  
("NOW/PAC")  
Alice Chapman, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(B)  
11 C.F.R. § 104.5(c)(3)(i)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

**GENERATION OF MATTER**

The Reports Analysis Division ("RAD") referred this matter to the Office of the General Counsel on July 3, 1985. The source of this attached referral is the late filing of the 1985 February Monthly Report by NOW/PAC (National Organization for Women Political Action Committee).

**FACTUAL AND LEGAL ANALYSIS**

The Act requires all political committees, other than the authorized committees of a candidate, filing reports on a monthly basis to submit their reports no later than 20 days after the last day of the month.

NOW/PAC, a political committee filing on a monthly basis, failed to submit the 1985 February Monthly Report in a timely

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manner. The Report was required to be filed by March 20, 1985 (20 days after the last day of the month). The report was not filed with the Commission until April 19, 1985.

Alice Chapman, NOW/PAC treasurer, telephoned the Reports Analysis Division on April 16, 1985, after receiving notice that NOW/PAC's February Monthly report had not been filed. During this conversation, Ms. Chapman stated that NOW/PAC had sent a letter to the Commission in January requesting permission to file on a semi-annual basis, pursuant to 11 C.F.R. § 104.5(c). Therefore, she explained, the February Monthly Report had not been filed since she believed the first report was due in July.

A search of the NOW/PAC file failed to uncover either Ms. Chapman's original letter sent in January or a copy of any letters from the Commission to NOW/PAC allowing NOW/PAC to file semi-annually. In addition, Ms. Chapman did not respond to RAD's request for a copy of her January letter.

NOW/PAC is required to file monthly reports on time, including a February Monthly Report. 2 U.S.C. § 434(a)(4)(B). The Commission has no record of NOW/PAC's request to file semi-annually and no record of granting that request. Therefore, this Office recommends that the Commission open a MUR and find reason to believe that NOW/PAC and Alice Chapman, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).

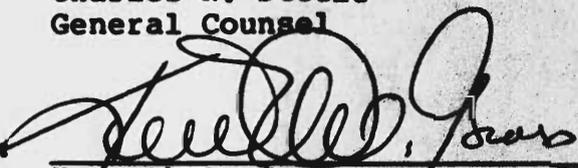
86040564490

**RECOMMENDATIONS**

1. Open a MUR.
2. Find reason to believe that the National Organization for Women Political Action Committee ("NOW/PAC") and Alice Chapman, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).
3. Approve the attached letter and Factual and Legal Analysis.

Charles N. Steele  
General Counsel

July 22, 1965  
Date

BY:   
Kenneth A. Gross  
Associate General Counsel

**Attachments**

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

86040564491

**REPORTS ANALYSIS REFERRAL**

**TO**

**OFFICE OF GENERAL COUNSEL**

**DATE:** 3 July 1985

**ANALYST:** Lisa J. Stolaruk

**I. COMMITTEE:** NOW/PAC (National Organization for Women Political Action Committee) (C00092247)  
Alice Chapman, Treasurer  
1401 New York Avenue, N.W., Suite 800  
Washington, DC 20005

**II. RELEVANT STATUTE:** 2 U.S.C. 434(a)(4)(B)  
11 CFR 104.5(c)(3)(i)

**III. BACKGROUND:**

**Failure to File the 1985 February Monthly Report in a Timely Manner**

NOW/PAC (National Organization for Women Political Action Committee ("NOW/PAC")) filed its 1985 February Monthly Report fifty eight (58) calendar days late.

Prior notice was sent to NOW/PAC on February 11, 1985, which explained the 1985 reporting obligations for monthly filers (Attachment 2). A Non-Filer Notice was mailed to NOW/PAC on March 18, 1985 concerning the 1985 February Monthly Report. The Non-Filer Notice informed NOW/PAC that failure to file the report may result in legal enforcement action (Attachment 3).

The Reports Analysis Division ("RAD") analyst attempted to contact Alice Chapman, NOW/PAC's treasurer on April 11, 1985. Ms. Chapman's secretary, Doris Moore, informed the RAD analyst that Ms. Chapman was out of town but would be returning the following week. The RAD analyst explained that the 1985 February and March Monthly Reports had not been filed with the Commission. Ms. Moore stated that she would prepare the first three monthly reports and send them to the Commission (Attachment 4).

Attachment 1a

86040564492

Ms. Chapman called the RAD analyst on April 16, 1985 to discuss the 1985 filing requirements, and stated that she had sent a letter to the Commission in January requesting permission to file on a semi-annual basis. Therefore, she felt that the first report for 1985 was required to be filed in July. After researching NOW/PAC's files, the RAD analyst informed Ms. Chapman that the Commission had not received the letter and recommended that she send a copy as soon as possible. In addition, the RAD analyst advised Ms. Chapman to file the first three monthly reports for 1985 (Attachment 5).

On April 19, 1985, NOW/PAC filed its February Monthly Report (Attachment 6). A separate letter was received on April 25, 1985 requesting permission to file on a semi-annual basis for 1985 (Attachment 7).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

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

DATE 9MAY85  
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NON/PAC (NATIONAL ORGANIZATION FOR WOMEN POLITICAL ACTION COMMITTEE) CONNECTED ORGANIZATION: WOMEN INC; NAT'L ORGANIZATION FOR				NON-PARTY QUALIFIED		ID #C00092247
1983	MID-YEAR REPORT	9,503	18,884	1JAN83 -30JUN83	6	83FEC/279/3909
	YEAR-END	40,118	32,127	1JUL83 -31DEC83	6	84FEC/296/2616
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31DEC83	1	84FEC/299/2623
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL83 -31DEC83	2	84FEC/307/1231
1984	MISCELLANEOUS NOTICE FROM FEC			1JUN84	1	84FEC/316/1129
	MISCELLANEOUS REPORT			3JUL84 TO FEC	2	84FEC/318/3502
	FEBRUARY MONTHLY	740	528	31DEC83 -31JAN84	3	84FEC/299/1470
	MARCH MONTHLY	2,229	15,530	31JAN84 -29FEB84	5	84FEC/314/0655
	NOTICE OF FAILURE TO FILE			1FEB84 -29FEB84	1	84FEC/313/4733
	APRIL MONTHLY	115,487	39,796	1MAR84 -31MAR84	8	84FEC/315/4325
	APRIL MONTHLY - AMENDMENT	115,487	39,796	1MAR84 -31MAR84	9	84FEC/318/1646
	NOTICE OF FAILURE TO FILE			1MAR84 -31MAR84	1	84FEC/314/0971
	REQUEST FOR ADDITIONAL INFORMATION			1MAR84 -31MAR84	2	84FEC/316/4576
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAR84 -31MAR84	1	84FEC/318/4294
	MAY MONTHLY	28,066	84,965	1APR84 -30APR84	7	84FEC/315/0973
	MAY MONTHLY - AMENDMENT	28,066	84,965	1APR84 -30APR84	8	84FEC/324/4967
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30APR84	1	84FEC/323/0375
	JUNE MONTHLY	30,513	24,803	1MAY84 -31MAY84	6	84FEC/317/0890
	JUNE MONTHLY - AMENDMENT	30,513	24,803	1MAY84 -31MAY84	8	84FEC/324/4975
	REQUEST FOR ADDITIONAL INFORMATION			1MAY84 -31MAY84	1	84FEC/323/0377
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAY84 -31MAY84	1	84FEC/325/1438
	JULY MONTHLY	3,190	17,103	1JUN84 -30JUN84	5	84FEC/324/4962
	1'ST LETTER INFORMATIONAL NOTICE			1JUN84 -30JUN84	1	84FEC/327/0532
	AUGUST MONTHLY	20,473	9,752	1JUL84 -31JUL84	5	84FEC/326/5477
	SEPTEMBER MONTHLY	5,844	11,954	1AUG84 -31AUG84	7	84FEC/338/1213
	SEPTEMBER MONTHLY - AMENDMENT	5,844	11,954	1AUG84 -31AUG84	9	84FEC/351/0575
	REQUEST FOR ADDITIONAL INFORMATION			1AUG84 -30AUG84	1	84FEC/349/0873
	NOTICE OF FAILURE TO FILE			1AUG84 -31AUG84	1	84FEC/337/4103
	REQUEST FOR ADDITIONAL INFORMATION			1AUG84 -31AUG84	4	84FEC/357/1679
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1AUG84 -31AUG84	1	85FEC/359/1688
	OCTOBER MONTHLY	56,045	61,203	1SEP84 -30SEP84	10	84FEC/347/4353
	OCTOBER MONTHLY - AMENDMENT	56,045	61,203	1SEP84 -30SEP84	10	84FEC/351/0504
	REQUEST FOR ADDITIONAL INFORMATION			1SEP84 -30SEP84	1	84FEC/349/0875
	REQUEST FOR ADDITIONAL INFORMATION			1SEP84 -30SEP84	1	84FEC/357/1684
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1SEP84 -30SEP84	6	85FEC/359/0880
	PRE-GENERAL	37,297	32,650	1OCT84 -17OCT84	10	84FEC/356/3614
	NOTICE OF FAILURE TO FILE			1OCT84 -17OCT84	1	84FEC/349/0587
	REQUEST FOR ADDITIONAL INFORMATION			1OCT84 -17OCT84	4	85FEC/358/0739
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT84 -17OCT84	5	85FEC/361/2547
	POST-GENERAL	14,152	23,457	18OCT84 - 7DEC84	7	85FEC/366/0194
	NOTICE OF FAILURE TO FILE			18OCT84 -26NOV84	1	84FEC/357/4962
	YEAR-END	1,140	537	8DEC84 -31DEC84	2	85FEC/366/0191
	TOTAL	364,797	0 373,289	0	172	TOTAL PAGES

Attachment 1c

ATTACHMENT #1 (page 5 of 5)

All reports have been reviewed. Ending cash-on-hand (12/31/84) = \$8,728.58 No debts

8 6 0 4 0 5 6 4 4 9 4

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NOW/PAC (NATIONAL ORGANIZATION FOR WOMEN POLITICAL ACTION COMMITTEE) CONNECTED ORGANIZATION: WOMEN INC; NAT'L ORGANIZATION FOR				NON-PARTY QUALIFIED		ID: 9C00092247
1985	MISCELLANEOUS REPORT			25APR85 TO FEC	2	85FEC/372/1474
	MISCELLANEOUS REPORT			3MAY85 FROM FEC	1	85FEC/372/4050
	FEBRUARY MONTHLY	4,884	10,556	1JAN85 -31JAN85	6	85FEC/371/2252
	NOTICE OF FAILURE TO FILE			1JAN85 -31JAN85	1	85FEC/368/2330
	MARCH MONTHLY	610	0	1FEB85 -28FEB85	3	85FEC/371/2262
	NOTICE OF FAILURE TO FILE			1FEB85 -28FEB85	1	85FEC/370/0572
	APRIL MONTHLY	95	500	1MAR85 -31MAR85	4	85FEC/371/2250
	TOTAL	5,589	0		0	18 TOTAL PAGES

No reports have been reviewed.

Ending cash-on-hand (3/31/85) = \$3,261

Debts and obligations owed by the committee as of 3/31/85 = \$0

Attachment 1a

ATTACHMENT #1 (page 2 of 2)



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

NOW/PAC  
Alice Chapman, as treasurer  
1401 New York Avenue, N.W.  
Suite 800  
Washington, D.C. 20005

RE:  
NOW/PAC and Alice Chapman,  
as treasurer

Dear Ms. Chapman:

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

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Attachment 2a

86040564496

Letter to NOW/PAC and  
Alice Chapman, as treasurer  
Page 2

pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

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Sincerely,

John Warren McGarry  
Chairman

Enclosures

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

Attachment 2b

86040564497

FEDERAL ELECTION COMMISSION  
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. \_\_\_\_\_  
Staff Member: Cullinan

RESPONDENT: National Organization for Women Political Action  
Committee ("NOW/PAC") and  
Alice Chapman, as treasurer

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

The Reports Analysis Division referred this matter to the Office of the General Counsel on July 3, 1985. The reason for this referral is the late filing of the 1985 February Monthly Report by NOW/PAC.

The Act requires all unauthorized committees filing monthly reports to do so no later than 20 days after the last day of the month.

NOW/PAC, a political committee filing on a monthly basis, failed to submit the report in a timely manner. The February Monthly Report was required to be filed within 20 days after the last day of the month, or by March 20, 1985. The report was not filed with the Commission until April 19, 1985.

After receiving notice of the late report, the treasurer of NOW/PAC told Commission staff that in January she had sent a letter requesting permission to file on a semi-annual basis. The Commission has no record of a request by NOW/PAC to report on a semi-annual basis; neither has the Commission granted NOW/PAC that privilege. Therefore, this Office recommends that the Commission find reason to believe that NOW/PAC violated 2 U.S.C. § 434(a)(4)(B).

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FEDERAL ELECTION COMMISSION

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

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THIS IS THE BEGINNING OF MUR # 8067

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