



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2746

DATE FILMED 3/13/89 CAMERA NO. 3

CAMERAMAN AS

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REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 21 September 1988

ANALYST: Elizabeth Jones

I. COMMITTEE: De Leuw, Cather & Co. Political Action
Committee, a Subcommittee of the
Parsons Corp. PAC (C00119784)
Linda M. Perras, Treasurer
1133 15th Street, NW, 8th Floor
Washington, DC 20005

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(B)
11 CFR 104.5(c)(3)(i)

III. BACKGROUND:

Failure to Timely File the 1988 July Monthly Report

The De Leuw, Cather & Co. Political Action Committee, a Subcommittee of the Parsons Corp. PAC ("the Committee") failed to timely file the 1988 July Monthly Report of Receipts and Disbursements covering the period from June 1, 1988 to June 30, 1988. The Committee was notified on February 12, 1988 that the report was due on July 20, 1988 (Attachment 2). A Non-Filer Notice was sent to the Committee on August 9, 1988 (Attachment 3).

On September 6, 1988 the Reports Analysis Division ("RAD") analyst called the Committee and asked to speak with the treasurer of record, Linda Perras, but was told that Ms. Perras was no longer with De Leuw, Cather and Co. The receptionist said that Zigmund Kobes was the new treasurer, but he was out for the day (Attachment 4).

The analyst called the Committee the following day and spoke with Mr. Kobes who was surprised that the report hadn't been filed. Mr. Kobes said the Committee would file the report by September 8, 1988 (Attachment 5). The analyst also advised Mr. Kobes to submit an amended Statement of Organization to reflect the change of treasurers. After the analyst spoke with Mr. Kobes, she received a call from Barbara Thomas, Mr. Kobes' assistant (Attachment 6). Ms. Thomas said that the required report would be filed by September 8, 1988.

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DE LEUW, CATHER & CO. POLITICAL
ACTION COMMITTEE, a
SUBCOMMITTEE OF THE PARSONS
CORP. PAC
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

On September 8, 1988 Ms. Thomas telephoned the RAD analyst and said that the report would not be filed that day but would be filed the following day (Attachment 7).

On September 9, 1988, the Committee filed the 1988 July Monthly Report (Attachment 8).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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FEDERAL ELECTION COMMISSION
1987-1988
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 13SEP88

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION TYPE OF FILER
DE LEUW, CATHER & CO, POLITICAL ACTION CMTE, A SUBCOMMITTEE OF THE PARSONS CORP PAC				ID #C00119784 NON-PARTY QUALIFIED		
CONNECTED ORGANIZATION: RALPH M PARSONS COMPANY						
1987	FEBRUARY MONTHLY	1,885	1,900	1JAN87 -31JAN87	5	87FEC/461/0894
	FEBRUARY MONTHLY - AMENDMENT	1,885	1,900	1JAN87 -31JAN87	3	87FEC/493/1888
	REQUEST FOR ADDITIONAL INFORMATION			1JAN87 -31JAN87	1	87FEC/492/3605
	MARCH MONTHLY	1,246	0	1FEB87 -28FEB87	3	87FEC/463/3262
	MARCH MONTHLY - AMENDMENT	1,246	0	1FEB87 -28FEB87	2	87FEC/493/1885
	REQUEST FOR ADDITIONAL INFORMATION			1FEB87 -28FEB87	1	87FEC/492/3604
	APRIL MONTHLY	1,255	2,833	1MAR87 -31MAR87	7	87FEC/465/5268
	APRIL MONTHLY - AMENDMENT	1,255	2,833	1MAR87 -31MAR87	2	87FEC/493/1882
	REQUEST FOR ADDITIONAL INFORMATION			1MAR87 -31MAR87	1	87FEC/492/3603
	MAY MONTHLY	1,357	61	1APR87 -30APR87	3	87FEC/467/4913
	MAY MONTHLY - AMENDMENT	1,357	61	1APR87 -30APR87	2	87FEC/493/1879
	REQUEST FOR ADDITIONAL INFORMATION			1APR87 -30APR87	1	87FEC/492/3602
	JUNE MONTHLY	1,269	3,000	1MAY87 -31MAY87	6	87FEC/469/5342
	JULY MONTHLY	3,347	1,087	1JUN87 -30JUN87	8	87FEC/478/4278
	AUGUST MONTHLY	1,870	1,272	1JUL87 -31JUL87	6	87FEC/483/4921
	SEPTEMBER MONTHLY	1,223	258	1AUG87 -31AUG87	5	87FEC/486/0965
	OCTOBER MONTHLY	1,244	758	1SEP87 -30SEP87	6	87FEC/492/0953
	NOVEMBER MONTHLY	1,238	1,507	1OCT87 -31OCT87	10	87FEC/494/3197
	DECEMBER MONTHLY	1,242	7	1NOV87 -30NOV87	8	88FEC/497/3502
	YEAR-END	1,222	608	1DEC87 -31DEC87	13	88FEC/501/3613
1988	FEBRUARY MONTHLY	1,458	8	1JAN88 -31JAN88	8	88FEC/509/4612
	MARCH MONTHLY	1,906	612	1FEB88 -29FEB88	6	88FEC/512/5329
	APRIL MONTHLY	6,119	393	1MAR88 -31MAR88	9	88FEC/521/3471
	MAY MONTHLY	1,512	3,447	1APR88 -30APR88	11	88FEC/526/0751
	JUNE MONTHLY	1,833	1,307	1MAY88 -31MAY88	10	88FEC/530/2172
	JUNE MONTHLY - AMENDMENT	1,833	1,307	1MAY88 -31MAY88	11	88FEC/545/2803
	REQUEST FOR ADDITIONAL INFORMATION			1MAY88 -31MAY88	1	88FEC/533/5357
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAY88 -31MAY88	2	88FEC/541/0216
	JULY MONTHLY	1,223	1,758	1JUN88 -30JUN88	11	88FEC/545/2792
	NOTICE OF FAILURE TO FILE			1JUN88 -30JUN88	1	88FEC/541/1790
	AUGUST MONTHLY	1,789	7	1JUL88 -31JUL88	9	88FEC/545/2814
	TOTAL	34,238	0	20,823	0	172 TOTAL PAGES

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ALL REPORTS REVIEWED.

ENDING CASH ON HAND BALANCE AS OF 7/31/88--\$15100.97

DEBTS OWED TO/BY COMMITTEE AS OF 7/31/88--\$0.00



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

February 12, 1988

REPORTING NOTICE FOR MONTHLY FILERS
ELECTION YEAR 1988

The Commission's records indicate that your committee will file monthly reports during 1988. This notice will assist you in complying with the monthly filing requirements.

* * * *

MONTHLY REPORTS

Monthly reports must be filed no later than the 20th day of each month. 11 CFR 104.5(c)(3). Each report must include all financial activity that occurred during the previous month. For example, the next monthly report due in 1988 should be filed by February 20, 1988, and should include all activity between January 1 and January 31, 1988. NOTE: During November, December and January, monthly filers must file Pre- and Post-General election reports and a Year-End report instead of their Monthly reports. (See chart on reverse side.)

You are required to use FEC Form 3X to file each report. Two of them have been enclosed for your use. You may duplicate these forms, or you may call the Information Services Division for additional copies (800/424-9530 or 202/376-3120).

(over)

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MONTHLY REPORTS 1988

REPORT	PERIOD COVERED	REG./CERT.	
		MAILING DATE*	FILING DATE
February	01/01 - 01/31	02/20/88	02/20/88
March	02/01 - 02/29	03/20/88	03/20/88
April	03/01 - 03/31	04/20/88	04/20/88
May	04/01 - 04/30	05/20/88	05/20/88
June	05/01 - 05/31	06/20/88	06/20/88
July	06/01 - 06/30	07/20/88	07/20/88
August	07/01 - 07/31	08/20/88	08/20/88
September	08/01 - 08/31	09/20/88	09/20/88
October	09/01 - 09/30	10/20/88	10/20/88
Pre-General	10/01 - 10/19	10/24/88	10/27/88
Post-General	10/20 - 11/28	12/08/88	12/08/88
Year-End	11/29 - 12/31	01/31/89	01/31/89

COMPLIANCE

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms will be required to refile.

*Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

89040734346



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

August 9, 1988

Linda M. Perras, Treasurer
De Leuw, Cather & Co. Political
Action Committee, A Subcommittee
of the Parsons Corp. PAC
1133 15th Street, NW, 8th Floor
Washington, DC 20005

Identification Number: C00119784

Reference: July Monthly Report (6/1/88-6/30/88)

Dear Ms. Perras:

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

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

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

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

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

890040734347

TELECON

ANALYST: ELIZABETH JONES

CONVERSATION WITH: DELEUM, CATHER & CO. RECEPTIONIST

COMMITTEE: DELEUM, CATHER & CO, PAC

DATE: 9/6/88

SUBJECT: NON-FILING OF JULY MONTHLY AND AUGUST REPORTS

I asked to speak with Linda Ferras but was told that she is no longer with the company. I then asked to speak with the treasurer of the company's PAC. The receptionist said that the new treasurer's name is Zigmund Kobes, but he was out for the day. I told her I would call back tomorrow.

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\$ TYPE DLC2EJ.;3
LF16

TELECON

ANALYST: ELIZABETH JONES

CONVERSATION WITH: ZIGMUND KOBES

COMMITTEE: DELEUM, CATHER & CO. PAC

DATE: 9/7/88

SUBJECT: NON-FILING OF JULY MONTHLY AND AUGUST MONTHLY REPORTS

Mr. Kobes seemed surprised that the reports hadn't been filed. I told him that the committee would have to be referred to OGC if the reports were not filed as soon as possible. He said that the reports would be filed by 9/8/88. I told him he needed to amend the committee's Statement of Organization to establish himself as treasurer, and that he could do it by sending us a letter or a new Form 1. He said he would send the necessary amendment.

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\$ TYPE DLC3EJ.;2

Attachment 6

TELECON

ANALYST: ELIZABETH JONES

CONVERSATION WITH: BARBARA THOMAS

COMMITTEE: DELEUM, CATHER, & CO. PAC

DATE: 9/8/88

SUBJECT: NON-FILING OF JULY MONTHLY AND AUGUST RERORTS

Ms. Thomas, Mr. Kobes' assistant, told me the reports would be here by 9/8/88.

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\$ TYPE DLC4EJ.42

TELECON

ANALYST: ELIZABETH JONES

CONVERSATION WITH: BARBARA THOMAS

COMMITTEE: DELEUN, CATHER & CO. PAC

DATE: 9/8/88

SUBJECT: NON-FILING OF JULY MONTHLY AND AUGUST MONTHLY REPORTS

Ms. Thomas said she couldn't get the reports to me by today. I told her I couldn't grant her an extension. She said she would get the reports in tomorrow morning. She also said that she had told Mr. Kobes that the reports had been filed.

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REPORT OF RECEIPTS AND DISBURSEMENTS

Attachment 8

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
REPORTS ANALYSIS DIVISION

08 SEP -9 AM 11:46

USE PREVIOUS EDITIONS OR PRINT

1. NAME OF COMMITTEE (in full) De Leuw, Cather & Company Political Action Committee A Subcommittee of the Persons Cooperation PAC	
ADDRESS (number and street) 1133 15th Street, N.W. 8th Floor	2. FEC IDENTIFICATION NUMBER 000-119784
CITY, STATE and ZIP CODE Washington, D. C. 20005-2701	3. <input type="checkbox"/> This committee qualified as a multicandidate committee during THIS Reporting Period on _____ (date).

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Termination Report
- Monthly Report Due On:
 February 28 June 30 October 30
 March 30 July 30 November 30
 April 30 August 30 December 30
 May 30 September 30 January 31
- Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- Thirtieth day report following the General Election on _____ in the State of _____
- (b) Is this Report an Amendment? YES NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	6/1/88 through 6/30/88		
6. (a) Cash on Hand January 1, 19 88			\$ 6,791.80
(b) Cash on Hand at Beginning of Reporting Period		\$ 13,853.28	
(c) Total Receipts (from Line 18)		\$ 1,223.59	\$14,054.45
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 15,076.87	\$20,846.25
7. Total Disbursements (from Line 28)		\$ 1,758.08	\$ 7527.46
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 13,318.79	\$13,318.79
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$	For further information contact: Federal Election Commission 990 E Street, NW Washington, DC 20463 Toll Free 800-424-6530 Local 202-376-3130
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$	

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

Type or Print Name of Treasurer
ZIGMUND KOBES

Signature of Treasurer
Zigmund Kobes

Date
9/8/88

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

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FEC FORM 3X
(revised 4/87)

2040734352-887354352

Thus, the due date for the 1988 July Monthly Report was July 20, 1988.

The Committee did not file its 1988 July Monthly Report until September 9, 1988, fifty (50) days late. Accordingly, the Office of the General Counsel recommends that the Commission open a Matter Under Review and find reason to believe that the Committee and its treasurer violated 2 U.S.C. § 434(a)(4)(B).

B. Change of Treasurer

The Act provides that any change in information previously submitted in a Statement of Organization shall be reported in accordance with Section 432(g) no later than 10 days after the date of the change. 2 U.S.C. § 433(c).

The RAD Referral Materials indicate that the treasurer of record for the Committee (Linda Perras) was no longer treasurer of the Committee at the time RAD contacted the Committee. See Attachment I at 2, 8 and 12. A review of the Committee's reports shows that Zigmund Kobes has been the treasurer of the Committee and signing the Committee's reports as of the 1988 May Monthly Report, filed May 20, 1988. The Committee filed an amendment to its Statement of Organization to report this change on September 15, 1988, several months after the Committee changed treasurers.

Accordingly, the Office of the General Counsel also recommends that the Commission find reason to believe that the Committee and its treasurer violated 2 U.S.C. § 433(c) by not

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reporting the change in the Committee's treasurers no later than 10 days after the date of the change.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

29040734355

IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parsons Corporation PAC, and Zigmund Kobes, as treasurer, violated 2 U.S.C. 433(c) and 2 U.S.C. § 434(a)(4)(B), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached letter, factual and legal analysis, and proposed conciliation agreement.

Lawrence M. Noble
General Counsel

10-21-88

Date



BY: Lois G. Lerner
Associate General Counsel

Attachments

1. Referral Materials
2. Proposed Conciliation Agreement
3. Letter and Factual and Legal Analysis

Staff Person: Janice Lacy

99040734355

BEFORE THE FEDERAL ELECTION COMMISSION

(MUR)
2746

In the Matter of)	
)	
De Leuw, Cather & Company Political)	RAD Ref. 88NF-47
Action Committee, a Subcommittee of)	
the Parsons Corporation PAC)	
Zigmund Kobes, as treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 26, 1988, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 88NF-47:

1. Open a MUR.
2. Find reason be believe that the De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parsons Corporation PAC, and Zigmund Kobes, as treasurer, violated 2 U.S.C. 433(c) and 2 U.S.C. § 434(a)(4)(B), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the letter, factual and legal analysis, and proposed conciliation agreement, as recommended in the First General Counsel's report signed October 21, 1988.

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

Attest:

Oct. 26, 1988

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Fri.,	10-21-88,	2:35
Circulated on 48 hour tally basis:	Mon.,	10-24-88,	11:00
Deadline for vote:	Wed.,	10-26-88,	11:00

jm

89040734357

7/11/88



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 2, 1988

Zigmund Kobes, Treasurer
De Leuw, Cather & Company
Political Action Committee,
a Subcommittee of the
Parsons Corporation PAC
1133 15th Street, NW, 8th Floor
Washington, D.C. 20005

RE: MUR 2746
De Leuw, Cather & Company
Political Action
Committee, a Subcommittee
of the Parsons Corporation
PAC, and Zigmund Kobes,
as treasurer

Dear Mr. Kobes:

On October 26, 1988, the Federal Election Commission found that there is reason to believe De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parsons Corporation PAC, ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 433(c) and 434(a)(4)(B), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's findings, 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.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement

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Zigmund Kobes, Treasurer
Page 2

of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, 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.

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 ordinarily will not 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.

This matter will remain 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 Janice Lacy, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Thomas J. Josefiak
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

39040754359

7/1/89



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 12, 1989

=

HAND DELIVERED

Zigmund Kobes, Treasurer
De Leuw, Cather & Company
Political Action Committee,
a Subcommittee of the
Parsons Corporation PAC
1133 15th Street, NW, 8th Floor
Washington, D.C. 20005

Re: MUR 2746
De Leuw, Cather & Company
Political Action
Committee, a Subcommittee
of the Parsons Corporation
PAC, and Zigmund Kobes,
as treasurer

Dear Mr. Kobes:

On November 2, 1988, you were notified that the Federal Election Commission found reason to believe that De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parsons Corporation PAC, and you, as treasurer, violated 2 U.S.C. §§ 433(c) and 434(a)(4)(B). On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter. We understand from your conversation with Janice Lacy, the attorney assigned to this matter, that you never received the notification letter and conciliation agreement. We have enclosed a copy of the November 2 notification letter and its attachments, including another conciliation agreement.

The attached letter provides time limits by which you may submit materials to this Office or pursue preprobable cause conciliation. Given the circumstances in this matter, these time periods will run from the date that you receive this letter.

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Zigmund Kobes
Page 2

Should you have any questions, please contact Janice Lacy at
(202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosure

Letter from Thomas J. Josefiak
dated November 2, 1988, and
attachments

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BEFORE THE FEDERAL ELECTION COMMISSION

89 JAN 18 PM 12: 12

In the Matter of)

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)
De Leuw, Cather & Company)
Political Action Committee, a)
Subcommittee of the Parsons)
Corporation PAC, and Zigmund Kobes,)
as treasurer)

MUR 2746

SENSITIVE

GENERAL COUNSEL'S REPORT

On October 26, 1988, the Commission found that there is reason to believe De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parsons Corporation PAC, ("Committee") and Zigmund Kobes, as treasurer, violated 2 U.S.C. §§ 433(c) and 434(a)(4)(B). At that time, the Commission also authorized the commencement of conciliation with the Respondents prior to a finding of probable cause to believe. Subsequently, the Respondents informed this Office that they had not received the notification letter and conciliation agreement. This Office has re-sent these documents to the Respondents, and has requested that they respond within fifteen days of their receipt. Accordingly, the Office of General Counsel has concluded that an extension of the conciliation period would facilitate the conclusion of a satisfactory settlement with the Respondents.

Lawrence M. Noble
General Counsel

1/27/89
Date _____

BY: 
Lois G. Lerner
Associate General Counsel

Staff Member: Janice Lacy

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**DeLEUW
CATHER
PAC**

06C1655
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 JAN 24 AM 8:56

January 19, 1989

CERTIFIED MAIL

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
Washington, D. C. 20461

Re: MUR 2746
De Leuw, Cather & Company Political Action Committee,
a Subcommittee of the Parsons Corporation PAC, and
Zigmund Kobes, as Treasurer

Dear Mr. Noble:

I have elected to pursue preprobable cause conciliation in the above-referenced matter and enclose payment of \$250.00 as civil penalty along with the executed conciliation agreement.

While fully accepting responsibility for failing to observe the requirements of the U.S.C. provisions cited in the conciliation agreement, I have previously explained to the Federal Election Commission that my assumption of the duties of Treasurer in the midst of a general election year coupled with reliance on the record-keeping of a long-term employee of the corporation resulted in the cited lapses in filing. The employee in question resigned without notice in the first week of November, 1988 after having concealed several notices of failure to file, including the conciliation action issued by your office on November 2, 1988.

I express the regrets of our company at the violations of Federal Statutes represented by the lapses in filing and notice which occurred and I wish to assure you that steps have been taken to avoid any such occurrences in the future.

Yours sincerely,

Zigmund G. Kobes
Zigmund G. Kobes, Treasurer
De Leuw, Cather & Company PAC

Enclosures

89 JAN 25 PM 3:33

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MONEY MARKET INVESTMENT ACCOUNT
DE LEUW, CATHER & COMPANY
POLITICAL ACTION COMMITTEE
1133 15TH STREET, N.W.
WASHINGTON, D.C. 20005-2701

139

January 19 1989 ¹⁵⁻⁴/₅₄₀ 19

PAY TO THE ORDER OF *****FEDERAL ELECTION COMMISSION*****

\$250.00*

*** TWO HUNDRED FIFTY & 00/100***

DOLLARS

1st AMERICAN
FIRST AMERICAN BANK NA, WASHINGTON, DC

FOR Civil Penalty - MUR 2746

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James H. Kober
James H. Kober

06C1655

MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER
FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

19 JAN 25 11 3:33

CHECK NO. 139 [A COPY OF WHICH IS ATTACHED] RELATING TO
MUR 2746 AND NAME De Leuw, Cather & Company Political Action
(Lacy) Committee, a Subcommittee of the Parsons
WAS RECEIVED ON 1/25/89 Corporation PAC. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

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

SIGNATURE Debra A. Trimiew DATE 1/26/89

BEFORE THE FEDERAL ELECTION COMMISSION

89FEB-8 AM11:16

In the Matter of)
)
De Leuw, Cather & Company Political Action)
Committee, a Subcommittee of the Parsons)
Corporation PAC, and Zigmund Kobes, as treasurer)

MUR 2746

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Zigmund G. Kobes, the treasurer of De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parsons Corporation PAC.

The attached agreement contains no changes from the agreement approved by the Commission on October 26, 1988. The Commission has received a check for the civil penalty.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parsons Corporation PAC, and Zigmund Kobes, as treasurer.
2. Close the file as to De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parsons Corporation PAC, and Zigmund Kobes, as treasurer.
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

2/7/89
Date

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

Attachments

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

Staff Assigned: Janice Lacy

89740734365

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
De Leuw, Cather & Company Political Action) MUR 2746
Committee, a Subcommittee of the Parsons)
Corporation PAC, and Zigmund Kobes, as)
treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 10, 1989, the Commission decided by a vote of 5-0 to take the following actions in MUR 2746:

1. Accept the conciliation agreement with De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parsons Corporation PAC, and Zigmund Kobes, as treasurer, as recommended in the General Counsel's report signed February 7, 1989.
2. Close the file as to De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parsons Corporation PAC, and Zigmund Kobes, as treasurer.
3. Approve the letter, as recommended in the General Counsel's report signed February 7, 1989.

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

Attest:

2-10-89
Date

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

Received in the Office of Commission Secretary: Wed., 2-8-89, 11:15
Circulated on 48 hour tally basis: Wed., 2-8-89, 4:00
Deadline for vote: Fri., 2-10-89, 4:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

February 16, 1989

Mr. Zigmund Kobes, Treasurer
De Leuw, Cather & Company
Political Action Committee,
a Subcommittee of the
Parsons Corporation PAC
1133 15th Street, N.W., 8th Floor
Washington, D.C. 20005

RE: MUR 2746
De Leuw, Cather & Company
Political Action Committee,
a Subcommittee of the Parsons
Corporation PAC, and Zigmund
Kobes, as treasurer

Dear Mr. Kobes:

On February 10, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of violations of 2 U.S.C. §§ 433(c) and 434(a)(4)(B), provisions 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

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Zigmund Kobes
Page 2

questions, please contact Janice Lacy, the attorney assigned to
this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
De Leuw, Cather & Company Political) MUR 2746
Action Committee, a Subcommittee)
of the Parsons Corporation PAC,)
and Zigmund Kobes, 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 De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parsons Corporation PAC, and Zigmund Kobes, as treasurer, ("Respondents") violated 2 U.S.C. § 433(c) and 2 U.S.C. § 434(a)(4)(B).

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. De Leuw, Cather & Company Political Action Committee, a subcommittee of the Parsons Corporation PAC, is a political committee within the meaning of 2 U.S.C. § 431(4).

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2. Respondent, Zigmund Kobes, is the treasurer of De Leuw, Cather & Company Political Action Committee, a Subcommittee of the Parson Corporation PAC.

3. Section 434(a)(4)(B) of Title 2 provides that all political committees other than authorized committees of a candidate shall file monthly reports in all calendar years which shall be filed no later than the 20th day after the last day of the month.

4. Respondents were required to file the 1988 July Monthly Report no later than July 20, 1988. Respondents filed the 1988 July Monthly Report on September 9, 1988, fifty days late. The total amount of financial activity disclosed was \$2,981.67.

5. Section 433(c) of Title 2 provides that any change in information previously submitted in a Statement of Organization shall be reported in accordance with Section 432(g) no later than 10 days after the date of the change.

6. Zigmund Kobes replaced Linda Perras as treasurer as of the 1988 May Monthly Report, filed May 20, 1988. The Respondents reported this change to the Commission on September 15, 1988.

V. 1. Respondents failed to file the 1988 July Monthly Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(B).

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2. Respondents failed to report a change in information previously submitted in a Statement of Organization within 10 days of such change in violation of 2 U.S.C. § 433(c).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of two hundred and fifty dollars (\$250.00), 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 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

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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

BY: *L. G. Lerner* *2/15/89*
Lois G. Lerner Date
Associate General Counsel

FOR THE RESPONDENTS:

Zigmund G. Kobes January 19, 1989
(Name) Zigmund G. Kobes Date
(Position) Treasurer

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FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20463

THIS IS THE END OF MUR # 2746

DATE FILMED 3/13/89 CAMERA NO. 3

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