



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2486

DATE FILMED 4/1/88 CAMERA NO. 4

CAMERAMAN GPC

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

May 22, 1987

MEMORANDUM

TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON *JS*
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

38040570975

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

3 3 7 4 0 5 9 0 9 7 4

C00184648

Housing for America Political Action
Committee

87HF-103.

89040640975

8 9 0 4 0 5 9 0 9 7 6

HOUSING FOR AMERICA POLITICAL ACTION COMMITTEE

(Attachments 20a - 20d)

8 8 0 4 0 6 9 0 9 7 7

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

DATE 27APR87
 PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
HOUSING FOR AMERICA POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: NONE				NON-PARTY QUALIFIED		ID #C00184648
1985	MID-YEAR REPORT	2,879	10,131	1JAN85 -30JUN85	9	85FEC/389/0798
	YEAR-END	853	16,897	1JUL85 -31DEC85	8	86FEC/398/4201
1986	APRIL QUARTERLY	207	7,892	1JAN86 -31MAR86	6	86FEC/408/3275
	JULY QUARTERLY	5,876	10,717	1APR86 -30JUN86	7	86FEC/420/1474
	1'ST LETTER INFORMATIONAL NOTICE			1APR86 -30JUN86	1	86FEC/424/5220
	OCTOBER QUARTERLY	12,000	2,882	1JUL86 -30SEP86	9	86FEC/435/0491
	NOTICE OF FAILURE TO FILE			24NOV86	1	86FEC/452/1373
	YEAR-END	0	1,947	1OCT86 -31DEC86	5	87FEC/452/5277
1987	STATEMENT OF ORGANIZATION - AMENDMENT			2MAR87	2	87FEC/462/0106
	TOTAL	21,817	0	50,166	0	48 TOTAL PAGES

All reports have been reviewed.
 Ending cash-on-hand as of 12/31/86: \$10,708
 Outstanding debts owed by the committee as of 12/31/86: \$0

STATE OF CALIFORNIA
 DEPARTMENT OF REVENUE
 Form 100-1 (REV. 10/1/96)

Spending For America, Inc. PAC

From **10/1/96** To **12/31/96**

93040590979
 5279

I. RECEIPTS

	COLUMN A Total This Period	COLUMN B Calendar Year To-Date	
11 CONTRIBUTIONS (other than loans FROM)			
(a) Individuals/Persons Other Than Political Committees		27,839.00	11(a)
(b) Political Party Committees		0	11(b)
(c) Other Political Committees		0	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans from 11(a), 11(b) and 11(c))			11(d)
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		0	12
13 ALL LOANS RECEIVED		0	13
14 LOAN REPAYMENTS RECEIVED		0	14
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		0	15
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		0	16
17 OTHER RECEIPTS (Dividends, Interest, etc.)		234.27	17
18 TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	0	28,073.27	18

II. DISBURSEMENTS

19 OPERATING EXPENDITURES	1,347.02	11,539.67	19
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	0	0	20
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	600.00	11,600.00	21
22 INDEPENDENT EXPENDITURES (Use Schedule E)	0	0	22
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 641 (d)) (Use Schedule F)	0	0	23
24 LOAN REPAYMENTS MADE	0	0	24
25 LOANS MADE	0	0	25
26 REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees	0	0	26(a)
(b) Political Party Committees	0	0	26(b)
(c) Other Political Committees	0	0	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	0	0	26(d)
27 OTHER DISBURSEMENTS	0	0	27
28 TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1,947.02	23,139.67	28

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29 TOTAL CONTRIBUTIONS (other than loans from Line 11(d))	0	0	29
30 TOTAL CONTRIBUTION REFUNDS from Line 26(d)	0	0	30
31 NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	0	0	31
32 TOTAL OPERATING EXPENDITURES from Line 19	1,347.02	11,539.67	32
33 OFFSETS TO OPERATING EXPENDITURES from Line 15	0	0	33
34 NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	1,347.02	11,539.67	34

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page

PAGE **1** OF **1**
FOR LINE NUMBER **21**

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

NAME OF COMMITTEE (in Full)
Housing For America, Inc. PAC

MB

MB

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Senator Slade Gorton '86 Comm 500 Wall Street 0421 Seattle, WA 98121	contribution (R-WA) Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/14/86	250.00
Bill Schuette for Congress 133 Rodd St. PO Box 351 Midland, MI 48640	contribution (R-MI) (10th) Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/15/86	350.00
C. 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
D. 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
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 (page one)	600.00
TOTAL of Disbursements This Page (page one)	600.00

37
34
33
32
31

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

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRALS: 87NF-85-134
STAFF MEMBER: George F. Rishel

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11
P12:

SOURCE OF NUR: INTERNALLY GENERATED

98040690981

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

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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:

<u>Committee</u>	<u>Date Filed</u>	<u>Pre-Election Activity</u>
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93040690983

disclosed activity indicating a 12-Day Pre-Election Report should have been filed:

Committee

Date Filed^{1/}

Pre-Election Activity

93040690984

^{1/} The date filed is that on which the Post-General Election Report was filed. The number of days late is that for the filing of the 12-Day Pre-Election Report. In some cases, the Post-General Election Report was filed after December 4, 1986. The late filings of such reports, however, were **not** included as a basis for these referrals. Therefore, no recommendations have been made with respect to the late filing of any Post-General Election Report.

89040670995

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^{4/}</u>	<u>Pre-Election Activity</u>
Housing For America PAC	1-6-87 (75 days late)	\$250 in contributions to one candidate

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

and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii). This Office recommends that the Commission decline to open a Matter Under Review in 87NF-114 (Massachusetts Freeze Voter). See footnote 2.

III. RECOMMENDATIONS

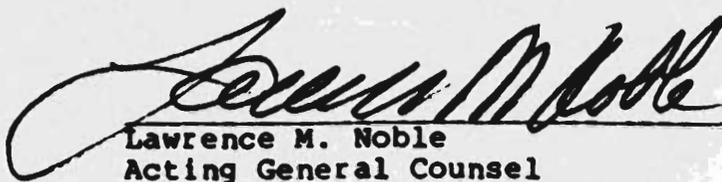
1. Open Matters Under Review with respect to the following committees and find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii):

88040390986

Housing for America Political Action Committee and Hilliard A. Zola, as treasurer

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)

83040590997

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

Page 4

9 3 0 4 0 5 7 0 9 9 1

Housing for America Political Action Committee and Hilliard
A. Zola, as treasurer

(continued)

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

Page 5

83040690992

(continued)

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

Page 6

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

3

Commissioners Aikens, 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

99040670993



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 1987

Hilliard A. Zola, Treasurer
Housing for America Political
Action Committee
1100 15th Street, N.W., Suite 800
Washington, D.C. 20005

RE: MUR 2486
Housing for America Political
Action Committee and Hilliard
A. Zola, as treasurer

Dear Mr. Zola:

On June 15, 1987, the Federal Election Commission found that there is reason to believe Housing for America Political Action Committee ("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.

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Plan

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 Charles Snyder, 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

83040590993

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Housing for America Political
Action Committee and
Hilliard A. Zola, as treasurer

MUR: 2486

3 3 0 4 0 5 2 0 9 9 6

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 did not file a report disclosing this activity until it filed its 1986 Year End Report that disclosed a \$250 contribution to one candidate between October 1, 1986, and October 15, 1986. Thus, the committee was required to file a 12-Day Pre-Election Report by October 23, 1986, and complete as of October 15, 1986. The committee did not file a report disclosing this activity until it filed its 1986 Year End Report on January 6, 1987. Accordingly, the committee and its treasurer have violated 2 U.S.C. § 434(a)(4)(A)(ii).

GCC# 3938

HOUSING FOR AMERICA, INC.
1100 - 15TH ST., N.W., SUITE 1120
WASHINGTON, D.C. 20005
202-887-6886

97 JUL 16 P 4: 037 JUL 16 P 4: 17

July 14, 1987

Mr. Scott E. Thomas
Treasurer
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20468

RE: Housing for America Political Action Committee

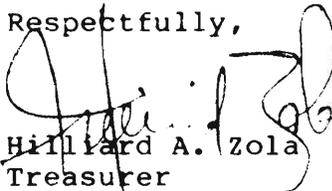
Dear Chairman Thomas:

I respectfully request a pre-probable cause conciliation concerning the MUR 2486 against Housing for America Political Action Committee and myself, Hilliard A. Zola. The MUR states that we violated 2 U.S.C. Par. 434 (a)(4)(A)(ii) by not filing the 1986 Pre-Election Report for the 1986 General Election.

Housing for America Political Action Committee is a very small committee which has no employees or paid consultants, a miniscule number of transactions, and a tiny amount of capital. When we retained counsel we filed our quarterly reports in a timely manner. Eliminating counsel was a method (albeit an unwise one) of reducing costs. The reason for this omission is that new personnel who were unfamiliar with the paperwork were utilized. I am confident this omission will not reoccur, and we therefore request whatever consideration you may deem appropriate.

In reviewing to prepare for this response, we noticed that the Post-Election Report was also not filed. We have submitted both reports and have attached the time-dated documents.

Respectfully,


Hilliard A. Zola
Treasurer

Attachment

An Independent Political Action Committee

93040690997

HOUSING FOR AMERICA, INC.
1100 - 15TH ST., N.W., SUITE 1120
WASHINGTON, D.C. 20005
202-887-6886

July 14, 1987

BY HAND

The Honorable Joan D. Aikens
Chairman
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Housing For America, Inc. PAC

Dear Chairman Aikens:

We hereby enclose for filing the following documents:

- 1986 Pre-Election Report for the 1986 General Election
- 1986 Post-Election Report for the 1986 General Election

Should you have any questions regarding this filing,
please contact the undersigned.

Respectfully,

Katharine R. Breuer

Katharine Breuer
Assistant to the Treasurer

Enclosure

88740640998

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

RECEIVED AT THE FEC

(Summary Page)

87 JUL 15 P 2: 58

<p>1. Name of Committee (In Full)</p> <p align="center">Housing For America, Inc. Political Action Committee</p> <hr/> <p>Address (Number and Street)</p> <p align="center">1100 15th Street NW #800</p> <hr/> <p>City, State and ZIP Code</p> <p align="center">Washington, DC 20005</p> <hr/> <p><input type="checkbox"/> Check here if address is different than previously reported.</p>	<p>4. TYPE OF REPORT (Check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report</p> <p><input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report</p> <p><input type="checkbox"/> July 31 Mid Year Report (Non-Election Year Only)</p> <p><input type="checkbox"/> Monthly Report for _____</p> <p><input type="checkbox"/> Twelfth day report preceding _____ <small>(Type of Election)</small></p> <p>election on _____ in the State of _____</p> <p><input checked="" type="checkbox"/> Thirtieth day report following the General Election on <u>11/4/86</u> in the State of <u>DC</u></p> <p><input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>
<p>2. FEC Identification Number</p> <p align="center">C00184648</p>	
<p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ <small>(Date)</small></p>	

0 3 7 4 0 5 2 0 9 9 9

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	10/16/86 through 11/24/86		
6. (a) Cash on hand January 1, 19 <u>86</u>			\$ 15,763.67
(b) Cash on Hand at Beginning of Reporting Period		\$ 12,386.53	
(c) Total Receipts (from Line 18)		\$ -0-	\$ 18,084.27
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 12,386.53	\$ 33,847.94
7. Total Disbursements (from Line 28)		\$ 1,659.61	\$ 23,121.02
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 10,726.92	\$ 10,726.92
9. Debts and Obligations Owed TO The Committee <small>(Itemize all on Schedule C or Schedule D)</small>		none	
10. Debts and Obligations Owed BY the Committee <small>(Itemize all on Schedule C or Schedule D)</small>		none	

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

William A. Zola
Type or Print Name of Treasurer

[Signature]
SIGNATURE OF TREASURER

7/17/87
Date

For further information contact:

Federal Election Commission
989 E Street, N.W.
Washington, D.C. 20463
Toll Free 800-424-9630
Local 202-376-3120

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

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

	FEC FORM 3X (3/80)
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**of Receipts and Disbursements
(Page 2, FEC FORM 3X)**

Name of Committee (in Full)

Housing For America, Inc. PAC

Report Covering the Period:

From: **10/16/86** To: **11/24/86**

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees (Memo Entry Unitarized \$ _____)	0	17,850.00	11(a)
(b) Political Party Committees	0	0	11(b)
(c) Other Political Committees	0	0	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	0	0	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	0	0	12
13. ALL LOANS RECEIVED	0	0	13
14. LOAN REPAYMENTS RECEIVED	0	0	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	0	0	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	0	234.27	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	-0-	18,084.27	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	1,309.61	11,521.02	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	0	0	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	350.00	11,600.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	0	0	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)	0	0	23
24. LOAN REPAYMENTS MADE	0	0	24
25. LOANS MADE	0	0	25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees	0	0	26(a)
(b) Political Party Committees	0	0	26(b)
(c) Other Political Committees	0	0	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	0	0	26(d)
27. OTHER DISBURSEMENTS	0	0	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1,659.61	23,121.02	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	0	0	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	0	0	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	0	0	31
32. TOTAL OPERATING EXPENDITURES from Line 19	1,309.61	11,521.02	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	0	0	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	1,309.61	11,521.02	34

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

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

NAME OF COMMITTEE (In Full)

Housing For America Political Action Committee

9304061001

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
ICG Inc. 1100 15th Street NW #800 Washington, DC 20005	reimbursement for fund raising trip to San Antonio Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/4/86	1,291.12
B. Full Name, Mailing Address and ZIP Code C & P Telephone P.O. Box 657 Baltimore, MD	telephone Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/4/86	18.49
C. 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
D. 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
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)	1,309.61

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

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

NAME OF COMMITTEE (in Full)

Housing For America Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement (R) contribution (10th-MI)	Date (month, day, year)	Amount of Each Disbursement This Period
Bill Schuette for Congress 133 Rodd St. P.O. Box 351 Midland, MI 48640	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) YTD: 350.00	11/15/86	350.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

83040691002

SUBTOTAL of Disbursements This Page (optional)	
TOTAL This Period (last page this line number only)	350.00

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

RECEIVED AT THE FEC

(Summary Page)

87 JUL 15 P 2: 58

<p>1. Name of Committee (In Full)</p> <p align="center">Housing For America, Inc. Political Action Committee</p> <hr/> <p>Address (Number and Street)</p> <p align="center">1100 15th Street NW #800</p> <hr/> <p>City, State and ZIP Code</p> <p align="center">Washington, DC 20005</p> <hr/> <p><input type="checkbox"/> Check here if address is different than previously reported.</p>	<p>4. TYPE OF REPORT (Check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report</p> <p><input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report</p> <p><input type="checkbox"/> July 31 Mid Year Report (Non-Election Year Only)</p> <p><input type="checkbox"/> Monthly Report : of _____</p> <p><input checked="" type="checkbox"/> Twelfth day report preceding <u>General</u> <small>(Type of Election)</small></p> <p>election on <u>11/4/86</u> in the State of <u>DC</u></p> <p><input type="checkbox"/> Thirtieth day report following the General Election</p> <p>on _____ in the State of _____</p> <p><input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment?</p> <p align="center"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>
<p>2. FEC Identification Number</p> <p align="center">C00184648</p>	
<p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)</p>	

C00184648

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>10/1/86</u> through <u>10/15/86</u>		
6. (a) Cash on hand January 1, 19 <u>86</u>			\$ 15,763.67
(b) Cash on Hand at Beginning of Reporting Period		\$ 12,655.29	
(c) Total Receipts (from Line 18)		\$ 0	\$ 18,084.27
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 12,655.29	\$ 33,847.94
7. Total Disbursements (from Line 28)		\$ 268.76	\$ 21,461.41
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 12,386.53	\$ 12,386.53
9. Debts and Obligations Owed TO The Committee <small>(Itemize all on Schedule C or Schedule D)</small>		\$ none	
10. Debts and Obligations Owed BY the Committee <small>(Itemize all on Schedule C or Schedule D)</small>		\$ none	

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

Hilliard A. Zola
Type or Print Name of Treasurer

Hilliard A. Zola
SIGNATURE OF TREASURER

7/13/87
Date

For further information contact:
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463
Toll Free 800-424-9530
Local 202-376-3120

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

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

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FEC FORM 3X (3/80)

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

Name of Committee (in Full)

Housing For America, Inc. PAC

Report Covering the Period:

From: **10/1/86** To: **10/15/86**

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees (Memo Entry Unitemized \$ _____)	0	17,850.00	11(a)
(b) Political Party Committees	0	0	11(b)
(c) Other Political Committees	0	0	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	0	0	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	0	0	12
13. ALL LOANS RECEIVED	0	0	13
14. LOAN REPAYMENTS RECEIVED	0	0	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	0	0	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	0	234.27	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	-0-	18,084.27	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	18.76	10,211.41	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	0	0	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	250.00	11,250.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	0	0	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)	0	0	23
24. LOAN REPAYMENTS MADE	0	0	24
25. LOANS MADE	0	0	25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees	0	0	26(a)
(b) Political Party Committees	0	0	26(b)
(c) Other Political Committees	0	0	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	0	0	26(d)
27. OTHER DISBURSEMENTS	0	0	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	268.76	21,461.41	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	0	0	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	0	0	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	0	0	31
32. TOTAL OPERATING EXPENDITURES from Line 19	18.76	10,211.41	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	0	0	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	18.76	10,211.41	34

SCHEDULE B

ITEMIZED DISBURSEMENTS

separate schedule(s) for each category of the Detailed Summary Page

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NAME OF COMMITTEE (in Full)

Housing For America, Inc. Political Action Committee

20050125

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C & P Telephone P.O. Box 657 Baltimore, MD	telephone Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/3/86	18.76
B. 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
C. 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
D. 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
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)	18.76

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NAME OF COMMITTEE (in Full)

Housing For America, Inc. Political Action Committee

00040571000

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Senator Slade Gorton '86 Comm 500 Wall Street #421 Seattle, WA 98121	contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) YTD: 250.00	10/14/86	250.00
B. 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
C. 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
D. 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
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)	250.00

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Housing for America Political)
Action Committee and Hilliard A. Zola,)
as treasurer)

MUR 2486

97 AUG 18 9:29

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 15, 1987, the Commission found reason to believe that the Housing for America Political Action Committee ("the Committee") and Hilliard A. Zola, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file their 1986 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 1).

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

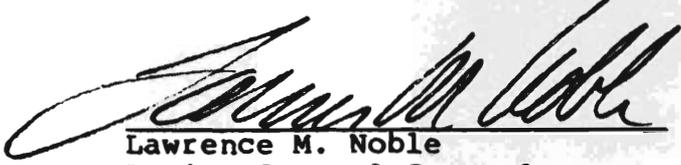
98040691007

III. RECOMMENDATIONS

1. Enter into conciliation with the Housing for America Political Action Committee and Hilliard A. Zola, as treasurer prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Date

8/17/57


Lawrence M. Noble
Acting General Counsel

Attachments

1. Request for conciliation
2. Proposed agreement and letter

38040691008



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

MEMORANDUM TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

FROM: MARJORIE W. EMMONS / JOSHUA MCFADDEN *JM*

DATE: AUGUST 19, 1987

SUBJECT: OBJECTION TO MUR 2486 - General Counsel's Report
Signed August 17, 1987

The above-captioned document was circulated to the Commission on Tuesday, August 18, 1987 at 4:00 P.M.

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

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

This matter will be placed on the Executive Session agenda for Wednesday, September 9, 1987.

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

38040691009

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Housing for America Political Action) MUR 2486
Committee and Hilliard A. Zola,)
as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of September 9, 1987, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in MUR 2486:

1. Enter into conciliation with the Housing for America Political Action Committee and Hilliard A. Zola, 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 August 17, 1987.

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

Attest:

9-10-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

28040691010



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 15, 1987

Hilliard A. Zola, Treasurer
Housing for America
Political Action Committee
1100 15th Street, N.W. Suite 800
Washington, D.C. 20005

RE: MUR 2486
Housing for America
Political Action Committee
and Hilliard A. Zola, as
treasurer

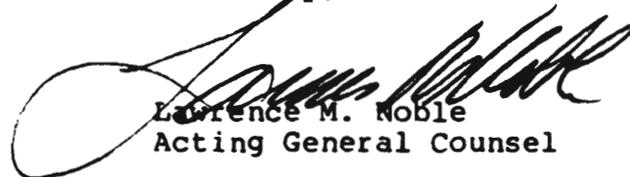
Dear Ms. Zola:

On June 15, 1987, the Federal Election Commission found reason to believe that Housing for America Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii). At your request, on September 9, 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 Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

93040591011

TLN

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE
RECEIVED
FEDERAL ELECTION COMMISSION
88 JAN 20 PM 5:03

In the Matter of)
)
Housing for America Political) MUR 2486
Action Committee and Hilliard A.)
Zola, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

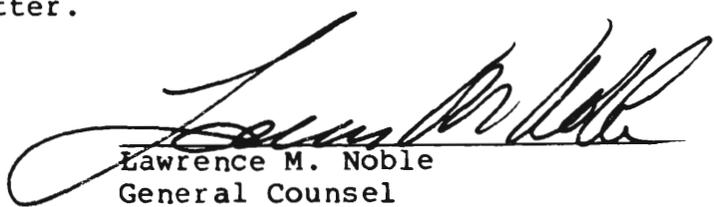
Attached is a conciliation agreement which has been signed by Hilliard A. Zola, treasurer of the Housing for America Political Action Committee.

The attached agreement contains no changes from the agreement approved by the Commission on December 8, 1987. A check for the civil penalty has been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Housing for America Political Action Committee and Hilliard A. Zola, as treasurer.
2. Close the file.
3. Approve the attached letter.

Date 1/20/88


Lawrence M. Noble
General Counsel

Attachments

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

Staff Person: Charles Snyder

8 3 0 4 0 5 9 1 0 1 2

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2486
Housing for America Political)
Action Committee and Hilliard A.)
Zola, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 25, 1988, the Commission decided by a vote of 6-0 to take the following actions in MUR 2486:

1. Accept the conciliation agreement with Housing for America Political Action Committee and Hilliard A. Zola, as treasurer, as recommended in the General Counsel's report signed January 20, 1988.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report signed January 20, 1988.

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

Attest:

Jan. 25, 1988
Date

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

Received in the Office of Commission Secretary: Wed., 1-20-88, 5:03
Circulated on 48 hour tally basis: Thurs., 1-21-88, 11:00
Deadline for vote: Mon., 1-25-88, 11:00

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plm



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

January 26, 1988

Hilliard A. Zola, Treasurer
Housing for America
Political Action Committee
1100 15th Street, N.W.
Suite 800
Washington, D.C. 20005

RE: MUR 2486
Housing for America
Political Action
Committee and
Hilliard A. Zola,
as treasurer

Dear Mr. Zola:

On January 25, 1988, 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)(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 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 Charles Snyder, the attorney assigned to this matter at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

88040591014

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Housing for America) MUR 2486
Political Action Committee)
and Hilliard A. Zola,)
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 Housing for America Political Action Committee and Hilliard A. Zola, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(ii).

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, Housing for America Political Action Committee, is a political committee within the meaning of 2 U.S.C. § 431(4).

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2. Respondent, Hilliard A. Zola, is the treasurer of Housing for America Political Action Committee.

3. Respondents were required by 2 U.S.C. § 434(a)(4)(A)(ii) to file their 1986 Pre-Election Report by October 23, 1986.

4. Respondents failed to file the aforesaid 1986 Pre-Election Report until January 6, 1987.

V. Respondents' failure to file their 1986 Pre-Election Report in a timely manner was in violation of 2 U.S.C. § 434(a)(4)(A)(ii).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Two Hundred Fifty Dollars (\$250), 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.

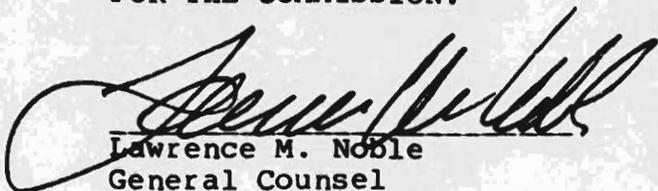
IX. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and

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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.

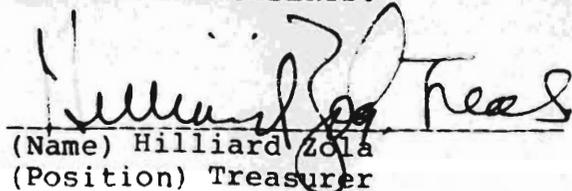
FOR THE COMMISSION:



Lawrence M. Noble
General Counsel

Date 1/26/88

FOR THE RESPONDENTS:


(Name) Hilliard Zola
(Position) Treasurer

Date 1/22/87

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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