



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

THIS IS THE BEGINNING OF MUR # 2501

DATE FILMED 5/6/88 CAMERA NO. 3

CAMERAMAN GPC

98040701753



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
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

83040701754

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.

83040701755

Attachments :

88040701756

83040701757

C00060707

National Association of Social Workers'
Political Action for Candidate
Election

07NF-121

83040701758

38040701759

**NATIONAL ASSOCIATION OF SOCIAL WORKERS' POLITICAL ACTION
FOR CANDIDATE ELECTION**

(Attachments 36a - 36j)

8 8 0 4 0 7 0 1 7 6 0

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)DATE 5MAY87
PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NATIONAL ASSOCIATION OF SOCIAL WORKERS' POLITICAL ACTION FOR CANDIDATE ELECTION				NON-PARTY QUALIFIED		ID #C00060707
CONNECTED ORGANIZATION: SOCIAL WORKERS; NAT'L ASS'N OF						
1985	APRIL QUARTERLY	5,200	576	1JAN85 -31MAR85	6	85FEC/370/3464
	MID-YEAR REPORT	5,919	468	1APR85 -30JUN85	7	85FEC/382/2035
	OCTOBER QUARTERLY	13,446	2,192	1JUL85 -30SEP85	7	85FEC/389/3065
	YEAR-END	10,337	7,652	1OCT85 -31DEC85	6	86FEC/398/0237
	YEAR-END - AMENDMENT	10,337	7,652	1OCT85 -31DEC85	8	86FEC/406/5211
	YEAR-END - AMENDMENT	9,137	7,652	1OCT85 -31DEC85	4	86FEC/417/1411
	REQUEST FOR ADDITIONAL INFORMATION			1OCT85 -31DEC85	1	86FEC/404/4863
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT85 -31DEC85	2	86FEC/407/0043
1986	APRIL QUARTERLY	34,522	17,403	1JAN86 -31MAR86	10	86FEC/408/0553
	REQUEST FOR ADDITIONAL INFORMATION			1JAN86 -31MAR86	1	86FEC/415/0403
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN86 -31MAR86	2	86FEC/416/4559
	JULY QUARTERLY	11,360	23,789	1APR86 -30JUN86	13	86FEC/421/4605
	OCTOBER QUARTERLY	15,135	11,353	1JUL86 -30SEP86	10	86FEC/435/4459
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL86 -30SEP86	4	86FEC/444/2015
	1'ST LETTER INFORMATIONAL NOTICE			1JUL86 -30SEP86	2	86FEC/443/3288
	PRE-GENERAL	1,672	47,400	1OCT86 -15OCT86	13	86FEC/445/0999
	POST-GENERAL	8,499	818	16OCT86 -24NOV86	8	86FEC/448/0091
	YEAR-END	5,465	370	25NOV86 -31DEC86	9	87FEC/456/2114
	TOTAL	110,355	0 112,021	0	113	TOTAL PAGES

All reports have been reviewed.

Ending cash-on-hand as of 12/31/86: \$20,801

Outstanding debts owed by the committee as of 12/31/86: \$0

Outstanding debts owed to the committee as of 12/31/86: \$46,011.98

For a Political Committee Other Than an Authorized Committee

(Summary Page)

86 DEC 4 AM: 03
ALIGN AREA

ALIGN AREA

1 Name of Committee (No Full)

**National Association of Social Workers
Political Action for Candidate Election
for Human Services (FACE)**

Address (Number and Street)

7981 Eastern Avenue

City, State and ZIP Code

Silver Spring, MD 20910

Check here if address is different than previously reported

2 FEC Identification Number

C-10-60-707

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 General
(Type of Election)
election on 11/4/86 in the State of _____

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

Termination Report

(b) Is this Report an Amendment?

YES NO

SUMMARY

5 Covering Period 10/1/86 through 10/31/86

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 (c)) for Column A and
Lines 6(a) and (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 Credits and Obligations Owed TO The Committee
(Items all on Schedule C or Schedule D)

10 Credits and Obligations Owed BY the Committee
(Items all on Schedule C or Schedule D)

COLUMN A This Period	COLUMN B Calendar Year to-Date
	\$ 45,281.90
\$ 53,753.60	
\$ 1,672.00	\$ 62,690.32
\$ 55,425.60	\$ 107,972.22
\$ 47,400.00	\$ 99,946.62
\$ 8,025.60	\$ 8,025.60
\$ 49,835.17	
\$ 0.00	

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

Betty M. Spencer
Type or Print Name of Treasurer

SIGNATURE OF TREASURER _____
Date 10/2/86

For further information contact
Federal Election Commission
Call Freq. 800 424 9630
Local 202 571 0700

NOTE: Candidates for office, officers and committee members who accept the position signing this report in the period 1/1/86 to 1/31/86

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

FEC FORM 2, 1986

8304070176

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

Name of Committee on Form 3 National Association of Social Workers-
Political Action for Candidate Election for Human
Services (FACE)

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	1,672.00	59,728.50	11(a)
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	1,672.00	59,728.50	11(d)
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13 ALL LOANS RECEIVED			13
14 LOAN REPAYMENTS RECEIVED			14
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17 OTHER RECEIPTS (Dividends, Interest, etc.)		2,961.82	17
18 TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	1,672.00	62,690.32	18
II. DISBURSEMENTS			
19 OPERATING EXPENDITURES		251.59	19
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	1,635.00	91,275.00	21
22 INDEPENDENT EXPENDITURES (use Schedule E)			22
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 9441 (d)) (Use Schedule F)			23
24 LOAN REPAYMENTS MADE			24
25 LOANS MADE			25
26 REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27 OTHER DISBURSEMENTS	550.00	5,120.03	27
28 TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	17,100.00	99,216.62	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29 TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	1,672.00	59,728.50	29
30 TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31 NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	1,672.00	59,728.50	31
32 TOTAL OPERATING EXPENDITURES from Line 19		251.59	32
33 OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34 NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)		251.59	34

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3 0 4
3 8 0

SCN
15/86

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

Name of Committee (in Full): **National Association of Social Workers - Political Action for Candidate Election for Human Services (PACE)**

PA

040170071763

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Steve Swendiman Comm. 1194 Almond Ave. Redding, CA 96001	CA/2 Campaign contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	500.00
Barbara Hoxer Campaign Comm. P. O. Box 4881 San Francisco, CA 94101	CA/6 Campaign Contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	250.00
Friends of Cong. George Miller 348 38th Street Richmond, CA 94805	CA/7 Campaign contribution Total YTD \$600.00 Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	500.00
Committee for Tim Wirth P. O. Box 75428 Washington, D.C. 20013	CO/Senate Campaign Contribution Total YTD \$4,000.00 Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	2,000.00
Skajgs for Congress P. O. Box 652 Westminster, CO. 80030	CO/2 Campaign contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	500.00
Ben Nighthorse Campbell for Congress P. O. Box 791 Durango, CO 81002	CO/3 Campaign Contribution Total YTD \$2,000.00 Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	1,000.00
Graham for U.S. Senate 345 South Magnolia Drive Suite E-6 Casselberry, FL 32301	FL/Senate Campaign contribution Total YTD \$3,700.00 Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	1,700.00
Jim Towne for Congress 25 Central Avenue Waterbury, CT 06701	CT/5 Campaign Contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	500.00
Wynn Fowler for Senate 3321 Princeton Rd, N.E. Atlanta, GA 30316	GA/Senate Campaign contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	500.00
SUBTOTAL of Disbursements This Page (optional)			6,200.00
TOTAL This Period (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full) **National Association of Social Workers - Political Action for Candidate Election for Human Services (FACE)**

9304074364

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Cazares for Congress Campaign Comm. P. O. Box 1196 Clearwater, FL 33517	Campaign contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	500.00
John Evans for Senate Comm. P. O. Box 1002 Boise, Idaho 83701	Campaign contribution Total YTD \$3,500.00 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	1,500.00
Mary Lou Kearn for Congress 827 East State Street Geneva, IL 60134	Campaign contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	500.00
Jim Jontz for Congress Comm. P. O. Box 149 Monticello, IN 47960	Campaign contribution Total YTD \$2,500.00 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	1,000.00
Friends of Phil Sharp P. O. Box 1046 Muncie, IN 47305	Campaign contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	1,000.00
Iowans for Hodjson P. O. Box 1111 Mason City, IA 50410	Campaign contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	500.00
Mikulski for Senate P. O. Box 13147 Baltimore, MD 21203	Campaign contribution Total YTD \$8,250.00 incl. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	5,000.00
Peterson '86 Comm. P. O. Box 703 Detroit Lakes, MN 56501	Campaign contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	500.00
Mike Espy for Congress 400 N. State Street, Ste 204 Jackson, MS 39206	Campaign contribution Total YTD \$1,500.00 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	1,000.00
SUBTOTAL of Disbursements This Page (optional)			11,500.00
TOTAL This Period (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full) **National Association of Social Workers - Political Action for Candidate Election for Human Services (FACE)**

98040795365

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Campaign Committee of the 24th District 341 N. Poinsettia Place Los Angeles, CA 90036	CA/24 Campaign contribution Henry Waxman Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	500.00
B. Full Name, Mailing Address and ZIP Code Pete Stark Reelection Comm. P. O. Box 5303 Oakland, CA 94605	CA/9 Campaign contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	500.00
C. Full Name, Mailing Address and ZIP Code Rcybal Campaign Committee 3165 Larga Ave. Los Angeles, CA 90039	CA/25 Campaign contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	500.00
D. Full Name, Mailing Address and ZIP Code Hawkins for Congress Comm. P. O. Box 6356 Washington, D.C. 20015	CA/29 Campaign contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	500.00
E. Full Name, Mailing Address and ZIP Code Committee to Reelect Cong. Esteban E. Torres P. O. Box 1312 Torrance, CA 90651	CA/34 Campaign contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	100.00
F. Full Name, Mailing Address and ZIP Code Return George Brown to Congress P. O. Box 4210 Riverside, CA 92501	CA/36 Campaign contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	\$500.00
G. Full Name, Mailing Address and ZIP Code Bella Abzug for Congress 48 Mamaronek Avenue White Plains, N.Y. 10601	NY/20 Campaign contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	500.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code Thomas S. Foley Committee P. O. Box 5538 Washington, D.C. 20016	WA/5 Campaign contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	500.00
SUBTOTAL of Disbursements This Page (optional)			3,500.00
TOTAL This Period (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

Name of Committee (in Full) **National Association of Social Workers - Political Action for Candidate Election for Human Services (FACE)**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Feighan for Congress 15401 Detroit Avenue Lakewood, OH 44107	OH/19 Campaign contribution	10/6/86	500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Strokes for Congress Comm. P. O. Box 8038 Washington, D.C. 20024	HO/21 Campaign contribution	10/6/86	500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Louise Slaughter for Congress 14 Manor Hill Dr. Fairport, N.Y. 14450	NY/30 Campaign contribution	10/6/86	500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Harriett Woods Committee 5100 Oakland, Suite 322 St. Louis, MO 63110	MO/Senate Campaign contribution Total YTD \$3,000.00	10/6/86	2,000.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Frank Askin for Congress Comm. Essex Green Center West Orange, NJ 07052	NJ/11 Campaign contribution	10/6/86	500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Citizens for Laurenti P. O. Box 339 Trenton, NJ 08603	NJ/4 Campaign contribution	10/6/86	500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
David Price for Congress Comm. P. O. Box 1986 Raleigh, N.C. 27602	NC/4 Campaign Contribution	10/6/86	500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Lancaster for Congress Comm. P. O. Box 1475 Goldboro, N.C. 27533	NC/3 Campaign Contribution	10/6/86	500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Comm. for Gordon Roberts 209 E. Silver Lebanon, OH 45036	OH/6 Campaign contribution	10/6/86	250.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			5,750.00
TOTAL This Period (list page this line number only)			

8304070176.6

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

Name of Committee (in Full) **National Association of Social Workers - Political Action for Candidate Election for Human Services (FACE)**

83040701757

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement ND/Senate Campaign contribution Total YTD \$1,000.00 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
Corad for Senate P. O. Box 747 Bismark, ND 58503		10/6/86	2,000.00
B. Full Name, Mailing Address and ZIP Code The Sawyer Committee 1298 N. Howard St. Akron, Oh 44310	Purpose of Disbursement OH/14 Campaign contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/6/86	Amount of Each Disbursement This Period 250.00
C. Full Name, Mailing Address and ZIP Code Bob Edgar for U.S. Senate 1029 Vermont Ave, N.W. 9th Fl. Washington, DC 20005	Purpose of Disbursement PA/Senate Campaign contribution Total YTD \$7,000.00 incl. \$2,000.00 for Primary Elect. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/6/86	Amount of Each Disbursement This Period 5,000.00
D. Full Name, Mailing Address and ZIP Code Kostmayer '86 Campaign Comm. P. O. Box 1370 Doylestown, PA 18901	Purpose of Disbursement PA/8 Campaign contribution Total YTD \$1,250.00 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/6/86	Amount of Each Disbursement This Period 500.00
E. Full Name, Mailing Address and ZIP Code Joe Hoeffel for Congress 1063 Easton Rd. Roslyn, PA 19001	Purpose of Disbursement PA/13 Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/6/86	Amount of Each Disbursement This Period 500.00
F. Full Name, Mailing Address and ZIP Code A Lot of People Supporting Tom Daschle P. O. Box 15155 Washington, D C 20003	Purpose of Disbursement SD/Senate Campaign contribution Total YTD \$6,000.00 incl. \$1,000.00 for Primary Elect. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/6/86	Amount of Each Disbursement This Period 4,000.00
G. Full Name, Mailing Address and ZIP Code Wachob for Congress P.O. Box 10141 State College, PA 16805	Purpose of Disbursement PA/23 Campaign contribution Total YTD \$2,000.00 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/6/86	Amount of Each Disbursement This Period 1,000.00
H. Full Name, Mailing Address and ZIP Code Tim Johnson for South Dakota Box 82113 Sioux Falls, SD 57105	Purpose of Disbursement SD/At-Large Campaign contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/6/86	Amount of Each Disbursement This Period 1,000.00
I. Full Name, Mailing Address and ZIP Code Hayes for Congress Comm. P. O. Box 2884 Washington, DC 20012	Purpose of Disbursement IL/1 Campaign contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/6/86	Amount of Each Disbursement This Period 50.00
SUBTOTAL of Disbursements This Page (optional)			14,750.00
TOTAL This Period (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full) **National Association of Social Workers - Political Action for Candidate Election for Human Services (NACS)**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Congressman Kildee Committee 1209 W. McClellan St. Blint, MI 48502	MI/7 Campaign contribution	10/6/86	500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		
Conte for Congress Blythwood Drive Pittsfield, MA 01201	MA/1 Campaign Contribution	10/6/86	500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		
Ackerman for Congress Box 95 Fresh Meadows, N.Y. 11365	NY/7 Campaign Contribution	10/6/86	500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		
Kaptur for Congress P.O. Box 899 Toledo, OH 43691	OH/9 Campaign contribution	10/6/86	500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		
Terry Sanford for U.S. Senate 1100 15th Street, N.W. Washington, D.C.	NC/SENATE Campaign Contribution	10/6/86	1,000.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		
Russo for Congress Committee P. O. Box 6270 OakLawn, IL 60454	IL/3 Campaign contribution	10/6/86	250.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" 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)		
Williams for Congress 107 Bolton Ave. Alexandria, LA 71301	LA/8 Campaign contribution	10/6/86	500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		
Friends of Bob Carr P.O. Box 1552 East Lansing, MI 48823	MI/6 Campaign contribution	10/6/86	500.00
	Total YTD \$1,000.00 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (continued) 4,250.00

TOTAL This Period (last page this line number only)

83040701758
 1777

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

Name of Committee (in Full) **National Association of Social Workers - Political Action for Candidate Election for Human Services (FACE)**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Lane Evans Comm. P.O. Box 1222 Rock Island, IL 61201	IL/17 Campaign contribution YTD total \$1,250.00 -- Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	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)			250.00
TOTAL This Period (last page this line number only)			1,6,850.00

93040701769

250

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

27
111
11
P12:
27

SOURCE OF MUR:

I N T E R N A L L Y G E N E R A T E D

88040701770

National Association of Social Workers'
Political Action for Candidate Election and
Jan Lindemann, as treasurer

83040701771

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

98040701772

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:

88040701773

National
Association of
Social Workers PAC

12-4-86
(42 days late)

\$46,850 in
contributions to 53
candidates

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>
------------------	----------------------	------------------------------

83040701774

89040701775

88040701776

33040701777

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):

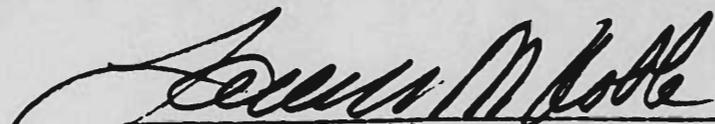
83040701778

33040701779

National Association of Social Workers' Political Action for
Candidate Election and Jan Lindemann, 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)

3 8 0 4 0 7 0 1 7 9 0

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

Page 2

3 8 0 4 0 7 0 1 7 8 2

National Association of Social Workers'
Political Action for Candidate Election and
Jan Lindemann, as treasurer

(continued)

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

Page 4

8 3 0 4 0 7 0 1 7 8 4

(continued)

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

Page 5

88040701785

National Association of Social Workers' Political Action for
Candidate Election and Jan Lindemann, as treasurer

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

38040701786



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 10, 1987

Jan Lindemann, Treasurer
National Association of Social Workers
Political Action for Candidate Election
7981 Eastern Avenue
Silver Spring, MD 20910

RE: MUR 2501
National Association of Social
Workers Political Action for
Candidate Election and Jan
Lindemann, as treasurer

Dear Ms. Lindemann:

On June 15, 1987, the Federal Election Commission found that there is reason to believe National Association of Social Workers Political Action for Candidate Election ("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

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plm

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.

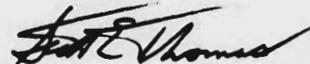
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel will not ordinarily give extensions beyond 20 days.

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 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

83040701788

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: National Association of Social Workers Political Action for Candidate Election and Jan Lindemann, as treasurer MUR: 2501

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 required to be 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 December 4, 1986 (which filing was 42 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).

38040701789



000#4154
RECEIVED AT THE FEC

August 11, 1987

87 AUG 13 AM 11:30

National Association of Social Workers, Inc.
7981 Eastern Avenue
Silver Spring, Maryland 20910
(301) 565-0333

Charles Snyder, Esq.
Office of General Counsel
Federal Election Commission
Washington, DC 20463

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- Myriam Centeno Cain, ACSW - 1990
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Mark G. Battle, ACSW

ASSOCIATE EXECUTIVE DIRECTOR

Evann Kays Petrarford, ACSW

GENERAL COUNSEL

Robert H. Cohen, J.D., ACSW

RE: MUR 2501
National Association of Social Workers
Political Action for Candidate
Election and Jan Lindemann,
as Treasurer

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
87 AUG 13 PM 12:11

Dear Mr. Snyder:

This is in response to the FEC's letter of July 10, 1987 (received by us July 29, 1987) from Scott E. Thomas, Chairman to Jan Lindemann, former treasurer of NASW Political Action for Candidate Election for Human Services (PACE) regarding possible violation of 2 U.S.C. § 434 (a) (4) (A) (ii).

PACE acknowledges that its 1986 Pre-Election report for the 1986 General Election which was due on October 23, 1986 was not filed until December 4, 1986. Failure to meet the filing deadline was inadvertent.

PACE has always sought to file complete, accurate reports and to do so in a timely fashion. Indeed, a review of our records going back to 1982 corroborates that PACE has met submission deadlines on all but one occasion. In a number of instances filing occurred a week or more prior to the due date.

PACE regrets the oversight which occasioned its late filing of the 1986 Pre-Election Report and respectfully requests pre-probable cause conciliation. We are prepared to offer our assurances that all filing deadlines will be met in the future.

Please direct responses to this request to my attention.
Thank you.

Sincerely,

Robert H. Cohen
General Counsel

RHC:en

cc: Betty M. Spencer, Treasurer
John J. Gunther, Chair
Toby Weismiller, Staff
Director for Political Affairs

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2501

NAME OF COUNSEL: Robert H. Cohen, General Counsel

ADDRESS: NASW

7981 Eastern Avenue

Silver Spring, MD 20910

TELEPHONE: (301) 565-0333

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.

8-11-87
Date

Betty M. Spencer
Signature

Betty M. Spencer

RESPONDENT'S NAME: NASW Political Action for Candidate Election

ADDRESS: 7981 Eastern Avenue

Silver Spring, MD 20910

HOME PHONE: (501) 488-0663

BUSINESS PHONE: (601)452-9234 or (601) 863-1132

83040701791

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Association of Social Workers) MUR 2501
Political Action for Candidate Election)
and Betty M. Spencer, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 15, 1987, the Commission found reason to believe National Association of Social Workers Political Action for Candidate Election ("the Committee") and its treasurer violated 2 U.S.C. § 434(a)(4)(A)(ii). The basis for this finding was that respondents filed their (1986) Pre-Election Report 42 days late. Respondents, on August 11, 1987, requested pre-probable cause conciliation. (See Attachment 1).

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

SENSITIVE
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FEDERAL ELECTION COMMISSION
87 SEP 23 AM 9:35

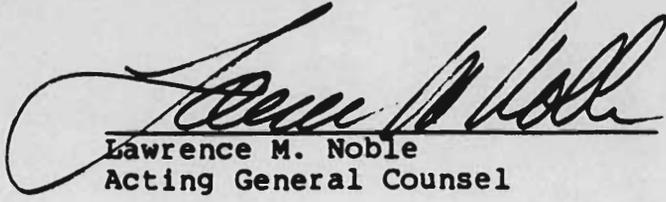
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III. RECOMMENDATIONS

1. Enter into conciliation with the National Association of Social Workers Political Action for Candidate Election and Betty M. Spencer, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Date

9/22/87


Lawrence M. Noble
Acting General Counsel

Attachments

1. Request for Conciliation
2. Proposed conciliation agreement and letter

38040701793

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Association of Social Workers) MUR 2501
Political Action for Candidate Election)
and Betty M. Spencer, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 25, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2501:

1. Enter into conciliation with the National Association of Social Workers Political Action for Candidate Election and Betty M. Spencer, 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 September 22, 1987.

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

Attest:

9-25-87
Date

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

Received in the Office of Commission Secretary: Wed., 9-23-87, 9:35
Circulated on 48 hour tally basis: Wed., 9-23-87, 4:00
Deadline for vote: Fri., 9-25-87, 4:00

33040701794



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

29 September 1987

Robert H. Cohen
General Counsel
National Association of
Social Workers
7981 Eastern Avenue
Silver Spring, MD 20910

RE: MUR 2501
National Association of
Social Workers Political
Action for Candidate
Election and Betty M.
Spencer, as treasurer

Dear Mr. Cohen:

On June 15, 1987, the Federal Election Commission found reason to believe that the National Association of Social Workers Political Action for Candidate Election and Betty M. Spencer, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii). At your request, on September 25, 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

83040701795

man

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

Sincerely,

Lawrence M Noble (Handwritten signature)

Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

8 3 0 4 0 7 0 1 7 9 6

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
National Association of Social)	MUR 2501
Workers Political Action for)	
Candidate Election and Betty M.)	
Spencer, as treasurer)	

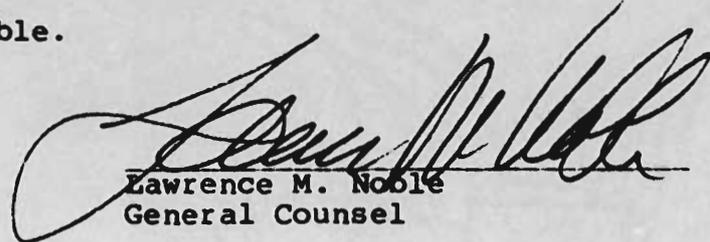
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 FEDERAL ELECTION COMMISSION
 88 FEB - 8 AM 9: 10

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to the National Association of Social Workers Political Action for Candidate Election and Betty M. Spencer, as treasurer, based on the assessment of the information presently available.

Date

2/5/88



Lawrence M. Noble
General Counsel

Staff Person: Charles Snyder

9 3 0 4 0 7 0 1 7 9 7

FEDERAL ELECTION COMMISSION
RECEIVED
NOV 7 11 9:46

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Association of Social) MUR 2501
Workers Political Action for)
Candidate Election, and Betty M.)
Spencer, as treasurer)
)

RECEIVED

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Robert H. Cohen, General Counsel of the National Association of Social Workers, on behalf of that organization's separate segregated fund, Political Action for Candidate Election ("the Committee"), and its treasurer, Betty M. Spencer.

The attached agreement contains no changes from the agreement approved by the Commission on November 27, 1987.*/ A check for the civil penalty has not been received.

II. RECOMMENDATIONS

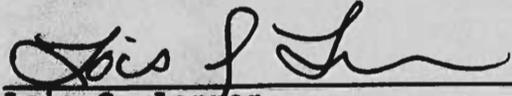
1. Accept the attached conciliation agreement with the National Association of Social Workers Political Action for Candidate Election and Betty M. Spencer, as treasurer.
2. Close the file.

83040701793

3. Approve the attached letter.

Lawrence M. Noble
General Counsel

3/4/88
Date

By: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Letter to Respondent

Staff Person: Charles Snyder

83040701799

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

National Association of Social)
Workers Political Action for)
Candidate Election, and Betty M.)
Spencer, as treasurer)

MUR 2501

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 9, 1988, the Commission decided by a vote of 5-0 to take the following actions in MUR 2501:

1. Accept the conciliation agreement with the National Association of Social Workers Political Action for Candidate Election and Betty M. Spencer, as treasurer, as recommended in the General Counsel's report signed March 4, 1988.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report signed March 4, 1988.

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

Attest:

3/10/88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Mon.,	3-7-88,	9:46
Circulated on 48 hour tally basis:	Mon.,	3-7-88,	4:00
Deadline for vote:	Thurs.,	3-9-88,	4:00

88040701800



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 14, 1988

Robert H. Cohen, Esquire
General Counsel
National Association of
Social Workers
7981 Eastern Avenue
Silver Spring, Maryland 29010

RE: MUR 2501
National Association of Social
Workers Political Action for
Candidate Election and
Betty M. Spencer, as treasurer

Dear Mr. Cohen:

On March 9, 1988, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's 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. Please make your check for the civil penalty payable to the Federal Election Commission. 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

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure

Conciliation Agreement

88040701801

plm

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Association of Social) MUR 2501
Workers Political Action for)
Candidate Election and Betty M.)
Spencer, 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 National Association of Social Workers Political Action for Candidate Election and Betty M. Spencer, 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, National Association of Social Workers Political Action for Candidate Election, is a political committee within the meaning of 2 U.S.C. § 431(4).

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2. Respondent, Betty M. Spencer, is the treasurer of said committee.

3. Respondents were required by 2 U.S.C. § 434(a)(4)(A)(ii) to file their (1986) 12 Day Pre-General Election Report by October 23, 1986.

4. Respondents failed to file said (1986) 12 Day Pre-General Election Report until December 4, 1986.

V. Respondents' failure to file their (1986) 12 Day Pre-General Election Report in a timely manner was in violation of 2 U.S.C. § 434(a)(4)(A)(ii). Respondents contend that the foregoing violation was not knowing and willful.

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Nine Hundred dollars (\$900.00), 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 requirement contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

Lawrence M Noble (LH) 3/14/88
Lawrence M. Noble Date
General Counsel

FOR THE RESPONDENTS:

RH. C. 2-17-88
(Name) Date
(Position)

Robert H. Cohen
General Counsel

93040701804

C Snyder
NASW

600 # 8854
RECEIVED
FEDERAL ELECTION COMMISSION

83 MAR 25 AM 10: 57

National Association of Social Workers, Inc.
7981 Eastern Avenue
Silver Spring, Maryland 20910
(301) 565-0333

March 21, 1988

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Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

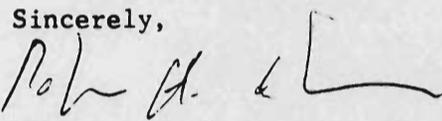
RE: MUR 2501
National Association of
Social Workers Political
Action for Candidate Election
and Betty Spencer, as Treasurer

Dear Mr. Noble:

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Under separate cover we will forward our check for the civil penalty in the amount of Nine Hundred Dollars (\$900.00) payable to the Federal Election Commission.

We would appreciate your acknowledgment of our request for inclusion of the enclosed materials in the public record and a report of the action taken by the FEC in this regard.

Sincerely,


Robert H. Cohen
General Counsel

Enclosures (2)

cc: John J. Gunther, Chair
Charles Snyder, Esq.
Betty Spencer, Treasurer
Toby Weismiller, Staff Director
for Political Affairs

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- GENERAL COUNSEL**
Robert H. Cohen, J.D., ACSW



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ASSOCIATE EXECUTIVE DIRECTOR

Evelyn Kays Pettiford, ACSW

GENERAL COUNSEL

Robert H. Cohen, J.D., ACSW

October 22, 1987

Charles Snyder, Esq.
Office of General Counsel
Federal Election Commission
Washington, DC 20463

RE: MUR 2501

National Association of Social
Workers Political Action for
Candidate Election and Betty
Spencer, as Treasurer

Dear Mr. Snyder:

Pursuant to our meeting of October 16, 1987, I would like to call to the Federal Election Commission's attention a number of factors which I believe should be taken into account by the FEC, in the matter under review.

As set forth in our letter to you of August 11, over the past five years NASW Political Action for Candidate Election for Human Services (PACE) has had an almost unblemished record of complete and timely submissions of all required FEC reports. In no instance has PACE failed to file the requisite report(s). PACE has never been cited or advised by the FEC (apart from the present instance) of possible violation of the Federal Election Campaign Act of 1971.

PACE has acknowledged that its 1986 Pre-Election report was filed late. Failure to meet the October 23, 1986 deadline was inadvertent. There was no knowing and willful violation on the part of PACE. There was no intent to evade the reporting requirements of the Act, to flout the authority of the FEC, or to impede the public disclosure responsibility of the Commission.

Late filing by PACE of the 1986 Pre-Election report was traced by us to a breakdown in internal communication and quality control mechanisms. The report was filed as soon as the oversight was discovered by us - there had



Charles Snyder, Esq.
October 22, 1987
Page 2

been no late filing reminder by the FEC - and steps were immediately instituted to ensure that there would be no recurrence. In recent months we have undertaken a further review of our procedures to assure ourselves that the systems we had put in place were working properly and that administrative controls were well in place.

NASW is a non-profit professional association. NASW PACE is of modest size with but a single professional staff person and election cycle disbursements in the neighborhood of \$100,000. Our 1986 Pre-Election report reflected total disbursements for the period in question of \$47,400. This amount represents less than .0007 per cent of the \$71,000,000. reportedly spent by political action committees on the 1986 election. Clearly the impact of the late filing by PACE was inconsequential in terms of total activity during this period. Any hypothetical harm that may have resulted from the late filing does not warrant a penalty of the magnitude proposed by the FEC.

The criteria employed by the FEC in setting civil penalties for late filing have not been explicated. The specific factors, the weight assigned to each factor and their application to individual cases and circumstances either have not been established or have not been communicated to the parties affected. Certainly this has not occurred with respect to PACE. In the face of these circumstances we have set forth above those factors which in our opinion should be considered by the FEC in mitigation of the penalty sought to be imposed on PACE.

In summary, PACE has had a near perfect record for timely and complete filing. Failure to meet the filing deadline was not a knowing and willful violation on the part of PACE but rather an administrative breakdown which has since been remedied. PACE is a relatively small subsidiary of a non-profit professional association. PACE disbursements in conjunction with the 1986 elections represent an almost infinitesimal portion of total 1986 PAC contributions. In light of these factors, the civil penalty proposed by the FEC is harsh, punitive, and disproportionate to the offense in question.

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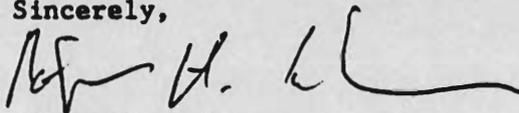
Charles Snyder, Esq.
October 22, 1987
Page 3

For the reasons stated, PACE cannot accept the conciliation agreement proposed by the FEC. However, in an effort to reach a settlement which would be dispositive of this matter, my client has authorized the attached counter proposal.

We appreciate having had the opportunity to present our views to you and to the Commission.

We look forward to hearing from you.

Sincerely,



Robert H. Cohen
General Counsel

RHC:ch

attachment

cc: Betty M. Spencer, Treasurer
John J. Gunther, Chair
Toby Weismiller, Staff Director
for Political Affairs

83040701808



National Association of Social Workers, Inc.
7981 Eastern Avenue
Silver Spring, Maryland 20910
(301) 565-0333

February 17, 1988

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Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: MUR 2501
National Association of
Social Workers Political
Action for Candidate Election
Betty Spencer, as Treasurer

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- Susan S. Bailis, ACSW - 1988
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West Lafayette, Indiana
- Margaret Feiler, BSW - 1989
Chippewa Falls, Wisconsin

Dear Mr. Noble:

In response to your letter of January 26, 1988, and as per my phone conversation with Charles Snyder of February 2, 1988, NASW PACE has authorized me to accept the Federal Election Commission's proposed Conciliation Agreement as set forth in your letter of December 2, 1987.

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Los Angeles, California

NASW PACE continues to believe the penalty which the Commission has imposed is arbitrary, unduly severe and unwarranted under the circumstances. Notwithstanding, the costs to NASW PACE of continuing to contest the Commission's penalty are prohibitive in light of the organization's limited financial resources. NASW PACE has therefore acceded to the civil penalty of Nine Hundred Dollars (\$900) as set forth in the enclosed Conciliation Agreement.

Sincerely,

Robert H. Cohen
General Counsel

EXECUTIVE DIRECTOR

Mark G. Battle, ACSW

ASSOCIATE EXECUTIVE DIRECTOR

Kevin Kays Pettiford, ACSW

GENERAL COUNSEL

Robert H. Cohen, J.D., ACSW

cc: Betty M. Spencer, Treasurer
John J. Gunther, Chair
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Toby Weismiller, Staff Director
for Political Affairs



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2501

DATE FILMED 5/6/88 CAMERA NO. 3

CAMERAMAN GPC

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 2501.

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OFFICE OF GENERAL COUNSEL

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National Association of Social Workers, Inc.
7981 Eastern Avenue
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(301) 565-0333

March 21, 1988

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Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: MUR 2501
National Association of
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Action for Candidate Election
and Betty Spencer, as Treasurer

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General Counsel

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October 22, 1987

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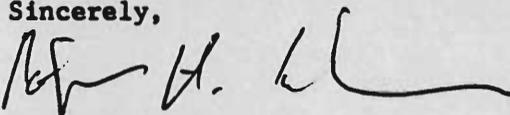
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Robert H. Cohen
General Counsel

RHC:ch

attachment

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88040704919



National Association of Social Workers, Inc.
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February 17, 1988

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999 E Street, NW
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RE: MUR 2501

National Association of
Social Workers Political
Action for Candidate Election
Betty Spencer, as Treasurer

Dear Mr. Noble:

In response to your letter of January 26, 1988, and as per my phone conversation with Charles Snyder of February 2, 1988, NASW PACE has authorized me to accept the Federal Election Commission's proposed Conciliation Agreement as set forth in your letter of December 2, 1987.

NASW PACE continues to believe the penalty which the Commission has imposed is arbitrary, unduly severe and unwarranted under the circumstances. Notwithstanding, the costs to NASW PACE of continuing to contest the Commission's penalty are prohibitive in light of the organization's limited financial resources. NASW PACE has therefore acceded to the civil penalty of Nine Hundred Dollars (\$900) as set forth in the enclosed Conciliation Agreement.

Sincerely,

Robert H. Cohen
General Counsel

cc: Betty M. Spencer, Treasurer
John J. Gunther, Chair
Charles Snyder, Esq.
Toby Weismiller, Staff Director
for Political Affairs



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

- N Y. 25. 24

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 2501 .

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National Association of Social Workers, Inc.
7981 Eastern Avenue
Silver Spring, Maryland 20910
(301) 565-0333

April 11, 1988

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Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: MUR 2501
National Association of
Social Workers Political
Action for Candidate Election
and Betty Spencer, as Treasurer

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West Lafayette, Indiana
- Margaret Feiler, BSW - 1989
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Dear Mr. Noble:

As per my letter to you of March 21, 1988, and in accordance with the Conciliation Agreement, enclosed is our check for the civil penalty in the amount of Nine Hundred Dollars (\$900.00).

REGIONAL MEMBERS

- Madette P. Pelczar, ACSW - 1990
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- Anslem Roanhorse, Jr., MSW - 1989
Window Rock, Arizona
- Martha M. Lemke, ACSW - 1989
Portland, Oregon
- Eleanor Belser, ACSW - 1990
Los Angeles, California

Sincerely yours,

Robert H. Cohen
General Counsel

Enclosure (check)

cc: John J. Gunther, Chair
Charles Snyder, Esq.
Betty Spencer, Treasurer
Toby Weismiller, Staff Director
for Political Affairs

EXECUTIVE DIRECTOR

Mark G. Bartle, ACSW

ASSOCIATE EXECUTIVE DIRECTOR

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GENERAL COUNSEL

Robert H. Cohen, J.D., ACSW