



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

THIS IS THE BEGINNING OF MUR # 2407

DATE FILMED 12/3/17 CAMERA NO. 3

CAMERAMAN AS

87040564937

PUBLIC RECORD INDEX MUR 2407

1. Memo, 18 Feb 87, John D. Gibson (Reports Analysis Division) to Charles N. Steele (General Counsel), subj: Referral of the Marshall Political Action Committee, w/atch (RAD Referral Package)
2. First General Counsel's Report, 22 Apr 87
3. Certification of Commission Action, 28 Apr 87
4. Ltr, 5 May 87, Scott E. Thomas (Chairman, FEC to Ralph S. Snyder (Treasurer, Marshall PAC)
5. Ltr, 7 May 87, Ralph S. Snyder to Carol A. Laham, subj: Request for pre-probable cause conciliation
6. General Counsel's Report, 28 May 87
7. Certification of Commission Action, 3 Jun 87
8. Ltr, 5 Jun 87, Lawrence M. Noble (Acting General Counsel) to Ralph S. Snyder
9. General Counsel's Report, 7 Jul 87
10. Ltr, 7 Jul 87, R.S. Snyder to C.A. Laham.
11. General Counsel's Report, 3 Aug 87
12. Certification of Commission Action, 6 Aug 87
13. Ltr, 11 Aug 87, L.M. Noble to R.S. Snyder
14. General Counsel's Report, 18 Sep 87
15. Certification of Commission Action, 23 Sep 87
16. Ltr, 25 Sep 87, L.M. Noble to R.S. Snyder, w/atch (executed conciliation agreement)

-END-

NOTE: In preparing its file for the public record, O.G.C. routinely removes those documents in which it perceives little or no public interest, and those documents, or portions thereof, which are exempt from disclosure under the Freedom of Information Act.

87040564938



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

18 February 1987

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF THE MARSHALL POLITICAL ACTION
COMMITTEE

This is a referral of the Marshall Political Action Committee ("MPAC"). MPAC 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 Tamara K. Rollins at 376-2480.

Attachment

8704064939

1

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 18 February 1987

ANALYST: Tamara K. Rollins

I. COMMITTEE: Marshall Political Action Committee
(C00080390)
Ralph S. Snyder, Esq., Treasurer
Suite 3600, 1600 Market Street
Philadelphia, PA 19103

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

III. BACKGROUND:

Failure to File Reports in a Timely Manner

The Marshall Political Action Committee ("MPAC") 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-four (34) and fifty-two (52) calendar days late.

On March 20, 1986, the Reports Analysis Division ("RAD") analyst contacted MPAC by telephone to inquire why the Commission had not received the 1985 Year End Report. Ms. Curley, an MPAC representative, stated that she had sent the report in January by return receipt mail. The RAD analyst requested that the report be sent, and Ms. Curley agreed to send a copy of the report along with a copy of the returned receipt (Attachment 7).

On May 6, 1986, a Chronic Late Filer Notice was sent to MPAC for failure to file the 1985 Mid-Year and Year End Reports in a timely manner (Attachment 9). The Notice advised MPAC that any additional late filing of reports could result in legal enforcement action.

On May 16, 1986, MPAC responded to the Chronic Late Filer Notice by stating that "the two reports...were mailed, not to the Federal Election Commission, but rather, to the Pennsylvania Election Commission" (Attachment 10). MPAC also submitted copies of the return receipt cards and another copy of the letter explaining the late filing of the 1985 Mid-Year Report.

87040564940

**MARSHALL POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2**

Subsequent to the mailing of the Chronic Late Filer Notice, MPAC failed to file the 1986 30 Day Post-General Report in a timely manner (Attachment 13).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

87040564941



LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1985 Mid-Year (1/1/85-6/30/85) ^{1/}	6/21/85 (Attachment 2)	7/31/85	8/22/85 (Attachment 3)	9/3/85 (Attachment 4)
1985 Year End (7/1/85-12/31/85) ^{2/}	12/20/85 (Attachment 5)	1/31/86	2/25/86 (Attachment 6)	3/24/86 (Attachment 8)
1986 30 Day Post-General (10/16/86-11/24/86) ^{3/}	9/29/86 (Attachment 11)	12/4/86	12/23/86 (Attachment 12)	1/8/87 (Attachment 13)

^{1/} The cover letter attached to the 1985 Mid-Year Report indicated the report had been sent to the wrong address.

^{2/} The cover letter attached to the 1985 Year End Report indicated the report had been sent to the wrong address.

^{3/} The cover letter attached to the 1986 30 Day Post-General Report acknowledged the lateness of the report.

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
MARSHALL POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: SCHNADDER HARRISON SEGAL & LEWIS				NON-PARTY QUALIFIED			ID 0C00080290
1985	MID-YEAR REPORT	19,594	20,650	1JAN85	-30JUN85	12	05FEC/307/0766
	MID-YEAR REPORT - AMENDMENT	19,594	20,650	1JAN85	-30JUN85	14	06FEC/393/3241
	MID-YEAR REPORT - AMENDMENT	19,594	20,650	1JAN85	-30JUN85	16	06FEC/414/3934
	MID-YEAR REPORT - AMENDMENT	19,594	20,650	1JAN85	-30JUN85	18	06FEC/414/3950
	NOTICE OF FAILURE TO FILE			1JAN85	-30JUN85	1	05FEC/306/3155
	REQUEST FOR ADDITIONAL INFORMATION			1JAN85	-30JUN85	1	05FEC/393/1082
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN85	-30JUN85	2	05FEC/393/4133
	YEAR-END	13,895	10,850	1JUL85	-31DEC85	9	06FEC/406/3963
	YEAR-END - AMENDMENT	13,895	10,850	1JUL85	-31DEC85	9	06FEC/413/3070
	YEAR-END - AMENDMENT	13,895	10,850	1JUL85	-31DEC85	9	06FEC/414/3960
	YEAR-END - AMENDMENT	13,895	10,850	1JUL85	-31DEC85	10	06FEC/414/3970
	NOTICE OF FAILURE TO FILE			1JUL85	-31DEC85	1	06FEC/403/3734
	REQUEST FOR ADDITIONAL INFORMATION			1JUL85	-31DEC85	1	06FEC/406/4927
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL85	-31DEC85	2	06FEC/412/3206
1986	MISCELLANEOUS NOTICE FROM FEC			6MAY86		1	06FEC/413/3186
	APRIL QUARTERLY	15,316	13,625	1JAN86	-31MAR86	8	06FEC/409/4254
	JULY QUARTERLY	17,063	9,060	1APR86	-30JUN86	10	06FEC/424/1542
	JULY QUARTERLY - AMENDMENT	17,063	9,060	1APR86	-30JUN86	11	06FEC/429/4017
	REQUEST FOR ADDITIONAL INFORMATION			1APR86	-30JUN86	1	06FEC/426/5250
	OCTOBER QUARTERLY	14,584	22,020	1JUL86	-30SEP86	13	06FEC/433/3017
	OCTOBER QUARTERLY - AMENDMENT	14,584	22,020	1JUL86	-30SEP86	15	06FEC/446/1619
	1'ST LETTER INFORMATIONAL NOTICE			1JUL86	-30SEP86	1	06FEC/443/3293
	PRE-GENERAL	-	1,000	1OCT86	-15OCT86	4	06FEC/441/0621
	POST-GENERAL	2,000	2,250	16OCT86	-24NOV86	17	07FEC/453/4437
	NOTICE OF FAILURE TO FILE				24NOV86	1	06FEC/452/1333
	YEAR-END	0	2,600	25NOV86	-31DEC86	4	07FEC/452/4982
	TOTAL	82,452	0			0	190 TOTAL PAGES

All reports have been reviewed.
 Ending Cash-On-Hand as of 12/31/86: \$1,512.15
 Debts Owed By the Committee as of 12/31/86: \$0
 Debts Owed To the Committee as of 12/31/86: \$0



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 21, 1985

**SEMIANNUAL REPORT NOTICE
FOR UNAUTHORIZED COMMITTEES**

WHO MUST FILE

ALL POLITICAL COMMITTEES currently registered with the Commission (except committees filing monthly) must file a semiannual report by July 31, 1985.

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through June 30, 1985. Unauthorized political committees that have not previously filed a financial disclosure report should report all financial activity from date of registration, through June 30, 1985.*

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than midnight July 31, 1985. Reports hand delivered or mailed first class must be received no later than close of business July 31, 1985.

WHERE AND HOW TO FILE

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

MONTHLY FILERS

Committees filing on a monthly schedule need not file a semi-annual report. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month. The next monthly report must be filed by July 20, 1985, and should disclose all financial activity of the committee from June 1 through June 30, 1985.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee; even if such amounts were not received during the current reporting period. See 11 CFR 101.3; 104.3(a) and (b). Activity which occurred prior to 1985 should be reported separately.

- over -

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COMPLIANCE

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

**FOR INFORMATION CALL: Information Services Division
202/523-4068
800/424-9530**

87040664945



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

BQ-7

August 22, 1985

Ralph S. Snyder, Esquire
Marshall Political Action
Committee
1600 Market Street, Ste. 3600
Philadelphia, PA 19103

Identification Number: C00080390

Reference: Mid-Year Report (1/1/85-6/30/85)

Dear Mr. Snyder:

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, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent state officer. See 2 U.S.C. §439.

If the report in question was filed, please submit documentation for the public record. Although the Commission may take further legal steps concerning this matter, your prompt response will be taken into consideration.

If you have any questions, please contact Hunter Bryan on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

97040464046

85 SEP 3 12:19

LAW OFFICES
SCHNADER, HARRISON, SEGAL & LEWIN
SUITE 3800

1800 MARKET STREET

PHILADELPHIA, PENNSYLVANIA 19103

215-751-8000 • TELECOPIER 215-751-8000

TELEX 83-4880 • CABLE WALEW

August 28, 1985

SUITE 3100
750 THIRD AVENUE
NEW YORK, NEW YORK 10017
212 680-2000

SUITE 1000
100 CONVENT STREET, N.W.
WASHINGTON, D.C. 20004
202-462-2000

DIRECT DIAL NUMBER
(215) 751-2024

Federal Election Commission
Washington, D.C. 20463

Re: Mid-Year Report (1/1/85 - 6/30/85)

I.D. #C00080390
I.D. #C00080291

Dear Mr. Gibson:

Please be advised that the above captioned reports were filed timely with the Federal Election Commission.

I have attached copies of the reports which were mailed in the same envelope and a copy of the return receipt by J. Reitz on 7/29/85.

Please let me know if you need any additional information.

Sincerely,

Theresa M. Curley
Theresa M. Curley

817:0143 1 6 9 3 2 7

P 378 050 242

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED -
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Send to Federal Election Commission	
Send to Bureau of Elect., N. Office	
P.O. Box 205, Martinsburg, 17120	
Postage	0
Cardinal Fee	
Special Delivery Fee	
Additional Delivery Fee	1
Insurance (Indicate Quantity to which and Class of Insurance to be Applied Through Postoffice)	
Name and Address of Returnee	



1. Recipient's Name Federal Election Commission, Bureau of Elections, N. Office Bldg. P.O. Box 205, Martinsburg, VA 17120	2. Amount of Money 3378050242	3. Date of Payment 6/27/78	4. Signature of Sender <i>[Handwritten Signature]</i>
5. Description of Contents <input type="checkbox"/> Cash <input type="checkbox"/> Money Order <input type="checkbox"/> Check <input type="checkbox"/> Other	6. Insurance <input type="checkbox"/> Insured <input type="checkbox"/> Not Insured	7. Postage <input type="checkbox"/> Paid <input type="checkbox"/> Not Paid	8. Remarks <i>[Handwritten Remarks]</i>

7570765508

RECEIVED BY THE FEC

For a Party or Committee Other Than an Authorized Committee

85 SEP 3 12:19

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (in Full)
Marshall Political Action Committee

Address (Number and Street)
**Suite 3600
1600 Market Street**

City, State and ZIP Code
Philadelphia, PA 19103

Check here if address is different than previously reported.

2. FEC Identification Number
C00080390

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 _____
 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 1/1/85 through 6/30/85

6. (a) Cash on hand January 1, 19 85

(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)		1,114.98
6. (b)	1,114.98	
6. (c)	17,594.50	17,594.50
6. (d)	20,909.48	20,909.48
7.	20,650.00	20,650.00
8.	59.48	59.48
9.		
10.		

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

Ralph S. Snyder
 Vice President
 Date _____

For further information contact:
 Federal Election Commission
 Toll Free 800-424-9630
 Local 202-523-4088

NOTE: Submission of false or incorrect or incomplete information may subject the person signing the report to the penalties of 2 U.S.C. 6437c.

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

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FEC FORM 3X (3/80)

71153370756

YEAR-END REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 20, 1985

WHO MUST FILE

ALL PARTY COMMITTEES, NON-CONECTED COMMITTEES, AND SEPARATE SEGREGATED FUNDS must file a year-end report by January 31, 1986.

WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for the last report through December 31, 1985. Political committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration* through December 31, 1985. For more detailed instructions, consult your campaign guide.

FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1986. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1986.

WHERE TO FILE

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

COMPLIANCE

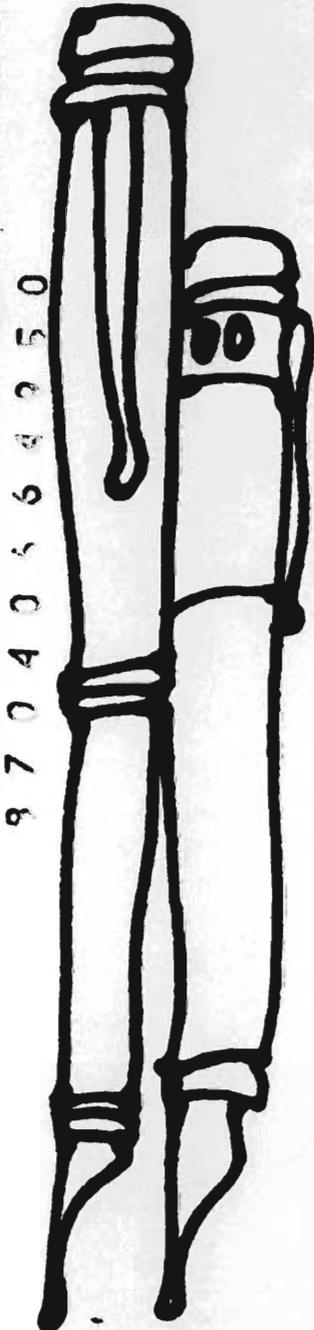
Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible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

1986 FILING REQUIREMENTS

See the January 1986 issue of the FEC Record for filing requirements during 1986. A committee that wishes to change its reporting schedule (e.g. from semiannually in 1985 to monthly—rather than quarterly in 1986) must notify the Commission by submitting a letter with the next report due under its current reporting schedule.

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

FOR INFORMATION CALL: Information Services Division
202/523-4068 or 800/424-9530





FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20543

EQ-7

February 25, 1986

Ralph S. Snyder, Esquire
Marshall Political Action Committee
1600 Market Street, Suite 3600
Philadelphia, PA 19103

Identification Number: C00080390

Reference: Year-End Report (7/1/85-12/31/85)

Dear Mr. Snyder:

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 Tammy Rollins on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

A handwritten signature in cursive script that reads "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

TELECON

ANALYST: Tamara K. Rollins

CONVERSATION WITH: Theresa M. Curly, committee representative

COMMITTEE: Marshall Political Action Committee

DATE: 3/20/86

SUBJECT(S): Failure To File the 1985 Year End Report

I contacted the committee to inquire about the 1985 Year End Report that was due on 1/31/86. Ms. Curley stated that she had sent the report to the Commission in January by return receipt mail and had received the receipt signed by the Commission. I stated that as of today the Commission had not received the report. I asked Ms. Curley if she had mailed the report to the correct address. She then proceeded to read the address of the Secretary of State in the state of Pennsylvania. I then informed her of the Commission's address in Washington, D.C. I advised her to file the report as quickly as possible. She stated she would send a copy of the report in the mail along with a copy of the returned receipt.

87040564952

70

LAW OFFICES
SCHNADER, HARRISON, SEGAL & LEWIS

MAR 24 11:00

SUITE 3000
1500 MARKET STREET

PHILADELPHIA, PENNSYLVANIA 19103

215-781-8000 • TELETYPE 215-781-8000

TELEX 82-6000 • CABLE WHELEW

SUITE 3100
750 THIRD AVENUE
NEW YORK NEW YORK 10017
212-686-5200

SUITE 4000
1111 EIGHTH STREET N.W.
WASHINGTON D.C. 20036
202-638-2000

DIRECT DIAL NUMBER

March 21, 1986

Ms. Tammy Rollins
Federal Election Commission
999 E. Street, Northwest
Washington, D.C. 20463

Re: Marshall Political Action Committee
FEC I.D. #C00080390

Dear Ms. Rollins:

Attached is a copy of our report for the above mentioned matter for the period July 1, 1986 through December 31, 1986.

Please be advised that this report was filed timely as per the attached copy of a return receipt signed by your office.

As we discussed on the telephone, the delay may have been due to a wrong address.

Please let me know if you need any additional information.

Sincerely,

Theresa M. Curley

Theresa M. Curley
For SCHNADER, HARRISON, SEGAL & LEWIS

Attachments

38794404269459553



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

NOV 8 1985

Ralph S. Snyder, Esquire
Marshall Political Action
Committee
1600 Market Street, Suite 3600
Philadelphia, PA 19103

Identification Number: C00000390

Reference: 1985-1986 Election Cycle Reports

Dear Mr. Snyder:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. 5434(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>
Mid-Year (1/1/85-6/30/85)	7/31/85	9/03/85
Year End (7/1/85-12/31/85)	1/31/86	1/26/86

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 Tammy Hollins on our toll-free number, (800) 424-9530. Our local number is (202) 376-2400.

Sincerely,

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

95734132196

86 MAY 20 AM: 25

Marshall Political Action Committee
1600 Market Street, Suite 3600
Philadelphia, Pennsylvania 19103

May 15, 1986

Ms. Lisa J. Stolaruk
Chief, Party/Non-Party Branch
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Re: Committee C00080390; 1985-1986 Election
Cycle Reports

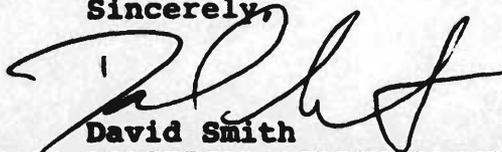
Dear Ms. Stolaruk:

Ralph Snyder is away, and asked me to respond in his absence to your letter of May 6, 1986, a copy of which is attached for ease of reference.

We were very surprised at the content of your letter, but upon investigation, our surprise turned into embarrassment. We discovered that the two reports to which you refer were mailed, not to the Federal Election Commission, but rather, to the Pennsylvania Election Commission. Copies of the reports, their cover letters and return receipts are enclosed.

We apologize for the clerical error that resulted in the misdirection of the reports, and respectfully request the Commission's indulgence.

Sincerely,



David Smith

For MARSHALL POLITICAL ACTION COMMITTEE

Enclosures

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

8 5 6 7 0 3 4 1 4 3 9 2 3 4 7

P 3780500 242

RECEIPT FOR CERTIFIED MAIL

INSURANCE COVERAGE PROVIDED FOR INTERNATIONAL MAIL

(See Reverse)

Sent to	
Federal Election Commission	
Street and No.	
Bureau of Elect., N. Office	
P.O., State and ZIP Code	
Rm. 305, Harrisburg, 17120	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	

102



88670034401 54634993578

Form 3811, July 1982

(Page 2 of 6)

Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

- The following service is requested (check one).
 - Show to whom and date delivered
 - Show to whom, date, and address of delivery
- RESTRICTED DELIVERY.....
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

3. ARTICLE ADDRESSED TO:
 Federal Election Commission
 Bureau of Elections, N. Office Bldg
 Room 305, Harrisburg, PA 17120

4. TYPE OF SERVICE: ARTICLE NUMBER
 REGISTERED INSURED
 CERTIFIED COD P378050242
 EXPRESS MAIL

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

5. DATE OF DELIVERY: **JUL 29 1985** POSTMARK
 6. ADDRESSEE'S ADDRESS (only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

86 MAY 20 AM 11:11

FIRST CLASS MAIL



100
100
100
100

Ms. Lisa J. Stolaruk
Chief, Party/Non-Party
Branch
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

RETURN RECEIPT REQUESTED



Marshall Political Action Committee
1600 Market St., Suite 3600
Philadelphia, Pa. 19103

86
86
P 3 5 4 2 9 9

LAW OFFICES
SCHNADER, HARRISON, BEGAL & LEWIS
SUITE 3600

1600 MARKET STREET
PHILADELPHIA, PENNSYLVANIA 19103

215-751-2000 • TELECOPIER: 215-751-2505

TELEX: 63-4280 • CABLE: WALEW

August 28, 1985

SUITE 3100
750 THIRD AVENUE
NEW YORK, NEW YORK 10017
212-666-8220

SUITE 1000
1111 NINETEENTH STREET, N. W.
WASHINGTON, D. C. 20036
202-462-2900

DIRECT DIAL NUMBER
(215) 751-2024

Federal Election Commission
Washington, D.C. 20463

Re: Mid-Year Report (1/1/85 - 6/30/85)

I.D. #C00080390

I.D. #C00080291

Dear Mr. Gibson:

Please be advised that the above captioned reports were filed timely with the Federal Election Commission.

I have attached copies of the reports which were mailed in the same envelope and a copy of the return receipt by J. Reitz on 7/29/85.

Please let me know if you need any additional information.

Sincerely,

Theresa M. Curley

Theresa M. Curley

896700344014634995610

8 8 7 0 3 4 1 4 6 9 5 4 1

P 378 056 758

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Federal Election Commission	
Street and No. 305 North Office Building	
P.O., State and ZIP Code Harrisburg, PA 17120	
APR - MAY 1986	
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

PS Form 3800, Feb. 1982

PS Form 3811, July 1982

● **SENDER:** Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
 Show to whom and date delivered
 Show to whom, date, and address of delivery ..
 RESTRICTED DELIVERY
(The restricted delivery fee is charged in addition to the return receipt fee.)

2. **TOTAL \$**

3. **ARTICLE ADDRESSED TO:**
Federal Election Commission
Bureau of Elections, 305 N. Office Building
Harrisburg, PA 17120

4. **TYPE OF SERVICE:** REGISTERED INSURED CERTIFIED COD EXPRESS MAIL
ARTICLE NUMBER P378056758

I have received the article described above.
SIGNATURE Addressee Restricted Delivery Agent
[Signature]

DATE DELIVERED JAN 21 1986

6. **ADDRESSEE'S ADDRESS** (only if requested)

7. **UNABLE TO DELIVER BECAUSE:**

7a. **EMPLOYER'S INITIALS**

9. GPO: 1983-574-605

RETURN RECEIPT

8 8670 034401 54 63 49 96 57 2

Marshall Political Action Committee
1600 Market St., Suite 3600
Philadelphia, Pa. 19103

NOV 1972

MASS MAIL



Ms. Lisa J. Stolaruk
Chief, Party/Non-Party
Branch
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

RECEIVED

SEARCHED
No. 652738
MAIL

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.

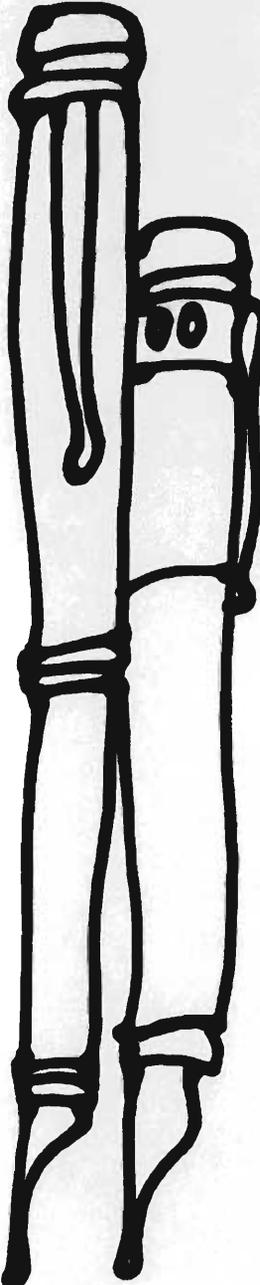
WHAT MUST BE REPORTED

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).



3701064953

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**

87040564964



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

20-7

December 23, 1986

Ralph S. Snyder, Esquire, Treasurer
Marshall Political Action Committee
Suite 2600, 1600 Market Street
Philadelphia, PA 19103

Identification Number: C00000390

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

Dear Mr. Snyder:

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 Tanny Hollins on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

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

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1235

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

FILED AT THE FEC

(Summary Page)

87 JAN 12 P 1: 28

1. Name of Committee (No Post)

MARSHALL PAC

Address (Number and Street)

**SUITE 3600
1600 MARKET STREET**

City, State and ZIP Code

PHILADELPHIA, PA 19103

Check here if address is different than previously reported.

2. FEC Identification Number

C00080390

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-Start-up Year Only)

Monthly Report for _____ (Type of Election)

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

87040164939

SUMMARY

5. Covering Period 10/6/86 through 11/29/86

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

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(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)		\$ 3,104.48
6. (b)	\$ 4,962.15	
6. (c)	\$ 2,000.00	\$ 48,463.00
6. (d)	\$ 6,962.15	\$ 52,069.48
7.	\$ 2,250.00	\$ 49,955.33
8.	\$ 4,112.15	\$ 4,112.15
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.

RALPH S. SNYDER
Type or Print Name of Treasurer

[Signature]
Date

For further information contact:
Federal Election Commission
1100 E Street, N.W.
Washington, D.C. 20543
Tel: (202) 426-6530
Local: (202) 376-3120

NOTE: Submission of false or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 4371.

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

--	--	--	--	--	--	--	--

FEC FORM 3X (3-80)

87034234453



Hon T. Carley
 Schwartz, Morrison, Spota & Lewis
 SUITE 2000
 100 MARKET STREET
 PHILADELPHIA, PENNSYLVANIA 19103

Federal Election Commission
 999 E Street, N.W.
 Washington, D.C. 20063
 Attn: Mr. Gibson

P 378 056 808
 MAIL

end !

SENSITIVE
87 APR 23 12:04
RECEIVED
COMMUNICATIONS SECTION

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

FIRST GENERAL COUNSEL'S REPORT

**RAD 87NF-46
STAFF MEMBER
Carol Lahan**

SOURCE OF MUR: INTERNALLY GENERATED

**RESPONDENT(S): Marshall Political Action Committee
and Ralph S. Snyder, as treasurer**

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

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the Marshall Political Action Committee and Ralph S. Snyder, as treasurer, ("the Committee") to the Office of the General Counsel on February 18, 1987. The basis of the attached referral is the Committee's failure to file its 1985 Mid-Year and Year-End Reports, as well as its 1986 Post-General Election Report, in a timely manner. The Committee has been identified as a chronic late filer.

II. FACTUAL AND LEGAL ANALYSIS

The Act provides that in calendar years in which there is no regularly scheduled federal election, committees shall file a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31, and a report covering the period beginning July 1 and ending December 31, which shall be filed no later than January 31 of the following

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calendar year. 2 U.S.C. § 434(a)(4)(A)(iv). Thus, the 1985 Mid-Year Report was due no later than July 31, 1985, and the 1985 Year End Report was due no later than January 31, 1986.

The Act further provides that committees shall 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. 2 U.S.C. § 434(a)(4)(A)(iii). Thus, the 1986 Post General Election Report was due on December 4, 1986.

The Marshall Political Action Committee ("MPAC") is a political committee registered with the Commission. RAD reported that MPAC failed to file three reports in a timely manner during the 1985-86 election cycle as follows:

<u>REPORT</u>	<u>DATE DUE</u>	<u>DATE FILED</u>	<u>DAYS LATE</u>
1985 Mid-Year	July 31, 1985	September 3, 1985	34
1985 Year-End	Jan. 31, 1986	March 24, 1986	52
1986 30 Day Post-General Election	Dec. 4, 1986	January 8, 1987	35

Therefore, the Office of General Counsel recommends that the Commission find reason to believe that MPAC, and Ralph Snyder, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv).

III. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Marshall Political Action Committee, and Ralph S. Snyder, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv).

87040564970

3. Approve and send the attached letter and Factual and Legal Analysis.

4/22/87
Date

BY: *Lawrence M. Noble*
Lawrence M. Noble
Acting General Counsel

Attachments:
1-Referral Materials
2-Proposed Letter and Factual and Legal Analysis (1)

97040664971

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Attachments to First
General Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 1 see 1
2 4

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Marshall Political Action Committee)
and Ralph S. Snyder, as treasurer)

(MUR
2407)
RAD Ref. 87NF-46

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 27, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 87NF-46:

1. Open a MUR.
2. Find reason to believe that the Marshall Political Action Committee, and Ralph S. Snyder, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv).
3. Approve and send the letter and Factual and Legal Analysis, as recommended in the First General Counsel's Report signed April 22, 1987.

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

Attest:

4-28-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Thurs.,	4-23-87,	12:0
Circulated on 48 hour tally basis:	Thurs.,	4-23-87,	4:0
Deadline for vote:	Mon.,	4-27-87,	4:0

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 5, 1987

Ralph S. Snyder, Esq., Treasurer
Marshall Political Action Committee
Suite 3600, 1600 Market Street
Philadelphia, PA 19103

RE: MUR 2407
Marshall Political Action Committee
and Ralph S. Snyder, as treasurer

Dear Mr. Snyder:

On April 27, 1987, the Federal Election Commission found that there is reason to believe Marshall Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The 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 the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the 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 the 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 the 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.

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Letter to Ralph S. Snyder, Esq.
Page 2

Further, the Commission will not entertain requests for pre-probable cause conciliation 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 the 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 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 Carol A. Laham, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Scott E. Thomas
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

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plm

**FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS**

RESPONDENT Marshall Political Action Committee and Ralph S. Snyder,
as treasurer MUR 2407

SUMMARY OF ALLEGATIONS

It is alleged that the Marshall Political Action Committee and Ralph S. Snyder, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv) by failing to file three reports in a timely manner during the 1985-86 election cycle.

FACTUAL BASIS AND LEGAL ANALYSIS

The Act provides that in calendar years in which there is no regularly scheduled federal election, committees shall file a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31, and a report covering the period beginning July 1 and ending December 31, which shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv). Thus, the 1985 Mid-Year Report was due no later than July 31, 1985, and the 1985 Year End Report was due no later than January 31, 1986.

The Act further provides that committees shall 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. 2 U.S.C. § 434(a)(4)(A)(iii). Thus, the 1986 Post General Election Report was due on December 4, 1986.

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4

The Marshall Political Action Committee ("MPAC") is a political committee registered with the Commission. RAD reported that MPAC failed to file three reports in a timely manner during the 1985-86 election cycle as follows:

<u>REPORT</u>	<u>DATE DUE</u>	<u>DATE FILED</u>	<u>DAYS LATE</u>
1985 Mid-Year	July 31, 1985	September 3, 1985	34
1985 Year-End	Jan. 31, 1986	March 24, 1986	52
1986 30 Day Post-General Election	Dec. 4, 1986	January 8, 1987	35

Therefore, the Office of General Counsel recommends that the Commission find reason to believe that MPAC, and Ralph Snyder, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv).

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4

Marshall Political Action
Committee
Suite 3600
1600 Market Street
Philadelphia, PA 19103

May 7, 1987

Carol A. Laham, Esquire
Federal Election Commission
Washington, D.C. 20463

77 MAY 12 P 2:47

RECEIVED
GENERAL COUNSEL

Re: MUR2407, Marshall Political Action Committee
and Ralph S. Snyder as Treasurer

Dear Ms. Laham:

This will respond to your letter of May 5, 1987. We are interested in pursuing pre-probable cause conciliation at your earliest convenience.

Sincerely,



Ralph S. Snyder

87040564078

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2407
Marshall Political Action Committee))
and Ralph S. Snyder, as treasurer))

07 MAY 29 9:51

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On April 27, 1987, the Commission found reason to believe that Marshall Political Action Committee and Ralph S. Snyder, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv) by failing to file its 1985 Mid-Year and Year-End Reports, and its 1986 30 day Post-General Election Report in a timely manner. By letter dated May 7, 1987, respondents requested to settle this matter prior to a finding of probable cause to believe (Attachment 1).

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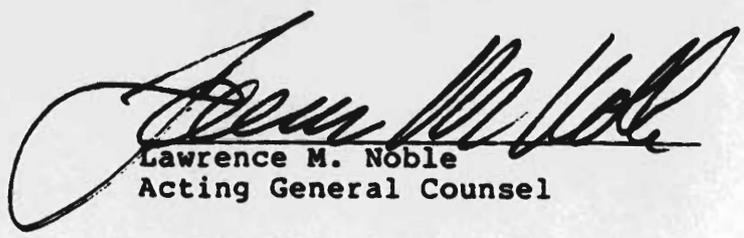
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III. RECOMMENDATIONS

1. Enter into conciliation with Marshall Political Action Committee and Ralph S. Snyder, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Date

6/28/57


 Lawrence M. Noble
 Acting General Counsel

Attachments

1. Request for conciliation
2. Proposed agreement and letter

Attachments to General
Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 1 see 5
2 8

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Marshall Political Action Committee) MUR 2407
and Ralph S. Snyder, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 2, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2407:

1. Enter into conciliation with Marshall Political Action Committee and Ralph S. Snyder, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter, as recommended in the General Counsel's Report signed May 28, 1987.

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

Attest:

6-3-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Fri., 5-29-87, 9:51
Circulated on 48 hour tally basis: Fri., 5-29-87, 2:00
Deadline for vote: Tues., 6-02-87, 4:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 5, 1987

Ralph S. Snyder, Esq., Treasurer
Marshall Political Action Commission
Suite 3600, 1600 Market Street
Philadelphia, PA 19103

RE: MUR 2407
Marshall Political Action Committee
and Ralph S. Snyder, as treasurer

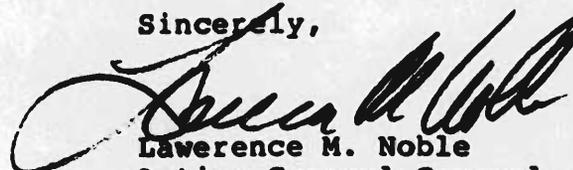
Dear Mr. Snyder:

On April 27, 1987, the Federal Election Commission found reason to believe that Marshall Political Action Committee and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv). At your request, on June 2, 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 you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Carol Laham, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

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SENSITIVE

07 JUL 9 1987
AG: 19

BEFORE THE FEDERAL ELECTION COMMISSION

In The Matter of)
) MUR 2407
Marshall Political Action Committee)
and Ralph S. Snyder, as treasurer)

GENERAL COUNSEL'S REPORT

On June 2, 1987, the Commission authorized the commencement of conciliation with Respondents in the above-captioned Matter prior to a finding of probable cause to believe. The Office of General Counsel has concluded that an extension of the conciliation period by an additional thirty days would facilitate the conclusion of a satisfactory settlement with the Respondents.

Lawrence M. Noble
Acting General Counsel

7/7/87
Date

BY: *Lois G. Lerner*
Lois G. Lerner
Associate General Counsel

87040564994

CONFIDENTIAL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Marshall Political Action)	MUR 2407
Committee and Ralph S. Snyder,)	
as treasurer)	

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GENERAL COUNSEL'S REPORT

I. BACKGROUND

On April 27, 1987, the Commission found reason to believe that Marshall Political Action Committee and Ralph S. Snyder, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv). By letter dated June 5, 1987, the Commission notified Ralph Snyder that it had approved the Committee's request for pre-probable cause conciliation and forwarded to him a proposed conciliation agreement that included an admission of the violation and a civil penalty.

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In view of the Committee's acknowledgment of the violation, its desire to resolve this matter, and the fact that a review of the three reports at issue shows that the Committee made one disbursement to a federal candidate in the amount of \$5000 out of almost \$34,000 in disbursements, bearing out the Committee's assertion that it engages primarily in non-federal activity^{1/},

^{1/} The Committee also transferred \$1000 to the affiliated Edward Douglass White Political Action Committee. The Edward Douglass White Committee is the subject of MUR 2384 which is also in pre-probable cause conciliation on similar violations. Marshall PAC's other disbursements went to state and local candidates and committees.

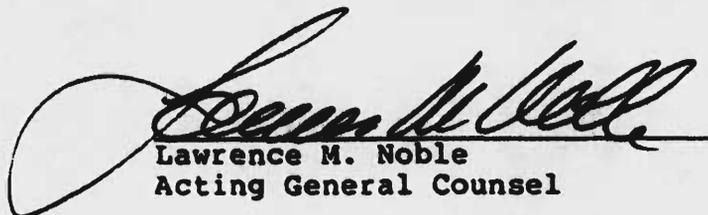
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the Office of General Counsel recommends that the Commission approve the attached conciliation agreement which provides for an admission of the violation, and the payment of a \$1000 civil penalty.

II. RECOMMENDATIONS

1. Approve the attached proposed conciliation agreement and letter.

8/3/87
Date


Lawrence M. Noble
Acting General Counsel

Attachments

1. Respondent's counteroffer of July 7, 1987.
2. Proposed agreement and letter

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Attachments to General
Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 1 see 10

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Marshall Political Action) MUR 2407
Committee and Ralph S. Snyder,)
as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 6, 1987, the Commission decided by a vote of 5-0 to approve the proposed conciliation agreement and letter, as recommended in the General Counsel's memorandum to the Commission dated August 3, 1987.

Commissioners Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision; Commissioner Aikens did not cast a vote.

Attest:

8-6-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Tues., 8-4-87, 11:30
Circulated on 48 hour tally basis: Tues., 8-4-87, 4:00
Deadline for vote: Thurs., 8-6-87, 4:00

87040564999



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

rum

August 11, 1987

Ralph S. Snyder, Esq., Treasurer
Marshall Political Action Committee
Suite 3600, 1600 Market Street
Philadelphia, PA 19103

Re: MUR 2407
Marshall Political Action Committee
and Ralph S. Snyder, as treasurer

Dear Mr. Snyder:

This letter is to confirm the Commission's receipt of your letter proposing a modification of the conciliation agreement on July 9, 1987. The Commission has reviewed your counterproposal and has authorized this Office to reduce the civil penalty to \$1000.

If you agree with the provisions of the enclosed agreement, please sign it and return it, along with the civil penalty, to the Commission within 10 days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty payable to the Federal Election Commission. Should you have any questions, please call Carol Laham, the attorney assigned to this matter at (202) 376-5690.

Sincerely,

Lawrence M. Noble
Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

37040564990

13

SENSITIVE

07 SEP 21 AM 9:45

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Marshall Political Action Committee) MUR 2407
and Ralph S. Snyder, as treasurer)
)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Ralph S. Snyder, the treasurer of the Marshall Political Action Committee.

The attached agreement contains no changes from the agreement approved by the Commission on August 6, 1987. In addition, a check for the civil penalty in the amount of \$1,000 has been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Marshall Political Action Committee and Ralph S. Snyder, as treasurer.
2. Close the file.
3. Approve the attached letter.

Date 9/18/87


Lawrence M. Noble
Acting General Counsel

Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check
3. Letter to Respondent

87040564991

14

First Pennsylvania Bank
First Pennsylvania Bank N.A.
Philadelphia PA 19101

No. 208

August 27, 1987

3-2
310

PAY TO THE ORDER OF Federal Election Commission \$ 1000.00

One thousand ⁰⁰/₁₀₀ DOLLARS

MARSHALL POLITICAL ACTION COMMITTEE

Ralph S. Snyder

⑆0310⑉0002⑆ 601-316-31

64992

MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER

FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

CHECK NO. 208 (A COPY OF WHICH IS ATTACHED) RELATING TO
FILE 2407 AND NAME Marshall Political Action Committee
and Ralph S. Snyder, as treasurer

WAS RECEIVED ON 9/9/87. PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

- BUDGET CLEARING ACCOUNT { 95F3875.16 }
- CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- OTHER _____

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 SEP-9 AM 11:44

SIGNATURE Debra A. Trimiew DATE 9/9/87

Attachment II

Attachments to GENERAL
Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 143 see 16

87040564993

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Marshall Political Action Committee) MUR 2407
and Ralph S. Snyder, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 23, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2407:

1. Accept the conciliation agreement with Marshall Political Action Committee and Ralph S. Snyder, as treasurer, as recommended in the General Counsel's report signed September 18, 1987.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report signed September 18, 1987.

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

Attest:

9-23-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Mon.,	9-21-87,	9:45
Circulated on 48 hour tally basis:	Mon.,	9-21-87,	11:00
Deadline for vote:	Wed.,	9-23-87,	11:00

8704064904

15



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

25 September 1987

Ralph S. Snyder, Esq. Treasurer
Marshall Political Action Committee
Suite 3600, 1600 Market Street
Philadelphia, PA 19103

Re: MUR 2407
Marshall Political Action Committee
and Ralph S. Snyder, as treasurer

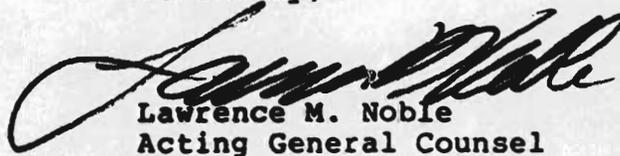
Dear Mr. Snyder:

On September 23 , 1987, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(iii) and (iv), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to Marshall Political Action Committee and you, as treasurer. This matter will become a part of the public record within 30 days. 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 Carol Laham, the attorney assigned to this matter at (202) 376-5690.

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

16

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2407
Marshall Political Action Committee)
and Ralph S. Snyder, 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 Marshall Political Action Committee and Ralph S. Snyder, as treasurer ("Respondents") violated 2 U.S.C. §§ 434(a)(4)(a)(iii) and (iv) by failing to file three reports in a timely manner during the 1985-86 election cycle.

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:

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1. Respondent, Marshall Political Action Committee, is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent, Ralph S. Snyder, is the treasurer of Marshall Political Action Committee.

3. Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv) Respondents were required to file a 1985 Mid-Year Report no later than July 31, 1985. The report was filed on September 3, 1985, 34 days late.

4. Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv) Respondents were required to file a 1985 Year-End Report no later than January 31, 1986. The report was filed on March 24, 1986, 52 days late.

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. The report was filed on January 8, 1987, 35 days late.

V. Respondents failed to file the 1985 Mid-Year and Year-End Reports, and the 30 day Post-General Election Report in a timely manner in violation of 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of One Thousand dollars (\$1,000), 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

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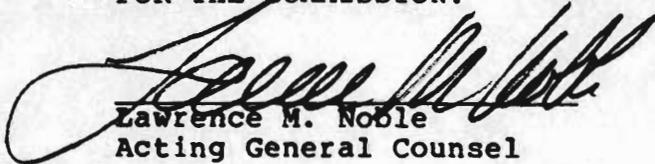
agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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.

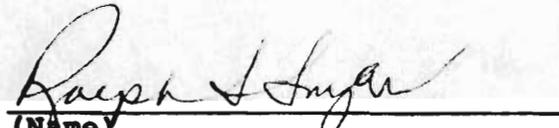
X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:


Lawrence M. Noble
Acting General Counsel

9/28/87
Date

FOR THE RESPONDENTS:



(Name)
(Position)

Date

R 7 0 4 0 5 6 4 9 9 8



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20541

THIS IS THE END OF MUR # 2407

DATE FILMED 12/3/87 CAMERA NO. 3

CAMERAMAN AS

87040664999



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

M12-28-87

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 2407

83040670115



First Pennsylvania Bank

First Pennsylvania Bank N.A.
Philadelphia PA 19101

1181

No. 208

August 27, 1987

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PAY TO THE
ORDER OF

Federal Election Commission

\$ 1000.00

One thousand

00
100

DOLLARS

MARSHALL POLITICAL ACTION COMMITTEE

Ralph S. Snyder

⑆0310⑆0002⑆

601⑆316⑆3⑆

First Pennsylvania Bank

670116

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMIEW

CHECK NO. 208 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2407 AND NAME Marshall Political Action Committee
(Lohan) and Ralph S. Snyder, as treasurer

WAS RECEIVED ON 9/9/87 . PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

/ ✓ / BUDGET CLEARING ACCOUNT { 95F3875.16 }

/ / CIVIL PENALTIES ACCOUNT { 95-1099.160 }

/ / OTHER _____

SIGNATURE *Debra A. Trimiew*

DATE 9/9/87

87 SEP 9 AM 11:44

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OFFICE OF GENERAL COUNSEL

6cc # 4336

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MAIL ROOM

LAW OFFICES
SCHNADER, HARRISON, SEGAL & LEWIS

SUITE 3600
1600 MARKET STREET
PHILADELPHIA, PENNSYLVANIA 19103

215-751-2000 • TELECOPIER: 215-751-2205
TELEX 83-4280 • CABLE WALEW

750 THIRD AVENUE
NEW YORK, NEW YORK 10017
212-986-5220

1111 NINETEENTH STREET, N. W.
WASHINGTON, D. C. 20036
202-463-2900

WILLIAM A. SCHNADER
1935-1968
FRANCIS A. LEWIS
1935-1945
EARL G. HARRISON
1948-1955

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LOUIS F. FLOGE
JAMES J. LEYDEN
ROBERT J. CALLAGHAN
OTIS W. ERISMAN
HARRIS L. WOFFORD
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VINCENT P. HALEY
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J. ALLEN DOUGHERTY
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M. RICHARD KALTER
RONALD E. HAYDANEK
BARRY S. MON
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JEFFREY R. HOROWITZ
NICHOLAS N. PRICE
DEANARD R. KNEIDER
ALEX H. KENT
DAVID G. BATHUR
W. MICHAEL BARNER*
RICHARD D. BARNES
JEFFREY L. SCHULTE
PHILIP R. WISHER
MICHAEL STINE BARTY*

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GARY A. KIMMELMAN*
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ROBIN P. LINCOLN
LANCE E. TUNICK*
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TOBY P. CAMEN
JANET BERNHEIM HUNT
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RICHARD F. SILBER*
ALISON M. BENDERS
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ANTONIA H. HILL
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SCOTT E. MACRIN
JEFFREY C. MOORE
MICHAEL G. NEPI
JANE D. WOODFIN*
STEVEN J. FRAM
ROBERT A. KOONS, JR.
KATHY C. MANDELBAUM
GAYLE CHATLLO SPROUL
WAYNE M. WITHROW, JR.
KATHEEN A. FREDERICK
ADAM M. EISGRAU*
ERIC HOFFMAN
GARY S. LEWIS
ANDREA L. PARRY
RONALD P. SCHILLER
ROBERT A. SHIVES, JR.
VICKIE WAITSMAN
LINDA P. FALCAG
EDWARD GOFF
JAY N. ITZKOWITZ*
WILLIAM J. MAFFUCC
BARBARA W. WOLF

87 SEP - 8 PM 1-49

*NOT ADMITTED IN PENNSYLVANIA

September 1, 1987

DIRECT DIAL NUMBER
215-751-2472

Carol Laham, Esquire
Federal Election Commission
999 "E" Street, N.W.
Washington, D.C. 20463

Re: MUR 2407
Marshall Political Action Committee

Dear Ms. Laham:

Enclosed is our check in the amount of \$1,000
together with the signed conciliation agreement.

Sincerely,
Ralph S. Snyder

Ralph S. Snyder
For SCHNADER, HARRISON, SEGAL & LEWIS

Enclosures

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 SEP - 9 AM 11:44