



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 2136

Date Filmed 9/15/86 Camera No. --- 2

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Conculation materials ; Routing Slips;

12 Day Report ; Comment Sheets

The above-described material was removed from this file pursuant to the following exemptions 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 type="checkbox"/> | (2) Internal rules and practices | <input type="checkbox"/> | (7) Investigatory files |
| <input checked="" type="checkbox"/> | (3) Exempted by other statute | <input type="checkbox"/> | (8) Banking Information |
| <input type="checkbox"/> | (4) Trade secrets and commercial or financial information | <input type="checkbox"/> | (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> | (5) Internal Documents | | |

Signed Maura White Callaway
date August 26, 1986



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

perm

August 20, 1986

William Fallon, Esquire
Hanson, O'Brien, Birney and Butler
888 Seventeenth Street, N.W.
Washington, D.C. 20006

RE: MUR 2136
National Association
of Chemical Distributors
PAC and Sanford Hill, as
treasurer

Dear Mr. Fallon:

On August 15, 1986, the Commission accepted the conciliation agreement signed by your clients, the National Association of Chemical Distributors Political Action Committee and Sanford Hill, as treasurer, in settlement of a violation of 2 U.S.C. §§ 441b(a), 432(h), 433(c), 434(a)(4)(A)(i), 434(a)(4)(A)(iii), and 434(a)(4)(A)(iv), and 11 C.F.R. §§ 103.2 and 103.3. Accordingly, the file has been closed in this matter and it will become a part of the public record within 30 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: Lawrence M. Noble
Deputy General Counsel

Enclosure
Conciliation Agreement

86040512429

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Association of) MUR 2136
Chemical Distributors Political)
Action Committee; Sanford Hill,)
as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the National Association of Chemical Distributors Political Action Committee and Sanford Hill, as treasurer, ("Respondents") violated 2 U.S.C. §§ 441b(a), 432(h), 433(c), 434(a)(4)(A)(i), 434(a)(4)(A)(iii), and 434(a)(4)(A)(iv), and 11 C.F.R. §§ 103.2 and 103.3.

NOW, THEREFORE, the Commission and the 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. Respondent, National Association of Chemical

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Distributors Political Action Committee ("NACDPAC") is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent, Sanford Hill, is the treasurer of NACDPAC.
3. The National Association of Chemical Distributors ("NACD") is an incorporated entity, and is the connected organization of NACDPAC.
4. During the period from March 1984 to October 1985 NACDPAC funds totalling \$9,652.11 were on deposit in an account of NACD containing NACD funds.
5. During the period of October 19, 1984, through November 1, 1984, NACDPAC made contributions totalling \$7,000. Such contributions were made from the above described combined account containing both NACDPAC and NACD funds.
6. On September 16, 1985, the Respondents filed an amended Statement of Organization which designated the Century National Bank as NACDPAC's depository and Sanford J. Hill as NACDPAC's treasurer and custodian of records. The most recent amendment to NACDPAC's Statement of Organization prior to the above filing occurred on November 16, 1981, signed by Gerald Bell, as treasurer, wherein the

85040512431

Huntington National Bank and Trust was designated as NACDPAC's depository.

7. On October 21, 1985, NACDPAC funds totalling \$2,652.11 were transferred from NACD's account at the LaSalle National Bank into the Century National Bank, NACDPAC's designated depository.
8. The Respondents were required to file the 1984 April Quarterly Report by April 15, 1984. The report was filed on September 16, 1985, 519 days late.
9. The Respondents were required to file the 1984 July Quarterly Report by July 15, 1984. The report was filed on September 16, 1985, 428 days late.
10. The Respondents were required to file the 1984 October Quarterly Report by October 15, 1984. The report was filed on September 16, 1985, 336 days late.
11. The Respondents were required to file the 1984 Post-General Election Report by December 6, 1984. The report was filed on September 16, 1985, 284 days late.
12. The Respondents were required to file the 1984 Year-End Report by January 31, 1985. The report was filed on September 16, 1985, 228 days late.

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13. The Respondents were required to file the 1985 Mid-Year Report by July 31, 1985. The report was filed on December 6, 1985, 128 days late.

V. 1. Respondents deposited NACDPAC funds into an account that was not established or maintained as an account of NACDPAC in a depository designated by NACDPAC, and made contributions from this account, in violation of 2 U.S.C. §§ 441b(a) and 432(h), and 11 C.F.R. §§ 103.2 and 103.3.

2. Respondents failed to amend NACDPAC's Statement of Organization in a timely manner, in violation of 2 U.S.C. § 433(c).

3. Respondents filed the 1984 April Quarterly, 1984 July Quarterly, 1984 October Quarterly, 1984 Post-General, 1984 Year-End, and 1985 Mid-Year Reports late, in violation of 2 U.S.C. §§ 434(a)(4)(A)(i), (iii), and (iv).

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Two Thousand Seven Hundred and Fifty Dollars (\$2,750), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

IX. 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.

X. 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.

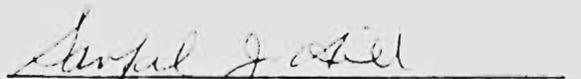
FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY: 
Lawrence M. Noble
Deputy General Counsel

8/19/86
Date

FOR THE RESPONDENTS:


Sanford J. Hill, Treasurer
National Association of
Chemical Distributors Political
Action Committee

July 21, 1986
Date

3 5 0 4 0 5 1 2 4 3 4

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 2136
National Association of)	
Chemical Distributors)	
Political Action Committee;)	
Sanford Hill, as treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 15, 1986, the Commission decided by a vote of 6-0 to take the following actions in MUR 2136:

1. Accept the conciliation agreement with the National Association of Chemical Distributors Political Action Committee and Sanford Hill, as treasurer, as recommended in the General Counsel's Report signed August 12, 1986.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report signed August 12, 1986.

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

Attest:

8/15/86
Date

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

Received in Office of Commission Secretary:	Wed.,	8-13-86,	10:01
Circulated on 48 hour tally basis:	Wed.,	8-13-86,	4:00
Deadline for vote:	Fri.,	8-15-86,	4:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel *Gar*

DATE: August 13, 1986

SUBJECT: MUR 2136 - General Counsel's Report

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

CIRCULATIONS

DISTRIBUTION

48 Hour Tally Vote [x]
Sensitive [x]
Non-Sensitive []

Compliance [x]
Audit Matters []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Litigation []
Closed MUR Letters []

Information []
Sensitive []
Non-Sensitive []

Status Sheets []
Advisory Opinions []

Other []

Other (see distribution below) []

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NACD PAC
1110 VERMONT AVE., N.W.
SUITE 1150
WASHINGTON, D. C. 20005

July 23, 1986

1001

15-153
540

PAY TO THE
ORDER OF

U. S. Treasurer

\$ 2750.00

Two Thousand Seven Hundred Fifty and 00/100-----DOLLARS

MONEY MARKET ACCOUNT

Century
NATIONAL BANK

Washington, D.C. 20008

FOR MUR 2136

Samuel J. ...

⑆054001534⑆ 001 211434 611 1001

MEMORANDUM

COCA 1056

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1(6)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Association of) MUR 2136
Chemical Distributors)
Political Action Committee)
Sanford Hill, as treasurer)

MING *TH*

CERTIFICATION

CUNSEL'S REPORT
NE 11, 1986

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I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of June 17,
1986, do hereby certify that the Commission decided by a
vote of 5-1 to approve the conciliation agreement attached
to the General Counsel's June 11, 1986, report on MUR 2136,
subject to amendment by deletion of reference to 11 C.F.R.
§ 102.5.

Commissioners Aikens, Elliott, Josefiak, McDonald, and
McGarry voted affirmatively for the decision; Commissioner
Harris dissented.

Attest:

6-18-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

COMMISSION SECRETARY

In the Matter of)
National Association of)
Chemical Distributors Political)
Action Committee; Sanford Hill,)
as treasurer)

22 JUN 12 AM : 04

MUR 2136

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On May 15, 1986, a General Counsel's Report was circulated to the Commission containing three recommendations: 1) take no further action against the National Association of Chemical Distributors Political Action Committee ("NACDPAC") Sanford Hill, as treasurer, with respect to a violation of 11 C.F.R. § 102.5; 2) enter into conciliation with NACDPAC and Sanford J. Hill, as treasurer, prior to a finding of probable cause to believe; and 3) approve the proposed conciliation agreement and letter. During Executive Session on June 5, 1986, the Commission rejected this Office's recommendation to take no further action against the respondents with respect to a violation of 11 C.F.R. § 102.5, and directed this Office to include the reason to believe finding concerning 11 C.F.R. § 102.5 in the proposed conciliation agreement. Pursuant to the Commission's direction, the attached proposed agreement incorporates the above finding.

II. RECOMMENDATIONS

1. Enter into conciliation with the National Association of Chemical Distributors Political Action Committee and Sanford Hill, as treasurer, prior to a finding of probable cause to believe.

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/ CHERYL A. FLEMING
DATE: JUNE 12, 1986
SUBJECT: OBJECTION TO MUR 2136 - GENERAL COUNSEL'S REPORT
SIGNED JUNE 11, 1986

The above-named document was circulated to the Commission on Thursday, June 12, 1986 at 4:00 P.M.

Objections have been received from the Commissioners as indicated by the name(s) checked:

Commissioner Aikens _____
Commissioner Elliott _____
Commissioner Harris _____
Commissioner Josefiak _____ X _____
Commissioner McDonald _____
Commissioner McGarry _____

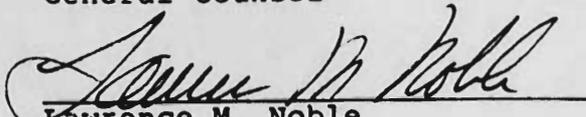
This matter will be placed on the Executive Session agenda for Tuesday, June 17, 1986.

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2. Approved the attached proposed conciliation agreement and letter.

Charles N. Steele
General Counsel

Date June 11, 1986

BY: 
Lawrence M. Noble
Deputy General Counsel

Attachments
Proposed agreement and letter

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Association of Chemical)
Distributors Political Action)
Committee; Sanford Hill, as)
treasurer)

MUR 2136

CERTIFICATION

I, Mary W. Dove, recording secretary for the Federal Election Commission executive session of June 5, 1986, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2136:

1. Reject the General Counsel's recommendation to take no further action against the National Association of Chemical Distributors Political Action Committee and Sanford J. Hill, as treasurer, with respect to a violation of 11 C.F.R. § 102.5.
2. Amend the conciliation agreement for the National Association of Chemical Distributors Political Action Committee and Sanford J. Hill, as treasurer, to show a violation of 11 C.F.R. § 102.5, and re-circulate the conciliation agreement to the Commission.

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

Attest:

6-5-86
Date

Mary W. Dove
Mary W. Dove
Administrative Assistant

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *pld*
DATE: June 12, 1986
SUBJECT: MUR 2136 - General Counsel's Report

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

CIRCULATIONS

DISTRIBUTION

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

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FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/ CHERYL A. FLEMING
DATE: MAY 19, 1986
SUBJECT: OBJECTION TO MUR 2136 - GENERAL COUNSEL'S REPORT
SIGNED MAY 14, 1986

The above-named document was circulated to the Commission on Thursday, May 15, 1986 at 11:00 A.M.

Objections have been received from the Commissioners as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Harris	_____ X _____
Commissioner Josefiak	_____
Commissioner McDonald	_____ X _____
Commissioner McGarry	_____

This matter will be placed on the Executive Session agenda for Tuesday, June 3, 1986.

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
National Association of Chemical)
Distributors Political Action)
Committee; Sanford Hill, as)
treasurer)

MUR 2136

22 MAR 14 10:50

GENERAL COUNSEL'S REPORT

I. Background

On January 28, 1986, the Commission determined that there is reason to believe the National Association of Chemical Distributors Political Action Committee ("NACDPAC") and Sanford Hill, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), 434(a)(4)(A)(iii), 434(a)(4)(A)(iv), 441b(a), 433(c) and 432(h), and 11 C.F.R. §§ 102.5, 103.2, and 103.3. Notification of the Commission's findings was mailed to the respondents on February 7, 1986. On February 24, 1986, the respondents requested to settle this matter prior to a finding of probable cause to believe (Attachment 1). By letter dated March 20, 1986, the respondents submitted information relevant to this matter (Attachment 2), and provided additional information by telephone on April 9, 1986.

The information obtained from the respondents subsequent to the reason to believe finding indicates that the funds (\$75,324.27) released from the Huntington Bank in March 1984 were deposited into a bank account of the National Association of

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Chemical Distributors ("NACD"), an incorporated entity.^{1/} The funds deposited into NACD's account were subsequently determined to represent \$65,672.16 in NACD funds and \$9,652.11 in NACDPAC funds. The respondents further explained that in the Fall of 1984 and from its funds in the above combined account NACDPAC made political contributions totalling \$7,000, leaving a balance of \$2,652.11 in NACDPAC funds in NACD's account. According to the response, on October 21, 1985, NACDPAC funds totalling \$2,652.11 were transferred to an "independent account" at the Century National Bank.^{2/}

Based upon the information provided by the respondents it appears that NACDPAC funds were commingled with NACD funds from March 1984 until October 1985 in an account of NACD. It appears that at no time relevant to this matter were NACD's funds deposited into an account of NACDPAC at a designated depository. Thus, insofar as NACDPAC funds were deposited into NACD's account, and not vice versa, it is the recommendation of this office that the Commission take no further action against NACDPAC with respect to a violation of 11 C.F.R. § 102.5. The fact that NACDPAC funds were commingled with NACD funds in other than an account in a designated depository of NACDPAC is being addressed

^{1/} As discussed in the First General Counsel's Report in this matter, NACDPAC's former treasurer had commingled NACDPAC funds with other funds in one account at the Huntington Bank. The former treasurer was the President of a management association for NACD. Although the financial records of NACDPAC and NACD were seized by the Sheriff's Department, NACD eventually was able to obtain the release of the remaining commingled funds from the Huntington Bank. Due to extenuating circumstances in this matter, the Commission's reason to believe findings involve only activity occurring since the release of funds in March 1984.

^{2/} On September 17, 1985, NACDPAC amended its Statement of Organization to report the Century National Bank as NACDPAC's depository.

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in this matter through the reason to believe findings with respect to a violation of 2 U.S.C. §§ 441b(a), 432(h), and 11 C.F.R. §§ 103.2 and 103.3.

II. Discussion of Conciliation and Civil Penalty

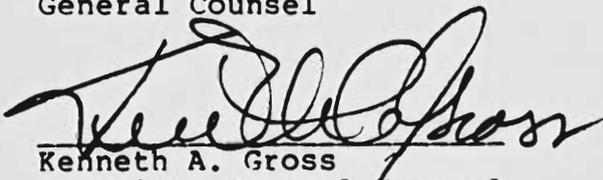
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III. Recommendations

1. Take no further action against the National Association of Chemical Distributors Political Action Committee and Sanford J. Hill, as treasurer, with respect to a violation of 11 C.F.R. § 102.5
2. Enter into conciliation with the National Association of Chemical Distributors Political Action Committee and Sanford Hill, as treasurer.
3. Approve the attached proposed conciliation agreement and letter.

Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel

Date

May 14, 1986

Attachments

1. Letter from Fallon (2-24-86)
2. Letter from Fallon (3-12-86)
3. Proposed agreement and letter

35040512148

Callaway

010+ 1007

LAW OFFICES

HANSON, O'BRIEN, BIRNEY AND BUTLER

ARTHUR B HANSON*
PAUL L O'BRIEN
ARTHUR A BIRNEY
WILLIAM J BUTLER, JR.*
MICHAEL H McCONIHE*
WILLIAM L FALLON*
ALEXANDER W WHITAKER
JEROME C SCHAEFER*
ARTHUR D McKEY
GREGORY P SCHERMER*
STEVEN P BENSON
VIRGINIA B SANAIE*

888 SEVENTEENTH STREET, N. W.
WASHINGTON, D. C. 20006
TELEPHONE (202) 298-6161

ELISHA HANSON (1888-1962)
W FRANK STICKLE, JR. (1929-1976)
TELECOPIER (202) 293-1640
CABLE ADDRESS "HANSON"
INTERNATIONAL TELEX 440521
MARYLAND OFFICE
51 MONROE STREET
ROCKVILLE, MARYLAND 20850
TELEPHONE (301) 340-6415

February 24, 1986

*ADMITTED TO PRACTICE IN MARYLAND
*ADMITTED TO PRACTICE IN VIRGINIA

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

HAND DELIVERED

Attention: Maura White Callaway

Re: MUR 2136
Respondent: National Association of Chemical Distributors
Political Action Committee

150 FF824 P2:17

95040612119

Dear Ms. Callaway:

This letter acknowledges the F.E.C. letter and enclosures of February 7, 1986 to Mr. Sanford J. Hill, Treasurer of NACD/PAC.

This letter constitutes our formal request on behalf of our client, National Association of Chemical Distributors Political Action Committee, to pursue pre-probable cause conciliation per C.F.R. §111.18(d).

The undersigned has been authorized to represent NACD/PAC before the Commission; per the attached Statement of Designation of Counsel.

We await further word from you on this matter.

Sincerely yours,

William L. Fallon
William L. Fallon

kjm

Enclosure

cc: Sanford J. Hill, Treasurer
Paul L. O'Brien, Esquire

Attachment 1

LAW OFFICES

HANSON, O'BRIEN, BIRNEY AND BUTLER

888 SEVENTEENTH STREET, N. W.
WASHINGTON, D. C. 20006
TELEPHONE (202) 298-6161

ARTHUR B. HANSON*
PAUL L. O'BRIEN
ARTHUR A. BIRNEY
WILLIAM J. BUTLER, JR.*
MICHAEL H. MCCONNIE*
WILLIAM L. FALLON*
ALEXANDER W. WHITAKER
JEROME C. SCHAEFER*
ARTHUR D. McKEY
GREGORY P. SCHERMER*
STEVEN P. BENSON
VIRGINIA B. SANAIE*

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TELECOPIER (202) 293-1640
CABLE ADDRESS "HANSON"
INTERNATIONAL TELEX 440521

MARYLAND OFFICE
51 MONROE STREET
ROCKVILLE, MARYLAND 20850
TELEPHONE (301) 340-6415

March 20, 1986

*ADMITTED TO PRACTICE IN MARYLAND
*ADMITTED TO PRACTICE IN VIRGINIA

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attention: Maura White Callaway

Re: MUR 2136
Respondent: National Association of Chemical Distributors Political
Action Committee

Dear Ms. Callaway:

Enclosed please find a copy of Mr. Hill's letter to me of March 18, 1986.

If there is any additional information you need, please call me.

Sincerely yours,

William L. Fallon

kjm

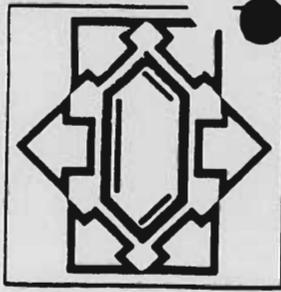
Enclosure

cc: Sanford J. Hill
Paul L. O'Brien, Esquire

MAR 24 P12:38

05040512150

Attachment 2(1)



NATIONAL ASSOCIATION OF CHEMICAL DISTRIBUTORS • 1110 Vermont Avenue, N.W., Suite 1150
Washington, D.C. 20005 • 202-296-9200

March 18, 1986

Mr. William L. Fallon
Hanson, O'Brien, Birney and Butler
888 Seventeenth Street, NW
Washington, D.C. 20006

Dear Bill:

As you requested, following is the additional information concerning the NACD/PAC funds:

\$75,324.27 in NACD Funds (\$9,652.11 of which was subsequently found to be NACD/PAC funds) were released from the Huntington Bank in March 1984 and deposited into the Lasalle National Bank, 135 S. Lasalle Street, Chicago, IL 60692, account #59-2042-1.

The funds represented in this account (#59-2042-1), included both the NACD and the NACD/PAC in the amounts as indicated in the above paragraph. In the fall of 1984 PAC contributions were made from this account totalling \$7,000.00 leaving \$2,652.11 of NACD/PAC funds still in the combined account.

On October 21, 1985 the identified NACD/PAC funds (\$2,652.11) were transferred to our independent account at the Century National Bank, 1875 Eye Street, N.W., Washington, D.C. 20006, account #001-211434-6.

Since October 21, 1985, no other individual or entity has been part of the NACD/PAC account.

Sincerely,

Sanford J. Hill
Executive Vice President

SJH/kw

cc: Paul O'Brien, Esquire

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *ella*
DATE: May 14, 1986
SUBJECT: MUR 2136 - General Counsel's Report

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

CIRCULATIONS

48 Hour Tally Vote
 Sensitive
 Non-Sensitive

24 Hour No Objection
 Sensitive
 Non-Sensitive

Information
 Sensitive
 Non-Sensitive

Other

DISTRIBUTION

Compliance
Audit Matters

Litigation
Closed MUR Letters

Status Sheets
Advisory Opinions

Other (see distribution
 below)

86040512452

LAW OFFICES
HANSON, O'BRIEN, BIRNEY AND BUTLER

ARTHUR B. HANSON*
PAUL L. O'BRIEN
ARTHUR A. BIRNEY
WILLIAM J. BUTLER, JR.*
MICHAEL H. McCONIHE*
WILLIAM L. FALLON*
ALEXANDER W. WHITAKER
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MARYLAND OFFICE
51 MONROE STREET
ROCKVILLE, MARYLAND 20850
TELEPHONE (301) 340-6415

March 20, 1986

*ADMITTED TO PRACTICE IN MARYLAND
*ADMITTED TO PRACTICE IN VIRGINIA

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attention: Maura White Callaway

Re: MUR 2136

Respondent: National Association of Chemical Distributors Political
Action Committee

Dear Ms. Callaway:

Enclosed please find a copy of Mr. Hill's letter to me of March 18, 1986.

If there is any additional information you need, please call me.

Sincerely yours,



William L. Fallon

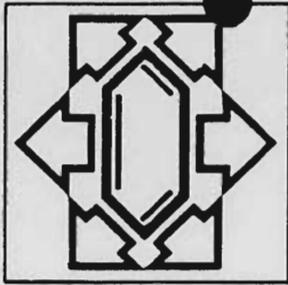
kjm

Enclosure

cc: Sanford J. Hill
Paul L. O'Brien, Esquire

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NATIONAL ASSOCIATION OF CHEMICAL DISTRIBUTORS • 1110 Vermont Avenue, N.W., Suite 1150
Washington, D.C. 20005 • 202-296-9200

March 18, 1986

Mr. William L. Fallon
Hanson, O'Brien, Birney and Butler
888 Seventeenth Street, NW
Washington, D.C. 20006

Dear Bill:

As you requested, following is the additional information concerning the NACD/PAC funds:

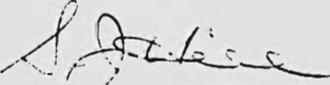
\$75,324.27 in NACD Funds (\$9,652.11 of which was subsequently found to be NACD/PAC funds) were released from the Huntington Bank in March 1984 and deposited into the Lasalle National Bank, 135 S. Lasalle Street, Chicago, IL 60692, account #59-2042-1.

The funds represented in this account (#59-2042-1), included both the NACD and the NACD/PAC in the amounts as indicated in the above paragraph. In the fall of 1984 PAC contributions were made from this account totalling \$7,000.00 leaving \$2,652.11 of NACD/PAC funds still in the combined account.

On October 21, 1985 the identified NACD/PAC funds (\$2,652.11) were transferred to our independent account at the Century National Bank, 1875 Eye Street, N.W., Washington, D.C. 20006, account #001-211434-6.

Since October 21, 1985, no other individual or entity has been part of the NACD/PAC account.

Sincerely,


Sanford J. Hill
Executive Vice President

SJH/kw

cc: Paul O'Brien, Esquire

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LAW OFFICES

LANSON, O'BRIEN, BIRNEY AND BUTLER

400 SEVENTEENTH STREET, N.W.

WASHINGTON, D. C. 20006

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attention: Maura White Callaway

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00:00:00

LAW OFFICES

HANSON, O'BRIEN, BIRNEY AND BUTLER

888 SEVENTEENTH STREET, N. W.

WASHINGTON, D. C. 20006

TELEPHONE (202) 298-6161

ARTHUR B. HANSON*
PAUL L. O'BRIEN
ARTHUR A. BIRNEY
WILLIAM J. BUTLER, JR.*
MICHAEL H. McCONIHE*
WILLIAM L. FALLON*
ALEXANDER W. WHITAKER
JEROME C. SCHAEFER*
ARTHUR D. McKEY
GREGORY P. SCHERMER*
STEVEN P. BENSON
VIRGINIA B. SANAIE*

ELISHA HANSON (1888-1962)
W. FRANK STICKLE, JR. (1929-1976)
TELECOPIER (202) 293-1640
CABLE ADDRESS "HANSON"
INTERNATIONAL TELEX 440521

MARYLAND OFFICE
51 MONROE STREET
ROCKVILLE, MARYLAND 20850
TELEPHONE (301) 340-6415

March 12, 1986

*ADMITTED TO PRACTICE IN MARYLAND

*ADMITTED TO PRACTICE IN VIRGINIA

Sanford J. Hill, Treasurer
NATIONAL ASSOCIATION OF CHEMICAL
DISTRIBUTORS POLITICAL ACTION COMMITTEE
1110 Vermont Avenue, N.W.
Suite 1150
Washington, D.C. 20005

Re: MUR 2136
Respondent: National Association of Chemical Distributors
Political Action Committee

Dear Mr. Hill:

Miss Maura Callaway of the F.E.C called me on March 11 to indicate that she needed additional information/answers before she could recommend to the F.E.C. that we should proceed on a conciliation process.

The specific questions that she has raised, and which we need to answer as fully as possible, are as follows:

- 1(a). From the release of NACD/PAC funds from Huntington Bank in April 1984 through the present, state the name of each bank and bank account into which NACD/PAC funds were deposited.
- (b). For each bank account listed above state the dates that NACD/PAC funds were on deposit in the account.
2. For each bank account listed in Response to Question No. 1, identify any other individual or entity, including the NACD, Bell Publicom, Inc., or its clients whose funds were contained in the account, including the dates that such funds were contained in the account.

We would appreciate your getting us the requested information as soon as possible.

Sincerely yours,

William L. Fallon
William L. Fallon

kjm

cc: Paul L. O'Brien, Esquire
Maura White Callaway

REC
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GENERAL COUNCIL

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LAW OFFICES

HANSON, O'BRIEN, BIRNEY AND BUTLER

888 SEVENTEENTH STREET, N.W.

WASHINGTON, D. C. 20006

Maura White Callaway
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

11:00:14

LAW OFFICES

HANSON, O'BRIEN, BIRNEY AND BUTLER

ARTHUR B. HANSON*
PAUL L. O'BRIEN
ARTHUR A. BIRNEY
WILLIAM J. BUTLER, JR.*
MICHAEL H. McCONIHE*
WILLIAM L. FALLON*
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CABLE ADDRESS "HANSON"
INTERNATIONAL TELEX 440521
MARYLAND OFFICE
51 MONROE STREET
ROCKVILLE, MARYLAND 20850
TELEPHONE (301) 340-6415

February 24, 1986

*ADMITTED TO PRACTICE IN MARYLAND
*ADMITTED TO PRACTICE IN VIRGINIA

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

HAND DELIVERED

Attention: Maura White Callaway

Re: MUR 2136
Respondent: National Association of Chemical Distributors
Political Action Committee

Dear Ms. Callaway:

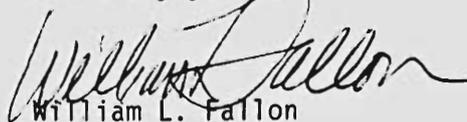
This letter acknowledges the F.E.C. letter and enclosures of February 7, 1986 to Mr. Sanford J. Hill, Treasurer of NACD/PAC.

This letter constitutes our formal request on behalf of our client, National Association of Chemical Distributors Political Action Committee, to pursue pre-probable cause conciliation per C.F.R. §111.18(d).

The undersigned has been authorized to represent NACD/PAC before the Commission; per the attached Statement of Designation of Counsel.

We await further word from you on this matter.

Sincerely yours,


William L. Fallon

kjm

Enclosure

cc: Sanford J. Hill, Treasurer
Paul L. O'Brien, Esquire

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 7, 1986

Sanford J. Hill, Treasurer
National Association of Chemical
Distributors Political Action Committee
1110 Vermont Avenue, N.W.
Washington, D.C. 20005

RE: MUR 2136

Dear Mr. Hill:

On January 28, 1986, the Federal Election Commission determined that there is reason to believe the National Association of Chemical Distributors Political Action Committee and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), (iii), (iv), and 441b(a), 432(h) and 433(c), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), and 11 CFR §§ 103.2, 103.3 and 102.5. 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 fifteen 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 that it may complete its investigation of the matter. Further,

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Letter to Sanford J. Hill, Treasurer
Page 2

requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

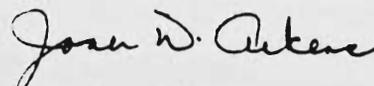
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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 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 Maura White Callaway the staff member assigned to this matter, at (202) 376-5690.

Sincerely,



Joan D. Aikens
Chairman

Enclosures

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

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 2136
Staff Member & Tel. No.
Maura White Callaway
(202) 376-5690

RESPONDENTS: National Association of Chemical Distributors
Political Action Committee; Sanford Hill,
as treasurer

SUMMARY OF ALLEGATIONS

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The National Association of Chemical Distributors Political Action Committee ("NACDPAC") and Sanford Hill, as treasurer, failed to file six reports in a timely manner during 1984 and 1985 in violation of 2 U.S.C. § 434(a)(4)(A)(i), (iii), and (iv), commingled NACDPAC funds with corporate funds in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5, failed to amend NACDPAC's Statement of Organization in a timely manner in violation of 2 U.S.C. § 433(c), and violated 2 U.S.C. 432(h), 11 C.F.R. § 103.2 and § 103.3 in connection with the deposit of NACDPAC funds.

FACTUAL BASIS AND LEGAL ANALYSIS

NACDPAC registered with the Commission on May 10, 1980, as the separate segregated fund of the National Association of Chemical Distributors ("NACD"). After filing its 1980 Year-End Report, NACDPAC failed to file any further reports.^{1/} On September 9, 1983, RAD mailed NACDPAC a notice stating the Commission's intent to administratively terminate NACDPAC.

^{1/} The 1980 Year-End Report disclosed cash-on-hand of \$270 and no outstanding obligations owed by, or to, NACDPAC.

On September 16, 1985, RAD received correspondence from NACDPAC's counsel which included all required reports for the 1981-1982 and 1983-1984 election cycles, and an amended Statement of Organization naming Sanford J. Hill as treasurer. Counsel also stated that Mr. Hill had filed the necessary reports for 1985, but the 1985 Mid-Year Report was not filed until December 6, 1985.

The above letter from counsel explained that NACDPAC's former treasurer, Gerald Bell, was killed on September 17, 1983, and at such time was acting as NACDPAC's treasurer and President of Bell Publicom, Inc.^{2/} Counsel's letter further stated that Sanford Hill obtained information which revealed that Gerald Bell commingled NACDPAC funds with those of Bell Publicom, Inc. and "other Bell clients" into one interest-bearing account at the Huntington Bank. According to counsel, Bell Publicom, Inc. was "essentially bankrupt" by February 1984 and NACDPAC funds "may have been used to pay Publicom, Inc. corporate bills." The letter continues on to state that during February and March 1984 NACD obtained the release of approximately \$75,000 in "'NACD/PAC' funds," but that it was impossible to obtain documentation "as to the source of those funds; i.e., NACD/PAC related" because the

^{2/} Bell Publicom, Inc. was the "management association" for NACD. See below.

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Sheriff's Department had seized "many of the NACD/PAC financial records needed to accurately reconstruct the financial activity of NACD/PAC for the period of January 1, 1981 through December 31, 1984."^{3/}

A review of the reports filed by NACDPAC on September 16, 1985, reveal a beginning cash-on-hand on January 1, 1981, of \$270, and no receipts or disbursements during 1981, 1982 and 1983. In addition, the 1984 April Quarterly Report disclosed \$9,382.11 in receipts, and the 1984 Year-End Report disclosed \$7,000 in contributions to federal candidates and committees between October 19, 1984, and November 1, 1984. Subsequent to RAD's review of these reports, informational notices were sent on September 26, 1985, advising NACDPAC that it may have violated 2 U.S.C. §§ 432(b)(3), 434, and 441b.

On October 15, 1985, RAD received a letter from NACDPAC's counsel which enclosed a letter from the treasurer explaining the source of the monies reflected on NACDPAC's reports to the Commission. According to a letter sent to counsel by Sanford Hill, the "\$75,324.27 obtained from the bank in March 1984 was from the general operating account for the parent association -- NACD." The letter stated that "[b]ank statements indicated \$75,324.27 had been deposited from NACD sources (dues, meetings, registration, etc.) over the past few months," but also noted that "[f]inancial statements for that time period indicated

^{3/} The files of Bell Publicom, Inc. and the Huntington Bank had also been seized, according to the response.

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that \$9,382.11 had been recorded as contributions for the PAC."^{4/}
The response emphasized that NACD "immediately separated the
\$9,382.11 monies from its general operating account which at that
time was the \$75,324.27 that had been withdrawn from the bank."^{5/}

(B) The Law

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), a political
committee is required to file quarterly reports in a calendar
year in which a regularly scheduled general election is held,
which shall be filed no later than the last day of each calendar
quarter, except that the report for the quarter ending on
December 31 of such calendar year shall be filed no later than
January 31 of the following calendar year.

As set forth at 2 U.S.C. § 434(a)(4)(A)(iii) a political
committee is required to file a post-general election report no
later than the 30th day after the general election and which
shall be complete as of the 20th day after such general election.

^{4/} It was again noted that "the backup information to identify
the individual contributors was not then nor subsequently
discovered in what remained of the association and the PAC
files."

^{5/} A copy of the NACD Treasurer's Report dated June 1, 1984, was
included with the letters. The letter references the "forced
termination of our arrangement with our management association,
Bell Publicom." The reports states that the monies in the
Huntington Bank were released on March 28, 1984, and subsequently
deposited into LaSalle Bank in Chicago. The June 1, 1984
Treasurer's Report noted that as of June 1, 1984, the NACD funds
and PAC funds were commingled. (The September 1985 amendment to
NACDPAC's Statement of Organization identifies NACDPAC's bank
depository as Century National Bank in Washington, D.C.)

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In other than an election year a report covering the period beginning January 1 and ending June 30 is required to be filed no later than July 31, and a report covering the period beginning July 1 and ending December 31 is required to be filed by January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv).

Pursuant to 2 U.S.C. § 432(b)(3) all funds of a political committee shall be segregated from, and may not be commingled with, the personal funds of any individual.

As set forth at 2 U.S.C. § 434(b)(2) a political committee is required to report for the reporting period and the calendar year, the total amount of all receipts.

Any change in information previously submitted in a Statement of Organization shall be reported in accordance with 2 U.S.C. § 432(g) no later than 10 days after the date of the change. 2 U.S.C. § 433(c).

A political committee is required to designate one or more State banks, federally chartered depository institutions, or depository institutions the accounts or deposits of which are insured by the Federal Deposit Insurance Corporation, the Federal Savings and Loan Insurance Corporation, or the National Credit Union Administration, as its campaign depository or depositories. Each political committee shall maintain at least one checking account and such other accounts as the committee determines at a depository designated by such committee. All receipts received by such committee shall be deposited in such accounts. 2 U.S.C. § 432(h) and 11 C.F.R. § 103.2.

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Pursuant to 11 C.F.R. § 103.3, all receipts by a political committee shall be deposited in account(s) established pursuant to 11 C.F.R. § 103.2. The treasurer of the committee shall be responsible for making such deposits. Id.

As set forth at 11 C.F.R. § 102.5(a)(1)(i) and (ii) a political committee may only receive contributions subject to the prohibitions and limitations of the Act.

C Application of the Law to the Facts

From the information in hand it appears that NACDPAC failed to file reports in a timely manner between 1981 and 1985. Although NACDPAC's reports for 1981 through 1983 did not disclose any receipts or disbursements during this period, it appears the receipts (\$9,382.11) reported on the 1984 April Quarterly Report (the time of their release from the bank) were accepted by the former treasurer prior to his death in September 1983. This office, however, makes no recommendation with respect to the timeliness of NACDPAC's reports during 1981, 1982, or 1983 in view of the amount of time that has elapsed since the reports were due, the fact that there is apparently no evidence of any contributions to federal candidates from 1981 through 1984, and the fact that such reports have now been filed. Insofar as NACDPAC's treasurer has attempted to recreate the financial picture of NACDPAC to the extent possible, and such has revealed both the release of NACDPAC funds in early 1984 as well as several contributions to federal candidates and committees during 1984, it is this office's view that the Commission should open a

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Matter Under Review with respect to all reports filed untimely subsequent to the release of the funds at issue. Accordingly, it is the recommendation of this office that the Commission find reason to believe NACDPAC and Sanford Hill, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (iii), and (iv) by failing to file timely the 1984 April Quarterly, 1984 July Quarterly, 1984 Post-General Election, 1984 October Quarterly, 1984 Year-End and 1985 Mid-Year Reports.

With respect to the commingling of NACDPAC funds with the funds of NACD and Bell Publicom, Inc. and its clients, and possible failure to report total receipts, this office, for the reasons stated above,^{6/} makes no recommendation concerning any commingling or reporting omissions that may have occurred prior to 1984. However, because the funds at issue were released by the bank on March 28, 1984, but continued to be commingled with corporate funds of NACD and Bell Publicom, Inc. as late as June 1, 1984, and such funds were later contributed in connection with federal elections, it is the recommendation of this office that the Commission find reason to believe NACDPAC and Sanford J. Hill, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5 by commingling NACD and Bell Publicom, Inc. and NACDPAC

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^{6/} It is also too conjectural to conclude that total receipts were not reported, and not likely that a conclusive determination could be made that such were not in fact reported. We note that there is also no evidence that any of the funds were required to be itemized pursuant to 2 U.S.C. § 434(b)(3)(A).

funds during 1984. In addition, insofar as it appears that NACDPAC funds were deposited into an account of NACD subsequent to their March 1984 release by the Huntington Bank there is reason to believe NACDPAC and Sanford J. Hill, as treasurer, violated 11 C.F.R. § 103.2 and § 103.3.

A final issue to be considered is the fact that NACDPAC failed to amend its Statement of Organization within ten days of any change in the information previously submitted in its November 16, 1981, Statement of Organization. Because NACDPAC funds were released in March 1984 and subsequently deposited into a separate bank account, and NACDPAC contributed to federal candidates and committees in October and November 1984, it appears that NACDPAC should have amended its Statement of Organization prior to September 17, 1985, to reflect the address of NACDPAC, the name, address, and position of the custodian of NACDPAC's books and accounts, the name and address of NACDPAC's treasurer, and NACDPAC's depository. In view of NACDPAC's failure to amend its Statement of Organization in a timely manner it is the recommendation of this office that the Commission find reason to believe NACDPAC and Sanford J. Hill, as treasurer, violated 2 U.S.C. § 433(c).

86040612458

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Association of Chemical) RAD Referral 85L-45
Distributors Political Action)
Committee)
Sanford Hill, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of January 28, 1986, do hereby certify that the Commission took the following actions in the above-captioned matter:

1. Decided by a vote of 6-0 to
 - a) Open a Matter Under Review.
 - b) Find reason to believe the National Association of Chemical Distributors Political Action Committee and Sanford Hill, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), (iii), and (iv) in connection with 1984 and 1985 reports.
 - c) Find reason to believe the National Association of Chemical Distributors Political Action Committee and Sanford Hill, as treasurer, violated 2 U.S.C. § 441b(a).
 - d) Find reason to believe the National Association of Chemical Distributors Political Action Committee and Sanford Hill, as treasurer, violated 2 U.S.C. § 433(c).

(continued)

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- (e) Find reason to believe the National Association of Chemical Distributors Political Action Committee and Sanford Hill, as treasurer, violated 2 U.S.C. 432(h) and 11 C.F.R. §§ 102.5, 103.2 and 103.3.

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

2. Decided by a vote of 6-0 to direct the Office of General Counsel to send appropriate letters and appropriate Factual and Legal Analysis pursuant to the above findings.

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

Attest:

1-29-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: JOHN D. GIBSON
FROM: MARJORIE W. EMMONS/ CHERYL A. FLEMING *CAF*
DATE: JANUARY 23, 1986
SUBJECT: OBJECTION - RAD REF. 85L-45:

First General Counsel's Report
Signed January 16, 1986

The above-named document was circulated to the
Commission on Tuesday, January 21, 1986, 4:00 P.M.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	<u> X </u>
Commissioner Elliott	<u> X </u>
Commissioner Harris	<u> </u>
Commissioner Josefiak	<u> </u>
Commissioner McDonald	<u> </u>
Commissioner McGarry	<u> </u>

This matter will be placed on the Executive Session
agenda for Tuesday, January 28, 1986.

Please advise the Office of Commission Secretary in writing
no later than 10:00 A.M. on Friday, January 24, 1986 who will
represent your Division before the Commission on this matter.
(Pursuant to Directive #17)

36040312471



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM TO: JOHN D. GIBSON
FROM: MARJORIE W. EMMONS/ CHERYL A. FLEMING *CAF*
DATE: JANUARY 23, 1986
SUBJECT: OBJECTION - RAD REF. 85L-45:
First General Counsel's Report
Signed January 16, 1986.

The above-named document was circulated to the
Commission on Tuesday, January 21, 1986, 4:00 P.M.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

- Commissioner Aikens _____
- Commissioner Elliott X
- Commissioner Harris _____
- Commissioner Josefiak _____
- Commissioner McDonald _____
- Commissioner McGarry _____

This matter will be placed on the Executive Session
agenda for Tuesday, January 28, 1986.

Please advise the Office of Commission Secretary in writing
no later than 10:00 A.M. on Friday, January 24, 1986 who will
represent your Division before the Commission on this matter.
(Pursuant to Directive #17)

86040512472



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Rad*
DATE: January 21, 1986
SUBJECT: RAD Ref. 85L-45 - First General Counsel's Report

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

CIRCULATIONS

DISTRIBUTION

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

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FEDERAL ELECTION COMMISSION
FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION _____

RAD Referral 85L-145 58
Staff Maura White Callaway

SOURCE OF MUR: RAD Referral

RESPONDENTS' NAMES: National Association of Chemical
Distributors Political Action
Committee; Sanford Hill, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4), § 434(b), § 441b

INTERNAL REPORTS CHECKED: Public Records

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

On October 30, 1985, the Reports Analysis Division ("RAD") referred the National Association of Chemical Distributors Political Action Committee ("NACDPAC") to the Office of the General Counsel (Attachment 1).

FACTUAL AND LEGAL ANALYSIS

(A) The Facts

NACDPAC registered with the Commission on May 10, 1980, as the separate segregated fund of the National Association of Chemical Distributors ("NACD"). After filing its 1980 Year-End Report, NACDPAC failed to file any further reports.^{1/} On September 9, 1983, RAD mailed NACDPAC a notice stating the Commission's intent to administratively terminate NACDPAC.

^{1/} The 1980 Year-End Report disclosed cash-on-hand of \$270 and no outstanding obligations owed by, or to, NACDPAC.

85040612474

On September 16, 1985, RAD received correspondence from NACDPAC's counsel which included all required reports for the 1981-1982 and 1983-1984 election cycles, and an amended Statement of Organization naming Sanford J. Hill as treasurer. Counsel also stated that Mr. Hill had filed the necessary reports for 1985, but the 1985 Mid-Year Report was not filed until December 6, 1985.^{2/}

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The above letter from counsel explained that NACDPAC's former treasurer, Gerald Bell, was killed on September 17, 1983, and at such time was acting as NACDPAC's treasurer and President of Bell Publicom, Inc.^{3/} Counsel's letter further stated that Sanford Hill obtained information which revealed that Gerald Bell commingled NACDPAC funds with those of Bell Publicom, Inc. and "other Bell clients" into one interest-bearing account at the Huntington Bank. According to counsel, Bell Publicom, Inc. was "essentially bankrupt" by February 1984 and NACDPAC funds "may have been used to pay Publicom, Inc. corporate bills." The letter continues on to state that during February and March 1984 NACD obtained the release of approximately \$75,000 in "'NACD/PAC' funds," but that it was impossible to obtain documentation "as to the source of those funds; i.e., NACD/PAC related" because the Sheriff's Department had seized "many of the NACD/PAC financial

^{2/} The 1985 Mid-Year Report disclosed no receipts or disbursements from January 1, 1985, through June 30, 1985.

^{3/} Bell Publicom, Inc. was the "management association" for NACD. See below.

records needed to accurately reconstruct the financial activity of NACD/PAC for the period of January 1, 1981 through December 31, 1984."^{4/}

A review of the reports filed by NACDPAC on September 16, 1985, reveal a beginning cash-on-hand on January 1, 1981, of \$270, and no receipts or disbursements during 1981, 1982, and 1983. In addition, the 1984 April Quarterly Report disclosed \$9,382.11 in receipts, and the 1984 Year-End Report disclosed \$7,000 in contributions to federal candidates and committees between October 19, 1984, and November 1, 1984. Subsequent to RAD's review of these reports, informational notices were sent on September 26, 1985, advising NACDPAC that it may have violated 2 U.S.C. §§ 432(b)(3), 434, and 441b.

On October 15, 1985, RAD received a letter from NACDPAC's counsel which enclosed a letter from the treasurer explaining the source of the monies reflected on NACDPAC's reports to the Commission. According to a letter sent to counsel by Sanford Hill, the "\$75,324.27 obtained from the bank in March 1984 was from the general operating account for the parent association -- NACD." The letter stated that "[b]ank statements indicated \$75,324.27 had been deposited from NACD sources (dues, meetings, registration, etc.) over the past few months," but also noted that "[f]inancial statements for that time period indicated

^{4/} The files of Bell Publicom, Inc. and the Huntington Bank had also been seized, according to the response.

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that \$9,382.11 had been recorded as contributions for the PAC."^{5/}
The response emphasized that NACD "immediately separated the
\$9,382.11 monies from its general operating account which at that
time was the \$75,324.27 that had been withdrawn from the bank."^{6/}

(B) The Law

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), a political
committee is required to file quarterly reports in a calendar
year in which a regularly scheduled general election is held,
which shall be filed no later than the last day of each calendar
quarter, except that the report for the quarter ending on
December 31 of such calendar year shall be filed no later than
January 31 of the following calendar year.

As set forth at 2 U.S.C. § 434(a)(4)(A)(iii) a political
committee is required to file a post-general election report no
later than the 30th day after the general election and which
shall be complete as of the 20th day after such general election.

^{5/} It was again noted that "the backup information to identify
the individual contributors was not then nor subsequently
discovered in what remained of the association and the PAC
files."

^{6/} A copy of the NACD Treasurer's Report dated June 1, 1984, was
included with the letters. The letter references the "forced
termination of our arrangement with our management association,
Bell Publicom." The reports states that the monies in the
Huntington Bank were released on March 28, 1984, and subsequently
deposited into LaSalle Bank in Chicago. The June 1, 1984
Treasurer's Report noted that as of June 1, 1984, the NACD funds
and PAC funds were commingled. (The September 1985 amendment to
NACDPAC's Statement of Organization identifies NACDPAC's bank
depository as Century National Bank in Washington, D.C.)

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In other than an election year a report covering the period beginning January 1 and ending June 30 is required to be filed no later than July 31, and a report covering the period beginning July 1 and ending December 31 is required to be filed by January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv).

Pursuant to 2 U.S.C. § 432(b)(3), all funds of a political committee shall be segregated from, and may not be commingled with, the personal funds of any individual.

As set forth at 2 U.S.C. § 434(b)(2) a political committee is required to report for the reporting period and the calendar year, the total amount of all receipts.

Any change in information previously submitted in a Statement of Organization shall be reported in accordance with 2 U.S.C. § 432(g) no later than 10 days after the date of the change. 2 U.S.C. § 433(c).

C Application of the Law to the Facts

From the information in hand it appears that NACDPAC failed to file reports in a timely manner between 1981 and 1985. Although NACDPAC's reports for 1981 through 1983 did not disclose any receipts or disbursements during this period, it appears the receipts (\$9,382.11) reported on the 1984 April Quarterly Report (the time of their release from the bank) were accepted by the former treasurer prior to his death in September 1983. This office, however, makes no recommendation with respect to the timeliness of NACDPAC's reports during 1981, 1982, or 1983 in view of the amount of time that has elapsed since the reports

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were due, the fact that there is apparently no evidence of any contributions to federal candidates from 1981 through 1983, and the fact that such reports have now been filed. Insofar as NACDPAC's treasurer has attempted to recreate the financial picture of NACDPAC to the extent possible, and such has revealed both the release of NACDPAC funds in early 1984 as well as several contributions to federal candidates and committees during 1984, it is this office's view that the Commission should open a Matter Under Review with respect to all reports filed untimely subsequent to the release of the funds at issue. Accordingly, it is the recommendation of this office that the Commission find reason to believe NACDPAC and Sanford Hill, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (iii), and (iv) by failing to file timely the 1984 April Quarterly, 1984 July Quarterly, 1984 Post-General Election, 1984 October Quarterly, 1984 Year-End and 1985 Mid-Year Reports.

With respect to the commingling of NACDPAC funds with the funds of NACD and clients of Bell Publicom, Inc., and possible failure to report total receipts, this office, for the reasons stated above,^{7/} makes no recommendation concerning any

^{7/} It is also too conjectural to conclude that total receipts were not reported, and not likely that a conclusive determination could be made that such were not in fact reported. We note that there is also no evidence that any of the funds were required to be itemized pursuant to 2 U.S.C. § 434(b)(3)(A).

commingling or reporting omissions that may have occurred prior to 1984. However, because the funds at issue were released by the bank on March 28, 1984, but continued to be commingled with corporate funds of NACD as late as June 1, 1984, and such funds were later contributed in connection with federal elections, it is the recommendation of this office that the Commission find reason to believe NACDPAC and Sanford J. Hill, as treasurer, violated 2 U.S.C. § 441b(a) by commingling NACD and NACDPAC funds during 1984.

A final issue to be considered is the fact that NACDPAC failed to amend its Statement of Organization within ten days of any change in the information previously submitted in its November 16, 1981, Statement of Organization. Because NACDPAC funds were released in March 1984 and subsequently deposited into a separate bank account, and NACDPAC contributed to federal candidates and committees in October and November 1984, it appears that NACDPAC should have amended its Statement of Organization prior to September 17, 1985, to reflect the address of NACDPAC, the name, address, and position of the custodian of NACDPAC's books and accounts, the name and address of NACDPAC's treasurer, and NACDPAC's depository. In view of NACDPAC's failure to amend its Statement of Organization in a timely manner it is the recommendation of this office that the Commission find reason to believe NACDPAC and Sanford J. Hill, as treasurer, violated 2 U.S.C. § 433(c).

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RECOMMENDATIONS

1. Open a Matter Under Review
2. Find reason to believe the National Association of Chemical Distributors Political Action Committee and Sanford Hill, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (iii), and (iv) in connection with 1984 and 1985 reports.
3. Find reason to believe the National Association of Chemical Distributors Political Action Committee and Sanford Hill, as treasurer, violated 2 U.S.C. § 441b(a).
4. Find reason to believe the National Association of Chemical Distributors Political Action Committee and Sanford Hill, as treasurer, violated 2 U.S.C. § 433(c).
5. Approve the attached letter and General Counsel's Factual and Legal Analysis.

Charles N. Steele
 General Counsel

January 10, 1986
 Date

BY: 
 Kenneth A. Gross
 Associate General Counsel

Attachments

- 1- RAD Referral
- 2- Proposed letter and analysis

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REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: October 30, 1985ANALYST: Bill Baber

- I. COMMITTEE: National Association of Chemical Distributors Political Action Committee (C00127613)
Sanford J. Hill, Treasurer
1110 Vermont Ave., N.W., #1150
Washington, D.C. 20005
- II. RELEVANT STATUTE: 2 U.S.C. §§432(b)(3); 434(a)(4); 434(b);
and 441b

III. BACKGROUND:

The Chemical Distributors Political Action Committee registered with the Commission on May 10, 1980 as a separate segregated fund of the National Association of Chemical Distributors. Its original treasurer was Gerald M. Bell (Attachment 2).

On November 16, 1981 an amended Statement of Organization was filed which changed the name to the National Association of Chemical Distributors Political Action Committee ("NACD/PAC") (Attachment 3). After the 1980 Year End Report, NACD/PAC failed to file further reports; therefore, NACD/PAC was sent an administrative termination notice on September 9, 1983 (Attachment 4).

Correspondence received from NACD/PAC on September 16 and 17, 1985 included all required reports for the 1981-82, 1983-84 election cycle and an amended Statement of Organization. The cover letter from William L. Fallon, NACD/PAC's attorney, stated that NACD/PAC's new treasurer was Sandford J. Hill. Mr. Fallon also stated he had been advised by Mr. Hill, "that the necessary reports for 1985 have been filed." To date, the 1985 Mid-Year Report has not been filed (Attachments 5, 6, 7 and 8).

According to Mr. Fallon's letter, the former treasurer, Mr. Bell (the president of Bell Publicom, Inc.) was killed in a plane crash on September 17, 1983. "Based on information obtained by Stanford J. Hill, it appears the Huntington Bank allowed Gerald Bell to commingle funds of

Attachment 1(10)

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NATIONAL ASSOCIATION OF CHEMICAL
DISTRIBUTORS POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

Bell Publicom, Inc., NACD/PAC, and other Bell clients into one interest-bearing account..." as stated by Mr. Fallon. He also noted that Bell Publicom, Inc. was "essentially bankrupt" by February 1984, and that NACD/PAC funds may have been used to pay the corporation's bills. According to Mr. Fallon, NACD/PAC's connected organization was able to obtain the release of approximately \$75,000 of "NACD/PAC" funds from the Huntington Bank during February-March 1984 (See Attachment 5).

NACD/PAC reports show a beginning cash-on-hand balance of \$270 on January 1, 1981, no receipts and disbursements during 1981, 1982 and 1983, and \$9,382.11 in receipts during 1984. Mr. Fallon stated that NACD/PAC was unable to obtain documentation as to the source of these funds because the files of Bell Publicom, Inc. and/or the Huntington Bank had been seized by the Dayton Sheriff's Department. He noted that the seized records included many of the NACD/PAC records needed to report the activity for the 1981-84 period and that Mr. Hill was given "limited access" to these records and disclosed the information in the reports. Based on these special circumstances, Mr. Fallon stated that NACD/PAC, "...has made its best effort to obtain and submit the enclosed Reports."

Informational Notices ("INs") were sent on September 26, 1985 advising NACD/PAC that it may have violated 2 U.S.C. §§432(b)(3), 434 and 441b. The INs stated that the Commission may initiate legal action concerning these matters (Attachment 9).

On September 30, 1985, Mr. Fallon called the Commission in response to the September 26, 1985 INs (Attachment 10). The Reports Analysis Division ("RAD") analyst explained that the Commission's legal division may need to look further into the matter. The RAD analyst also told Mr. Fallon that there were at least two points that needed to be clarified for the public record: 1) the source of the funds reported in the 1984 April Quarterly Report and 2) the source of the \$75,000 in "NACD/PAC funds" released by the Huntington Bank. Mr. Fallon said that he would talk to Mr. Hill to see if the matter could be clarified.

On October 15, 1985, the Commission received a response from Mr. Fallon and he stated that Mr. Hill had sent him a letter explaining "the source monies indicated on the reports previously submitted to the Commission...." Mr. Hill's letter stated that financial statements from the general operating account for the parent association indicated that of the \$75,324.27 in that account, \$9,382.11

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NATIONAL ASSOCIATION OF CHEMICAL
DISTRIBUTORS POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 3

had been recorded as contributions for NACD/PAC in March 1984. The letter further stated that the backup information to identify the individual contributions was not available in what remained of the association and NACD/PAC's files and that the association immediately separated the funds from its general operating account (Attachment 11).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

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NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
CHEMICAL DISTRIBUTORS POLITICAL ACTION COMMITTEE						ID #C00127613
CONNECTED ORGANIZATION: CHEMICAL DISTRIBUTORS, NAT'L ASS'N OF						
	1980 STATEMENT OF ORGANIZATION			1MAY80	2	80FEC/155/4779
	JULY QUARTERLY	0	0	1MAY80 -30JUN80	2	80FEC/158/4690
	OCTOBER QUARTERLY	3,488	2,158	1JUL80 -30SEP80	7	80FEC/169/3297
	POST-GENERAL	1,758	2,818	1OCT80 -24NOV80	6	81FEC/191/1714
	YEAR-END	475	475	25NOV80 -31DEC80	5	81FEC/191/1709
	TOTAL	5,721	0		22	TOTAL PAGES

ALL REPORTS HAVE BEEN REVIEWED

CASH ON HAND AT CLOSE OF ELECTION CYCLE: \$270.00

DEBTS OWED TO THE COMMITTEE: \$00.00

DEBTS OWED BY THE COMMITTEE: \$00.00

(7)

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 FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 29OCT85
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NATIONAL ASSOCIATION OF CHEMICAL DISTRIBUTORS POLITICAL ACTION COMMITTEE						
CONNECTED ORGANIZATION: CHEMICAL DISTRIBUTORS; NAT'L ASS'N OF						NON-PARTY NON-QUALIFIED ID #C00127613
1981	REQUEST FOR ADDITIONAL INFORMATION					2 81FEC/205/0316
	STATEMENT OF ORGANIZATION - AMENDMENT			16NOV81		2 81FEC/209/2492
	MID-YEAR REPORT	0	0	1JAN81 -30JUN81		2 85FEC/387/4589
	1'ST LETTER INFORMATIONAL NOTICE			1JAN81 -30JUN81		1 85FEC/388/3524
	YEAR-END	0	0	1JUL81 -31DEC81		2 85FEC/387/4586
	1'ST LETTER INFORMATIONAL NOTICE			1JUL81 -31DEC81		1 85FEC/388/352
1982	APRIL QUARTERLY	0	0	1JAN82 -31MAR82		2 85FEC/387/458
	1'ST LETTER INFORMATIONAL NOTICE			1JAN82 -31MAR82		1 82FEC/388/3528
	JULY QUARTERLY	0	0	1APR82 -30JUN82		2 85FEC/387/4580
	1'ST LETTER INFORMATIONAL NOTICE			1APR82 -30JUN82		1 85FEC/388/3527
	OCTOBER QUARTERLY	0	0	1JUL82 -30SEP82		2 85FEC/387/4577
	1'ST LETTER INFORMATIONAL NOTICE			1JUL82 -30SEP82		1 85FEC/388/3526
	YEAR-END	0	0	1OCT82 -31DEC82		2 85FEC/387/4574
	1'ST LETTER INFORMATIONAL NOTICE			1OCT82 -31DEC82		1 85FEC/388/3525
	COMPREHENSIVE AMEND	-	-	1JAN81 -31DEC82		1 85FEC/390/2500
	COMPREHENSIVE AMEND - AMENDMENT	-	-	1JAN81 -31DEC82		1 85FEC/390/2501
	TOTAL	0	0	0	0	24 TOTAL PAGES

ALL REPORTS HAVE BEEN REVIEWED.

CASH ON HAND AT CLOSE OF ELECTION CYCLE: \$270.00

DEBTS OWED TO AND OR BY THE COMMITTEE: \$00.00

ATTACHMENT 1 PAGE 2 OF 4

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

DATE 29OCT85
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NATIONAL ASSOCIATION OF CHEMICAL DISTRIBUTORS POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: CHEMICAL DISTRIBUTORS; NAT'L ASS'N OF				NON-PARTY NON-QUALIFIED ID #C00127613		
1983	MISCELLANEOUS REPORT			9SEP83 FROM FEC	1	03FEC/283/4922
	MID-YEAR REPORT	0	0	1JAN83 -30JUN83	2	05FEC/387/4571
	1'ST LETTER INFORMATIONAL NOTICE			1JAN83 -30JUN83	1	05FEC/388/3540
	YEAR-END	0	0	1JUL83 -31DEC83	2	05FEC/387/4568
	1'ST LETTER INFORMATIONAL NOTICE			1JUL83 -31DEC83	1	05FEC/388/3541
1984	APRIL QUARTERLY	9,382	0	1JAN84 -31MAR84	3	05FEC/387/4567
	1'ST LETTER INFORMATIONAL NOTICE			1JAN84 -31MAR84	1	05FEC/388/3542
	JULY QUARTERLY	0	0	1APR84 -30JUN84	2	05FEC/387/4561
	1'ST LETTER INFORMATIONAL NOTICE			1APR84 -30JUN84	1	05FEC/388/3543
	OCTOBER QUARTERLY	0	0	1JUL84 -30SEP84	2	05FEC/387/4558
	1'ST LETTER INFORMATIONAL NOTICE			1JUL84 -30SEP84	1	05FEC/388/3544
	YEAR-END	0	7,000	1OCT84 -31DEC84	3	05FEC/387/4554
	1'ST LETTER INFORMATIONAL NOTICE			1OCT84 -31DEC84	1	05FEC/388/3545
	COMPREHENSIVE AMEND	-	-	1JAN83 -31DEC84	3	05FEC/387/4592
	COMPREHENSIVE AMEND - AMENDMENT	-	-	1JAN83 -31DEC84	4	05FEC/389/1437
	TOTAL	9,382	0	7,000	0	28 TOTAL PAGES

ALL REPORTS HAVE BEEN REVIEWED

CASH ON HAND AT THE CLOSE OF ELECTION CYCLE: \$2,652.11

DEBTS OWED TO AND OR BY THE COMMITTEE: \$00.00

ATTACHMENT 1 PAGE 3 OF 4

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86040612138
 FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 29OCT85
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NATL ASSOC OF CHEMICAL DISTRIBUTORS PAC CONNECTED ORGANIZATION: NATL ASSOC OF CHEMICAL DISTRIBUTORS				NON-PARTY NON-QUALIFIED	ID #C00127613	
	1985 STATEMENT OF ORGANIZATION - AMENDMENT			17SEP85	1	85PEC/387/4595
	TOTAL	0	0	0	0	1 TOTAL PAGES

ALL REPORTS HAVE BEEN REVIEWED

1(7)

STATEMENT OF ORGANIZATION

RECEIVED

(See reverse side for instructions)

1. (a) Name of Committee (in Full) Check, if name or address is changed. **Chemical Distributors Political Action Committee** 2. Date **May 1, 1980 MAY 10 AM 11**

(b) Address (Number and Street) **1406 Third National Bldg.** 3. FEC identification Number

(c) City, State and ZIP Code **Dayton, OH 45402** 4. Is this an amended Statement? YES NO

5. TYPE OF COMMITTEE check one:
- (a) The committee is a principal campaign committee. (Complete the candidate information below.)
 - (b) The committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
 - (c) The committee supports, opposes only one candidate _____ and is NOT an authorized committee. (Name of candidate)
 - (d) The committee is a _____ committee of the _____ Party. (National, State or Subordinate) (Democratic, Republican, etc.)
 - (e) The committee is a separate segregated fund.
 - (f) The committee supports, opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
National Association of Chemical Distributors	1406 Third National Bldg. Dayton, OH 45402	Connected

6. The committee is a _____ connected organization above please indicate type of organization: Corporation Corporation with Share Stock Labor Organization Membership Organization Trade Association Other _____

7. Custodian of Records: certify by name, address, phone number - optional and position the person in possession of committee books and records

Full Name	Mailing Address and ZIP Code	Title or Position
Treasurer		
8. Treasurer: List the name and address, phone number - optional of the treasurer of the committee and the name and address of any co-treasurer.		
Vernon R. Lowe	Same as below	Alternate Treasurer
Gerald M. Bell	1406 Third National Bldg. Dayton, OH 45402	Treasurer

9. Banks or Other Depositories: List a bank or other depository in which the committee deposits funds, holds accounts, holds money, deposits, or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Third National Bank & Trust Co.	Dayton, OH 45402

Gerald M. Bell

Gerald M. Bell

May 1, 1980

(8)

RECEIVED

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

1. (a) Name of Committee (in Full) Check if name or address is changed. **NATIONAL ASSOCIATION OF ETHNIC DISTRICTS POLITICAL ACTION COMMITTEES**

(b) Address (Number and Street)

(c) City, State and ZIP Code

2. Date **11 NOV 16 AM: 00**

3. FEC Identification Number **000177613**

4. Is this an amended Statement? YES NO

5. TYPE OF COMMITTEE (check one):

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate _____ Candidate Party Affiliation _____ Office Sought _____ State/District _____

- (c) This committee supports/opposes only one candidate _____ (name of candidate) and is NOT an authorized committee.
- (d) This committee is a _____ (National, State or subordinate) committee of the _____ Party. (Democratic, Republican, etc.)
- (e) This committee is a separate segregated fund.
- (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

- Corporation Corporation w/o Capital Stock Labor Organization Membership Organization Trade Association Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position, the person in possession of committee books and records.

Full Name _____ Mailing Address and ZIP Code _____ Title or Position _____

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee, and the name and address of any designated agent (e.g., assistant treasurer).

Full Name _____ Mailing Address and ZIP Code _____ Title or Position _____

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc. _____ Mailing Address and ZIP Code _____
HUNTINGTON NATIONAL BANK & TRUST DAYTON OH 45402

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

GERALD M BELL
Type or Print Name of Treasurer

Gerald M Bell
SIGNATURE OF TREASURER

NOV 10 1981
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4088

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

September 9, 1983

00127613
NATIONAL ASSOCIATION OF CHEMICAL DISTRIBUTORS
POLITICAL ACTION COMMITTEE
GERALD H BELL
1666 THIRD NATIONAL BLDG

DAYTON OH 45402
Dear Treasurer:

Pursuant to 2 U.S.C. 433(d)(2) of the Federal Election Campaign Act, the Commission intends to administratively terminate the reporting obligation of your committee. According to 11 CFR 102.4, the treasurer of the committee has 30 days from the day of receipt of this notice to object to this administrative termination. If a written objection is not received by the Commission within the 30 days, this action will take effect.

Please note that:

- The administrative termination of the reporting obligation does not relieve the committee of any legal responsibility for the payment of any outstanding debt or obligation.

- The committee must continue to maintain all records in accordance with 2 U.S.C. 432(d). The records should be maintained and available for Commission inspection should the necessity arise.

- Excess or residual funds held by the committee can only be used in accordance with Commission regulations (11 CFR 110.3(a)(2), 113.1 and 113.2).

- Any future undertaking by the Committee to raise funds for the purpose of influencing a Federal election or supporting a Federal candidate will void the administrative termination. At that time, the committee is required to report all financial activity since the ending coverage date of the last report filed.

If you should have any questions concerning this matter, please call Craig Crooks at (202) 523-4048 or toll free on (800) 424-9530.

Sincerely,

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

(110)

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05 SEP 85 4:23

LAW OFFICES
HANSON, O'BRIEN, BIRNEY AND BUTLER

600 SEVENTEENTH STREET, N.W.
WASHINGTON, D. C. 20005
TELEPHONE (202) 596-6410

ELONA HANSON (1926-1982)
W. FRANK O'NEALE, JR (1920-1976)
TELEPHONE (202) 593-1840
CABLE ADDRESS "HANSON"
INTERNATIONAL FILES 44082
MARYLAND OFFICE
81 MONROE STREET
ROCKVILLE, MARYLAND 20850
TELEPHONE (301) 340-8415

GEORGE S. HANSON •
EMIL L. O'BRIEN
ARTHUR A. BIRNEY
WILLIAM J. BUTLER, JR •
MICHAEL H. MCCORMICK •
WILLIAM L. FALLOH •
ALEXANDER W. WHITMAN
JEROME C. SCHAEFER •
ARTHUR B. MURPHY
GREGORY P. SCHERER
JOHN R. CONNORS •
JEFFREY S. WENTHAUS •
RAMELA J. BROWN

September 16, 1985

ADMITTED TO PRACTICE IN MARYLAND

ADMITTED TO PRACTICE IN VIRGINIA

Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: FEC I.D. AC 00127613
Our Client: National Association of Chemical
Distributors Political Action Committee
Subject Matter: Statement of Organization and
Report of Receipts and Disbursements
For Period January 1, 1981 through
December 31, 1984.

Gentlemen:

Enclosed please find the following FEC forms which are being submitted on behalf of National Association of Chemical Distributors Political Action Committee (hereinafter "NACD/PAC"):

1. Statement of Organization Form 1, dated September 16, 1985.
2. Report of Receipts and Disbursements Form 3X and Detailed Summary Page for period 1/1-6/30/81.
3. Report of Receipts and Disbursements Form 3X and Detailed Summary Page for period 7/1-12/31/81.
4. Report of Receipts and Disbursements Form 3X and Detailed Summary Page for period 1/1-3/31/82.
5. Report of Receipts and Disbursements Form 3X and Detailed Summary Page for period 4/1-6/30/82.
6. Report of Receipts and Disbursements Form 3X and Detailed Summary Page for period 7/1-9/30/82.
7. Report of Receipts and Disbursements Form 3X and Detailed Summary Page for period 10/1-12/31/82.
8. Report of Receipts and Disbursements Form 3X and Detailed Summary Page for period 1/1-6/30/83.

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1(11)

Federal Election Commission

Page 2

September 16, 1985

9. Report of Receipts and Disbursements Form 2X and Detailed Summary Page for period 7/1-12/31/83.

10. Report of Receipts and Disbursements Form 2X and Detailed Summary Page and Schedule A, Itemized Receipts, for period 1/1-2/31/84.

11. Report of Receipts and Disbursements Form 2X and Detailed Summary Page for period 4/1-6/30/84.

12. Report of Receipts and Disbursements Form 2X and Detailed Summary Page and Schedule B, Itemized Disbursements for period 7/1-9/30/84.

13. Report of Receipts and Disbursements Form 2X and Detailed Summary Page and Schedule B for period 10/1-12/31/84.

Additionally, we have been advised by Sanford J. Hill, the current Treasurer and Executive Vice-President of "NACD/PAC" that the necessary Reports for 1985 have been filed.

The enclosed Statement of Organization and Reports are being filed with the Commission in a good faith attempt to reconstruct the financial activity of "NACD/PAC" for the period January 1, 1981 to December 31, 1984.

The source(s) for the information on the enclosed Forms is/are limited due to a series of events which took place in the Fall of 1983 and following months. I will now detail those events to the degree possible, based on the limited information available to this office.

On September 17, 1983, a plane crashed on a flight from Dayton, Ohio to Pittsburgh, Pennsylvania. Passengers on that flight included Gerald M. Bell, John Stratton and Robert Abrahamson. All were killed in that plane crash.

Gerald Bell was the president of Bell Publicom, Inc., of Dayton, Ohio and Robert Abrahamson was an attorney in Dayton, Ohio and represented Bell Publicom as legal counsel.

At the time of death, Gerald Bell was the primary agent for "NACD/PAC" which included his acting as Treasurer and Custodian for the PAC. This included recording receipts and disbursement of all funds associated with the NACD/PAC.

The bank depository for the NACD/PAC funds at the time of the plane crash was the Huntington Bank of Ohio, in Dayton, Ohio.

Based on information obtained by Sanford J. Hill, the current Treasurer of NACD/PAC, it appears the Huntington Bank allowed Gerald Bell to commingle funds of Bell Publicom, Inc., NACD/PAC and other Bell clients into one

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1(12)

Federal Election Commission

page 3

September 16, 1985

interest-bearing account; that signature card authorizations from NACD/PAC may have been violated by Gerald Bell, etc., as part of this commingling; and that NACD/PAC funds may have been used to pay Publicom, Inc., corporate bills.

Based on his investigation, Mr. Hill further advises that by February, 1984, Publicom, Inc., was essentially bankrupt.

During the period February-March, 1984, the parent Association, the National Association of Chemical Distributors, went to the Huntington Bank and was able to convince that Bank to release approximately \$75,000 of "NACD/PAC" funds. At that time, it was impossible to obtain documentation as to the source of those funds; i.e., NACD/PAC related. Unfortunately, the files of Publicom, Inc., and/or Huntington Bank have since been seized by the Sheriff's Department in Dayton. The seized records include many of the NACD/PAC financial records needed to accurately reconstruct the financial activity of NACD/PAC for the period January 1, 1981 through December 31, 1984.

Mr. Sanford J. Hill has been given limited access to the financial records of NACD/PAC in Ohio. It is from this limited information that Mr. Hill has been able to reconstruct the enclosed Reports.

Mr. Sanford J. Hill has advised this office that with the filing of the enclosed Forms, the recordkeeping for NACD/PAC is now in compliance with 2 U.S.C. §432, §433, and §437(b).

We respectfully submit that, based on the limited information available to Mr. Hill, he has made his best effort to obtain and submit the information required by 42 U.S.C. §434. Based on these efforts by Mr. Hill and his representation (as the now authorized agent for NACD/PAC) that the statutory filing requirements shall be kept current, we would request that the enclosed documentation be accepted by the Commission and that NACD/PAC be deemed to be in compliance with 2 U.S.C. §434.

Finally, based on the special circumstances involved in this matter; and the limited information to which Mr. Sanford J. Hill has had access to reconstruct the enclosed Reports; and the fact that NACD/PAC, through Mr. Hill, has made its best effort to obtain and submit the enclosed Reports, the undersigned respectfully submits that NACD/PAC and/or its agents should not be found to be in knowing and willfull violation of any provision of the Federal Election Campaign Act. 2 U.S.C. §441 j.

Respectfully submitted,

W. Fallon

William L. Fallon

8360403114104

	2011	2012	
I. RECEIPTS			
11. CONTRIBUTIONS (other than from FECA):			
(a) Individuals/Persons Other Than Political Committees.....	-	-	11(a)
(Enter Entry Indicated 0.....)			
(b) Political Party Committees.....	-	-	11(b)
(c) Other Political Committees.....	-	-	11(c)
(d) TOTAL CONTRIBUTIONS (other than from FECA) (Add 11(a), 11(b) and 11(c))	-	-	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, Returns, etc.)	-	-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-	-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-	-	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	-	-	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	-	-	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-	-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-	-	21
22. INDEPENDENT EXPENDITURES (See Schedule E)	-	-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 6441 add) (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.....	-0-	-0-	26(a)
(b) Political Party Committees.....	-0-	-0-	26(b)
(c) Other Political Committees.....	-0-	-0-	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	-0-	-0-	26(d)
27. OTHER DISBURSEMENTS	-0-	-0-	27
28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	-0-	-0-	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than from Line 11(d))	-0-	-0-	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-0-	-0-	30
31. NET CONTRIBUTIONS (other than from FECA) (Subtract Line 30 from Line 29)	-0-	-0-	31
32. TOTAL OPERATING EXPENDITURES from Line 19	-0-	-0-	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-0-	-0-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	-0-	-0-	34

(16)

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

05 SEP 1981

(Summary Page)

ALMA 489A

1. Name of Committee (do not print National Association of Chemical Distributors Political Action Committee)

Address (Number and Street)
 1110 Vermont Avenue, NW

City, State and ZIP Code
 Washington, DC 20005

Check here if address is different than previously reported

2. FEC Identification Number
 C00127613

This committee qualified as a multicandidate committee during this reporting period on _____

4. TYPE OF REPORT (Check appropriate box)

April 15 Quarterly Report October 15 Quarterly Report

July 15 Quarterly Report January 31 Year End Report

July 31 Mid Year Report (Non-Election Year Only)

Monthly Report for _____

Twelfth day report preceding _____
 election on _____ in the State of _____

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

Transition Report

5. Is this Report an Amendment?
 YES NO

SUMMARY

6. Covering Period 7/1/81 through 12/31/81

6a. In Cash on hand January 1, 19 81

6b. Cash on Hand at Beginning of Reporting Period \$ 270.00

6c. Total Receipts (from Line 10) \$ -0-

6d. Subtotal (add Lines 6b and 6c) for Column A and Lines 6a and 6c for Column B \$ 270.00

7. Total Disbursements (from Line 20) \$ -0-

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6d) \$ 270.00

9. Debts and Obligations Owed TO The Committee \$ -0-
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee \$ -0-
(Itemize all on Schedule C or Schedule D)

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6a. In Cash on hand January 1, 1981		\$ 270.00
6b. Cash on Hand at Beginning of Reporting Period	\$ 270.00	
6c. Total Receipts (from Line 10)	\$ -0-	\$ -0-
6d. Subtotal (add Lines 6b and 6c) for Column A and Lines 6a and 6c for Column B	\$ 270.00	\$ 270.00
7. Total Disbursements (from Line 20)	\$ -0-	\$ -0-
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6d)	\$ 270.00	\$ 270.00
9. Debts and Obligations Owed TO The Committee	\$ -0-	
10. Debts and Obligations Owed BY the Committee	\$ -0-	

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

For further information contact:
 Federal Election Commission
 Toll Free 800-424-6530
 Local 707-623-4680

Sanford J. Hill
 Type or Print Name of Treasurer

Sanford J. Hill 8/15/81
 SIGNATURE OF TREASURER Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 USC § 434b.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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FEC FORM 3X (3-80)

1(17)

	11/1/00	12/31/01	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	-	-	11(a)
(Include Entry Underlined 0.....)			
(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))	-	-	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, Returns, etc.)	-	-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-	-	16
17. OTHER RECEIPTS (Donations, Interest, etc.)	-	-	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	-	-	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	-	-	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-	-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-	-	21
22. INDEPENDENT EXPENDITURES (see Schedule E)	-	-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES	-	-	23
(2 U.S.C. 6441 (e)(2) (Use Schedule F))			
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	-	-	27
28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	-	-	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	-	-	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-	-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	-	-	34

(18)

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

... A INF REC
85 SEP 11 40:11
FBI/DOJ

(Summary Page)

COLUMN A

1. Name of Committee (in Full)

National Association of Chemical
Distributors Political Action
Committee

2. Address (Number and Street)

1110 Vermont Avenue, NW

3. City, State and ZIP Code

Washington, DC 20006

Check here if address is different than previously reported.

4. FEC Identification Number

C09127613

5. This committee qualified as a non-federally financed committee during this reporting period on _____ (Date)

6. TYPE OF REPORT (Check appropriate box)

- April 15 Quarterly Report
 - October 15 Quarterly Report
 - July 15 Quarterly Report
 - January 31 Year End Report
 - July 31 Mid Year Report (Non-Quarter Year Only)
 - Monthly Report for _____
 - Twelfth day report preceding _____ (Special Event)
 - _____ (Event) in the State of _____
 - Thirteenth day report following the General Election on _____ in the State of _____
 - Termination Report
- Did this Report an Amendment?
 YES NO

SUMMARY

6. Covering Period 1/1/82 through 3/31/82

6(a) Cash on hand January 1, 1982

(a) Cash on Hand at Beginning of Reporting Period

(b) Total Receipts (from Line 1B)

(c) Subtotal (add Lines 6(a) and 6(b) for Column A and Lines 6(a) and 6(b) for Column B)

7. Total Disbursements (from Line 2B)

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

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

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

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

Sanford J. Hill
Type or Print Name of Treasurer

[Signature]
SIGNATURE OF TREASURER

8/11/85
Date

For further information contact:
Federal Election Commission
Toll Free 888 434 9530
Local 202 523-4888

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 USC 6431g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

1(19)

UNITED STATES DEPARTMENT OF JUSTICE
 FEDERAL BUREAU OF INVESTIGATION
 WASHINGTON, D.C. 20535

Name of Candidate or Club

Name of Party or Club

From 1/1/82

To 12/31/82

Column A
Total This Period

Column B
Quantity Year-to-Date

I. RECEIPTS		Column A	Column B	
11. CONTRIBUTIONS (other than loans) FROM:				
(a) Individuals/Persons Other Than Political Committees				
(Please Enter Unformatted 0 _____)		-0-	-0-	11(a)
(b) Political Party Committees		-0-	-0-	11(b)
(c) Other Political Committees		-0-	-0-	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))		-0-	-0-	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		-0-	-0-	12
13. ALL LOANS RECEIVED		-0-	-0-	13
14. LOAN REPAYMENTS RECEIVED		-0-	-0-	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Retain, etc.)		-0-	-0-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		-0-	-0-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)		-0-	-0-	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)		-0-	-0-	18
II. DISBURSEMENTS				
19. OPERATING EXPENDITURES		-0-	-0-	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		-0-	-0-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		-0-	-0-	21
22. INDEPENDENT EXPENDITURES (see Schedule E)		-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d) (Use Schedule F))		-0-	-0-	23
24. LOAN REPAYMENTS MADE		-0-	-0-	24
25. LOANS MADE		-0-	-0-	25
26. REFUNDS OF CONTRIBUTIONS TO:				
(a) Individuals/Persons Other Than Political Committees				
		-0-	-0-	26(a)
(b) Political Party Committees				
		-0-	-0-	26(b)
(c) Other Political Committees				
		-0-	-0-	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))		-0-	-0-	26(d)
27. OTHER DISBURSEMENTS		-0-	-0-	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		-0-	-0-	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES				
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)		-0-	-0-	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)		-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)		-0-	-0-	31
32. NET OPERATING EXPENDITURES from Line 19		-0-	-0-	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		-0-	-0-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)		-0-	-0-	34

1(30)

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

85SEP17 08:11

(Summary Page)

ALABAMA

ALABAMA

1. Name of Committee On Ballot

National Association of Chemical
Distributors Political Action
Committee

Address (Number and Street)

1110 Vermont Avenue, NW

City, State and ZIP Code

Washington, DC 20005

Check here if address is different than previously reported.

2. FEC Identification Number

000127613

3. This committee qualified as a multi-candidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

- (a) April 15 Quarterly Report October 15 Quarterly Report
 - July 15 Quarterly Report January 31 Year End Report
 - July 31 Mid Year Report (Non-Election Year Only)
 - Monthly Report for _____
 - Twelfth day report preceding _____ (Special Election) 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 4/1/82 through 6/30/82

6. (a) Cash on Hand January 1, 19 82

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 20)

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

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

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

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

Sanford J. Hill
Type or Print Name of Treasurer

[Signature] 8/15/85
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 7 U.S.C. § 437b.

For further information contact:

Federal Election Commission
Toll Free 800 424 9530
Local 202 523-4888

All previous versions of FEC FORM 3 and FEC FORM 3x are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

1(21)

U.S. DEPARTMENT OF JUSTICE
 FEDERAL BUREAU OF INVESTIGATION
 WASHINGTON, D.C. 20535

	2016	2017
I. RECEIPTS		
11. CONTRIBUTIONS (other than loan) FROM:		
(a) Individuals/Persons Other Than Political Committees	-	-
(Share Entry Unchecked 0		
(b) Political Party Committees	-	-
(c) Other Political Committees	-	-
(d) TOTAL CONTRIBUTIONS (other than loan) (Add 11(a), 11(b) and 11(c))	-	-
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-	-
13. GIFT LOANS RECEIVED	-	-
14. LOAN REPAYMENTS RECEIVED	-	-
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Retires, etc.)	-	-
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-	-
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-	-
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	-	-
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	-	-
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-	-
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-	-
22. INDEPENDENT EXPENDITURES (see Schedule E)	-	-
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 6441 (d)) (Use Schedule F)	-	-
24. LOAN REPAYMENTS MADE	-	-
25. LOANS MADE	-	-
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	-	-
(b) Political Party Committees	-	-
(c) Other Political Committees	-	-
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	-	-
27. OTHER DISBURSEMENTS	-	-
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	-	-
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loan) from Line 11(d)	-	-
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-	-
31. NET CONTRIBUTIONS (other than loan) (Subtract Line 30 from Line 29)	-	-
32. TOTAL OPERATING EXPENDITURES from Line 19	-	-
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-	-
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	-	-

2016 03 03 01 00

(22)

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

05 SEP 82 00:11

(Summary Page)

1. Name of Committee (Do Not Leave Blank)
National Association of Chemical Distributors Political Action Committee

2. P.E.C. Identification Number
C00127613

3. TYPE OF REPORT (Check appropriate box)
 April 15 Quarterly Report October 15 Quarterly Report
 July 15 Quarterly Report January 31 Year End Report
 July 31 Mid Year Report (Non-Station Year Only)
 Monthly Report for _____
 Twelfth day report preceding _____
 Thirtieth day report following the General Election
 Termination Report

4. Is this Report an Amendment?
 YES NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year to Date
6. Covering Period <u>7/1/82</u> through <u>9/30/82</u>			
6. (a) Cash on hand January 1, 19 <u>82</u>			\$ 270.00
(b) Cash on Hand at Beginning of Reporting Period		270.00	
(c) Total Receipts (from Line 10)		-0-	-0-
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		270.00	\$ 270.00
7. Total Disbursements (from Line 20)		-0-	-0-
8. Cash on Hand at Close of Reporting Period (Subtract Line 7 from Line 6(d))		270.00	\$ 270.00
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		-0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		-0-	

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

Sarford J. Hill
Type or Print Name of Treasurer

[Signature]
SIGNATURE OF TREASURER

For further information contact:
Federal Election Commission
Toll Free 800 424 9630
Local 202 632-6000

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437b.

All previous versions of P.E.C. FORM 3 and P.E.C. FORM 3a are obsolete and should no longer be used.

03033719577

OFFICIAL CAMPAIGN STATEMENT
of Receipts and Disbursements
Form 1, FEB 1981 (2)

Name of Candidate for Office		Report Ending on Date		
		From 1/1/82	To 9/30/82	
		COLUMN A Total This Period	COLUMN B Calendar Year to Date	
I. RECEIPTS				
11. CONTRIBUTIONS (other than loan) FROM:				
(a) Individuals/Persons Other Than Political Committees				
	(Illinois Entry Unchecked 0.....)	-	-	11(a)
	(b) Political Party Committees	-	-	11(b)
	(c) Other Political Committees	-	-	11(c)
	(d) TOTAL CONTRIBUTIONS (other than loan) (Add 11(a), 11(b) and 11(c))	-	-	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, Returns, etc.)	-	-	15
	16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-	-	16
	17. OTHER RECEIPTS (Dividends, Interest, etc.)	-	-	17
	18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	-	-	18
II. DISBURSEMENTS				
	19. OPERATING EXPENDITURES	-	-	19
	20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-	-	20
	21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-	-	21
	22. INDEPENDENT EXPENDITURES (see Schedule E)	-	-	22
	23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 (d)) (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	-0-	-0-	26(a)
	(b) Political Party Committees	-0-	-0-	26(b)
	(c) Other Political Committees	-0-	-0-	26(c)
	(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	-0-	-0-	26(d)
	27. OTHER DISBURSEMENTS	-0-	-0-	27
	28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	-0-	-0-	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES				
	29. TOTAL CONTRIBUTIONS (other than loan) from Line 11(d)	-0-	-0-	29
	30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-0-	-0-	30
	31. NET CONTRIBUTIONS (other than loan) (Subtract Line 30 from Line 29)	-0-	-0-	31
	32. OPERATING EXPENDITURES from Line 19	-0-	-0-	32
	33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-0-	-0-	33
	34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	-0-	-0-	34

1(24)

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

FEC

(Summary Page)

85 SEP 17 08:11

ALISON AREA

ALISON AREA

1. Name of Committee (in Full)

National Association of Chemical
Distributors Political Action
Committee

Address (Number and Street)

1110 Vermont Avenue, NW

City, State and ZIP Code

Washington, DC 20005

Check here if address is different than previously reported

2. FEC Identification Number

C00127613

3. This committee qualified as a multicandidate committee during this Reporting Period on _____

4. TYPE OF REPORT (Check appropriate boxes)

- (a) April 15 Quarterly Report
- Quarter 15 Quarterly Report
- July 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-Election Year Only)
- Monthly Report for _____
- Twelfth day report preceding _____
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 1/1/83 through 6/30/83

6. (a) Cash on hand January 1, 1983

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (From Line 100)

(d) Subtotal (Add Lines 6(b) and 6(c) for Column A and
Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (From Line 200)

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

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

10. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D)

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

Sarford J. Hill

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

Sarford J. Hill

Date

8/15/85

For further information contact

Federal Election Commission

Toll Free 800 424 9630

Local 202 573-4888

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. 643(h)

All previous versions of FEC FORM 3 and FEC FORM 3e are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

1(27)

85 SEP 17 08:11

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

Name of Candidate for Office

Report Covering the Period

From: 1/1/82

To: 6/30/82

	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 (Please Enter Unitemized \$ _____)	-0-	-0-	11(a)
(b) Political Party Committees	-0-	-0-	11(b)
(c) Other Political Committees	-0-	-0-	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (Add 11(a), 11(b) and 11(c))	-0-	-0-	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	12
13. ALL LOANS RECEIVED	-0-	-0-	13
14. LOAN REPAYMENTS RECEIVED	-0-	-0-	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	-0-	-0-	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	-0-	-0-	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	21
22. INDEPENDENT EXPENDITURES (see Schedule E)	-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 6441 (d)) (Use Schedule F)	-0-	-0-	23
24. LOAN REPAYMENTS MADE	-0-	-0-	24
25. LOANS MADE	-0-	-0-	25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individual/Persons Other Than Political Committees	-0-	-0-	26(a)
(b) Political Party Committees	-0-	-0-	26(b)
(c) Other Political Committees	-0-	-0-	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	-0-	-0-	26(d)
27. OTHER DISBURSEMENTS	-0-	-0-	27
28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	-0-	-0-	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	-0-	-0-	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	-0-	-0-	31
32. TOTAL OPERATING EXPENDITURES from Line 19	-0-	-0-	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-0-	-0-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	-0-	-0-	34

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 P-7
 2

(28)

14 FEC

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

35 SEP 17 10:11

(Summary Page)

ALICIA AREA [] [] ALICIA AREA

1. Name of Committee (in Full)
National Association of Chemical Distributors Political Action Committee

Address (Number and Street)
1110 Vermont Avenue, NW

City, State and ZIP Code
Washington, DC 20005

Check here if address is different than previously reported

2. FEC Identification Number
CO0127613

3. This committee qualified as a multi-candidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) April 15 Quarterly Report October 15 Quarterly Report
 July 15 Quarterly Report January 31 Year End Report
 July 31 Mid Year Report (Election Year Only)
 Monthly Report for _____
 Tenth day report preceding _____ (Type of Election)
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		COLUMN A	COLUMN B
5. Covering Period <u>7/1/83</u> through <u>12/31/83</u>		This Period	Calendar Year to Date
6. (a) Cash on hand January 1, 19 <u>83</u>		\$ 270.00
(b) Cash on Hand at Beginning of Reporting Period	\$ 270.00	
(c) Total Receipts (from Line 1B)	\$ -0-	\$ -0-
(d) Subtotal (Add Lines 6(b) and 6(c) for Column A and Line 6(a) and 6(c) for Column B)	\$ 270.00	\$ 270.00
7. Total Disbursements (from Line 2B)	\$ -0-	\$ -0-
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 270.00	\$ 270.00
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

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

Sanford J. Hill
Type or Print Name of Treasurer

Sanford J. Hill
SIGNATURE OF TREASURER

8/15/85
Date

For further information contact
Federal Election Commission
Toll Free 800 424 9530
Local 202 527 4088

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g

All previous versions of FEC FORM 2 and FEC FORM 3 are obsolete and should no longer be used

FEC FORM 2X (3-80)

1(29)

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
Form 1, FISC FORM 202**

Name of Committee for Full	Report covering the period		
	From 7/1/83	To 12/31/83	
	COLUMN A Total This Period	COLUMN B Quarter Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	11(a)
(b) Political Party Committees	-0-	-0-	11(b)
(c) Other Political Committees	-0-	-0-	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (Add 11(a), 11(b) and 11(c))	-0-	-0-	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	12
13. ALL LOANS RECEIVED	-0-	-0-	13
14. LOAN REPAYMENTS RECEIVED	-0-	-0-	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	-0-	-0-	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	-0-	-0-	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	21
22. INDEPENDENT EXPENDITURES (Use Schedule E)	-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 641 (a)(4)) (Use Schedule F)	-0-	-0-	23
24. LOAN REPAYMENTS MADE	-0-	-0-	24
25. LOANS MADE	-0-	-0-	25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	26(a)
(b) Political Party Committees	-0-	-0-	26(b)
(c) Other Political Committees	-0-	-0-	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	-0-	-0-	26(d)
27. OTHER DISBURSEMENTS	-0-	-0-	27
28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	-0-	-0-	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	-0-	-0-	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	-0-	-0-	31
32. TOTAL OPERATING EXPENDITURES from Line 19	-0-	-0-	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-0-	-0-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	-0-	-0-	34

1(30)

For a Federal Candidate Other Than a Member of Congress

(Summary Page)

THE FEC

NAME AREA

NAME AREA

1. Name of Committee (in Full)
National Association of Chemical Distributors Political Action Committee

2. Address (Number and Street)

1110 Vermont Avenue, NW

3. City, State and ZIP Code

Washington, DC 20005

Check here if address is different than previously reported.

4. FEC Identification Number

C00127613

5. This committee qualified as a non-candidate committee during the Reporting Period on _____

6. TYPE OF REPORT (Check appropriate box)

(a) April 15 Quarterly Report October 15 Quarterly Report

July 15 Quarterly Report January 31 Year End Report

July 31 Mid Year Report (Non-Election Year Only)

Monthly Report for _____

Twelfth day report preceding _____
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

09SEP11 08:11

SUMMARY

6. Covering Period 1/1/84 through 3/31/84

6. (a) Cash on hand January 1, 19 84

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 20)

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

9. Debts and Obligations Owed TO The Committee (itemize all on Schedule C or Schedule D)

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

	COLUMN A This Period	COLUMN B Calendar Year to-Date
6. (a) Cash on hand January 1, 19 84		\$ 270.00
(b) Cash on Hand at Beginning of Reporting Period	\$ 270.00	
(c) Total Receipts (from Line 10)	\$ 9,382.11	\$ 9,382.11
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 9,652.11	\$ 9,652.11
7. Total Disbursements (from Line 20)	\$ -0-	\$ -0-
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 9,652.11	\$ 9,652.11
9. Debts and Obligations Owed TO The Committee	\$ -0-	
10. Debts and Obligations Owed BY the Committee	\$ -0-	

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

Sanford J. Hill

Type or Print Name of Treasurer

Sanford J. Hill
SIGNATURE OF TREASURER

3/15/85
Date

For further information contact
Federal Election Commission
Toll Free 800-424-6530
Local 202-573-4888

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437e.

All previous versions of FEC FORM 3 and FEC FORM 2e are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

1(31)

Name of Committee (see Form 702)

Report covering the period

From: 1/1/84

To: 8/31/84

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
L RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	9,382.11	9,382.11	11(a)
(Blank Entry Unchecked 9.....)			
(b) Political Party Committees	-0-	-0-	11(b)
(c) Other Political Committees	-0-	-0-	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	9,382.11	9,382.11	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	12
13. ALL LOANS RECEIVED	-0-	-0-	13
14. LOAN REPAYMENTS RECEIVED	-0-	-0-	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	9,382.11	9,382.11	18
M. DISBURSEMENTS			
19. OPERATING EXPENDITURES	-0-	-0-	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	21
22. INDEPENDENT EXPENDITURES (see Schedule E)	-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES. (2 U.S.C. § 441 (d)) (Use Schedule F)	-0-	-0-	23
24. LOAN REPAYMENTS MADE	-0-	-0-	24
25. LOANS MADE	-0-	-0-	25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	26(a)
(b) Political Party Committees	-0-	-0-	26(b)
(c) Other Political Committees	-0-	-0-	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	-0-	-0-	26(d)
27. OTHER DISBURSEMENTS	-0-	-0-	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	-0-	-0-	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	9,382.11	9,382.11	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	9,382.11	9,382.11	31
32. TOTAL OPERATING EXPENDITURES from Line 19	-0-	-0-	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-0-	-0-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	-0-	-0-	34

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(132)

SCHEDULE A

ITEMIZED RECEIPTS

For the purpose of this schedule, the term "employer" includes the Secretary of the District Government Board.

Any information copied from such Reports or 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)
National Association of Chemical Distributors Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Unknown			\$9,382.11
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 9,382.11		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (see page this line number only)			1(33)

75033974566

Summary Page

NE FEC

ALIAS AREA

1. Name of Committee (in Full)
National Association of Chemical Distributors Political Action Committee

Address (Number and Street)
1110 Vermont Avenue, NW

City, State and ZIP Code
Washington, DC 20005

Check here if address is different than previously reported.

2. FEC Identification Number
C00127613

3. This committee qualified as a multicandidate committee during this Reporting Period on _____

ALIAS AREA

4. TYPE OF REPORT (Check appropriate box)

(a) April 15 Quarterly Report October 15 Quarterly Report

July 15 Quarterly Report January 31 Year End Report

July 31 Mid Year Report (Non-Election Year Only)

Monthly Report for _____

Twelfth day report preceding _____

_____ 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		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>4/1/84</u> through <u>6/30/84</u>		
6. (a) Cash on hand January 1, 19 <u>84</u>			\$ 270.00
(b) Cash on Hand at Beginning of Reporting Period		9,652.11	
(c) Total Receipts (from Line 10)		-0-	\$ 9,382.11
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		9,652.11	\$ 9,652.11
7. Total Disbursements (from Line 20)		-0-	\$ -0-
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		9,652.11	\$ 9,652.11
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		-0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		-0-	

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

Type or Print Name Stephen J. Hill

Stephen J. Hill 8/15/85

SIGNATURE OF THE CANDIDATE Date

For further information contact:
 Federal Election Commission
 Toll Free 800-424-9630
 Local 202-525-4889

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437b.

All previous versions of FEC FORM 3 and FEC FORM 3e are obsolete and should no longer be used.

FEC FORM 3X (3/80)

1(34)

Statement of Receipts and Disbursements
Form 2, FDC FORM 200

Name of Candidate for Fed

Period: **6/1/84** to **6/30/84**

	PERIOD A Total This Period	PERIOD B Quantity Year-to-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	-	9,382.11	11(a)
(Blank Entry Unfunded 0			
(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))	-	9,382.11	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, Returns, etc.)	-	-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-	-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-	-	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	-	9,382.11	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	-	-	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-	-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-	-	21
22. INDEPENDENT EXPENDITURES (see Schedule E)	-	-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 (d)) (See 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	-	-	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	-	-	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	-	9,382.11	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-	-	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	-	9,382.11	31
32. TOTAL OPERATING EXPENDITURES from Line 19	-	-	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-	-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	-	-	34

1(35)

(Summary Page)

NE FEC

ALABAMA

ALABAMA

1. Name of Committee (in Full)

National Association of Chemical Distributors Political Action Committee

Address (Number and Street)

1110 Vermont Avenue, NW

City, State and ZIP Code

Washington, DC 20005

Check here if address is different than previously reported.

2. FEC Identification Number

C00127613

This committee qualified as a multicandidate committee during this reporting period on _____ and _____

4. TYPE OF REPORT (Check appropriate box)

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

Is this Report an Amendment?

YES NO

SUMMARY

3. Covering Period 7/1/84 through 9/30/84

6. (a) Cash on hand January 1, 1984

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 20)

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

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

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on hand January 1, 1984		\$ 270.00
6. (b) Cash on Hand at Beginning of Reporting Period	\$ 9,652.11	
6. (c) Total Receipts (from Line 10)	\$ -0-	\$ 9,382.11
6. (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 9,652.11	\$ 9,652.11
7. Total Disbursements (from Line 20)	\$ -0-	\$ -0-
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 9,652.11	\$ 9,652.11
9. Debts and Obligations Owed TO The Committee	\$ -0-	
10. Debts and Obligations Owed BY the Committee	\$ -0-	

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

Sanford J. Hill

Type or Print Name of Treasurer

Sanford J. Hill

8/15/85

SIGNATURE OF TREASURER

For further information contact

Federal Election Commission

Toll Free 800-424-9630

Local 202-423-4888

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g.

All previous versions of FEC FORM 3 and FEC FORM 3e are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

1(36)

U.S. DEPARTMENT OF JUSTICE
 FEDERAL BUREAU OF INVESTIGATION
 Form 1, FEB 1988 EDITION

Report Covering the Period
 From: 7/1/04 To: 9/30/04

PERIOD A
 From 7/1/04 To 7/31/04

PERIOD B
 From 8/1/04 To 9/30/04

I. RECEIPTS

- 11. CONTRIBUTIONS (other than loans) FROM:
 - (a) Individuals/Persons Other Than Political Committees
 - (b) Political Party Committees
 - (c) Other Political Committees
 - (d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))
- 12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES
- 13. ALL LOANS RECEIVED
- 14. LOAN REPAYMENTS RECEIVED
- 15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)
- 16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES
- 17. OTHER RECEIPTS (Dividends, Interest, etc.)
- 18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)

-0-	9,382.11	904d
-0-	-0-	904e
-0-	-0-	904f
-0-	9,382.11	904g
-0-	-0-	91
-0-	-0-	92
-0-	-0-	93
-0-	-0-	94
-0-	-0-	95
-0-	-0-	96
-0-	-0-	97
-0-	9,382.11	98

II. DISBURSEMENTS

- 19. OPERATING EXPENDITURES
- 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES
- 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES
- 22. INDEPENDENT EXPENDITURES (see Schedule E)
- 23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES
 (2 U.S.C. § 441 et seq) (Use Schedule F)
- 24. LOAN REPAYMENTS MADE
- 25. LOANS MADE
- 26. REFUNDS OF CONTRIBUTIONS TO
 - (a) Individuals/Persons Other Than Political Committees
 - (b) Political Party Committees
 - (c) Other Political Committees
 - (d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))
- 27. OTHER DISBURSEMENTS
- 28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)

-0-	-0-	99
-0-	-0-	100
-0-	-0-	101
-0-	-0-	102
-0-	-0-	103
-0-	-0-	104
-0-	-0-	105
-0-	-0-	106
-0-	-0-	107
-0-	-0-	108
-0-	-0-	109
-0-	-0-	110
-0-	-0-	111
-0-	-0-	112
-0-	-0-	113
-0-	-0-	114
-0-	-0-	115
-0-	-0-	116
-0-	-0-	117
-0-	-0-	118
-0-	-0-	119
-0-	-0-	120

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

- 29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)
- 30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)
- 31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)
- 32. TOTAL OPERATING EXPENDITURES from Line 19
- 33. NET OPERATING EXPENDITURES from Line 19
- 34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)

-0-	9,382.11	121
-0-	-0-	122
-0-	9,382.11	123
-0-	-0-	124
-0-	-0-	125
-0-	-0-	126

1(37)

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

Name of Committee (or Pool)	Report Covering the Period		
	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	-0-	9,382.11	11(a)
(b) Political Party Committees	-0-	-0-	11(b)
(c) Other Political Committees	-0-	-0-	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	-0-	9,382.11	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	12
13. ALL LOANS RECEIVED	-0-	-0-	13
14. LOAN REPAYMENTS RECEIVED	-0-	-0-	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Robots, etc.)	-0-	-0-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	-0-	9,382.11	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	-0-	-0-	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	7,000.00	7,000.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)	-0-	-0-	23
24. LOAN REPAYMENTS MADE	-0-	-0-	24
25. LOANS MADE	-0-	-0-	25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	26(a)
(b) Political Party Committees	-0-	-0-	26(b)
(c) Other Political Committees	-0-	-0-	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	-0-	-0-	26(d)
27. OTHER DISBURSEMENTS	-0-	-0-	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	7,000.00	7,000.00	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	-0-	9,382.11	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	-0-	9,382.11	31
32. TOTAL OPERATING EXPENDITURES from Line 19	-0-	-0-	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-0-	-0-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	-0-	-0-	34

1(39)

SCHEDULE B

ITEMIZED DISBURSEMENTS

See page 14 of 14 for
 Also attach schedule for each
 category of the General
 (Summary Page)

Any information copied from such Reports and Disbursements 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 (or Full)			
National Association of Chemical Distributors Political Action Committee			
A. Full Name, Mailing Address and ZIP Code John Morris John Morris For Senate 1315 North Union Street Wilmington, DE 19806	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/1/84	\$200.00
B. Full Name, Mailing Address and ZIP Code Frank Hill Frank Hill For Congress P. O. Box 2941 Durham, NC 27705	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/30/84	\$300.00
C. Full Name, Mailing Address and ZIP Code Chris Smith Chris Smith for Congress 341 White Horse Road Trenton, NJ 08610	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/30/84	\$300.00
D. Full Name, Mailing Address and ZIP Code James Sensenbrenner The Sensenbrenner Committee P. O. Box 95 Requon, WI 53092	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/30/84	\$300.00
E. Full Name, Mailing Address and ZIP Code John Kasich Citizens for Kasich Committee 2668-L Cannon Point Columbus, OH 43209	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/30/84	\$300.00
F. Full Name, Mailing Address and ZIP Code John Miler Miler for Congress Committee P. O. Box 118 LaPorte, IN 43650	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/30/84	\$300.00
G. Full Name, Mailing Address and ZIP Code John Davis Davis for Congress P. O. Box 11427 Chattanooga, TN 37401	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/30/84	\$300.00
H. Full Name, Mailing Address and ZIP Code Wholesale-Distributor Political Action Co. (WDPAC) 1725 K Street, NW Washington, DC 20006	Purpose of Disbursement Contribution by WDPAC to federal candidates	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Approx 10/19/84	\$5,000.00
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)			\$ 7,000.00
TOTAL This Period (last page the line number only)			\$ 7,000.00

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1(40)



FEDERAL ELECTION COMMISSION
 WASHINGTON, D.C. 20463

RQ-5

SEP 26 1985

Sanford J. Hill, Treasurer
 National Association of Chemical
 Distributors Political Action
 Committee
 1110 Vermont Ave., N.W. #1150
 Washington, D.C. 20005

Identification Number: C00127613

Reference: Mid-Year (1/1/81-6/30/81), Year End (7/1/81-12/31/81), April Quarterly (1/1/82-3/31/82), July Quarterly (4/1/82-6/30/82), October Quarterly (7/1/82-9/30/82), and Year End (10/01/82-12/31/82) Reports

Dear Mr. Hill:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above.

-The Commission acknowledges the receipt of NACD/PAC's reports for the 1981-82 election cycle. These reports, however, may not have disclosed all activity for the reporting periods. Be advised that the failure to file reports in a timely and accurate manner is viewed as a serious violation of the Federal Election Campaign Act. 2 U.S.C. §434.

According to your September 16, 1985 letter, it also appears that NACD/PAC funds may have been commingled with corporate and/or personal funds. This activity may be in violation of 2 U.S.C. §432(b)(3) and/or §441b.

Although the Commission may take further legal steps concerning these matters, your recent letter of explanation will be taken into consideration.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Bill Baber
 Reports Analyst
 Reports Analysis Division

1(41)

95040512522



FEDERAL ELECTION COMMISSION
 WASHINGTON, D.C. 20463

RQ-5

SEP 26 1985

Sanford J. Hill, Treasurer
 National Association of Chemical
 Distributors Political Action
 Committee
 1110 Vermont Ave., N.W. #1150
 Washington, D.C. 20005

Identification Number: C00127613

Reference: Mid-Year (1/1/83-6/30/83), Year End (7/1/83-12/31/83), April Quarterly (1/1/84-3/31/84), July Quarterly (4/1/84-6/30/84), October Quarterly (7/1/84-9/30/84), and Year End (10/1/84-12/31/84) Reports

Dear Mr. Hill:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above.

-The Commission acknowledges the receipt of NACD/PAC's reports for the 1983-84 election cycle. These reports, however, may not have disclosed all activity for the reporting period. Be advised that the failure to file reports in a timely and accurate manner is viewed as a serious violation of the Federal Election Campaign Act, 2 U.S.C. §434.

According to your September 16, 1985 letter, it also appears that NACD/PAC funds may have been commingled with corporate and/or personal funds. This activity may be in violation of 2 U.S.C. §432(b)(3) and/or §441b.

Although the Commission may take further legal steps concerning these matters, your recent letter of explanation will be taken into consideration.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Bill Baber
 Reports Analyst
 Reports Analysis Division

1(42)

85040612520

ANALYST: BILL BABER

CONVERSATION WITH: WILLIAM L. FALLON

COMMITTEE: NATIONAL ASSOCIATION OF CHEMICAL DISTRIBUTORS PAC

DATE: SEPTEMBER 30, 1985 9:38 am

SUBJECT(S): The September 26, 1985 Informational notices

Mr. Fallon called in response to the September 26, 1985 letters he received from the Reports Analysis Division under my signature. He asked if there was any more he needed to do. I explained to him that the letters were based upon our preliminary review of NACD/PAC's reports. I mentioned to him that our legal department may want to look into the matter further.

I told him that there were two matters that definitely needed to be clarified for the public record:

- 1) the source of the funds reported in the 1984 April Quarterly report (they had listed 9,382.11 in receipts an the source as "unknown".)
- 2) the source of the \$75,000 in "NACD/PAC funds" that the Huntington Bank released to the National Association of Chemical Distributors in February-March 1984.

Mr. Fallon said he would talk with Mr. Hill to see if they could clarify the matter.

86040512504

1(43)

RECEIVED BY THE FED. RES.

05 OCT 15 10:48

LAW OFFICES

HANSON, O'BRIEN, BIRNEY AND BUTLER

888 SEVENTEENTH STREET, N.W.
 WASHINGTON, D. C. 20006
 TELEPHONE (202) 590-0101

ELIASH HANSON (1888-1962)
 W. FRANK STIGLER, JR. (1889-1976)
 TELESCOPE (202) 593-1840
 CABLE ADDRESS "HANSON"
 INTERNATIONAL TELE GROUP:

MARYLAND OFFICE
 81 MONROE STREET
 ROCKVILLE, MARYLAND 20850
 TELEPHONE (301) 340-8448

OF COUNSEL
 DANIEL P. OPPENHEIM

October 10, 1985

ARTHUR S. HANSON *
 PAUL L. O'BRIEN
 ARTHUR A. BIRNEY
 WILLIAM J. BUTLER, JR. *
 MICHAEL H. MCCORMICK *
 WILLIAM L. FALLON *
 ALEXANDER G. WINTNER
 JEROME C. SCHAEFER *
 ARTHUR S. BAREY
 GREGORY P. SCHNEIDER *
 JOHN P. CONNORS *
 JEFFREY S. WEINTRAUB *
 ROSALEA J. BAYON
 RYLE A. RANI

* ADMITTED TO PRACTICE IN MARYLAND
 * ADMITTED TO PRACTICE IN VIRGINIA

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

Attention: Mr. Bill Baber, Reports Analyst, Reports Analysis Division

Re: FEC I.D. No. C00127613
 Our Client: National Association of Chemical Distributors,
 Political Action Committee

Dear Mr. Baber:

This is a follow-up to your letter of September 26, 1985 to Sanford J. Hill and our subsequent telephone conversation regarding your letter of September 26.

Please find enclosed a copy of Mr. Hill's letter to me of October 4, 1985, wherein he explains the source of the monies indicated on the reports previously submitted to the Commission and for which you raised questions in our telephone conversation.

Included in the submission is a copy of the National Association of Chemical Distributors Treasurer's Report of June 1, 1984, prepared by John R. Hess, Treasurer, National Association of Chemical Distributors.

Hopefully, the enclosed paperwork will lay to rest any questions the Commission may have in this area.

Sincerely yours,

William L. Fallon
 William L. Fallon

kjm

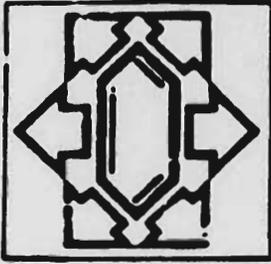
Enclosures

cc: Sanford J. Hill
 Paul L. O'Brien, Esquire

1(44)

RECEIVED

US OCT 15 9:43



NATIONAL ASSOCIATION OF CHEMICAL DISTRIBUTORS • 1110 Vermont Avenue, N.W., Suite 1150
Washington, D.C. 20005 • 202-296-9200

October 4, 1985

Mr. William L. Fallon
Hanson, C'Brien, Birney and Butler
888 Seventeenth Street, NW
Washington, DC 20006

Dear Bill:

I'm responding to your letter of October 1 to Ralph Nappi.

The \$75,324.27 obtained from the bank in March 1984 was from the general operating account for the parent association---NACD. Bank statements indicated \$75,324.27 had been deposited from NACD sources (dues, meetings, registrations, etc.) over the past few months. The elected officers of the association were successful in getting this money from the bank by indicating signature authorization cards had been updated in the past and sending a cashiers check for the \$75,000 indicated as "NACD monies".

Financial statements for that time period indicated that \$9,382.11 had been recorded as contributions for the PAC. Attached is a copy of a written report filed June 1, 1984 by the then elected treasurer for the association that references the activities with the bank and the PAC monies.

However, the backup information to identify the individual contributions was not then nor subsequently discovered in what remained of the association and the PAC's files.

The association immediately separated the \$9,382.11 monies from its general operating account which at that time was the \$75,324.27 that had been withdrawn from the bank. The separated PAC funds were eventually distributed as indicated in the reports filed with the FEC. The remainder of the general account was used as originally intended for the present associations' general operating expenditures.

Hopefully, this will be the "clarification" the Commission needs.

Sincerely,

Stanford S. Hill
Stanford S. Hill
Executive Vice President

SH kw

1(45)

100-400000-1438

NACD

TREASURER'S REPORT

June 1, 1984

You are all aware that we have had a forced termination of our arrangement with our management association, Bell Publicom. For a period of time our funds on deposit with Huntington National Bank of Columbus, Ohio were in jeopardy. On March 28, 1984 Huntington Bank released the funds to us stating that these were/are the correct amounts in our account. In the absence of an audit (not yet complete) I, as Treasurer, am using these figures as the basis of this treasurer's report. I would add that the monies released to us by Huntington approximate the balance in our checkbook as of March 28, 1984. The funds from Huntington Bank have been deposited in LaSalle Bank in Chicago. The account was opened with a total of \$75,324.27 in a Depository Account and \$9,652.11 in our PAC. The funds are currently comingled.

Balance June 1, 1984

Depository Account	\$21,411.03
PAC	<u>9,652.11</u>
TOTAL	\$31,064.04

Deposits, April & May	\$ 8,567.93
Expenses, April & May	\$63,180.27

Management Fees	\$22,182.54
Supplies, Stationery, etc.	785.08
Association Affiliations	689.00
National Convention Balance (Vacation Village)	30,663.65
Management Foresight (Par)	<u>7,860.00</u>
	\$63,180.27

John R. Hess,
Treasurer

8504051232
7935391139

1(46)

150334

Country and Detail
Washington, D.C.

National Election Commission
1205 K Street, N.W.
Washington, D.C. 20003
Attention: Mr. Bill Haber



(147)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Sanford J. Hill, Treasurer
National Association of Chemical
Distributors Political Action Committee
1110 Vermont Avenue, N.W.
Washington, D.C. 20005

RE: MUR

Dear Mr. Hill:

On _____, 1986, the Federal Election Commission determined that there is reason to believe the National Association of Chemical Distributors Political Action Committee and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), (iii), (iv), and 441b(a) and 433(c), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen 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 that it may complete its investigation of the matter. Further,

Attachment 2(1)

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Letter to Sanford J. Hill, Treasurer
Page 2

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 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 Maura White Callaway the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Joan D. Aikens
Chairman

Enclosures

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

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2(2)

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. _____
Staff Member & Tel. No.
Maura White Callaway
(202) 376-5690

RESPONDENTS: National Association of Chemical Distributors
Political Action Committee; Sanford Hill,
as treasurer

SUMMARY OF ALLEGATIONS

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The National Association of Chemical Distributors Political Action Committee ("NACDPAC") and Sanford Hill, as treasurer, failed to file six reports in a timely manner during 1984 and 1985 in violation of 2 U.S.C. § 434(a)(4)(A)(i), (iii), and (iv), commingled NACDPAC funds with corporate funds in violation of 2 U.S.C. § 441b(a), and failed to amend NACDPAC's Statement of Organization in a timely manner in violation of 2 U.S.C. § 433(c).

FACTUAL BASIS AND LEGAL ANALYSIS

NACDPAC registered with the Commission on May 10, 1980, as the separate segregated fund of the National Association of Chemical Distributors ("NACD"). After filing its 1980 Year-End Report, NACDPAC failed to file any further reports.^{1/} On September 9, 1983, RAD mailed NACDPAC a notice stating the Commission's intent to administratively terminate NACDPAC.

^{1/} The 1980 Year-End Report disclosed cash-on-hand of \$270 and no outstanding obligations owed by, or to, NACDPAC.

On September 16, 1985, RAD received correspondence from NACDPAC's counsel which included all required reports for the 1981-1982 and 1983-1984 election cycles, and an amended Statement of Organization naming Sanford J. Hill as treasurer. Counsel also stated that Mr. Hill had filed the necessary reports for 1985, but the 1985 Mid-Year Report was not filed until December 6, 1985.

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The above letter from counsel explained that NACDPAC's former treasurer, Gerald Bell, was killed on September 17, 1983, and at such time was acting as NACDPAC's treasurer and President of Bell Publicom, Inc.^{2/} Counsel's letter further stated that Sanford Hill obtained information which revealed that Gerald Bell commingled NACDPAC funds with those of Bell Publicom, Inc. and "other Bell clients" into one interest-bearing account at the Huntington Bank. According to counsel, Bell Publicom, Inc. was "essentially bankrupt" by February 1984 and NACDPAC funds "may have been used to pay Publicom, Inc. corporate bills." The letter continues on to state that during February and March 1984 NACD obtained the release of approximately \$75,000 in "'NACD/PAC' funds," but that it was impossible to obtain documentation "as to the source of those funds; i.e., NACD/PAC related" because the

^{2/} Bell Publicom, Inc. was the "management association" for NACD. See below.

Sheriff's Department had seized "many of the NACD/PAC financial records needed to accurately reconstruct the financial activity of NACD/PAC for the period of January 1, 1981 through December 31, 1984."^{3/}

A review of the reports filed by NACDPAC on September 16, 1985, reveal a beginning cash-on-hand on January 1, 1981, of \$270, and no receipts or disbursements during 1981, 1982, and 1983. In addition, the 1984 April Quarterly Report disclosed \$9,382.11 in receipts, and the 1984 Year-End Report disclosed \$7,000 in contributions to federal candidates and committees between October 19, 1984, and November 1, 1984. Subsequent to RAD's review of these reports, informational notices were sent on September 26, 1985, advising NACDPAC that it may have violated 2 U.S.C. §§ 432(b)(3), 434, and 441b.

On October 15, 1985, RAD received a letter from NACDPAC's counsel which enclosed a letter from the treasurer explaining the source of the monies reflected on NACDPAC's reports to the Commission. According to a letter sent to counsel by Sanford Hill, the "\$75,324.27 obtained from the bank in March 1984 was from the general operating account for the parent association -- NACD." The letter stated that "[b]ank statements indicated \$75,324.27 had been deposited from NACD sources (dues, meetings, registration, etc.) over the past few months," but also noted that "[f]inancial statements for that time period indicated

^{3/} The files of Bell Publicom, Inc. and the Huntington Bank had also been seized, according to the response.

that \$9,382.11 had been recorded as contributions for the PAC."^{4/}
The response emphasized that NACD "immediately separated the
\$9,382.11 monies from its general operating account which at that
time was the \$75,324.27 that had been withdrawn from the bank."^{5/}

(B) The Law

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), a political
committee is required to file quarterly reports in a calendar
year in which a regularly scheduled general election is held,
which shall be filed no later than the last day of each calendar
quarter, except that the report for the quarter ending on
December 31 of such calendar year shall be filed no later than
January 31 of the following calendar year.

As set forth at 2 U.S.C. § 434(a)(4)(A)(iii) a political
committee is required to file a post-general election report no
later than the 30th day after the general election and which
shall be complete as of the 20th day after such general election.

^{4/} It was again noted that "the backup information to identify
the individual contributors was not then nor subsequently
discovered in what remained of the association and the PAC
files."

^{5/} A copy of the NACD Treasurer's Report dated June 1, 1984, was
included with the letters. The letter references the "forced
termination of our arrangement with our management association,
Bell Publicom." The reports states that the monies in the
Huntington Bank were released on March 28, 1984, and subsequently
deposited into LaSalle Bank in Chicago. The June 1, 1984
Treasurer's Report noted that as of June 1, 1984, the NACD funds
and PAC funds were commingled. (The September 1985 amendment to
NACDPAC's Statement of Organization identifies NACDPAC's bank
depository as Century National Bank in Washington, D.C.)

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In other than an election year a report covering the period beginning January 1 and ending June 30 is required to be filed no later than July 31, and a report covering the period beginning July 1 and ending December 31 is required to be filed by January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv).

Pursuant to 2 U.S.C. § 432(b)(3) all funds of a political committee shall be segregated from, and may not be commingled with, the personal funds of any individual.

As set forth at 2 U.S.C. § 434(b)(2) a political committee is required to report for the reporting period and the calendar year, the total amount of all receipts.

Any change in information previously submitted in a Statement of Organization shall be reported in accordance with 2 U.S.C. § 432(g) no later than 10 days after the date of the change. 2 U.S.C. § 433(c).

C Application of the Law to the Facts

From the information in hand it appears that NACDPAC failed to file reports in a timely manner between 1981 and 1985. Although NACDPAC's reports for 1981 through 1983 did not disclose any receipts or disbursements during this period, it appears the receipts (\$9,382.11) reported on the 1984 April Quarterly Report (the time of their release from the bank) were accepted by the former treasurer prior to his death in September 1983. This office, however, makes no recommendation with respect to the timeliness of NACDPAC's reports during 1981, 1982, or 1983 in view of the amount of time that has elapsed since the reports

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were due, the fact that there is apparently no evidence of any contributions to federal candidates from 1981 through 1984, and the fact that such reports have now been filed. Insofar as NACDPAC's treasurer has attempted to recreate the financial picture of NACDPAC to the extent possible, and such has revealed both the release of NACDPAC funds in early 1984 as well as several contributions to federal candidates and committees during 1984, it is this office's view that the Commission should open a Matter Under Review with respect to all reports filed untimely subsequent to the release of the funds at issue. Accordingly, it is the recommendation of this office that the Commission find reason to believe NACDPAC and Sanford Hill, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (iii), and (iv) by failing to file timely the 1984 April Quarterly, 1984 July Quarterly, 1984 Post-General Election, 1984 October Quarterly, 1984 Year-End and 1985 Mid-Year Reports.

With respect to the commingling of NACDPAC funds with the funds of NACD and clients of Bell Publicom, Inc., and possible failure to report total receipts, this office, for the reasons stated above,^{6/} makes no recommendation concerning any

^{6/} It is also too conjectural to conclude that total receipts were not reported, and not likely that a conclusive determination could be made that such were not in fact reported. We note that there is also no evidence that any of the funds were required to be itemized pursuant to 2 U.S.C. § 434(b)(3)(A).

commingling or reporting omissions that may have occurred prior to 1984. However, because the funds at issue were released by the bank on March 28, 1984, but continued to be commingled with corporate funds of NACD as late as June 1, 1984, and such funds were later cotnributed in connection with federal elections, it is the recommendation of this office that the Commission find reason to believe NACDPAC and Sanford J. Hill, as treasurer, violated 2 U.S.C. § 441b(a) by commingling NACD and NACDPAC funds during 1984.

A final issue to be considered is the fact that NACDPAC failed to amend its Statement of Organization within ten days of any change in the information previously submitted in its November 16, 1981, Statement of Organization. Because NACDPAC funds were released in March 1984 and subsequently deposited into a separate bank account, and NACDPAC contributed to federal candidates and committees in October and November 1984, it appears that NACDPAC should have amended its Statement of Organization prior to September 17, 1985, to reflect the address of NACDPAC, the name, address, and position of the custodian of NACDPAC's books and accounts, the name and address of NACDPAC's treasurer, and NACDPAC's depository. In view of NACDPAC's failure to amend its Statement of Organization in a timely manner it is the recommendation of this office that the Commission find reason to believe NACDPAC and Sanford J. Hill, as treasurer, violated 2 U.S.C. § 433(c).

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REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: October 30, 1985ANALYST: Bill Baber

- I. COMMITTEE: National Association of Chemical Distributors Political Action Committee (C00127613)
Sanford J. Hill, Treasurer
1110 Vermont Ave., N.W., #1150
Washington, D.C. 20005
- II. RELEVANT STATUTE: 2 U.S.C. §§432(b)(3); 434(a)(4); 434(b);
and 441b
- III. BACKGROUND:

The Chemical Distributors Political Action Committee registered with the Commission on May 10, 1980 as a separate segregated fund of the National Association of Chemical Distributors. Its original treasurer was Gerald M. Bell (Attachment 2).

On November 16, 1981 an amended Statement of Organization was filed which changed the name to the National Association of Chemical Distributors Political Action Committee ("NACD/PAC") (Attachment 3). After the 1980 Year End Report, NACD/PAC failed to file further reports; therefore, NACD/PAC was sent an administrative termination notice on September 9, 1983 (Attachment 4).

Correspondence received from NACD/PAC on September 16 and 17, 1985 included all required reports for the 1981-82, 1983-84 election cycle and an amended Statement of Organization. The cover letter from William L. Fallon, NACD/PAC's attorney, stated that NACD/PAC's new treasurer was Sandford J. Hill. Mr. Fallon also stated he had been advised by Mr. Hill, "that the necessary reports for 1985 have been filed." To date, the 1985 Mid-Year Report has not been filed (Attachments 5, 6, 7 and 8).

According to Mr. Fallon's letter, the former treasurer, Mr. Bell (the president of Bell Publicom, Inc.) was killed in a plane crash on September 17, 1983. "Based on information obtained by Stanford J. Hill, it appears the Huntington Bank allowed Gerald Bell to commingle funds of

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NATIONAL ASSOCIATION OF CHEMICAL
DISTRIBUTORS POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

Bell Publicom, Inc., NACD/PAC, and other Bell clients into one interest-bearing account..." as stated by Mr. Fallon. He also noted that Bell Publicom, Inc. was "essentially bankrupt" by February 1984, and that NACD/PAC funds may have been used to pay the corporation's bills. According to Mr. Fallon, NACD/PAC's connected organization was able to obtain the release of approximately \$75,000 of "NACD/PAC" funds from the Huntington Bank during February-March 1984 (See Attachment 5).

NACD/PAC reports show a beginning cash-on-hand balance of \$270 on January 1, 1981, no receipts and disbursements during 1981, 1982 and 1983, and \$9,382.11 in receipts during 1984. Mr. Fallon stated that NACD/PAC was unable to obtain documentation as to the source of these funds because the files of Bell Publicom, Inc. and/or the Huntington Bank had been seized by the Dayton Sheriff's Department. He noted that the seized records included many of the NACD/PAC records needed to report the activity for the 1981-84 period and that Mr. Hill was given "limited access" to these records and disclosed the information in the reports. Based on these special circumstances, Mr. Fallon stated that NACD/PAC, "...has made its best effort to obtain and submit the enclosed Reports."

Informational Notices ("INs") were sent on September 26, 1985 advising NACD/PAC that it may have violated 2 U.S.C. §§432(b)(3), 434 and 441b. The INs stated that the Commission may initiate legal action concerning these matters (Attachment 9).

On September 30, 1985, Mr. Fallon called the Commission in response to the September 26, 1985 INs (Attachment 10). The Reports Analysis Division ("RAD") analyst explained that the Commission's legal division may need to look further into the matter. The RAD analyst also told Mr. Fallon that there were at least two points that needed to be clarified for the public record: 1) the source of the funds reported in the 1984 April Quarterly Report and 2) the source of the \$75,000 in "NACD/PAC funds" released by the Huntington Bank. Mr. Fallon said that he would talk to Mr. Hill to see if the matter could be clarified.

On October 15, 1985, the Commission received a response from Mr. Fallon and he stated that Mr. Hill had sent him a letter explaining "the source monies indicated on the reports previously submitted to the Commission...." Mr. Hill's letter stated that financial statements from the general operating account for the parent association indicated that of the \$75,324.27 in that account, \$9,382.11

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NATIONAL ASSOCIATION OF CHEMICAL
DISTRIBUTORS POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 3

had been recorded as contributions for NACD/PAC in March 1984. The letter further stated that the backup information to identify the individual contributions was not available in what remained of the association and NACD/PAC's files and that the association immediately separated the funds from its general operating account (Attachment 11).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

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NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
CHEMICAL DISTRIBUTORS POLITICAL ACTION COMMITTEE						ID #C00127613
CONNECTED ORGANIZATION: CHEMICAL DISTRIBUTORS, NAT'L ASS'N OF						
1980	STATEMENT OF ORGANIZATION			1MAY80	2	80FEC/155/4779
	JULY QUARTERLY	0	0	1MAY80 -30JUN80	2	80FEC/158/4690
	OCTOBER QUARTERLY	3,488	2,158	1JUL80 -30SEP80	7	80FEC/169/3297
	POST-GENERAL	1,758	2,818	1OCT80 -24NOV80	6	81FEC/191/1714
	YEAR-END	475	475	25NOV80 -31DEC80	5	81FEC/191/1709
	TOTAL	5,721	0		22	TOTAL PAGES

ALL REPORTS HAVE BEEN REVIEWED

CASH ON HAND AT CLOSE OF ELECTION CYCLE: \$270.00

DEBTS OWED TO THE COMMITTEE: \$00.00

DEBTS OWED BY THE COMMITTEE: \$00.00

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 FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 29OCT85
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NATIONAL ASSOCIATION OF CHEMICAL DISTRIBUTORS POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: CHEMICAL DISTRIBUTORS; NAT'L ASS'N OF				NON-PARTY NON-QUALIFIED ID #C00127613		
1981	REQUEST FOR ADDITIONAL INFORMATION STATEMENT OF ORGANIZATION - AMENDMENT			16NOV81	2	81FEC/205/0316
	MID-YEAR REPORT	0	0	1JAN81 -30JUN81	2	81FEC/209/2492
	1'ST LETTER INFORMATIONAL NOTICE YEAR-END	0	0	1JAN81 -30JUN81	1	85FEC/388/3524
	1'ST LETTER INFORMATIONAL NOTICE			1JUL81 -31DEC81	2	85FEC/387/4586
1982	APRIL QUARTERLY	0	0	1JUL81 -31DEC81	1	85FEC/388/3524
	1'ST LETTER INFORMATIONAL NOTICE			1JAN82 -31MAR82	2	85FEC/387/4586
	JULY QUARTERLY	0	0	1JAN82 -31MAR82	1	82FEC/388/3528
	1'ST LETTER INFORMATIONAL NOTICE			1APR82 -30JUN82	2	85FEC/387/4580
	OCTOBER QUARTERLY	0	0	1APR82 -30JUN82	1	85FEC/388/3527
	1'ST LETTER INFORMATIONAL NOTICE YEAR-END	0	0	1JUL82 -30SEP82	2	85FEC/387/4577
	1'ST LETTER INFORMATIONAL NOTICE			1JUL82 -30SEP82	1	85FEC/388/3526
	COMPREHENSIVE AMEND	-	-	1OCT82 -31DEC82	2	85FEC/387/4574
	COMPREHENSIVE AMEND - AMENDMENT	-	-	1OCT82 -31DEC82	1	85FEC/388/3525
				1JAN81 -31DEC82	1	85FEC/390/2500
				1JAN81 -31DEC82	1	85FEC/390/2501
	TOTAL	0	0	0	24	TOTAL PAGES

ALL REPORTS HAVE BEEN REVIEWED.

CASH ON HAND AT CLOSE OF ELECTION CYCLE: \$270.00

DEBTS OWED TO AND OR BY THE COMMITTEE: \$00.00

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

DATE 29OCT85
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NATIONAL ASSOCIATION OF CHEMICAL DISTRIBUTORS POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: CHEMICAL DISTRIBUTORS; NAT'L ASS'N OF				NON-PARTY NON-QUALIFIED ID #C00127613		
1983	MISCELLANEOUS REPORT			9SEP83 FROM FEC	1	83FEC/283/4922
	MID-YEAR REPORT	0	0	1JAN83 -30JUN83	2	85FEC/387/4571
	1'ST LETTER INFORMATIONAL NOTICE			1JAN83 -30JUN83	1	85FEC/388/3540
	YEAR-END	0	0	1JUL83 -31DEC83	2	85FEC/387/4568
	1'ST LETTER INFORMATIONAL NOTICE			1JUL83 -31DEC83	1	85FEC/388/3541
1984	APRIL QUARTERLY	9,382	0	1JAN84 -31MAR84	3	85FEC/387/4564
	1'ST LETTER INFORMATIONAL NOTICE			1JAN84 -31MAR84	1	85FEC/388/3542
	JULY QUARTERLY	0	0	1APR84 -30JUN84	2	85FEC/387/4561
	1'ST LETTER INFORMATIONAL NOTICE			1APR84 -30JUN84	1	85FEC/388/3543
	OCTOBER QUARTERLY	0	0	1JUL84 -30SEP84	2	85FEC/387/4558
	1'ST LETTER INFORMATIONAL NOTICE			1JUL84 -30SEP84	1	85FEC/388/3544
	YEAR-END	0	7,000	1OCT84 -31DEC84	3	85FEC/387/4554
	1'ST LETTER INFORMATIONAL NOTICE			1OCT84 -31DEC84	1	85FEC/388/3545
	COMPREHENSIVE AMEND	-	-	1JAN83 -31DEC84	3	85FEC/387/4592
	COMPREHENSIVE AMEND - AMENDMENT	-	-	1JAN83 -31DEC84	4	85FEC/389/1437
	TOTAL	9,382	0	7,000	0	28 TOTAL PAGES

ALL REPORTS HAVE BEEN REVIEWED

CASH ON HAND AT THE CLOSE OF ELECTION CYCLE: \$2,652.11

DEBTS OWED TO AND OR BY THE COMMITTEE: \$00.00

ATTACHMENT 1 PAGE 3 OF 4

8 6 0 4 0 6 1 2 5 4 4
 FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 29OCT85
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NATL ASSOC OF CHEMICAL DISTRIBUTORS PAC CONNECTED ORGANIZATION: NATL ASSOC OF CHEMICAL DISTRIBUTORS				NON-PARTY NON-QUALIFIED	ID #C00127613	
	1985 STATEMENT OF ORGANIZATION - AMENDMENT			17SEP85	1	85FEC/387/4595
	TOTAL	0	0	0	1	TOTAL PAGES

ALL REPORTS HAVE BEEN REVIEWED

STATEMENT OF ORGANIZATION

RECEIVED

(See reverse side for instructions)

1. (a) Name of Committee (in Full) Check if name or address is changed. **Chemical Distributors Political Action Committee** 2. Date **May 1, 1980 MAY 10 AM 11**

(b) Address (Number and Street) **1406 Third National Bldg.** 3. FEC identification Number

(c) City, State and ZIP Code **Dayton, OH 45402** 4. Is this an amended statement? YES NO

5. TYPE OF COMMITTEE (check one)

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) The committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- (c) This committee supports, opposes only one candidate _____ and is NOT an authorized committee.
- (d) This committee is a _____ committee of the _____ Party.
- (e) This committee is a separate segregated fund.
- (f) This committee supports, opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
National Association of Chemical Distributors	1406 Third National Bldg. Dayton, OH 45402	Connected

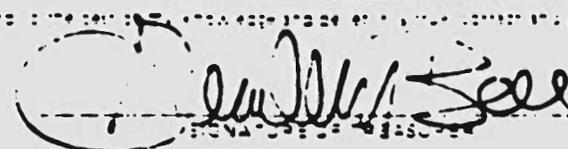
6. The reporting committee has identified a "connected organization" above. Please indicate type of organization: Corporation Corporation with Public Stock Labor Organization Membership Organization Trade Association Other

7. Custodian of Records: identify by name, address, phone number - job title and position the person in possession of committee books and records.

Full Name	Mailing Address and ZIP Code	Title or Position
Treasurer		
Vernon R. Lowe	Same as below	Alternate Treasurer
Gerald M. Bell	1406 Third National Bldg. Dayton, OH 45402	Treasurer

8. Banks or Other Depositories: List all banks or other depositories in which the committee deposes its funds, holds accounts, holds money, deposits, or other assets.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Third National Bank & Trust Co.	Dayton, OH 45402

Gerald M. Bell  May 1, 1980

NOTE: Submit this statement to the Federal Election Commission (FEC) by the date specified on the reverse side of this form. If you are filing this statement with the FEC, you must also file a copy with the appropriate State or local election official.

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RECEIVED

STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (in Full) Check if name or address is changed. **NATIONAL ASSOCIATION OF KENTUCKY DISTRICTS POLITICAL ACTION COMMITTEES**

(b) Address (Number and Street)

(c) City, State and ZIP Code

2. Date **NOV 16 1981**

3. FEC Identification Number **00127613**

4. Is this an amended Statement? YES NO

5. TYPE OF COMMITTEE (check one):

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District
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- (c) This committee supports/expresses only one candidate _____ and is NOT an authorized committee. (name of candidate)
- (d) This committee is a _____ committee of the _____ Party. (National, State or subordinate) (Democratic, Republican, etc.)
- (e) This committee is a separate segregated fund.
- (f) This committee supports/expresses more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

- Corporation Corporation w/o Capital Stock Labor Organization Membership Organization Trade Association Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position, the person in possession of committee books and records.

Full Name	Mailing Address and ZIP Code	Title or Position

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee, and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address and ZIP Code	Title or Position

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
HUNTINGTON NATIONAL BANK & TRUST	DAYTON OH 45402

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

GERALD M BELL
Type or Print Name of Treasurer

Gerald M Bell
SIGNATURE OF TREASURER

NOV 10 1981
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4088

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FEC FORM 1 (3/80)

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

September 9, 1983

201127613
NATIONAL ASSOCIATION OF CHEMICAL DISTRIBUTORS
POLITICAL ACTION COMMITTEE
GERALD M BELL
1606 THIRD NATIONAL BLDG

BAYTON

ON 65402

Dear Treasurer:

Pursuant to 2 U.S.C. 433(d)(2) of the Federal Election Campaign Act, the Commission intends to administratively terminate the reporting obligation of your committee. According to 11 CFR 102.4, the treasurer of the committee has 30 days from the day of receipt of this notice to object to this administrative termination. If a written objection is not received by the Commission within the 30 days, this action will take effect.

Please note that:

- The administrative termination of the reporting obligation does not relieve the committee of any legal responsibility for the payment of any outstanding debt or obligation.
- The committee must continue to maintain all records in accordance with 2 U.S.C. 432(d). The records should be maintained and available for Commission inspection should the necessity arise.
- Excess or residual funds held by the committee can only be used in accordance with Commission regulations (11 CFR 110.3(a)(2), 113.1 and 113.2).
- Any future undertaking by the Committee to raise funds for the purpose of influencing a Federal election or supporting a Federal candidate will void the administrative termination. At that time, the committee is required to report all financial activity since the ending coverage date of the last report filed.

If you should have any questions concerning this matter, please call Craig Crooks at (202) 523-4048 or toll free on (800) 424-9530.

Sincerely,

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

8 1 0 3 2 9 3 4 0 2

LAW OFFICES

HANSON, O'BRIEN, BIRNEY AND BUTLER

888 SEVENTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

TELEPHONE (202) 596-6411

85 SEP 18 P 4: 23

EDWARD S. HANSON •
ORAL L. O'BRIEN
ARTHUR A. BIRNEY
WILLIAM J. BUTLER, JR.
MICHAEL H. MCCORMIE •
WILLIAM L. FALLON •
ALEXANDER W. WHITAKER
JEROME C. SCHAEFER •
ARTHUR B. MOLEY
GREGORY P. SCHERNER
JOHN R. CONNORS •
JEFFREY S. WENTHAUS •
PAMELA J. BROWN

ELISHA HANSON (1926-1982)
W. FRANK STCALE, JR. (1929-1978)
TELECOPIER (202) 593-1540
CABLE ADDRESS "HANSON"
INTERNATIONAL TELETYPE 44082
—
MARYLAND OFFICE
81 MONROE STREET
ROCKVILLE, MARYLAND 20850
TELEPHONE (301) 340-8445

September 16, 1985

ADMITTED TO PRACTICE IN MARYLAND
ADMITTED TO PRACTICE IN VIRGINIA

Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: FEC I.D. #C 00127613
Our Client: National Association of Chemical
Distributors Political Action Committee
Subject Matter: Statement of Organization and
Report of Receipts and Disbursements
For Period January 1, 1981 through
December 31, 1984.

Gentlemen:

Enclosed please find the following FEC forms which are being submitted on behalf of National Association of Chemical Distributors Political Action Committee (hereinafter "NACD/PAC"):

1. Statement of Organization Form 1, dated September 16, 1985.
2. Report of Receipts and Disbursements Form 3X and Detailed Summary Page for period 1/1-6/30/81.
3. Report of Receipts and Disbursements Form 3X and Detailed Summary Page for period 7/1-12/31/81.
4. Report of Receipts and Disbursements Form 3X and Detailed Summary Page for period 1/1-3/31/82.
5. Report of Receipts and Disbursements Form 3X and Detailed Summary Page for period 4/1-6/30/82.
6. Report of Receipts and Disbursements Form 3X and Detailed Summary Page for period 7/1-9/30/82.
7. Report of Receipts and Disbursements Form 3X and Detailed Summary Page for period 10/1-12/31/82.
8. Report of Receipts and Disbursements Form 3X and Detailed Summary Page for period 1/1-6/30/83.

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Federal Election Commission
Page 2
September 16, 1985

9. Report of Receipts and Disbursements Form 2X and Detailed Summary Page for period 7/1-12/31/83.

10. Report of Receipts and Disbursements Form 2X and Detailed Summary Page and Schedule A, Itemized Receipts, for period 1/1-2/31/84.

11. Report of Receipts and Disbursements Form 2X and Detailed Summary Page for period 4/1-6/30/84.

12. Report of Receipts and Disbursements Form 2X and Detailed Summary Page and Schedule B, Itemized Disbursements for period 7/1-9/30/84.

13. Report of Receipts and Disbursements Form 2X and Detailed Summary Page and Schedule B for period 10/1-12/31/84.

Additionally, we have been advised by Sanford J. Hill, the current Treasurer and Executive Vice-President of "NACD/PAC" that the necessary Reports for 1985 have been filed.

The enclosed Statement of Organization and Reports are being filed with the Commission in a good faith attempt to reconstruct the financial activity of "NACD/PAC" for the period January 1, 1981 to December 31, 1984.

The source(s) for the information on the enclosed Forms is/are limited due to a series of events which took place in the Fall of 1983 and following months. I will now detail those events to the degree possible, based on the limited information available to this office.

On September 17, 1983, a plane crashed on a flight from Dayton, Ohio to Pittsburgh, Pennsylvania. Passengers on that flight included Gerald M. Bell, John Stratton and Robert Abrahamson. All were killed in that plane crash.

Gerald Bell was the president of Bell Publicom, Inc., of Dayton, Ohio and Robert Abrahamson was an attorney in Dayton, Ohio and represented Bell Publicom as legal counsel.

At the time of death, Gerald Bell was the primary agent for "NACD/PAC" which included his acting as Treasurer and Custodian for the PAC. This included recording receipts and disbursement of all funds associated with the NACD/PAC.

The bank depository for the NACD/PAC funds at the time of the plane crash was the Huntington Bank of Ohio, in Dayton, Ohio.

Based on information obtained by Sanford J. Hill, the current Treasurer of NACD/PAC, it appears the Huntington Bank allowed Gerald Bell to commingle funds of Bell Publicom, Inc., NACD/PAC and other Bell clients into one

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Federal Election Commission
page 3
September 16, 1985

interest-bearing account; that signature card authorizations from NACD/PAC may have been violated by Gerald Bell, etc., as part of this commingling; and that NACD/PAC funds may have been used to pay Publicom, Inc., corporate bills.

Based on his investigation, Mr. Hill further advises that by February, 1984, Publicom, Inc., was essentially bankrupt.

During the period February-March, 1984, the parent Association, the National Association of Chemical Distributors, went to the Huntington Bank and was able to convince that Bank to release approximately \$75,000 of "NACD/PAC" funds. At that time, it was impossible to obtain documentation as to the source of those funds; i.e., NACD/PAC related. Unfortunately, the files of Publicom, Inc., and/or Huntington Bank have since been seized by the Sheriff's Department in Dayton. The seized records include many of the NACD/PAC financial records needed to accurately reconstruct the financial activity of NACD/PAC for the period January 1, 1981 through December 31, 1984.

Mr. Sanford J. Hill has been given limited access to the financial records of NACD/PAC in Ohio. It is from this limited information that Mr. Hill has been able to reconstruct the enclosed Reports.

Mr. Sanford J. Hill has advised this office that with the filing of the enclosed Forms, the recordkeeping for NACD/PAC is now in compliance with 2 U.S.C. §432, §433, and §437(b).

We respectfully submit that, based on the limited information available to Mr. Hill, he has made his best effort to obtain and submit the information required by 42 U.S.C. §434. Based on these efforts by Mr. Hill and his representation (as the now authorized agent for NACD/PAC) that the statutory filing requirements shall be kept current, we would request that the enclosed documentation be accepted by the Commission and that NACD/PAC be deemed to be in compliance with 2 U.S.C. §434.

Finally, based on the special circumstances involved in this matter; and the limited information to which Mr. Sanford J. Hill has had access to reconstruct the enclosed Reports; and the fact that NACD/PAC, through Mr. Hill, has made its best effort to obtain and submit the enclosed Reports, the undersigned respectfully submits that NACD/PAC and/or its agents should not be found to be in knowing and willfull violation of any provision of the Federal Election Campaign Act. 2 U.S.C. §441 j.

Respectfully submitted,

W. Fallon

William L. Fallon

83,040,331,434

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

05 SEP 85 10:11

1. (a) Name of Committee (in Full) <input type="checkbox"/> Check if name or address is changed. National Association of Chemical Distributors Political Action Committee	2. Date
(b) Address (Number and Street) 1110 Vermont Avenue, NW, Suite 1150	3. FEC Identification Number C00127613
(c) City, State and ZIP Code Washington, DC 20005	4. Is this an amended Statement? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

5. TYPE OF COMMITTEE (check one):

(a) This committee is a principal campaign committee. (Complete the candidate information below.)

(b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District
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(c) This committee supports/opposes only one candidate _____ (name of candidate) and is NOT an authorized committee.

(d) This committee is a _____ (National, State or subordinate) committee of the _____ Party. (Democratic, Republican, etc.)

(e) This committee is a separate segregated fund.

(f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
National Association of Chemical Distributors	1110 Vermont Avenue, NW Suite 1150 Washington, DC 20005	Connected

If the registering political committee has identified a "connected organization" above, please indicate type of organization

Corporation Corporation w/o Capital Stock Labor Organization Membership Organization Trade Association Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position, the person in possession of committee books and records.

Full Name	Mailing Address and ZIP Code	Title or Position
Sanford J. Hill	1110 Vermont Ave., NW Washington, DC 20005	Executive Vice President

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee, and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address and ZIP Code	Title or Position
Sanford J. Hill	1110 Vermont Avenue, NW Washington, DC 20005	Executive Vice President

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Century National Bank	1875 Eye Street, NW Washington, DC 20006

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

SANFORD J HILL Type or Print Name of Treasurer

Sanford J Hill SIGNATURE OF TREASURER

9/15/85 Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437c

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

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FEC FORM 1 7 85

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

... A INF REC
85 SEP 11 09:11

(Summary Page)

ALABAMA

ALABAMA

1. Name of Committee (in Full)
National Association of Chemical Distributors Political Action Committee

Address (Number and Street)
1110 Vermont Avenue, NW

City, State and ZIP Code
Washington, DC 20005

Check here if address is different than previously reported.

2. FEC Identification Number
C00127613

This committee qualified as a multifunctional committee during this Reporting Period on _____

4. TYPE OF REPORT (Check appropriate box)

(a) April 15 Quarterly Report October 15 Quarterly Report

July 15 Quarterly Report January 31 Year End Report

July 31 Mid Year Report (Non-Election Year Only)

Monthly Report for _____

Twelfth day report preceding _____
election on _____ in the State of _____

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

Termination Report

(b) Is this Report an Amendment?
 YES NO

SUMMARY		COLUMN A	COLUMN B
		This Period	Calendar Year-to-Date
6. Covering Period <u>1/1/82</u> through <u>3/31/82</u>			
6(a) Cash on hand January 1, 19 <u>82</u>			\$ 270.00
(a) Cash on Hand at Beginning of Reporting Period		\$ 270.00	
(b) Total Receipts (from Line 10)		\$ -0-	\$ -0-
(c) Subtotal (add Lines 6(a) and 6(b) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 270.00	\$ 270.00
7. Total Disbursements (from Line 20)		\$ -0-	\$ -0-
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(c))		\$ 270.00	\$ 270.00
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	

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

Sanford J. Hill
Type or Print Name of Treasurer

[Signature] 5/11/85
Date

For further information contact:
Federal Election Commission
Toll Free 888 424 9530
Local 202 633-4888

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 USC 437h.

All previous versions of FEC FORM 3 and FEC FORM 3e are obsolete and should no longer be used.

FEDERAL ELECTION CAMPAIGN ACT
OF 1971 AND SUBSEQUENT AMENDMENTS
FORM 1. FEB. 1992

Form of Schedule B-1 (F)

For Reporting Year
 From 1/1/92 To 12/31/92

	For Reporting Year		
	Column A Total Year Total	Column B Other Year Totals	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			11(a)
(Show Entry Unchecked 0 _____)			
(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))			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.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Gifts, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	-0-	-0-	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	-0-	-0-	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	21
22. INDEPENDENT EXPENDITURES (see Schedule E)	-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 et al) (Use Schedule F)	-0-	-0-	23
24. LOAN REPAYMENTS MADE	-0-	-0-	24
25. LOANS MADE	-0-	-0-	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	-0-	-0-	27
28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	-0-	-0-	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	-0-	-0-	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	-0-	-0-	31
32. TC: OPERATING EXPENDITURES from Line 19	-0-	-0-	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-0-	-0-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	-0-	-0-	34

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**FEDERAL CAMPAIGN FINANCE ACT OF 1976
OF THE FEDERAL ELECTION COMMISSION**

	PART II - RECEIPTS		
	STATE & LOCAL FUNDS	FEDERAL FUNDS	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loan proceeds)			
(a) Individuals/Persons Other Than Political Committees			11(a)
(Enter Entry Worksheet # _____)			
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loan) (Add 11(a), 11(b) and 11(c))			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, Returns, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Donations, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)			18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES			19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22. INDEPENDENT EXPENDITURES (see Schedule B)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 6441 (d)) (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			27
28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)			28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loan) from Line 11(d)			29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loan) (Subtract Line 30 from Line 29)			31
32. TOTAL OPERATING EXPENDITURES from Line 19			32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)			34

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

DATE: 05 SEP 82 00:11

(Summary Page)

Column A Column B

1. Name of Committee (in Full)
National Association of Chemical Distributors Political Action Committee

Address (Number and Street)
1110 Vermont Avenue, NW

City, State and ZIP Code
Washington, DC 20005

Check here if address is different than previously reported.

2. FEC Identification Number
000127613

This committee qualified as a multi-candidate committee during this Reporting Period on _____

3. TYPE OF REPORT (Check appropriate box)

(a) April 15 Quarterly Report October 15 Quarterly Report

July 15 Quarterly Report January 31 Year End Report

July 31 Mid Year Report (Non-Election Year Only)

Monthly Report for _____

Twelfth day report preceding _____ in the State of _____

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

Transition Report

Is this Report an Amendment?
 YES NO

035040514577

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year to-Date
6. Covering Period <u>7/1/82</u> through <u>9/30/82</u>			
6. (a) Cash on hand January 1, 19 <u>82</u>			\$ 270.00
(b) Cash on Hand at Beginning of Reporting Period		\$ 270.00	
(c) Total Receipts (from Line 10)		\$ -0-	\$ -0-
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 270.00	\$ 270.00
7. Total Disbursements (from Line 20)		\$ -0-	\$ -0-
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 270.00	\$ 270.00
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	

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

Sarford J. Hill
Type or Print Name of Treasurer

[Signature]
SIGNATURE OF TREASURER

9/4/82
Date

For further information contact:
Federal Election Commission
Toll Free 800 424 9630
Local 202 437-6888

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g.

All previous versions of FEC FORM 2 and PEC FORM 2a are obsolete and should no longer be used.

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**FEDERAL ELECTION CAMPAIGN ACT OF 1971
OF RECEIPTS AND DISBURSEMENTS
FORM 7, FEB. 1982 EDITION**

Name of Candidate for Office		Report Ending on Date		
		From 7/1/78	To 9/30/78	
		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	-0-	-0-	11(a)
(b) Political Party Committees	-0-	-0-	11(b)
(c) Other Political Committees	-0-	-0-	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (Add 11(a), 11(b) and 11(c))	-0-	-0-	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	12
13. ALL LOANS RECEIVED	-0-	-0-	13
14. LOAN REPAYMENTS RECEIVED	-0-	-0-	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	-0-	-0-	18
II. DISBURSEMENTS				
19. OPERATING EXPENDITURES	-0-	-0-	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	21
22. INDEPENDENT EXPENDITURES (see Schedule E)	-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 (d)) (Use Schedule F)	-0-	-0-	23
24. LOAN REPAYMENTS MADE	-0-	-0-	24
25. LOANS MADE	-0-	-0-	25
26. REFUNDS OF CONTRIBUTIONS TO:				
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	26(a)
(b) Political Party Committees	-0-	-0-	26(b)
(c) Other Political Committees	-0-	-0-	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	-0-	-0-	26(d)
27. OTHER DISBURSEMENTS	-0-	-0-	27
28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	-0-	-0-	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES				
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	-0-	-0-	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	-0-	-0-	31
32. OPERATING EXPENDITURES from Line 19	-0-	-0-	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-0-	-0-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	-0-	-0-	34

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

35 SEP 11 10:11

(Summary Page)

ALAN ARBA

ALAN ARBA

1. Name of Committee (Do Not)

National Association of Chemical
Distributors Political Action
Committee

Address (Number and Street)

1110 Vermont Avenue, NW

City, State and ZIP Code

Washington, DC 20005

Check here if address is different than previously reported.

2. FEC Identification Number

C00127613

3. This committee qualified as a multicandidate committee during
this Reporting Period on _____

4. TYPE OF REPORT (Check appropriate box)

- (a) April 15 Quarterly Report October 15 Quarterly Report
- July 15 Quarterly Report January 31 Year End Report
- July 31 Mid Year Report (Non-Election Year Only)
- Monthly Report for _____
- Twelfth day report preceding _____
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 10/1/82 through 12/31/82

6. (a) Cash on hand January 1, 1982

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and
Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 20)

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

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

10. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D)

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

Sanford J. Hill

Type or Print Name of Treasurer

Sanford J. Hill

SIGNATURE OF THE ASSURER

8/15/85

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437b.

For further information contact:

Federal Election Commission

Toll Free 800-426-9930

Local 202-633-4888

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3/80)

3500 ASD 14 5 7 2

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

PEC

(Summary Page)

85 SEP 11 10:11

ALISON AREA

1. Name of Committee (in Full)
National Association of Chemical Distributors Political Action Committee

Address (Number and Street)
1110 Vermont Avenue, NW

City, State and ZIP Code
Washington, DC 20005

Check here if address is different than previously reported

2. FEC Identification Number
C00127613

3. This committee qualified as a multicandidate committee during this Reporting Period on _____

4. TYPE OF REPORT (Check appropriate boxes)

(a) April 15 Quarterly Report October 15 Quarterly Report
 July 15 Quarterly Report January 31 Year End Report
 July 31 Mid Year Report (Non-Election Year Only)
 Monthly Report for _____
 Twelfth day report preceding _____
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

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SUMMARY		COLUMN A	COLUMN B
5. Covering Period <u>1/1/83</u> through <u>6/30/83</u>		This Period	Calendar Year-to-Date
6. (a) Cash on hand January 1, 19 <u>83</u>		\$ 270.00
(b) Cash on Hand at Beginning of Reporting Period	\$ 270.00	
(c) Total Receipts (from Line 10)	\$ -0-	\$ -0-
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 270.00	\$ 270.00
7. Total Disbursements (from Line 20)	\$ -0-	\$ -0-
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 270.00	\$ 270.00
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

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

Sirford J. Hill
Type or Print Name of Treasurer

[Signature] 8/15/85
SIGNATURE OF THE ASSEMBLER Date

For further information contact
 Federal Election Commission
 Toll Free 800 424 9530
 Local 202 527-4088

NOTE: Failure to file, or omission of incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g.

All previous versions of FEC FORM 3 and FEC FORM 3e are obsolete and should no longer be used.

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
Form 3, FEC FORM 321**

Name of Committee for Year

Year Ending the Period

To: 11/30/02

**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 11(a)
- (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)) 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.) 15

16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES 16

17. OTHER RECEIPTS (Dividends, Interest, etc.) 17

18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17) 18

II. DISBURSEMENTS

19. OPERATING EXPENDITURES 19

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES 20

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES 21

22. INDEPENDENT EXPENDITURES (See Schedule E) 22

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 6441 (d)) (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 27

28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27) 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 32

33. OFFSETS TO OPERATING EXPENDITURES from Line 15 33

34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32) 34

15-7-02

114 FEC

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

358EP17 AG: 11

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (in Full)

National Association of Chemical
Distributors Political Action
Committee

Address (Number and Street)

1110 Vermont Avenue, NW

City, State and ZIP Code

Washington, DC 20005

Check here if address is different than previously reported

2. FEC Identification Number

C00127613

This committee qualified as a multicandidate committee during
this Reporting Period on _____

4. TYPE OF REPORT (Check appropriate boxes)

- (a) April 15 Quarterly Report October 15 Quarterly Report
 - July 15 Quarterly Report January 31 Year End Report
 - July 31 Mid Year Report (Non Election Year Only)
 - Monthly Report for _____
 - Twelfth day report preceding _____
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 7/1/83 through 12/31/83

6. (a) Cash on hand January 1, 19 83

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1B)

(d) Subtotal (Add Lines 6(b) and 6(c) for Column A and
Line 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 2B)

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

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

10. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D)

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

Sanford J. Hill
Type or Print Name of Treasurer

Sanford J. Hill
SIGNATURE OF TREASURER

8/15/85
Date

For further information contact
Federal Election Commission
Toll Free 800 424 9530
Local 202 527 4088

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g

All previous versions of FEC FORM 3 and FEC FORM 3s are obsolete and should no longer be used

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FEC FORM 3X (3-80)

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

Name of Committee to File

Report Covering the Period

From **7/1/03**

To **12/31/03**

	COLUMN A Total This Period	COLUMN B Quicker Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	11(a)
(b) Political Party Committees	-0-	-0-	11(b)
(c) Other Political Committees	-0-	-0-	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (Add 11(a), 11(b) and 11(c))	-0-	-0-	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	12
13. ALL LOANS RECEIVED	-0-	-0-	13
14. LOAN REPAYMENTS RECEIVED	-0-	-0-	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	-0-	-0-	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	-0-	-0-	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	21
22. INDEPENDENT EXPENDITURES (see Schedule E)	-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES	-0-	-0-	23
(2 U.S.C. § 441 (d)) (Use Schedule F)			
24. LOAN REPAYMENTS MADE	-0-	-0-	24
25. LOANS MADE	-0-	-0-	25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	26(a)
(b) Political Party Committees	-0-	-0-	26(b)
(c) Other Political Committees	-0-	-0-	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	-0-	-0-	26(d)
27. OTHER DISBURSEMENTS	-0-	-0-	27
28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	-0-	-0-	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	-0-	-0-	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	-0-	-0-	31
32. TOTAL OPERATING EXPENDITURES from Line 19	-0-	-0-	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-0-	-0-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	-0-	-0-	34

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For a Political Committee Other Than an Election Committee

(Summary Page)

THE FEC

ALLEGY AREA

ALLEGY AREA

1. Name of Committee (in Full)
National Association of Chemical Distributors Political Action Committee

Address (Number and Street)
1110 Vermont Avenue, NW

City, State and ZIP Code
Washington, DC 20005

2. FEC Identification Number
C00127613

3. This committee qualified as a multi-candidate committee during the Reporting Period on _____

4. TYPE OF REPORT (Check appropriate box)
(a) April 15 Quarterly Report October 15 Quarterly Report
 July 15 Quarterly Report January 31 Year End Report
 July 31 Mid Year Report (Non-Election Year Only)
 Monthly Report for _____
 Twelfth day report preceding _____
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		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>1/1/84</u> through <u>3/31/84</u>		
6. (a) Cash on hand January 1, 19 <u>84</u>			\$ 270.00
(b) Cash on Hand at Beginning of Reporting Period		\$ 270.00	
(c) Total Receipts (from Line 10)		\$ 9,382.11	\$ 9,382.11
(d) Subtotal (add Lines 6(a) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 9,652.11	\$ 9,652.11
7. Total Disbursements (from Line 20)		\$ -0-	\$ -0-
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 9,652.11	\$ 9,652.11
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	

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

Snford J. Hill
Type or Print Name of Treasurer

Snford J. Hill
SIGNATURE OF TREASURER

3/15/85
Date

For further information contact
Federal Election Commission
Toll Free 800-424-9630
Local 202-523-4888

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 USC § 437g.

All previous versions of FEC FORM 3 and FEC FORM 2e are obsolete and should no longer be used.

03050549545

SCHEDULE A

ITEMIZED RECEIPTS

For the purpose of deducting contributions for each category of the Standard Deduction Table

Any information copied from such Reports or 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 sources.

Name of Committee (in Full)
National Association of Chemical Distributors Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Unknown	Occupation		99,382.11
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 9,382.11		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

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Statement of Receipts and Disbursements
 Form 1, FISC FORM 990

Name of Candidate for Full

Page: 4/1/04 To: 6/30/04

	Column A Total This Period	Column B Balance Forward	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	-	9,382.11	116d
(b) Political Party Committees	-	-	116e
(c) Other Political Committees	-	-	116f
(d) TOTAL CONTRIBUTIONS (other than loans) (add 116d, 116e and 116f)	-	9,382.11	116g
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.)	-	-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-	-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-	-	17
18. TOTAL RECEIPTS (Add 116g, 12, 13, 14, 15, 16 and 17)	-	9,382.11	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	-	-	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-	-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-	-	21
22. INDEPENDENT EXPENDITURES (see Schedule E)	-	-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 et al) (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	-	-	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	-	-	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	-	9,382.11	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-	-	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	-	9,382.11	31
32. TOTAL OPERATING EXPENDITURES from Line 19	-	-	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-	-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	-	-	34

Summary Page

ME FEC

ALIAS AREA

ALIAS AREA

1. Name of Committee (in Full)

National Association of Chemical Distributors Political Action Committee

Address (Number and Street)

1110 Vermont Avenue, NW

City, State and ZIP Code

Washington, DC 20005

Check here if address is different than previously reported.

2. FEC Identification Number

C00127613

This committee qualified as a multicandidate committee during this Reporting Period on

4. TYPE OF REPORT (Check appropriate)

- April 15 Quarterly Report, October 15 Quarterly Report, July 15 Quarterly Report, January 31 Year End Report, July 31 Mid Year Report, Monthly Report, Twelfth day report, Thirtieth day report following the General Election, Termination Report

Is this Report an Amendment? YES NO

SUMMARY

5. Covering Period 7/1/84 through 9/30/84

6. (a) Cash on hand January 1, 1984

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 20)

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

9. Debts and Obligations Owed TO The Committee

10. Debts and Obligations Owed BY the Committee

Table with 2 columns: COLUMN A This Period, COLUMN B Calendar Year-to-Date. Rows include cash on hand, receipts, disbursements, and ending cash.

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

Sanford J. Hill

Title or Print Name of Treasurer

Signature of Sanford J. Hill

Date 8/15/85

For further information contact Federal Election Commission, Toll Free 800-424-9630, Local 202-623-4888

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 USC 6437e

All previous versions of PSC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

Grid of 12 empty boxes for reporting period.

FEC FORM 3X (3/80)

Vertical stamp: 2025 SEP 17 10 18 AM '85

U.S. DEPARTMENT OF JUSTICE
 FEDERAL BUREAU OF INVESTIGATION
 FORM 280 (REV. 10-1-80)

		From: 7/1/04	To: 6/30/04	
		COLLECTED	PAID	
		Part 11(a)	Part 11(b)	
I. RECEIPTS				
11. CONTRIBUTIONS (other than loan) FROM:				
(a) Individuals/Persons Other Than Political Committees	-0-	9,382.11	11(a)
(b) Political Party Committees	-0-	-0-	11(b)
(c) Other Political Committees	-0-	-0-	11(c)
(d) TOTAL CONTRIBUTIONS (other than loan) (add 11(a), 11(b) and 11(c))	-0-	9,382.11	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	12
13. ALL LOANS RECEIVED	-0-	-0-	13
14. LOAN REPAYMENTS RECEIVED	-0-	-0-	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Retains, etc.)	-0-	-0-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	-0-	9,382.11	18
II. DISBURSEMENTS				
19. OPERATING EXPENDITURES	-0-	-0-	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	21
22. INDEPENDENT EXPENDITURES (see Schedule E)	-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 (d)) (Use Schedule F)	-0-	-0-	23
24. LOAN REPAYMENTS MADE	-0-	-0-	24
25. LOANS MADE	-0-	-0-	25
26. REFUNDS OF CONTRIBUTIONS TO:				
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	26(a)
(b) Political Party Committees	-0-	-0-	26(b)
(c) Other Political Committees	-0-	-0-	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	-0-	-0-	26(d)
27. OTHER DISBURSEMENTS	-0-	-0-	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	-0-	-0-	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES				
29. TOTAL CONTRIBUTIONS (other than loan) from Line 11(d)	-0-	9,382.11	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-0-	-0-	30
31. NET CONTRIBUTIONS (other than loan) (Subtract Line 30 from Line 29)	-0-	9,382.11	31
32. TOTAL OPERATING EXPENDITURES from Line 19	-0-	-0-	32
33. TOTAL OPERATING EXPENDITURES from Line 19	-0-	-0-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	-0-	-0-	34

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

11: FEC

(Summary Page)

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ALLEGANY

ALLEGANY

1. Name of Committee (in Full)

National Association of Chemical
Distributors Political Action
Committee

Address (Number and Street)

1110 Vermont Avenue, NW

City, State and ZIP Code

Washington, DC 20005

Check here if address is different than previously reported

2. FEC Identification Number

000127613

3. This committee qualified as a multi-candidate committee during
the Reporting Period on _____

4. TYPE OF REPORT (Check appropriate boxes)

(a) April 15 Quarterly Report October 15 Quarterly Report

July 15 Quarterly Report January 31 Year End Report

July 31 Mid Year Report (Non-Election Year Only)

Monthly Report for _____

Tenth day report preceding _____
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 10/1/84 through 12/31/84

6. (a) Cash on hand January 1, 1984

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1b)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and
Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 2b)

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

9. Debts and Obligations Owed TO The Committee
(itemize all on Schedule C or Schedule D)

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

COLUMN A
This Period

COLUMN B
Calendar Year to Date

	\$ 270.00	
	\$ 9,652.11	
	\$ -0-	\$ 9,382.11
	\$ 9,652.11	\$ 9,652.11
	\$ 7,000.00	\$ 7,000.00
	\$ 2,652.11	\$ 2,652.11
	\$ -0-	
	\$ -0-	

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

Sanford J. Hill

Signature of Treasurer

Sanford J. Hill
SIGNATURE OF TREASURER

9/15/85
Date

For further information contact:

Federal Election Commission

Toll Free 800 424 9630

Local 702 523 4088

NOTE: Submit this report to the Federal Election Commission by the person filing this report to the penalties of 2 U.S.C. 6437c.

All previous versions of FEC FORM 2 and FEC FORM 2a are obsolete and should no longer be used.

FEC FORM 3x (3-80)

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

Name of Committee (in Full)

Report Covering the Period

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

(Name Entry Unitemized \$ _____)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

**16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES
AND OTHER POLITICAL COMMITTEES**

17. OTHER RECEIPTS (Dividends, Interest, etc.)

18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND
OTHER POLITICAL COMMITTEES**

22. INDEPENDENT EXPENDITURES (use Schedule E)

**23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES
(2 U.S.C. § 441 a(d)) (Use Schedule F)**

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))

27. OTHER DISBURSEMENTS

28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)

30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)

31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)

3
5
5
4
7
7
3
3
3
3
0
2
2
2

	COLUMN A Total This Period	COLUMN B Calendar Year To-Date	
11(a)	-0-	9,382.11	11(a)
11(b)	-0-	-0-	11(b)
11(c)	-0-	-0-	11(c)
11(d)	-0-	9,382.11	11(d)
12	-0-	-0-	12
13	-0-	-0-	13
14	-0-	-0-	14
15	-0-	-0-	15
16	-0-	-0-	16
17	-0-	-0-	17
18	-0-	9,382.11	18
19	-0-	-0-	19
20	-0-	-0-	20
21	7,000.00	7,000.00	21
22	-0-	-0-	22
23	-0-	-0-	23
24	-0-	-0-	24
25	-0-	-0-	25
26(a)	-0-	-0-	26(a)
26(b)	-0-	-0-	26(b)
26(c)	-0-	-0-	26(c)
26(d)	-0-	-0-	26(d)
27	-0-	-0-	27
28	7,000.00	7,000.00	28
29	-0-	9,382.11	29
30	-0-	-0-	30
31	-0-	9,382.11	31
32	-0-	-0-	32
33	-0-	-0-	33
34	-0-	-0-	34

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page _____ of _____ for
JOHN BARRIS
 (See separate schedule(s) for con-
 tribution of the General
 Summary Page)

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

Name of Committee (in Full)
National Association of Chemical Distributors Political Action Committee

0333774536

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
John Barris John Barris For Senate 1318 North Union Street Wilmington, DE 19806	Contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/1/84	\$200.00
Frank Hill Frank Hill For Congress P. O. Box 2941 Durham, NC 27705	Contribution Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/30/84	\$300.00
Chris Smith Chris Smith for Congress 341 White Horse Road Trenton, NJ 08610	Contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/30/84	\$300.00
James Sensenbrenner The Sensenbrenner Committee P. O. Box 95 Requon, WI 53092	Contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/30/84	\$300.00
John Kasich Citizens for Kasich Committee 2668-L Cannon Point Columbus, OH 43209	Contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/30/84	\$300.00
John Miler Miler for Congress Committee P. O. Box 118 LaPorte, IN 43650	Contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/30/84	\$300.00
John Davis Davis for Congress P. O. Box 11427 Chattanooga, TN 37401	Contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/30/84	\$300.00
Wholesale-Distributor Political Action Co. (WDPAC) 1725 K Street, NW Washington, DC 20006	Contribution by WDPAC to federal candidates Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) Approx 10/19/84	\$5,000.00
1. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) **\$ 7,000.00**

TOTAL This Period (last page this line number only) **\$ 7,000.00**



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

SEP 26 1985

Sanford J. Hill, Treasurer
National Association of Chemical
Distributors Political Action
Committee
1110 Vermont Ave., N.W. #1150
Washington, D.C. 20005

Identification Number: C00127613

Reference: Mid-Year (1/1/81-6/30/81), Year End (7/1/81-12/31/81), April Quarterly (1/1/82-3/31/82), July Quarterly (4/1/82-6/30/82), October Quarterly (7/1/82-9/30/82), and Year End (10/01/82-12/31/82) Reports

Dear Mr. Hill:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above.

-The Commission acknowledges the receipt of NACD/PAC's reports for the 1981-82 election cycle. These reports, however, may not have disclosed all activity for the reporting periods. Be advised that the failure to file reports in a timely and accurate manner is viewed as a serious violation of the Federal Election Campaign Act. 2 U.S.C. §434.

According to your September 16, 1985 letter, it also appears that NACD/PAC funds may have been commingled with corporate and/or personal funds. This activity may be in violation of 2 U.S.C. §432(b)(3) and/or §441b.

Although the Commission may take further legal steps concerning these matters, your recent letter of explanation will be taken into consideration.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Bill Baber
Reports Analyst
Reports Analysis Division

85040612578



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

SEP 26 1985

Sanford J. Hill, Treasurer
National Association of Chemical
Distributors Political Action
Committee
1110 Vermont Ave., N.W. #1150
Washington, D.C. 20005

Identification Number: C00127613

Reference: Mid-Year (1/1/83-6/30/83), Year End (7/1/83-
12/31/83), April Quarterly (1/1/84-3/31/84), July
Quarterly (4/1/84-6/30/84), October Quarterly
(7/1/84-9/30/84), and Year End (10/1/84-12/31/84)
Reports

Dear Mr. Hill:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above.

-The Commission acknowledges the receipt of NACD/PAC's reports for the 1983-84 election cycle. These reports, however, may not have disclosed all activity for the reporting period. Be advised that the failure to file reports in a timely and accurate manner is viewed as a serious violation of the Federal Election Campaign Act. 2 U.S.C. §434.

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Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Bill Baber
Reports Analyst
Reports Analysis Division

36040612579

ANALYST: BILL BABER

CONVERSATION WITH: WILLIAM L. FALLON

COMMITTEE: NATIONAL ASSOCIATION OF CHEMICAL DISTRIBUTORS PAC

DATE: SEPTEMBER 30, 1985 9:38 am

SUBJECT(S): The September 26, 1985 Informational notices

Mr. Fallon called in response to the September 26, 1985 letters he received from the Reports Analysis Division under my signature.

He asked if there was any more he needed to do. I explained to him that the letters were based upon our preliminary review of NACD/PAC's reports. I mentioned to him that our legal department may want to look into the matter further.

I told him that there were two matters that definitely needed to be clarified for the public record:

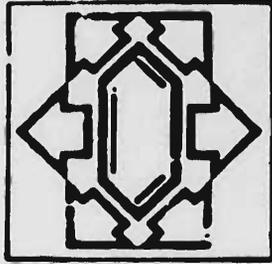
- 1) the source of the funds reported in the 1984 April Quarterly report (they had listed 9,382.11 in receipts an the source as "unknown".)
- 2) the source of the \$75,000 in "NACD/PAC funds" that the Huntington Bank released to the National Association of Chemical Distributors in February-March 1984.

Mr. Fallon said he would talk with Mr. Hill to see if they could clarify the matter.

86040612590

RECEIVED BY THE SEC

05 OCT 15 09:43



NATIONAL ASSOCIATION OF CHEMICAL DISTRIBUTORS • 1110 Vermont Avenue, N.W., Suite 1150
Washington, D.C. 20005 • 202-296-9200

October 4, 1985

Mr. William L. Fallon
Hanson, C'Brien, Birney and Butler
888 Seventeenth Street, NW
Washington, DC 20006

Dear Bill:

I'm responding to your letter of October 1 to Ralph Nappi.

The \$75,324.27 obtained from the bank in March 1984 was from the general operating account for the parent association---NACD. Bank statements indicated \$75,324.27 had been deposited from NACD sources (dues, meetings, registrations, etc.) over the past few months. The elected officers of the association were successful in getting this money from the bank by indicating signature authorization cards had been updated in the past and sending a cashiers check for the \$75,000 indicated as "NACD monies".

Financial statements for that time period indicated that \$9,382.11 had been recorded as contributions for the PAC. Attached is a copy of a written report filed June 1, 1984 by the then elected treasurer for the association that references the activities with the bank and the PAC monies.

However, the backup information to identify the individual contributions was not then nor subsequently discovered in what remained of the association and the PAC's files.

The association immediately separated the \$9,382.11 monies from its general operating account which at that time was the \$75,324.27 that had been withdrawn from the bank. The separated PAC funds were eventually distributed as indicated in the reports filed with the FEC. The remainder of the general account was used as originally intended for the present associations' general operating expenditures.

Hopefully, this will be the "clarification" the Commission needs.

Sincerely,

Sanford J. Hill
Executive Vice President

SH kw

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113371438

NACD
TREASURER'S REPORT

June 1, 1984

You are all aware that we have had a forced termination of our arrangement with our management association, Bell Publicom. For a period of time our funds on deposit with Huntington National Bank of Columbus, Ohio were in jeopardy. On March 28, 1984 Huntington Bank released the funds to us stating that these were/are the correct amounts in our account. In the absence of an audit (not yet complete) I, as Treasurer, am using these figures as the basis of this treasurer's report. I would add that the monies released to us by Huntington approximate the balance in our checkbook as of March 28, 1984. The funds from Huntington Bank have been deposited in LaSalle Bank in Chicago. The account was opened with a total of \$75,324.27 in a Depository Account and \$9,652.11 in our PAC. The funds are currently comingled.

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Balance June 1, 1984

Depository Account	\$21,411.03
PAC	9,652.11
TOTAL	<u>\$31,064.04</u>

Deposits, April & May	\$ 8,567.93
Expenses, April & May	\$63,180.27

Management Fees	\$22,182.54
Supplies, Stationery, etc.	785.08
Association Affiliations	689.00
National Convention Balance (Vacation Village)	20,653.65
Management Foresight (Par)	<u>7,860.00</u>
	<u>\$63,180.27</u>

John R. Hess,
Treasurer

95033491

Office of the Inspector General
U.S. Department of Justice
Washington, D.C. 20535

Federal Election Commission
1225 K Street, N.E.
Washington, D.C. 20463

Attention: Mr. Bill Baber





FEDERAL ELECTION COMMISSION

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

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THIS IS THE BEGINNING OF MUR # 2136

Date Filmed 9/15/86 Camera No. --- 2

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