



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2472

DATE FILMED 4/23/88 CAMERA NO. 3

CAMERAMAN LPC

8 9 7 4 0 5 9 5 1 4 2



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 22, 1987

MEMORANDUM

TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: QUARTERLY FILERS (UNAUTHORIZED COMMITTEES) WHICH
FAILED TO FILE THE 1986 12 DAY PRE-GENERAL REPORT
BY ELECTION DAY

The attached list of unauthorized committees consists of forty-nine (49) quarterly filers which failed to file a 1986 12 Day Pre-General Report by Election Day, November 4, 1986. In accordance with Standard 3 of the RAD Review and Referral Procedures, further examination is required by your office.

Unlike the mandatory reporting requirement placed upon monthly filers, 2 U.S.C. §434(a)(4)(A)(ii) requires quarterly filers to submit 12 Day Pre-General Reports only if the committees make contributions to or expenditures on behalf of federal candidates involved in the general election. All unauthorized committees were sent prior notification regarding the pre- and post-general filing requirements on September 29, 1986 (Attachment 50).

The Party/Non-Party Branch conducted a thorough examination to identify quarterly filers disclosing contributions or expenditures between October 1 and October 15, 1986. The research revealed committees that submitted:

- a) 12 Day Pre-General Reports in an untimely manner;
- b) 30 Day Post-General Reports indicating that 12 Day Pre-General Reports should have been filed; and
- c) Year End Reports indicating that 12 Day Pre-General Reports should have been filed.

ATTACHMENT 1

For your information, the pertinent supporting documentation on each committee has been arranged in alphabetical order. Statistics on all C indices only reflect activity through December 31, 1986. Any reports disclosing activity in 1987 have not been reviewed.

The following committees were previously referred either to your office or to the Audit Division for a possible 2 U.S.C. §438(b) audit.

(1)

(2)

(3)

(4)

(5)

(6)

If you have any questions, please contact Lisa J. Stolaruk at 376-2480.

Attachments

90405313
C00197491

CAMPAC

87MF-91

3740575140

CAMPAC

(Attachments 6a - 6e)

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
CAMPAC						
CONNECTED ORGANIZATION:	NONE					
				NON-PARTY QUALIFIED		ID #C00197491
1985	STATEMENT OF ORGANIZATION			28AUG85	1	85FEC/386/4810
	YEAR-END	39,225	34,301	1JUL85 -31DEC85	14	86FEC/398/4800
	YEAR-END - AMENDMENT	39,225	34,301	1JUL85 -31DEC85	5	86FEC/406/4048
	YEAR-END - AMENDMENT	39,255	38,850	1JUL85 -31DEC85	16	86FEC/416/2724
	REQUEST FOR ADDITIONAL INFORMATION			1JUL85 -31DEC85	3	86FEC/404/4785
1986	APRIL QUARTERLY	15,004	14,698	1JAN86 -31MAR86	7	86FEC/409/2572
	REQUEST FOR ADDITIONAL INFORMATION			1JAN86 -31MAR86	1	86FEC/415/0425
	JULY QUARTERLY	30,065	19,727	1APR86 -30JUN86	15	86FEC/420/5007
	JULY QUARTERLY - AMENDMENT	30,065	19,727	1APR86 -30JUN86	4	86FEC/432/4046
	REQUEST FOR ADDITIONAL INFORMATION			1APR86 -30JUN86	2	86FEC/430/1651
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR86 -30JUN86	3	86FEC/432/3888
	OCTOBER QUARTERLY	4,646	13,051	1JUL86 -30SEP86	8	86FEC/435/3984
	OCTOBER QUARTERLY - AMENDMENT	4,646	14,601	1JUL86 -30SEP86	2	86FEC/449/1776
	OCTOBER QUARTERLY - AMENDMENT	4,646	13,051	1JUL86 -30SEP86	3	87FEC/459/1868
	REQUEST FOR ADDITIONAL INFORMATION			1JUL86 -30SEP86	2	86FEC/443/4494
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL86 -30SEP86	3	86FEC/445/1332
	PRE-GENERAL	1,132	1,072	1OCT86 -15OCT86	6	87FEC/453/2286
	PRE-GENERAL - AMENDMENT	1,132	1,072	1OCT86 -15OCT86	3	87FEC/459/1871
	POST-GENERAL	2,386	2,924	16OCT86 -24NOV86	6	87FEC/453/2280
	POST-GENERAL - AMENDMENT	2,386	2,924	16OCT86 -24NOV86	3	87FEC/459/1874
	POST-GENERAL - AMENDMENT	2,386	2,924	16OCT86 -24NOV86	6	87FEC/462/5134
	NOTICE OF FAILURE TO FILE			24NOV86	1	86FEC/452/1505
	REQUEST FOR ADDITIONAL INFORMATION			16OCT86 -24NOV86	1	87FEC/455/4119
	REQUEST FOR ADDITIONAL INFORMATION 2ND			16OCT86 -24NOV86	2	87FEC/461/0998
	YEAR-END	848	1,837	25NOV86 -31DEC86	6	87FEC/459/1877
	YEAR-END - AMENDMENT	848	1,837	25NOV86 -31DEC86	6	87FEC/462/5140
1987	MISCELLANEOUS NOTICE FROM FEC			21JAN87	1	87FEC/455/2963
	TOTAL	93,336	0 92,159	0	130	TOTAL PAGES

All reports listed above have been reviewed with the exception of the last Post-General amendment and the amended Year End Report.

Ending cash-on-hand as of 12/31/86: \$1,174
 Debts as of 12/31/86: \$0

Report of Receipts and Disbursements
For a Political Committee Other Than a Authorized Committee

RECEIVED AT THE FEC

Monthly Report

07 JAN 9 PR: 22

1. Name of Committee (in Full)
CAMPAC

Address (Number and Street)
**2550 M Street, N.W.
Suite 275**

City, State and ZIP Code
Washington, D.C. 20037

Check here if address is different than previously reported.

2. FEC Identification Number
C00197491

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

4. TYPE OF REPORT (Check appropriate boxes)

April 15 Quarterly Report October 15 Quarterly Report

July 15 Quarterly Report January 31 Year End Report

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

Monthly Report for _____

Twelfth day report preceding General State of District

Station on Nov 5, '86 in the State of _____

Thirtieth day report following the General Election

on _____ in the State of _____

Termination Report

5. Is this Report an Amendment?
 YES NO

SUMMARY

6. Covering Period October 1 through October 15

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

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

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

7. Total Disbursements (from Line 20)

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

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

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

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a)		\$ 404.53
(b)	\$ 1091.82	
(c)	\$ 1132.00	\$ 50,847.00
(d)	\$ 2223.82	\$ 51,251.53
7	\$ 1072.00	\$ 50,099.71
8	\$ 1151.82	\$ 1,151.82
9	\$ - 0 -	
10	\$ - 0 -	

Truthfully certify that the information reported here is true and correct to the best of my knowledge and belief.

JOHN C. CAMP, Treasurer
Type or Print Name of Treasurer
John C. Camp
DATE 1/06/87

For further information contact:
Federal Election Commission
1100 E Street, N.W.
Washington, D.C. 20543
Tel: (202) 456-4500
Local: (202) 456-3400

Submission of false or untrue or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 4370.

All previous versions 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)

97034532286

STATE OF CALIFORNIA

CAMPAC

From 10/1/86 To 10/15/86

Column 4
Year To Date

Column 5
Calendar Year-To-Date

I. RECEIPTS

11. CONTRIBUTIONS (other than loan) FROM:

(a) Individuals/Persons Other Than Political Committees

None Entry Unchecked 0 _____

(b) Political Party Committees

(c) Other Political Committees

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

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

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

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

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

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

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES

22. INDEPENDENT EXPENDITURES (see Schedule D)

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 3401 (d)) (Use Schedule F)

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

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

27. OTHER DISBURSEMENTS

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

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

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

30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)

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

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

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

1
2
3
4
5
6
7
8

11(d)
11(b)
11(c)
11(d)
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26(a)
26(b)
26(c)
26(d)
27
28
29
30
31
32
33
34

SDC

SDC

SCHEDULE B

ITEMIZED DISBURSEMENTS

See instructions on page 2 for each category of the Schedule B category page

Page 1 of 1
 For Line Number 21

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

NAME OF CONTRIBUTOR (in Full)

CANPAC

37034523

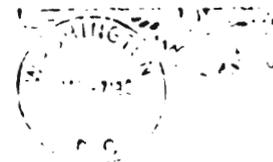
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Oakar for Congress Committee P.O. Box 2888 Washington, D.C. 20013	Political Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/02/86	600.00
B. Full Name, Mailing Address and ZIP Code Pay Williams for Congress c/o 274 M Street, S.W. Washington, D.C. 20024	Political Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/15/86	250.00
C. Full Name, Mailing Address and ZIP Code Mike Espy for Congress P.O. Box 1005 Yazoo City, MI 39194	Political Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/15/86	100.00
D. Full Name, Mailing Address and ZIP Code Bobby Scott for Congress P.O. Box 251 Newport News, VA 23666	Political Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/15/86	100.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

1,050.00

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



First Class Mail

FROM

CAMP, BARSH, BATES & TATE
A DISTRICT OF COLUMBIA PROFESSIONAL CORPORATION
 2550 M STREET, N.W., SUITE 275 WASHINGTON, D.C. 20037-1396

TO

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

CERTIFIED

909 4779536

MAIL



Attachment 6e

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

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRALS: 87NF-86-134
STAFF MEMBER: George F. Rishel

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

Campac and John C. Camp, as treasurer

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

INTERNAL REPORTS
CHECKED: Referral Materials

FEDERAL AGENCIES
CHECKED: None

I. GENERATION OF MATTER

The Report Analysis Division ("RAD") referred the above-listed 49 committees to the Office of the General Counsel on May 22, 1987. The basis of the attached referrals is their failure to either file a 12-day Pre-Election Report or file such report in a timely fashion.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file a Pre-Election Report before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. Such report shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) such election and shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii).

The 1986 Pre-Election Report for the 1986 General Election was due on October 23, 1986, complete as of October 15, 1986. Quarterly

filers were notified on September 29, 1986, of the requirement for filing the Pre-Election Report.

The following committees filed a 12-Day Pre-Election Report, but did not file it in a timely fashion:

CAMPAC

1-7-87
(76 days late)

\$1,050 in contributions
to four candidates

J
P
I
V
I
I

The following committees filed a 1986 Post-General Report that disclosed activity indicating a 12-Day Pre-Election Report should have been filed:

<u>Committee</u>	<u>Date Filed</u> 1/	<u>Pre-Election Activity</u>
------------------	----------------------	------------------------------

0
1
2
3
4
5
6
7
8
9

The following committees filed a Year End Report disclosing activity indicating that 12-Day Pre-Election Report should have been filed:

<u>COMMITTEE</u>	<u>Date Filed</u> ^{4/}	<u>Pre-Election Activity</u>
------------------	---------------------------------	------------------------------

Accordingly, with regard to 48 of these 49 committees, the Office of the General Counsel recommends that the Commission open Matter Under Review and find reason to believe these committees

^{4/} See footnote 1.

III. RECOMMENDATIONS

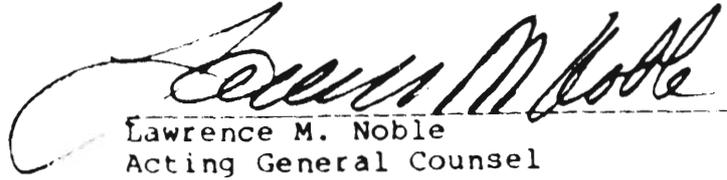
1. Open Matters Under Review with respect to the following committees and find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii):

CAMPAC and John C. Camp, as treasurer

3 2 4 7 5 , 5 1 5 7

2. Approve and send the attached letters and factual and legal analyses to the respective committees listed in recommendation 1.
- 3.

6/10/87
Date


Lawrence M. Noble
Acting General Counsel

Attachments

1. Referral Materials
2. Letters and Factual and Legal Analyses (48)

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15, 1987

Page 4

CAMPAC and John C. Camp, as treasurer

(continued)

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15 1987

Page 5

(continued)

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15, 1987

Page 5

2. Approve and send the letters and factual and legal analyses to the respective committees listed in recommendation 1.

3

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

Attest:

6-16-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: Thurs., 6-11-87, 12:34
Circulated on 48 hour tally basis: Thurs., 6-11-87, 4:00
Deadline for vote: Mon., 6-15-87, 4:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541

June 29, 1987

John C. Camp, Treasurer
CAMPAC
2550 M Street, N.W., Suite 275
Washington, D.C. 20037

RE: MUR 2472
CAMPAC and John C. Camp, as
treasurer

Dear Mr. Camp:

On June 15, 1987, the Federal Election Commission found that there is reason to believe CAMPAC ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The 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. 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 will not ordinarily 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 John Drury, 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

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: CAMPAC and John C. Camp
 as treasurer

MUR: 1472

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file a Pre-Election Report before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. Such report shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) such election and which shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii).

The 1986 Pre-Election Report for the 1986 General Election was due on October 23, 1986, and complete as of October 15, 1986. Quarterly filers were notified on September 29, 1986, of the requirement for filing the Pre-Election Report. The committee filed a 12-Day Pre-Election Report on January 7, 1987, (which was 75 days late). Accordingly, the committee and its treasurer failed to file the 12-Day Pre-Election Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(A)(ii).

HAND DELIVERED

37 JUL 13 P2 33

STATEMENT OF DESIGNATION OF COUNSEL

37 JUL 13 P3:41

MUR 2472

NAME OF COUNSEL: Judith L. Corley

ADDRESS: Perkins Cole

1110 Vermont Ave., N.W., #1200

Washington, D.C. 20005

TELEPHONE: 202/887-9030

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

July 9, 1987
Date

John C. Camp
Signature

RESPONDENT'S NAME: CAMPAC and John C. Camp,
as Treasurer

ADDRESS: 2550 M Street, N.W.

Suite 275

Washington, D.C. 20037

HOME PHONE: N/A

BUSINESS PHONE: 202/887-9160

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
1110 VERMONT AVENUE, N.W. • WASHINGTON, D.C. 20005 • (202) 887-9930

July 14, 1987

7.10.15 AM 1:36

Lawrence M. Noble, Esq.
Acting General Counsel
Federal Election Commission
999 B Street, N.W.
Washington, D.C. 20463

Re: MDR 2472 - CAMPAC and John C. Camp, as Treasurer

Attention: John Drury

Dear Mr. Noble:

This letter is in response to the Commission's letter of June 29, 1987, in which it found reason to believe that CAMPAC and John C. Camp, as Treasurer ("Respondents"), had violated the Federal Election Campaign Act of 1971, as amended, by failing to file in a timely manner a 1986 pre-general election report.

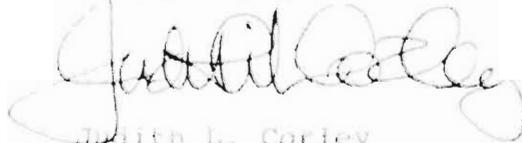
At the time the pre-general election report was due, the individual responsible for preparing Respondents' disclosure report was unexpectedly unavailable. The individual subsequently decided to discontinue her work with CAMPAC. During the confusion created by her absence, and the transition after her departure, the filing of the pre-general election report was overlooked. As soon as Respondents realized they had not met their disclosure obligation as required, the report was prepared and filed.

Respondents have now taken steps to avoid a recurrence of these circumstances by designating a "back-up" individual who now has responsibility for FEC reports in the event the individual with the primary responsibility is unavailable. In addition, Respondents have calendared future reporting dates so that all responsible for FEC reports will be reminded when a report is due.

Lawrence M. Noble, Esq.
July 14, 1987
Page 2

Respondents request pre-probable cause conciliation in this matter. There is no question that the above-referenced report was filed late. Respondents have, however, taken appropriate steps to ensure that future reports will be timely filed.

Very truly yours,



Judith L. Corley
Counsel for CAMPAC and
John C. Camp, as Treasurer

BEFORE THE FEDERAL ELECTION COMMISSION

EXECUTIVE SESSION

SEP 22 1987

SENSITIVE

87 SEP 15 PM 4:19

RECEIVED
FEDERAL ELECTION COMMISSION

In the Matter of
CAMPAC and John C. Camp,
as treasurer

MUR 2472

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 15, 1987, the Commission found reason to believe that CAMPAC and John C. Camp, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file a 1986 12-Day Pre-Election Report in a timely manner. By letter dated July 14, 1987, respondents requested to settle this matter prior to a finding of probable cause to believe (Attachment I).

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

III. RECOMMENDATIONS

1. Enter into conciliation with CAMPAC and John C. Camp, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Date

9/14/87


Lawrence M. Noble
Acting General Counsel

Attachments

- I. Request for conciliation
- II. Proposed agreement and letter



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

MEMORANDUM TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

FROM: MARJORIE W. EMMONS / SUSAN GREENLEE 50

DATE: SEPTEMBER 16, 1987

SUBJECT: OBJECTION TO MUR 2472: General Counsel's Report
signed September 14, 1987

The above-captioned document was circulated to the Commission on TUESDAY, September 15, 1987 at 11:00 A.M.

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

Commissioner Aikens _____
Commissioner Elliott X _____
Commissioner Josefak _____
Commissioner McDonald _____
Commissioner McGarry _____
Commissioner Thomas _____

This matter will be placed on the Executive Session agenda for September 22, 1987.

Please notify us who will represent your Division before the Commission on this matter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of:)
)
CAMPAC and John C. Camp,) MUR 2472
as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of September 22, 1987, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2472:

1. Enter into conciliation with CAMPAC and John C. Camp, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter attached to the General Counsel's report dated September 14, 1987, subject to amendment of the letter as discussed in the meeting.

Commissioners Aikens, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision. Commissioner Elliott was not present at the time this matter was considered.

Attest:

9-22-87
Date

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20542

22 September 1987

Judith L. Corley, Esquire
Perkins Coie
1110 Vermont Avenue, N.W.
Washington, D.C. 20005

RE: MUR 2472
CAMPAC and John C. Camp,
as treasurer

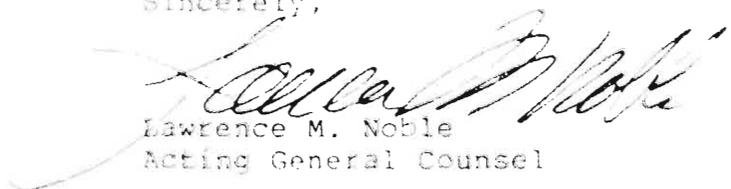
Dear Ms. Corley:

On June 15, 1987, the Federal Election Commission found reason to believe that CAMPAC, and John C. Camp, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii). At your request, on September 22, 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 John Drury, the attorney assigned to this matter, at (202) 376-2200.

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

COPIED 19 7/13/11

In the Matter of)
)
CAMPAC and John C. Camp,)
as treasurer)

MUR 2472

25 6 1988

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by John C. Camp, the treasurer of the CAMPAC.

The attached agreement contains no changes from the agreement approved by the Commission on September 22, 1987. A check for the civil penalty has been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with CAMPAC and John C. Camp, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

Date 8/19/88

By: 
Lois G. Lerner
Associate General Counsel

Attachments

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

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
CAMPAC and John C. Camp,) MUR 2472
as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 24, 1988, the Commission decided by a vote of 6-0 to take the following actions in MUR 2472:

1. Accept the conciliation agreement with CAMPAC and John C. Camp, as treasurer, as recommended in the General Counsel's report signed February 19, 1988.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report signed February 19, 1988.

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

Attest

2/24/88
Date

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

Received in the Office of Commission Secretary:	Fri.,	2-19-88,	3:
Circulated on 48 hour tally basis:	Mon.,	2-22-88,	11:
Deadline for vote:	Wed.,	2-24-88,	11:



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20001

February 29, 1988

Judith L. Corley, Esquire
Perkins Cole
1110 Vermont Avenue, N.W.
Washington, D.C. 20005

RE: MUR 2472
CAMPAC and John C.
Camp, as treasurer

Dear Ms. Corley:

On February 24, 1988, 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)(ii), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. 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 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 R. Lee Andersen, the attorney assigned to this matter at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

Q 2054516

FEDERAL ELECTION COMMISSION
1100 LACOM

BEFORE THE FEDERAL ELECTION COMMISSION

87 OCT -5 AM 9:07

In the Matter of)
)
CAMPAC and John C. Camp,)
)
as treasurer)

MFR 2472

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 CAMPAC and John C. Camp, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(ii).

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 OCT -6 AM 10:22

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

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C.

§ 437g(a)(4)(A)(i).

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

III. Respondents enter voluntarily into this agreement with the Commission

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

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

2. Respondent, John C. Camp, is the treasurer of the Committee.

3. Respondents were obligated to file a 1986 12-Day Pre-Election Report by October 23, 1986.

4. Respondents failed to file the 12 Day Pre-Election Report until January 7, 1987, seventy-six days after the Pre-Election Report was due.

V. The respondents' failure to timely file the 1986 12 Day Pre-Election Report was in violation of 2 U.S.C. § 434(a)(4)(A)(iii).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Five Hundred dollars (\$500), 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.

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 (42) *2/29/88*
Lawrence M. Noble Date

FOR THE RESPONDENT

John C. Camp
John C. Camp
President



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF TAP #

2472

DATE FILMED

4/23/88

CAMERA NO.

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CAMERAMAN

G.P.C.