



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE BEGINNING OF MUR # 2368

DATE FILMED 3/30/88 CAMERA NO. 4

CAMERAMAN GPC

88040590524



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

19 February 1987

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SUBINA
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF THE POLITICAL ACTION COMMITTEE OF THE
ASSEMBLY OF TURKISH AMERICAN ASSOCIATIONS

This is a referral of the Political Action Committee of the Assembly of Turkish American Associations ("the Committee"). The Committee failed to file three (3) reports in a timely manner during the 1985-1986 election cycle. According to the 1985-1986 RAD Review and Referral Procedures for Unauthorized Committees (Standard 4), this matter requires further examination by your office.

If you have any questions on this matter, please contact Michael D. Butterfield at 376-2480.

Attachment

33040590525

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 19 February 1987

ANALYST: Michael D. Butterfield

I. COMMITTEE: Political Action Committee of the
Assembly of Turkish American
Associations (C00195636)
Bulent Atalay, Treasurer
2010 Massachusetts Avenue, NW
Washington, DC 20036

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

III. BACKGROUND:

Failure to File Reports in a Timely Manner

The Political Action Committee of the Assembly of Turkish American Associations ("the Committee") failed to file three (3) reports in a timely manner during the 1985-1986 election cycle (see Chart and Attachments). The reports were filed between thirty-six (36) and forty-nine (49) calendar days late.

On May 22, 1986, Ms. Aylin Ozdogan, the Committee's Executive Director, called the Reports Analysis Division ("RAD") analyst regarding the 1986 April Quarterly Report (Attachment 4). Ms. Ozdogan stated that she thought the Committee had a semi-annual filing requirement. The RAD analyst explained election year filing requirements.

On August 25, 1986, Ms. Joan Weeks called on behalf of the Committee and spoke with the Assistant Staff Director of RAD, John D. Gibson, regarding the 1986 July Quarterly Report (Attachment 8). Mr. Gibson advised her to file the report as soon as possible.

On August 28, 1986, the Commission received a response from Ms. Weeks (Attachment 9). She explained that the reason for the delay in filing the 1986 July Quarterly Report was because the Committee "was staffed by volunteers from different areas of the country, and we have had difficulty in gathering the information necessary for the report...".

83040590526

**POLITICAL ACTION COMMITTEE OF THE ASSEMBLY
OF TURKISH AMERICAN ASSOCIATIONS
REPORTS ANALYSIS OGC REFERRAL
PAGE 2**

On September 3, 1986, a Chronic Late Filer Notice was sent to the Committee for failure to file the 1986 April Quarterly and July Quarterly Reports in a timely manner (Attachment 11). The Notice advised the Committee that any additional late filing of reports could result in legal enforcement action.

On December 24, 1986, the Committee's treasurer, Bulent Atalay, called the RAD analyst (Attachment 14). Ms. Atalay informed him that the 30 Day Post-General Report was late because Ms. Atalay had marked the wrong filing date on her calendar.

On December 28, 1986, the Commission received a letter from Ms. Atalay (Attachment 15). Ms. Atalay apologized for the delay in filing the 30 Day Post-General Report.

Subsequent to the mailing of the Chronic Late Filer Notice, the Committee failed to file the 1986 30 Day Post-General Report in a timely manner (Attachment 16).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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8 8 0 4 0 6 9 0 5 2 8

LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1986 April Quarterly (1/1/86-3/31/86) ^{1/}	3/21/86 (Attachment 2)	4/15/86	5/7/86 (Attachment 3)	6/3/86 (Attachment 5)
1986 July Quarterly (4/1/86-6/30/86)	6/20/86 (Attachment 6)	7/15/86	8/6/86 (Attachment 7)	9/2/86 (Attachment 10)
1986 30 Day Post-General (10/1/86-11/24/86)	9/29/86 (Attachment 12)	12/4/86	12/23/86 (Attachment 13)	1/9/87 (Attachment 16)

^{1/} The cover letter attached to the report noted the Committee's election year filing requirements.

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
POLITICAL ACTION COMMITTEE-ASSEMBLY OF TURKISH AMERICAN ASSOCIATIONS CONNECTED ORGANIZATION: TURKISH AMERICAN ASS'NS; ASSEMBLY OF				NON-PARTY QUALIFIED		ID #C00195636
1985	STATEMENT OF ORGANIZATION			30MAY85	3	85FEC/374/5083
	MID-YEAR REPORT	-	-	1JAN85 -30JUN85	2	85FEC/379/1794
	MID-YEAR REPORT - AMENDMENT	0	0	1JUN85 -30JUN85	4	86FEC/406/4761
	REQUEST FOR ADDITIONAL INFORMATION			1JUN85 -30JUN85	1	86FEC/402/4803
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUN85 -30JUN85	2	86FEC/404/5292
	YEAR-END	34,775	25,596	1JUL85 -31DEC85	9	86FEC/399/2682
	YEAR-END - AMENDMENT	34,775	23,546	1JUL85 -31DEC85	5	86FEC/406/4839
	YEAR-END - AMENDMENT	-	-	1JUL85 -31DEC85	55	86FEC/406/4771
	REQUEST FOR ADDITIONAL INFORMATION			1JUL85 -31DEC85	5	86FEC/403/4404
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL85 -31DEC85	6	86FEC/405/5319
1986	MISCELLANEOUS REPORT			28AUG86 TO FEC	2	86FEC/429/2028
	MISCELLANEOUS NOTICE FROM FEC			3SEP86	1	86FEC/429/4491
	MISCELLANEOUS REPORT			18SEP86 TO FEC	2	86FEC/430/4422
	MISCELLANEOUS REPORT			31DEC86 TO FEC	2	86FEC/452/3189
	APRIL QUARTERLY	5,225	5,206	1JAN86 -31MAR86	8	86FEC/416/0895
	NOTICE OF FAILURE TO FILE			1JAN86 -31MAR86	1	86FEC/413/2938
	JULY QUARTERLY	-	8,968	1APR86 -30JUN86	6	86FEC/429/3289
	NOTICE OF FAILURE TO FILE			1APR86 -30JUN86	1	86FEC/426/3522
	OCTOBER QUARTERLY	7,000	9,267	1JUL86 -30SEP86	6	86FEC/436/5344
	POST-GENERAL	8,925	6,618	1OCT86 -24NOV86	7	87FEC/453/1446
	NOTICE OF FAILURE TO FILE			24NOV86	1	86FEC/452/1418
	YEAR-END	585	1,794	25NOV86 -31DEC86	7	87FEC/458/3479
	TOTAL	56,510	0 55,399	0	136	TOTAL PAGES

All reports have been reviewed.
 Ending cash-on-hand as of 12/31/86: \$4,346
 Debts owed to and by the committee as of 12/31/86: \$0

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PAGES

March 21, 1986

WHO MUST FILE

ALL Party Committees, Non-connected Committees and Separate Segregated Funds, except those filing monthly (see below), must file a quarterly report by April 15, 1986.

WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for last report filed through March 31, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through March 31, 1986.* For more detailed instructions, consult your campaign guide.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than midnight April 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business April 15, 1986.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

MONTHLY FILERS

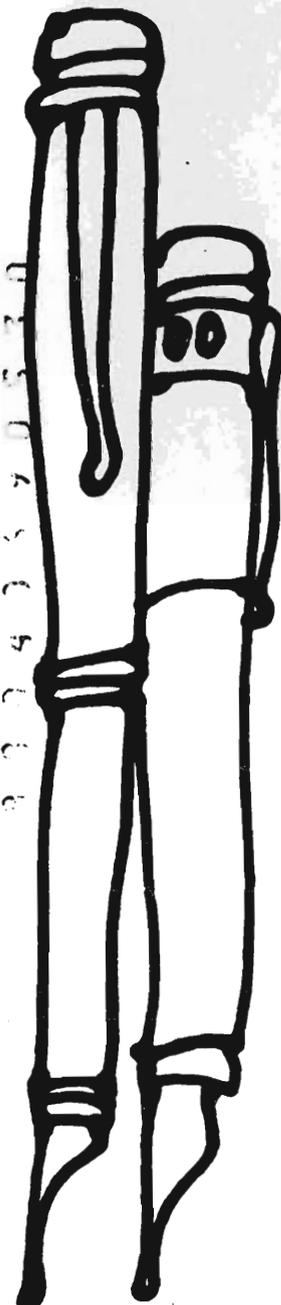
Committees that file on a monthly schedule must file their next report by April 20, 1986, and disclose all financial activity of their committee from March 1 through March 31, 1986. (See the schedule of monthly reports on the reverse side.)

COMPLIANCE

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

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

-over-



REMINDERS

QUARTERLY FILERS

Committees that make contributions or expenditures (including independent expenditures) in connection with an election, must file a pre-election report if this activity has not been previously disclosed. See the January 1986 issue of the Federal Election Commission Record for primary election filing requirements.

MONTHLY FILERS

Committees that file monthly must follow the schedule below. Pre-general election reports sent by registered or certified mail must be postmarked no later than midnight October 20, 1986. All other reports sent by registered or certified mail must be postmarked no later than midnight on the filing date in order to be timely. Reports hand delivered or mailed first class must be received by close of business on the filing date.

REPORT	PERIOD COVERED	FILING DATE
February	01/01 - 01/31	02/20/86
March	02/01 - 02/28	03/20/86
April	03/01 - 03/31	04/20/86
May	04/01 - 04/30	05/20/86
June	05/01 - 05/31	06/20/86
July	06/01 - 06/30	07/20/86
August	07/01 - 07/31	08/20/86
September	08/01 - 08/31	09/20/86
October	09/01 - 09/30	10/20/86
Pre-election	10/01 - 10/15	10/23/86
Post-election	10/16 - 11/24	12/04/86
Year-End	11/25 - 12/31	01/31/87

INDEPENDENT EXPENDITURES

Any independent expenditure aggregating \$1,000 or more and made between 2 and 20 days before an election must be reported within 24 hours after the expenditure is made. See 11 CFR 104.4(c)(2) and (3) for information concerning where to file.

**FOR INFORMATION CALL: Information Services Division
800/424-9530 or 202/376-3120**

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FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20543

20-7

May 7, 1986

**Bulent Atalay, Treasurer
Political Action Committee-
Assembly of Turkish American
Associations
2010 Massachusetts Avenue, N.W.
Washington, D.C. 20036**

Identification Number: C00195636

Reference: April Quarterly Report (1/1/86-3/31/86)

Dear Mr. Atalay:

It has come to the attention of the Federal Election Commission ("the Commission") that you may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent state officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Michael Butterfield on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

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

96034132938

ANALYST: Michael D. Butterfield

CONVERSATION WITH: Aylin Ozdogan

COMMITTEE: PAC Assembly of Turkish American Associations

DATE: May 22, 1986

SUBJECT(S): Filing obligations

Ms Ozdogan called to explain that she was sending in the April Quarterly Report. She was under the impression that the committee only had to file on a semi-annual basis. I explained the filing requirements for a quarterly filer. She agreed to file the next report in a timely manner.

88040690533

PAC-AWA

May 30, 1986

Mr. Michael Butterfield
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Dear Mr. Butterfield:

Thank you for clarifying our obligations to file quarterly reports during this election year. I am confident that the enclosed report will meet this requirement. Enclosed you will also find Attachment A that lists all non-candidate contributions received during this period. We are still working to complete all occupational information regarding our contributors.

I have noted on our calendar that the next quarterly report is due on 7/30/86. Please be assured that you will receive it in a timely manner.

Thank you again for all of your assistance.

Sincerely,



Aylin Ozdogan
Executive Director

enclosures

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

FEDERAL ELECTION COMMISSION
(Page 2 of 2)

JUN 3 02:11

(Summary Page)

1. Name of Committee (in Full)
Political Action Committee of the Assembly of Turkish American Associations

Address (Number and Street)
2010 Massachusetts Avenue, N.W.

City, State and ZIP Code
Washington, DC 20036

Check here if address is different than previously reported.

2. FEC Identification Number
C00195636

3. This committee qualified as a multicandidate committee during this reporting period on November 30, 1985

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 End Year Report (Non-Election Year Only)

Monthly Report for _____

Twelfth 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 This Period	COLUMN B Calendar Year-to-Date
6. Covering Period <u>1/1/86</u> through <u>1/31/86</u>			
6. (a) Cash on hand January 1, 19<u>86</u>			\$ 11,229.00
(b) Cash on Hand at Beginning of Reporting Period	\$ 11,229.00		
(c) Total Receipts (from Line 1B)	\$ 5,225.00		
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(b) and 6(c) for Column B)	\$ 16,454.00	\$ 16,454.00	
7. Total Disbursements (from Line 2B)	\$ 5,206.51	\$ 5,206.51	
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 11,247.49	\$ 11,247.49	
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)	\$		

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

Bulent Atalay 5/25/86
Print or Type Name of Treasurer
Bulent Atalay 5/25/86
Signature of Treasurer

For further information contact:
 Federal Election Commission
 600 E Street, N.W.
 Washington, D.C. 20543
 Toll Free 800-424-9529
 Local 202-376-3129

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

All previous editions of POC FORM 3 and POC FORM 3a are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

June 20, 1986

WHO MUST FILE

All Party Committees, Nonconnected Committees and Separate Segregated Funds, except those that file monthly (see below), must file a quarterly report by July 15, 1986.

WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for the last report filed through June 30, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through June 30, 1986.* For more detailed instructions, consult your campaign guide.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than midnight July 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business July 15, 1986.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

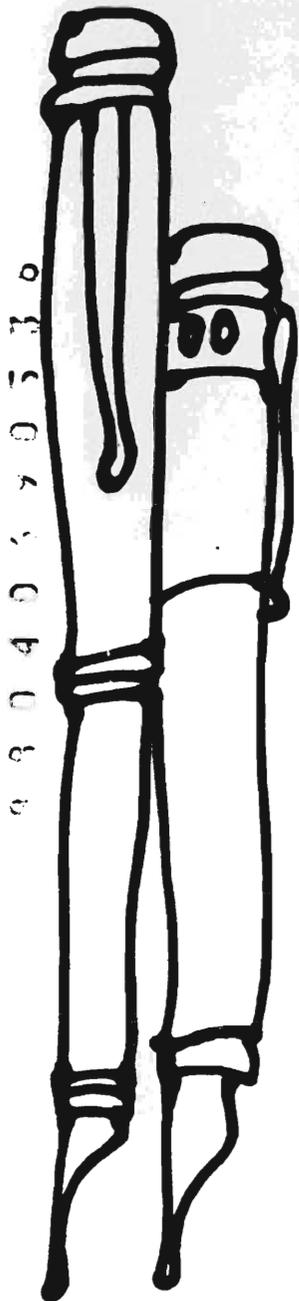
MONTHLY FILERS

Committees that file on a monthly schedule must file their next report by July 20, 1986, and disclose all financial activity of their committee from June 1 through June 30, 1986. (See the schedule of monthly reports on the reverse side.)

COMPLIANCE

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

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



REMINDERS**QUARTERLY FILERS**

Committees that make contributions or expenditures (including independent expenditures) in connection with an election, must file a pre-election report, if this activity has not been previously disclosed. See the January 1986 issue of the Federal Election Commission Record for primary election filing requirements.

MONTHLY FILERS

Committees that file monthly reports must follow the schedule below. Pre-general election reports sent by registered or certified mail must be postmarked no later than mid-night October 20, 1986. All other reports sent by registered or certified mail must be postmarked no later than midnight on the filing date in order to be timely. Reports hand delivered or mailed first class must be received by close of business on the filing date.

REPORT	PERIOD COVERED	FILING DATE
February	01/01 - 01/31	02/20/86
March	02/01 - 02/28	03/20/86
April	03/01 - 03/31	04/20/86
May	04/01 - 04/30	05/20/86
June	05/01 - 05/31	06/20/86
July	06/01 - 06/30	07/20/86
August	07/01 - 07/31	08/20/86
September	08/01 - 08/31	09/20/86
October	09/01 - 09/30	10/20/86
Pre-election	10/01 - 10/15	10/23/86
Post-election	10/16 - 11/24	12/04/86
Year-End	11/25 - 12/31	01/31/87

INDEPENDENT EXPENDITURES

Any independent expenditure aggregating \$1,000 or more and made between 2 and 20 days before an election must be reported within 24 hours after the expenditure is made. See 11 CFR 104.4(c) (2) and (3) for information concerning where to file.

**FOR INFORMATION CALL: Information Services Division
800/424-9530 or 202/376-3120**

98040590537



FEDERAL ELECTION COMMISSION
 WASHINGTON, D.C. 20463

EO 7

August 6, 1986

Bulent Atalay, Treasurer
Political Action Committee-
Assembly of Turkish American
Associations
 2010 Massachusetts Avenue, N.W.
 Washington, D.C. 20036

Identification Number: C00195636

Reference: July Quarterly Report (4/1/86-6/30/86)

Dear Mr. Atalay:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Michael Butterfield on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson
 Assistant Staff Director
 Reports Analysis Division

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MEMORANDUM TO THE FILE

CONVERSATION WITH: Joan Weeks

COMMITTEE: PAC - Assembly of Turkish American Associations

DATE: August 25, 1986

FROM: John D. Gibson

Joan Weeks called regarding the Non-Filer Notice sent for the 1986 July Quarterly Report. I told her to file the report as soon as possible.

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AUG 26 11:32



**ASSEMBLY OF
TURKISH
AMERICAN
ASSOCIATIONS**

3914 Mass. Ave., N.W.
Washington, DC 20036
Telephone 202 795-4670

August 26, 1986

John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Gibson:

Pursuant to our telephone conversation of August 25, 1986, we are writing to you to explain our delay in filing our July Quarterly Report, and to advise you that we will file this report in the next several days.

Our PAC is staffed by volunteers from different areas of the country, and we have had difficulty in gathering the information necessary for the report from them because of vacations and a resignation.

Please accept our apology for our delayed report. We will endeavor to file future reports in a timely manner.

Respectfully,
*Alan Weeks for
Bulent Atalay*

Bulent Atalay
Treasurer

BA/jw

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

ATTACHMENT 10

RECEIVED

06 SEP 2

(Summary Page)

ALIEN AREA ALIEN AREA

1. Name of Committee (No Full)
**Political Action Committee of the
Assembly of Turkish American
Associations**

Address (Number and Street)
2010 Massachusetts Avenue, N.W.

City, State and ZIP Code
Washington, DC 20036

Check here if address is different than previously reported.

2. FEC Identification Number
C 00195636

3. This committee qualified as a multi-candidate committee during
this Reporting Period on **November 30, 1985**
(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 _____
(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

5. Covering Period **4/1/86** through **6/30/86**

6. (a) Cash on hand January 1, 19**86**

(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
6. (a)		\$ 11,229
6. (b)	\$ 11,247	
6. (c)		\$ 5,225
6. (d)	\$ 11,247	\$ 16,454
7.	\$ 8,968	\$ 14,175
8.	\$ 2,279	\$ 2,279
9.	\$	
10.	\$	

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

Type or Print Name of Treasurer
D. Robert Atalay
SIGNATURE OF TREASURER

8/30/1986
Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9630
Local 702-523-4088

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

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

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F.L. FORM 3B (3-80)

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323237



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

MB-1

SEP 3 1986

Bulent Atalay, Treasurer
Political Action Committee-
Assembly of Turkish Americans
Association
2010 Massachusetts Avenue, N.W.
Washington, D.C. 20036

Identification Number: C00195636

Reference: 1985-1986 Election Cycle Reports

Dear Mr. Atalay:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. §434(a), by failing to timely file Reports of Receipts and Disbursements. The following is a list of the reports in question.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
April Quarterly Report (1/1/86-3/31/86)	4/15/86	6/3/86
July Quarterly Report (4/1/86- 6/30/86)	7/15/86	9/2/86

Timely filing is a specific requirement of the Federal Election Campaign Act ("the Act") and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views the untimely filing of reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending before the Commission, any additional report which is not submitted in a timely manner by your committee may result in the Commission initiating legal enforcement or audit action.

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Michael Butterfield on our toll-free number, (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

Lisa J. Stolaruk
Chief, Party/Non-Party Branch
Reports Analysis Division

3 5 7 3 4 2 9 4 4 9 1

GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 29, 1986

WHO MUST FILE THE PRE-GENERAL ELECTION REPORT

ALL COMMITTEES that file monthly reports must file the pre-general election report due October 23, 1986.

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

WHAT MUST BE REPORTED

Quarterly filers must disclose all financial activity from the close of books of the last report, or from the date of registration* (whichever is later), through October 15, 1986. (Monthly filers must disclose all financial activity from October 1 or from the date of registration* (whichever is later), through October 15, 1986.) For more detailed instructions, consult your campaign guide.

WHEN TO FILE

Pre-general election reports sent registered or certified mail must be postmarked no later than midnight October 20, 1986. Reports hand delivered or mailed first class must be received no later than close of business October 23, 1986.

WHO MUST FILE THE POST-GENERAL ELECTION REPORT

ALL COMMITTEES must file the post-general election report due December 4, 1986, regardless of election activity.

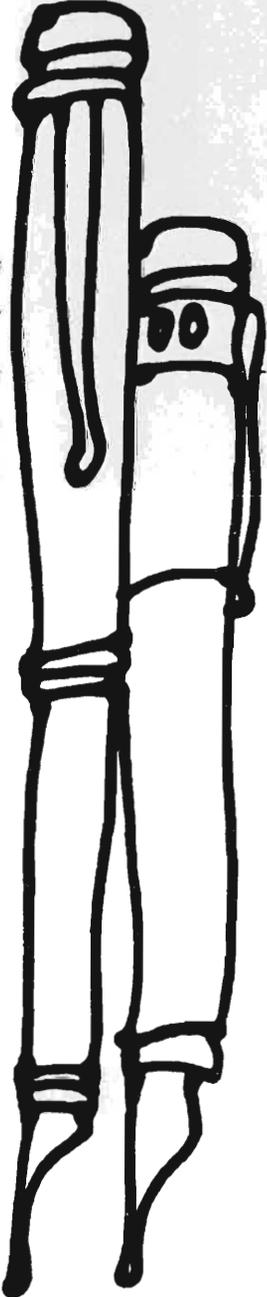
WHAT MUST BE REPORTED

The report must disclose all financial activity from the close of books of the last report, or the date of registration* (whichever is later), through November 24, 1986.

WHEN TO FILE

Post-general election reports sent by registered or certified mail must be postmarked no later than midnight December 4, 1986. Reports hand delivered or mailed first class must be received no later than close of business December 4, 1986.

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



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QUARTERLY FILERS

<u>Name of Report</u>	<u>Period Covered</u>	<u>Reg./Cert. Mailing Date</u>	<u>Filing Date</u>
Oct. Quarterly	07/01 ^{1/} - 09/30	10/15/86	10/15/86
Pre-General	10/01 - 10/15	10/20/86	10/23/86
Post-General ^{2/}	10/16 - 11/24	12/04/86*	12/04/86*
Year-End	11/25 - 12/31	01/31/87	01/31/87

MONTHLY FILERS

<u>Name of Report</u>	<u>Period Covered</u>	<u>Reg./Cert. Mailing Date</u>	<u>Filing Date</u>
Oct. Monthly	09/01 ^{1/} - 09/30	10/20/86	10/20/86
Pre-General	10/01 - 10/15	10/20/86	10/23/86
Post-General	10/16 - 11/24	12/04/86*	12/04/86*
Year-End	11/25 - 12/31	01/31/87	01/31/87

*Follow these dates for mailing and filing the post-general report. Disregard dates shown on the October Quarterly Report Notice dated September 19, 1986.

INDEPENDENT EXPENDITURES

Any independent expenditure aggregating \$1,000 or more and made between 2 and 20 days before an election must be reported within 24 hours after the expenditure is made. See 11 CFR 104.4(c) (2) and (3) for information concerning where to file.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X, for details.

COMPLIANCE

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

^{1/}Or from date of registration, or the close of books of the last report filed, whichever is later.

^{2/}Reports filed by committees that did not file the pre-general election report should cover all financial activity from the closing date of the last report or from the date of registration (whichever is later), through November 24, 1986. See the footnote on the reverse side.

FOR INFORMATION CALL: Information Services Division
800/424-9530 or 202/376-3120

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

EQ-7

December 23, 1986

Bulent Atalay, Treasurer
Political Action Committee-Assembly
of Turkish American Associations
2010 Massachusetts Avenue, NW
Washington, DC 20036

Identification Number: C00195636

Reference: 30 Day Post-General Report (through 11/24/86)

Dear Treasurer:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Michael Butterfield on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

ANALYST: Michael D. Butterfield

CONVERSATION WITH: Bulent Atalay

COMMITTEE: PAC Assembly of Turkish American Associations

DATE: December 24, 1986

SUBJECT(S): Non-filing of 30 Day Post General Report

Ms. Bulent Atalay called to explain that she inadvertently marked the wrong due date on her calender for filing the 30 Day Post-General Report.

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PAC-ATA

2010 Massachusetts Ave. N.W.
Washington, DC 20006

December 21, 1988

John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20543

Dear Mr. Gibson:

Pursuant to our telephone conversation of December 21, 1988 with Mr. Butterfield, we are writing to you to explain our delay in filing our first financial report and to advise you that we have already filed this report on 12/21/88. We inadvertently marked our calendar with the date of 12/04/88 as the due date of the report.

Please accept our apology for our error. We will endeavor to file future reports in a timely manner.

Sincerely,

Jim Coak
Dr. Bulent Atalay

Bulent Atalay
Treasurer

BA/go

cc
Michael Butterfield

86034452310547

1. Name of Committee on Form
Political Action Committee of Assembly of Turkish American Association
 Address (Number and Street)
2010 Massachusetts Ave., N.W.
 City, State and ZIP Code
Washington, D.C. 20036
 Check here if address is different than previously reported.
 2. FEC Identification Number
C 00175636
 3. This committee qualified as an independent expenditure committee during the Reporting Period on November 29, 1996
(and)

4. Type of Report
 Full Report
 Short Report
 Pre-Convention Report
 Other Report
 This is a report following the General Election on 11-03-96 in the State of _____
 Termination Report
 5. Is this Report an Amendment?
 Yes No

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	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Covering Period <u>10-01-96</u> through <u>11-24-96</u>		
6. (a) Cash on hand January 1, 19 <u>96</u>		11,829
(b) Cash on hand at beginning of Reporting Period	12	
(c) Total Receipts (from Line 10)	9,925	21,850
(d) Subtotal (add Lines 6(b) and (c) for Column A and Lines 6(a) and (c) for Column B)	9,937	21,879
7. Total Disbursements (from Line 20)	6,418	22,060
8. Cash on hand at close of Reporting Period (subtract Line 7 from Line 6(d))	3,519	3,519
9. Debts and Obligations Owed TO The Committee <small>(Itemize all on Schedule C or Schedule D)</small>		
10. Debts and Obligations Owed BY the Committee <small>(Itemize all on Schedule C or Schedule D)</small>		

I hereby declare that I have prepared this report in good faith and to the best of my knowledge and belief it is true, correct and complete.

Bulent Atalay
 Type or Print Name of Treasurer

Robert Atalay
 SIGNATURE OF THE REPORTER

12-14-96
 Date

For further information contact:
 Federal Election Commission
 434 Constitution Ave.
 Washington, D.C. 20543
 Tel: 202-453-3434
 Fax: 202-453-3437

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 6370.

All previous versions of FEC FORM 2 and FEC FORM 2b are obsolete and should be kept to file.

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FEC FORM 2b (1996)

BEFORE THE FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

Date and Time of Transmittal by
OGC to the Commission _____

RAD 87NF-52
Staff Member: Reilly

RESPONDENTS' NAMES: Political Action Committee of the
Assembly of Turkish American
Associations and Bulent Atalay, as
treasurer

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

INTERNAL REPORTS
CHECKED: Disclosure Reports

FEDERAL AGENCIES
CHECKED: None

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GENERATION OF THE MATTER

The Reports Analysis Division ("RAD") referred the Political Action Committee of the Assembly of Turkish American Associations and Bulent Atalay, as treasurer, ("the Committee") to the Office of the General Counsel on February 19, 1987. The basis of the attached referral is the Committee's failure to file its 1986 April and July Quarterly Reports, as well as its 1986 Post-General Election Report, in a timely manner. The Committee has been identified as a chronic late filer.

FACTUAL AND LEGAL ANALYSIS

The Act requires all political committees other than authorized committees of a candidate to file on either a quarterly or monthly basis. 2 U.S.C. § 434(a)(4)(A) and (B). Those opting to file quarterly shall file quarterly reports in a calendar year in which a regularly scheduled general election is

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held. These quarterly reports are due no later than the 15th day after the last day of each calendar quarter, except that the report due for the quarter ending on December 31 shall be filed no later than January 31 of the following calendar year.

2 U.S.C. § 434(a)(4)(A)(i) and (iv). Additionally, such Committees are also required to file a Post General Election Report which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election. 2 U.S.C. § 434(a)(4)(A)(iii).

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In the instant case, despite prior notices by RAD, the Committee failed to meet the Act's reporting requirements. Its 1986 April Quarterly Report, due on April 15, 1986, was not filed until June 3, 1986. Additionally, its 1986 July Quarterly Report, due on July 15, 1986, was not filed until September 2, 1986. On September 3, 1986, RAD sent the Committee a chronic late filer notice, warning that additional late filings of reports could result in legal enforcement action. Subsequently, the Committee filed its 1986 Post-General Election Report on January 9, 1987. This report was due on December 4, 1986. Therefore, this Office recommends that the Commission open a MUR and find reason to believe the Political Action Committee of the Assembly of Turkish American Associations and Bulent Atalay, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii).

RECOMMENDATIONS

1. Open a MUR.

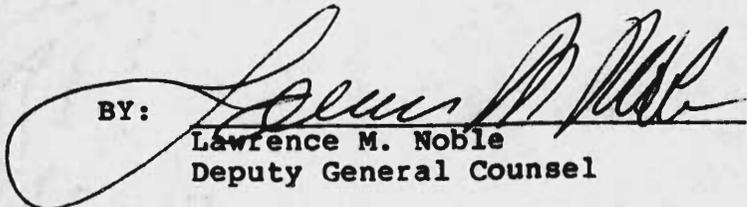
2. Find reason to believe the Political Action Committee of the Assembly of Turkish American Associations and Bulent Atalay, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii).
3. Approve the attached letter and factual and legal analysis.

Charles N. Steele
General Counsel

Date

3/9/87

BY:


Lawrence M. Noble
Deputy General Counsel

Attachments

1. RAD Referral
2. Factual and Legal Analysis
3. Proposed Letter

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Political Action Committee of the)
Assembly of Turkish American)
Associations and Bulent Atalay, as)
treasurer)

RAD Ref. 87NF-52 (MUR 2368)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 12, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 87NF-52:

1. Open a MUR.
2. Find reason to believe the Political Action Committee of the Assembly of Turkish American Associations and Bulent Atalay, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii).
3. Approve the letter and factual and legal analysis, as recommended in the First General Counsel's Report signed March 9, 1987.

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

Attest:

3-12-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 19, 1987

Bulent Atalay, Treasurer
Political Action Committee
of the Assembly of Turkish
American Associations
2010 Massachusetts Avenue, N.W.
Washington, D.C. 20036

Re: MUR 2368
Political Action
Committee of the Assembly
of Turkish American
Associations and Bulent
Atalay, as treasurer

Dear Ms. Atalay:

On March 12, 1987, the Federal Election Commission determined that there is reason to believe the Political Action Committee of the Assembly of Turkish American Associations and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be

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

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 Patty Reilly, the attorney assigned to this matter, at (202) 375-8200.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

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

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KELLEY DRYE & WARREN

1330 CONNECTICUT AVENUE, N.W.

WASHINGTON, D.C. 20036

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TELEX 697034

440458

TELECOPIER (202) 463-8338

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MYRON H. NORDQUIST
DAVID L. VAUGHAN
EDWARD M. LEBOW
FRANCIS Y. SOGI
BUD G. HOLMAN
JUN MORI
BRIAN CHRISTALDI

EDWARD R. VENIT
WILLIAM C. BURT
NEIL T. PROTO
COUNSEL

DAVID R. BUSAM
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(201) 267-4848

CORRESPONDENT OFFICE
SOGI & ITO
HIBIYA PARK BUILDING
TOKYO 100, JAPAN
(03) 201-0401

March 27, 1987

BY HAND

Patty Reilley, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2368--Political Action Committee of the
Assembly of Turkish American Associations

Dear Ms. Reilley:

On behalf of the Assembly of Turkish American Associations ("Assembly") we hereby request a 15 day extension to April 21, 1987 to respond to your letter dated March 19, 1987 from Mr. Scott E. Thomas, Chairman, Federal Election Commission, concerning the Assembly's political action committee ("PAC").

This law firm was retained by the Assembly on March 25, 1987 to assist it in responding to Mr. Scott's letter. At the present time, the Assembly is in the process of consolidating the PAC's books and records as well as other relevant material for our review in connection with the preparation of the Assembly's response. It is anticipated that we will be unable to confer with the managing officers of the Assembly's PAC until the first part of the week of April 5th due to an unavoidable conflict in schedules. As a consequence, the request for an extension of time is necessary in order to

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OFFICE OF THE
GENERAL COUNSEL

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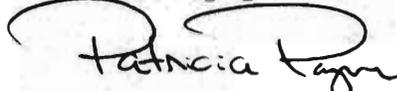
Ms. Patty Reilly
March 27, 1987
Page 2

afford the Assembly and its counsel adequate time to review the PAC's corporate records and confer prior to preparing the response.

Enclosed is the Assembly's Statement of Designation of Counsel. Please acknowledge receipt of this letter and its enclosure by stamping the attached copy provided herewith and return it to the undersigned in the enclosed envelope.

If you have a question with regard to this submission, please do not hesitate to contact the undersigned at the above-referenced telephone number or Charles L. Marinaccio at (202) 463-8333 or Terrance W. Schwab of this Firm's New York office at (212) 808-7581.

Very truly yours,



Patricia L. Payne

PLP/kjr

Enclosure

cc: Bulent Atalay, Treasurer
Tarhan A. Danisman, President
Charles L. Marinaccio, Esq.
Terrance W. Schwab, Esq.
Peter J. Lesser, Esq.

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STATEMENT OF DESIGNATION OF COUNSEL

MUR: 2386

NAME OF COUNSEL:

Charles L. Marinaccio, Esq.
Kelley Drye & Warren
Suite 600
1330 Connecticut Ave., N.W.
Washington, DC 20036
(202) 463-8333

and

Terrance W. Schwab, Esq.
Kelley Drye & Warren
101 Park Avenue
New York, NY 10178
(212) 808-7800

The above-named individuals are hereby designated as my
counsel and are authorized to receive any notifications and
other communications from the Commission and to act on my
behalf before the Commission.

3/27/1987
Date

Bulent Atalay
Signature

RESPONDENT'S NAME: Bulent Atalay, Treasurer

ADDRESS: Political Action Committee of
Turkish American Associations
2010 Massachusetts Ave., N.W.
Washington, DC 20034

BUSINESS PHONE: (202) 293-4670

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 3, 1987

Patricia Payne, Esquire
Kelley, Drye & Warren
1330 Connecticut Avenue, N. W.
Washington, D. C. 20036

RE: MUR 2368
Political Action Committee
the Assembly of Turkish
American Associations and
Bulent Atalay, as treasurer

Dear Ms. Payne:

The Office of the General Counsel is in receipt of your recent request for an extension of time to respond in the above-captioned matter. After considering the circumstances as detailed in your request, this Office will grant the requested 15 day extension. Accordingly, your response is due no later than April 21, 1987.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
Acting General Counsel

By: 
George F. Rishel
Acting Associate General
Counsel

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pen

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KELLEY DRYE & WARREN

1330 CONNECTICUT AVENUE, N.W.

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440456

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(201) 267-4946

CORRESPONDENT OFFICE
SOGI & ITO
HIBIYA PARK BUILDING
TORO 100, JAPAN
201-0401

April 21, 1987

BY HAND

Patty Reilley, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2368 -- Political Action Committee of the
Assembly of Turkish American Associations

Dear Ms. Reilley:

On March 20, 1987 the Political Action Committee of the Assembly of Turkish American Associations ("PAC-ATAA"), received notification that the Federal Election Commission ("F.E.C.") had determined that there is reason to believe that PAC-ATAA violated the F.E.C.'s reporting requirements by failing to file three reports in a timely manner. We subsequently were in communication with your office and obtained an extension of time until April 21, 1987 to reply to your notification. During the intervening period, PAC-ATAA and this office conducted a thorough examination of the circumstances surrounding PAC-ATAA's reporting procedures. We believe that this inquiry reveals that any infractions of F.E.C. regulations by PAC-ATAA were inadvertent and solely due to logistical and administrative problems. Moreover, since receiving the notice of investigation, PAC-ATAA has undertaken a positive and substantial reorganization of its structure designed to ensure that all future reports will be filed on a timely basis and in full compliance with F.E.C. rules and regulations. In light of PAC-ATAA's curative response to the FEC notification, we submit that no useful purpose would be served by further proceedings. PAC-ATAA therefore respectfully requests that the F.E.C. dismiss its investigation. In the

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GENERAL COUNSEL

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KELLEY DRYE & WARREN

Patty Reilley, Esq.
April 21, 1987
Page 2

alternative, PAC-ATAA requests pre-probable cause conciliation of this matter in accordance with section 111.18(d) of the F.E.C.'s regulations.

PAC-ATAA does not dispute the F.E.C.'s contention that three of its reports were untimely filed. However, some background regarding PAC-ATAA and its limited personnel and operations may put this matter into better perspective. Since its inception in mid-1985, PAC-ATAA has operated on a voluntary basis.*/ None of its Directors or Officers (including the Treasurer) is compensated for their services. PAC-ATAA is funded exclusively by voluntary contributions, and its budget and administrative resources are very modest.

PAC-ATAA's former Treasurer, Professor Bulent Atalay, was, of course, ultimately responsible for ensuring the timely filing of the F.E.C. reports at issue. Professor Atalay is a highly respected member of the Turkish-American community who lives in Fredricksburg, Virginia and teaches theoretical physics at the University of Virginia and Mary Washington College. Unfortunately, Professor Atalay's busy teaching schedule in central Virginia and his travels abroad prevented him from visiting PAC-ATAA's Washington, D.C. offices with any regularity. Moreover, these same factors limited Professor Atalay's ability to fulfill his voluntary responsibilities as Treasurer in a fully satisfactory manner.

With respect the three reports in question, it appears that the lack of clearly defined responsibility by volunteer personnel, together with the schedule and geographic distance of Professor Atalay from the PAC-ATAA office in the District of Columbia, resulted in a management structure inadequate to the task of adhering to the precise schedules under F.E.C. law.

However, it is clear that any violations of the F.E.C.'s rules by PAC-ATAA were purely unintentional and the result of procedural and structural inadequacies that are readily corrected. Therefore, PAC-ATAA has undertaken a substantial reorganization in response to the F.E.C.'s notification and has

*/ As discussed later in this letter, in late 1986, PAC-ATAA hired Gun Cagal, C.P.A., to assist with the preparation of draft F.E.C. reports and to carry out other accounting duties. Mr. Cagal has been compensated for his efforts.

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KELLEY DRYE & WARREN

Patty Reilley, Esq.
April 21, 1987
Page 3

implemented a number of significant steps that will ensure full compliance with F.E.C. requirements in the future. The reorganization PAC-ATAA has undertaken is as follows:

1) PAC-ATAA has received the resignation of Professor Atalay as Treasurer. Erol Ozdemir, a Certified Public Accountant who resides in Bethesda, Maryland, has been appointed as the new Treasurer of PAC-ATAA.

2) PAC-ATAA has amended its by-laws to specify that the Treasurer is under an obligation to "take all steps necessary to ensure full compliance with the statutes and regulations relating to the Political Action Committee's registration with the Federal Election Commission." PAC-ATAA By-Laws at Article IV, Section 6(f) (effective April 20, 1987).

3) PAC-ATAA has further amended its by-laws to provide for the appointment of an Assistant Treasurer who "is specifically empowered to sign reports and other documents required by the Federal Election Commission, and to take all other necessary actions to ensure full compliance with the laws and regulations relating to the Political Action Committee's registration with the Federal Election Commission." PAC-ATAA By-Laws at Article IV, Section 7 (effective April 20, 1987).

4) PAC-ATAA has appointed an Assistant Treasurer, Mr. Eren Veral, who is a resident of Washington, D.C.* / Mr. Veral's proximity to PAC-ATAA's office and his authority to prepare and sign F.E.C. reports should cure the logistical problems that led to the previous late reports.

5) PAC-ATAA has hired a Certified Public Accountant, Mr. Gun Cagal, who will assist the Treasurer and Assistant Treasurer in the preparation of the F.E.C. reports and the maintenance of proper books and records by the PAC. Mr. Cagal was retained by PAC-ATAA in late 1986, and has been of invaluable assistance since that time.

6) PAC-ATAA has instituted a procedure whereby reports and records will, when necessary, be transmitted between the relevant parties via Federal Express, rather than being left in the PAC office for signature or other action.

* / PAC-ATAA will, of course, file an amended Statement of Organization with the F.E.C. reflecting these personnel changes.

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KELLEY DRYE & WARREN

Patty Reilley, Esq.
April 21, 1987
Page 4

7) Finally, the Board of Directors of PAC-ATAA will ensure that PAC-ATAA's new Treasurer, Assistant Treasurer and Accountant meet within the next 10 days with Counsel to review in detail all F.E.C. reporting requirements and the procedures to be followed to prevent any future infractions.

Taken together, these positive actions demonstrate with clarity that PAC-ATAA understands the serious implications of its former methods of reporting its activities to the F.E.C. Moreover, they demonstrate that PAC-ATAA has fully committed itself to establishing the necessary framework for future compliance with all F.E.C. rules and regulations. In light of this commitment, PAC-ATAA submits that the objectives of a F.E.C. enforcement action have already been accomplished. Therefore, PAC-ATAA respectfully requests that the F.E.C.'s investigation of this matter be dismissed at this time, without prejudice to the institution of future proceedings if further infractions occur. In the alternative, pursuant to 11 C.F.R. § 111.18(d), PAC-ATAA requests pre-probable cause conciliation of this matter.

We would appreciate an opportunity to discuss this matter with you in person, and will be available for a meeting at your convenience.

Thank you for your cooperation in this matter.

Sincerely,

Charles L. Marinaccio

Charles L. Marinaccio

8 3 0 4 0 5 0 5 6 2

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)	
)	
Political Action Committee of the)	MUR 2368
Assembly of Turkish American)	
Associations and Bulent Atalay)	
as treasurer)	

MAY 12 9 31 39
 COMMUNICATIONS SECTION

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On March 12, 1987, the Commission found reason to believe the Political Action Committee of the Assembly of Turkish American Associations and Bulent Atalay, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii). By letter dated April 21, 1987, Respondents alternatively request pre-probable cause conciliation or that the Commission take no further action in this matter.^{1/} As developed below, this Office recommends that the Commission grant Respondents' request for pre-probable cause conciliation.

II. DISCUSSION OF RESPONSE

In support of its request that the Commission take no further action in this matter, Respondents cite the limited resources of this volunteer organization. Additionally, Respondents assert that the treasurer, Bulent Atalay, teaches in central Virginia and travels infrequently to Washington, D.C. The treasurer's schedule and distance from the Committee's office, and a lack of clear responsibility for volunteer personnel, is said to have resulted in the three reports filed

^{1/} Respondents' actual request is that the Commission "dismiss its investigation." Committee Response at 1.

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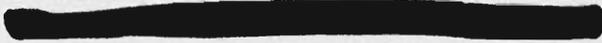
late. Committee Response at 2. Respondents state they have now implemented steps to meet the Act's disclosure requirements. These include appointment of a new treasurer in the Washington area,^{2/} amendment of Respondents' by-laws to require the treasurer to meet the Act's reporting requirements, the appointment of an assistant treasurer, continued use of a certified public accountant, new internal filing procedures, and instruction of key personnel on the Act's reporting requirements.

This Office does not believe that no further action should be taken in this matter. Notwithstanding the Respondents' new procedures, Respondents failed to timely file reports on three different occasions. Moreover, these reports were filed between 36 and 49 days late, thus creating incomplete public disclosure for significant periods of time. Therefore, this Office recommends that the Commission grant Respondents' alternative request for pre-probable cause conciliation.

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

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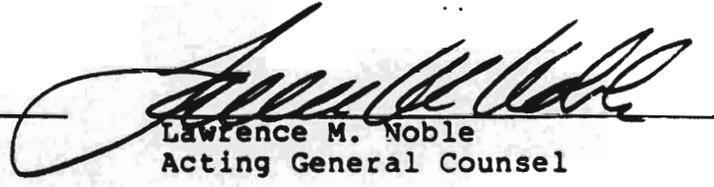


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RECOMMENDATIONS

1. Enter into conciliation with the Political Action Committee of the Assembly of Turkish American Associations and Bulent Atalay, as treasurer.
2. Approve the attached letter and conciliation agreement.

Date 5/12/87


Lawrence M. Noble
Acting General Counsel

Attachments

1. Conciliation Request
2. Proposed Conciliation Agreement
3. Proposed letter

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Political Action Committee of the)	MUR 2368
Assembly of Turkish American)	
Associations and Bulent Atalay)	
as treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 15, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2368:

1. Enter into conciliation with the Political Action Committee of the Assembly of Turkish American Associations and Bulent Atalay, as treasurer, as recommended in the General Counsel's Report signed May 12, 1987.
2. Approve the letter and conciliation agreement, as recommended in the General Counsel's Report signed May 12, 1987.

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

Attest:

5-15-87
Date

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

Received in the Office of Commission Secretary:	Tues.,	5-12-87,	3:39
Circulated on 48 hour tally basis:	Wed.,	5-13-87,	11:00
Deadline for vote:	Fri.,	5-15-87,	11:00

88040690567



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

John

May 19, 1987

Charles L. Marinaccio, Esquire
Kelley Drye & Warren
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036

Re: MUR 2368
Political Action Committee of
the Assembly of Turkish
American Associations and
Bulent Atalay, as treasurer

Dear Mr. Marinaccio:

On March 12, 1987, the Federal Election Commission found reason to believe that the Political Action Committee of the Assembly of Turkish American Associations and Bulent Atalay, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii). At your request, on May 14, 1987, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

38040590568

GCM#4803

KELLEY DRYE & WARREN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

87 NOV 20 PM 3:19

1330 CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20036
(202) 463-8333
TELEX 897034
TELECOPIER (202) 463-8338

BRIAN CRISTALDI
CLIFFORD J. GROEN
BUD G. HOLMAN
JOHN G. IMMER
EDWARD M. LEBOW
CHARLES L. MARINACCIO
JUN MORI
MYRON H. NORDQUIST
JOHN W. SIMPSON
FRANCIS Y. SOGI
SAMUEL C. ULLMAN, P.A.
DAVID L. VAUGHAN

EDWARD R. VENIT
NEIL T. PROTO
COUNSEL

DAVID R. SUSAM
JILLY H. GROSS
MARY S. HEAD
BERNARD J. KAROL
HARRY J. KELLY
PETER J. LESSER
PATRICIA L. PAYNE
MARY M. SWEENEY
THERESA M. VOGLER
STEPHEN J. WALLACE

* NOT ADMITTED IN WASHINGTON, D.C.

101 PARK AVENUE
NEW YORK, NY 10178
(212) 688-7800
624 SOUTH GRAND AVENUE
LOS ANGELES, CA 90017
(213) 688-1200
50 CALIFORNIA STREET
SAN FRANCISCO, CA 94111
(415) 688-3530
SIX STAMFORD FORUM
STAMFORD, CT 06901
(203) 324-1400
MIAMI CENTER
100 CHOPIN PLAZA
MIAMI, FL 33131
(305) 372-2400
175 SOUTH STREET
MORRISTOWN, N.J. 07960
(201) 267-4948
CORRESPONDENT OFFICE
SOGI & ITO
HIBIYA PARK BUILDING
TOKYO 100, JAPAN
(03) 261-0401

November 20, 1987

BY HAND

Patty Reilly, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Re: MUR 2368--Political Action Committee of the
Assembly of Turkish American Associations

Dear Ms. Reilly:

Pursuant to our telephone conversation of November 17, 1987, enclosed is a Conciliation Agreement signed by the new Treasurer of PAC-ATAA, Dr. Alp Karahasan.

PAC-ATAA has already submitted a civil penalties check for \$1,500 to your office (copy enclosed).

For your information, on November 20, 1987, PAC-ATAA filed an amended Statement of Organization reflecting the appointment of Dr. Karahasan as Treasurer (copy enclosed).

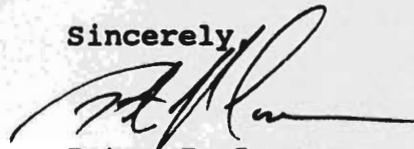
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Patty Reilly, Esq.
November 20, 1987
Page 2

Please keep us advised of any action by the Federal
Election Commission with respect to the enclosed Agreement.

Thank you for your cooperation and assistance throughout
the course of this matter.

Sincerely,



Peter J. Lesser

PJLvcb
Enclosures

83040690570

37 JUN 12 P 4:45

PAC - ATAA
2010 MASSACHUSETTS AVENUE, N.W.
WASHINGTON, D.C. 20036

EXPLANATION	AMOUNT

15-4
540
376

AMOUNT *One thousand five hundred and 00/100*

DATE *1/18/87*

TO THE ORDER OF

Federal Election Commission

DESCRIPTION

CHECK NUMBER

376

1500.00

CHECK AMOUNT

FIRST AMERICAN BANK, N.A.
1919 M STREET, N.W. WASHINGTON, D.C. 20036

⑆0000376⑆ ⑆054000043⑆ 3 325 091⑆

David M. ...
Jan ...

1 7 5 0 4 9 0 4 0 8 8

STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (in Full) <input type="checkbox"/> Check if name or address is changed. Political Action Committee of the Assembly of Turkish American Associations	2. Date November 20, 1987
(b) Address (Number and Street) 2010 Massachusetts Avenue, N.W.	3. FEC Identification Number C00195636
(c) City, State and ZIP Code Washington, D.C. 20036	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
-------------------	-----------------------------	---------------	----------------

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

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
None		

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
Dr. Alp Karahasan	12201 Benson Branch Road Ellicot City, Maryland 21043	Treasurer

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
Dr. Alp Karahasan	12201 Benson Branch Road Ellicot City, Maryland 21043	Treasurer
Eren Veral	3887 Rodman St., N.W., #E-71 Washington, D.C. 20016	Assistant Treasurer

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

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
First American Bank	1919 M Street, N.W. Washington, D.C. 20036

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

Dr. Alp Karahasan		11/20/87
Type or Print Name of Treasurer	SIGNATURE OF TREASURER	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.

BEFORE THE FEDERAL ELECTION COMMISSION 87 DEC -7 PH 4:21

In the Matter of)
)
Political Action Committee of the) MUR 2368
Assembly of Turkish American)
Associations and Dr. Alp)
Karahasan, as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached for Commission approval is a conciliation agreement signed by Dr. Alp Karahasan, treasurer of the Political Action Committee of the Assembly of Turkish American Associations ("the Committee").

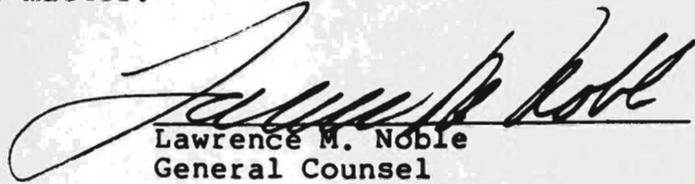
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II. RECOMMENDATIONS

1. Approve the attached proposed agreement signed by Dr. Alp Karahasan, treasurer of the Political Action Committee of the Assembly of Turkish American Associations.
2. Approve the attached letter.
3. Close the file in this matter.

Date

12/7/87


Lawrence M. Noble
General Counsel

Attachments

1. Conciliation Agreement
2. Proposed Letter

88040690574

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 2368
Political Action Committee of the)	
Assembly of Turkish American)	
Associations and Dr. Alp)	
Karahasan, as treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 10, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2368:

1. Approve the proposed agreement signed by Dr. Alp Karahasan, treasurer of the Political Action Committee of the Assembly of Turkish American Associations, as recommended in the General Counsel's report signed December 7, 1987.
2. Approve the letter, as recommended in the General Counsel's report signed December 7, 1987.
3. Close the file in this matter.

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

Attest:

12-10-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Mon., 12-7-87, 4:21
Circulated on 48 hour tally basis:	Tues., 12-8-87, 11:00
Deadline for vote:	Thurs., 12-10-87, 11:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

14 December 1987

Peter J. Lesser, Esquire
Kelley Drye & Warren
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036

RE: MUR 2368
Political Action Committee of
the Assembly of Turkish
American Associations and
Dr. Alp Karahasan, as
treasurer

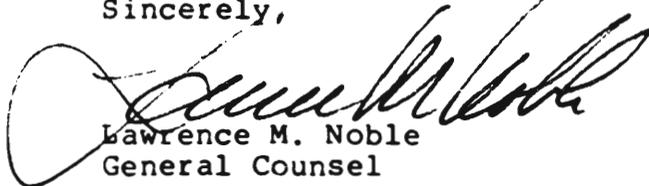
Dear Mr. Lesser:

On December 10, 1987, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(i) and (iii), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

83040690570

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Political Action Committee of the) MUR 2368
Assembly of Turkish American)
Associations and Dr. Alp Karahasan,)
as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Political Action Committee of the Assembly of Turkish American Associations and its Treasurer ("Respondents"), violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii).

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).

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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, the Political Action Committee of the Assembly of Turkish American Associations ("PAC-ATAA"), is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent Dr. Alp Karahasan is the Treasurer of PAC-ATAA, having assumed that responsibility on November 18, 1987, but was not the Treasurer of PAC-ATAA at the time of the violations.

3. Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), Respondents were required to file a 1986 April Quarterly Report no later than April 15, 1986. Respondents failed to file this report until June 3, 1986.

4. Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), Respondents were required to file a 1986 July Quarterly Report no later than July 15, 1986. Respondents failed to file this report until September 2, 1986.

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5. Pursuant to 2 U.S.C § 434(a)(4)(A)(iii), Respondents were required to file a 1986 Post General Election Report no later than December 4, 1986. Respondents failed to file this report until January 9, 1987.

V. Respondents failed to file their 1986 April and July Quarterly Reports and their 1986 Post General Election Report in a timely manner in violation of 2 U.S.C. § 434(a)(4)(A)(i) and (iii).

IV. Respondents will pay a civil penalty to the Federal Election Commission in the amount of One Thousand Five Hundred Dollars (\$1500), 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.

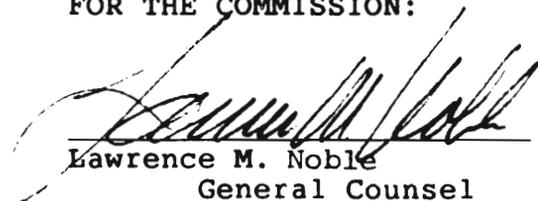
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VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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

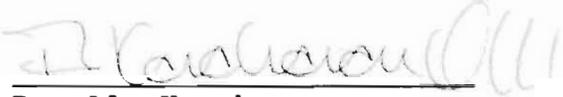
X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:


Lawrence M. Noble
General Counsel

12/11/87
Date

FOR THE RESPONDENTS:


Dr. Alp Karahasan
Treasurer, Political
Action Committee of the
Assembly of Turkish American
Associations

11/18/87
Date

93040690580



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2368
DATE FILMED 3/30/88 CAMERA NO. 4
CAMERAMAN GPC

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