



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1842

DATE FILMED 5/19/89 CAMERA NO. 4

CAMERAMAN J.A.O.

89040750064

REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: February 14, 1989

ANALYST: Anthony Raymond

I. COMMITTEE: Masters, Mates and Pilots Political
 Contribution Fund
 Harry Seidman, Treasurer
 (C00073056)
 700 Maritime Blvd., Suite 500
 Linthicum Heights, MD 21090

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

III. BACKGROUND:

Failure to Timely File Reports

The Masters, Mates and Pilots Political Contribution Fund ("the Fund") failed to file three (3) Reports of Receipts and Disbursements in a timely manner for the 1987-88 election cycle (see chart). The reports were filed between seven (7) and forty (40) calendar days late.

On November 4, 1988, a Chronic Late Filer Notice was sent to the Fund for failing to file the 1988 July Quarterly and 1988 October Quarterly Reports in a timely manner (Attachment 7). The Notice advised the Fund that any additional late filing of reports could result in legal enforcement action. Subsequent to the sending of the Chronic Late Filer Notice, the Fund filed the 1988 30 Day Post-General report late (Attachment 9).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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LATE FILING HISTORY

<u>REPORT TYPE</u>	<u>PRIOR NOTICE</u>	<u>DATE DUE</u>	<u>NON-FILER NOTICE</u>	<u>DATE FILED</u>
1988 July Quarterly (4/1/88-6/30/88)	6/21/88 (Attachment 2)	7/15/88	N/A	8/1/88 (Attachment 3)
1988 October Quarterly (7/1/88-9/30/88)	9/21/88 (Attachment 4)	10/15/88	N/A	10/22/88 (Attachment 6)
1988 30 Day Post-General (10/1/88-11/28/88)	10/3/88 (Attachment 5)	12/8/88	1/6/89 (Attachment 8)	1/17/89 (Attachment 9)

8 9 0 4 0 7 5 0 0 6 7

FEDERAL ELECTION COMMISSION

1987-1988

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 1FEB89

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
MASTERS, MATES AND PILOTS POLITICAL CONTRIBUTION FUND				ID #C00073056 NON-PARTY QUALIFIED		
CONNECTED ORGANIZATION: MASTERS MATES & PILOTS; INT'L						
1987	APRIL QUARTERLY	27,748	21,851	1JAN87 -31MAR87	11	87FEC/465/1223
	JULY QUARTERLY	22,206	32,891	1APR87 -30JUN87	11	87FEC/474/3213
	OCTOBER QUARTERLY	15,089	23,538	1JUL87 -30SEP87	14	87FEC/491/3208
	YEAR-END	25,800	18,238	1OCT87 -31DEC87	17	88FEC/503/1322
1988	MISCELLANEOUS NOTICE FROM FEC			4NOV88	1	88FEC/564/4884
	APRIL QUARTERLY	18,397	15,500	1JAN88 -31MAR88	9	88FEC/519/5217
	JULY QUARTERLY	23,078	32,773	1APR88 -30JUN88	10	88FEC/540/3018
	OCTOBER QUARTERLY	21,696	20,231	1JUL88 -30SEP88	11	88FEC/557/3853
	POST-GENERAL	13,279	14,500	1OCT88 -28NOV88	12	89FEC/577/3563
	NOTICE OF FAILURE TO FILE			28NOV88	1	89FEC/576/2303
	YEAR-END	7,307	0	29NOV88 -31DEC88	4	89FEC/577/3646
	TOTAL	174,600	0		101	TOTAL PAGES

All reports have been reviewed

Debts and obligations owed by the committee as of 12/31/88: \$-0-

Debts and obligations owed to the committee as of 12/31/88: \$-0-

Cash on hand as of 12/31/88: \$20,244

ATTACHMENT 1

QUARTERLY REPORT NOTICE

ATTACHMENT 2

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

June 21, 1988

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
July Quarterly	04/01/88**-06/30/88	07/15/88	07/15/88

WHO MUST FILE

PARTY COMMITTEES AND PACS (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) filing on a quarterly basis must file a quarterly report in July.

WHAT MUST BE REPORTED

All financial activity (not previously reported) that occurred during the reporting period.

REPORTING FORMS

Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE

Consult the instructions on the back of the Form 3X Summary Page. Note state filing requirements also.

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with a candidate's primary election, must also file a 12-day Pre-Election Report if the activity was not previously reported. See the January Record.

LAST-MINUTE INDEPENDENT EXPENDITURES

Committees which make an independent expenditure of \$1,000 or more, after the 20th day, but more than 24 hours before an election, must report it within 24 hours.

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.

**From the date of registration, or the close of books of the last report filed, whichever is later.

FOR INFORMATION, Call: 202/376-3120 or 800/424-9530



REPORT OF RECEIPTS AND DISBURSEMENTS

ATTACHMENT 3

For Other Than An Authorized Committee
(Summary Page)

88 AUG -1 119:25

USE FEC MAILING LABEL OR PRINT TYPE OR PRINT

1 NAME OF COMMITTEE (in full) INTERNATIONAL ORGANIZATION OF MASTERS, MATES & PILOTS POLITICAL CONTRIBUTION FUND	2 FEC IDENTIFICATION NUMBER C00073056
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 700 MARITIME BLVD.	3 <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)
CITY, STATE and ZIP CODE LINTHICUM HEIGHTS, MARYLAND 21090	

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
- | | | |
|--------------------------------------|---------------------------------------|--------------------------------------|
| <input type="checkbox"/> February 20 | <input type="checkbox"/> June 20 | <input type="checkbox"/> October 20 |
| <input type="checkbox"/> March 20 | <input type="checkbox"/> July 20 | <input type="checkbox"/> November 20 |
| <input type="checkbox"/> April 20 | <input type="checkbox"/> August 20 | <input type="checkbox"/> December 20 |
| <input type="checkbox"/> May 20 | <input type="checkbox"/> September 20 | <input type="checkbox"/> 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

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SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period <u>4-1-88</u> through <u>6-30-88</u>		
6	(a) Cash on Hand January 1, 19__		\$ 19,489.42
	(b) Cash on Hand at Beginning of Reporting Period	\$ 22,386.80	
	(c) Total Receipts (from Line 18)	\$ 23,078.96	\$ 41,476.34
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 45,465.76	\$ 60,965.76
7	Total Disbursements (from Line 28)	\$ 32,773.60	\$ 48,273.60
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 12,692.16	\$ 12,692.16
9	Debits and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact:
10	Debits and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$	Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800 424 9530 Local 202 378 3120

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 **HARRY SEIDMAN**

Signature of Treasurer
Harry Seidman

Date
7-28-88

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §411g

FEC FORM 3X
(revised 4-87)

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 21, 1988

REPORT	REPORTING PERIOD	REG./CERT.	
		MAILING DATE*	FILING DATE
October Quarterly	07/01/88**-09/30/88	10/15/88	10/15/88

WHO MUST FILE

PARTY COMMITTEES AND PACs (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) filing on a quarterly basis must file a quarterly report in October.

WHAT MUST BE REPORTED

All financial activity (not previously reported) that occurred during the reporting period.

REPORTING FORMS

Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE

Consult the instructions on the back of the Form 3X Summary Page. Note State filing requirements also.

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with a candidate's primary or general election, must also file a 12-day Pre-Election Report if the activity was not previously reported. See the January Record.

LAST-MINUTE INDEPENDENT EXPENDITURES

Committees which make an independent expenditure of \$1,000 or more, after the 20th day, but more than 24 hours before an election, must report it within 24 hours.

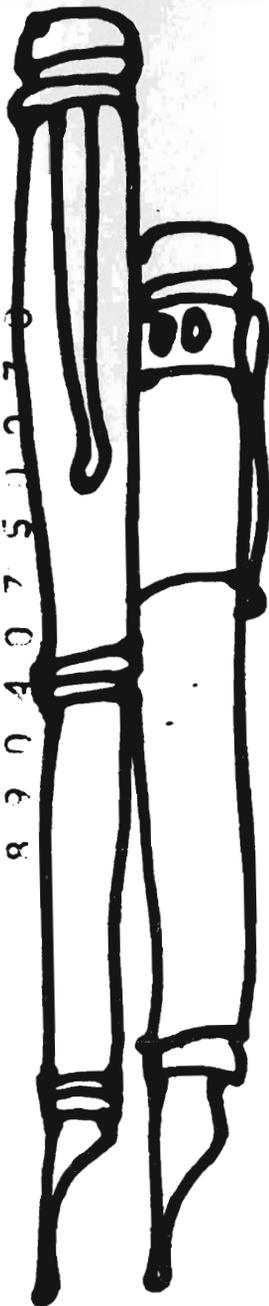
COMPLIANCE

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.

**From the date of registration, or the close of books of the last report filed, whichever is later.

FOR INFORMATION, Call: 202/376-3120 or 800/424-9530



GENERAL ELECTION REPORT NOTICE

ATTACHMENT 5
(Page 1 of 2)

FEDERAL ELECTION COMMISSION

PARTIES AND PACs

October 3, 1988

I. ALL MONTHLY FILERS

Report	Reporting Period	Reg./Cert.	
		Mailing Date*	Filing Date
Pre-General	10/01/88**-10/19/88	10/24/88	10/27/88
Post-General	10/20/88 -11/28/88	12/08/88	12/08/88

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 19***

Report	Reporting period	Reg./Cert.	
		Mailing Date*	Filing Date
Pre-General	10/01/88**-10/19/88	10/24/88	10/27/88
Post-General	10/20/88 -11/28/88	12/08/88	12/08/88

III. QUARTERLY FILERS WHICH DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 19***

Report	Reporting Period	Reg./Cert.	
		Mailing Date*	Filing Date
Post-General	10/01/88**-11/28/88	12/08/88	12/08/88

WHO MUST FILE

Party committees and PACs must follow the above charts in order to determine whether they must file the pre-general election report. All Party committees and PACs, regardless of financial activity, must file the post-general election report.

WHAT MUST BE REPORTED

All financial activity (not previously reported) that occurred during the reporting period.

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

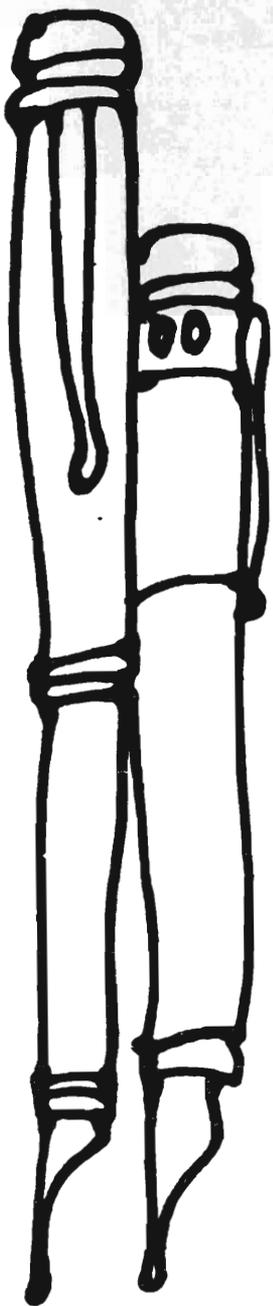
**Or from the date of registration, or the close of books of the last report filed, whichever is later.

***Committees that made general election contributions or expenditures prior to October 1 which have not been previously reported must also follow the Chart II reporting requirements.

FOR INFORMATION, Call: 202/376-3120 or 800/424-9530

(over)

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REPORTING FORMS

Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE

Consult the instructions on the back of the Form 3X Summary Page.
Note State filing requirements also.

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

LAST-MINUTE INDEPENDENT EXPENDITURES

Any PAC which makes any independent expenditures aggregating \$1,000 or more during the period beginning October 20 and ending November 6 must report them within 24 hours. Call the FEC for more information.

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.

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REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

ATTACHMENT 6
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

08 OCT 22 AM 9:25

SEE FEC BULLETIN LABEL
ON TYPE ON PARTY

1. NAME OF COMMITTEE (in full) International Organization of Masters, Mates & Pilots Political Contribution Fund ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 700 Maritime Blvd.		2. FEC IDENTIFICATION NUMBER 000073056
CITY, STATE and ZIP CODE Linthicum, Md. 21090		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 11 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Termination Report
- Monthly Report Due On:
 February 20 June 20 October 20
 March 20 July 20 November 20
 April 20 August 20 December 20
 May 20 September 20 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

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
7-1-88 through 9-30-88		
6 (a) Cash on Hand January 1, 19____		\$ 19,489.42
(b) Cash on Hand at Beginning of Reporting Period	\$ 12,692.16	
(c) Total Receipts (from Line 18)	\$ 21,696.46	\$ 63,172.80
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 34,388.62	\$ 82,662.22
7 Total Disbursements (from Line 28)	\$ 20,231.00	\$ 68,504.60
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 14,157.62	\$ 14,157.62
9 Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	
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

Harry Seidman, Comptroller

Signature of Treasurer

Harry Seidman

Date

10-17-88

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

FEC FORM 3X

Revised 4-87

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

MS-L

NOV - 4 1988

Harry Seidman, Treasurer
Masters, Mates and Pilots Political
Contribution Fund
700 Maritime Boulevard, Suite 500
Linthicum Heights, MD 21090

Identification Number: C00073056

Reference: 1987-1988 Election Cycle Reports

Dear Mr. Seidman:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. §434(a), by failing to timely file Reports of Receipts and Disbursements. The following is a list of the reports in question.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
July Quarterly (4/1/88-6/30/88)	07/15/88	08/01/88
October Quarterly (7/1/88-9/30/88)	10/15/88	10/22/88

Timely filing is a specific requirement of the Federal Election Campaign Act ("the Act") and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views the untimely filing of reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending before the Commission, any additional report which is not submitted in a timely manner by your committee may result in the Commission initiating legal enforcement or audit action.

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Anthony Raymond on our toll-free number, (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

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

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FEDERAL ELECTION COMMISSION
 WASHINGTON, DC 20461

80-7

January 6, 1989

Harry Seidman, Treasurer
 Masters, Mates and Pilots Political
 Contribution Fund
 700 Maritime Blvd., Suite 500
 Linthicum Heights, MD 21090

Identification Number: C00073056

Reference: 30 Day Post-General Report (through 11/28/88)

Dear Mr. Seidman:

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 Anthony Raymond 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

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REPORT OF RECEIPTS AND DISBURSEMENTS

ATTACHMENT 9

For Other Than An Authorized Committee
(Summary Page)

FEDERAL ELECTION COMMISSION

89 JAN 17 PH 1:31

USE FEC LABELING LABEL OR TYPE OR PRINT

1 NAME OF COMMITTEE (in full) International Organization of Masters, Mates & Pilots Political Contribution Fund ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 700 Maritime Blvd. CITY, STATE and ZIP CODE Linthicum Hgts., Md. 21090		2 FEC IDENTIFICATION NUMBER C 00073056
		3 This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (Date)

4. TYPE OF REPORT

- (a) April 15 Quarterly Report Monthly Report Due On _____
- July 15 Quarterly Report February 20 June 20 October 20
- October 15 Quarterly Report March 20 July 20 November 20
- January 31 Year End Report April 20 August 20 December 20
- July 31 Mid Year Report (Non election Year Only) May 20 September 20 January 31
- Twelfth day report preceding _____ (Type of Election)
- election on _____ in the State of _____
- Thirtieth day report following the General Election on _____
- Termination Report Post General Report 11-8-88 in the State of Md.
Due 12-08-88

b Is this Report an Amendment? YES NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5 Covering Period <u>10-1-88</u> through <u>11-25-88</u>		
6 a Cash on Hand January 1, 19 <u>88</u>		\$ 19,489.42
b Cash on Hand at Beginning of Reporting Period	\$ 14,157.62	
c Total Receipts (from Line 18)	\$ 13,279.37	\$ 76,452.17
d Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 27,436.99	\$ 95,944.59
7 Total Disbursements (from Line 28)	\$ 14,500.00	\$ 83,004.60
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 12,936.99	\$ 12,936.99
9 Debts and Obligations Owed TO the Committee (itemize all on Schedule C and or Schedule D)	\$ 0.00	
10 Debts and Obligations Owed BY the Committee (itemize all on Schedule C and or Schedule D)	\$ 0.00	

For further information contact:
Federal Election Commission
999 E Street NW
Washington, DC 20542
Tel: Free 800 424-9541
Voice 202 375-3000

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

Type of Election of Treasurer

Signature of Treasurer

FEC FORM 3X

89 MAR -8 AM 11:03

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

FIRST GENERAL COUNSEL'S REPORT

RAD Referral # 89NF-27
Staff Member Kenneth Kellner

SENSITIVE
EXECUTIVE SESSION

MAR 28 1989

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

RESPONDENTS: Masters, Mates and Pilots Political Contribution
Fund and Harry Seidman, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(A)(i)
2 U.S.C. § 434(a)(4)(A)(iii)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

On February 14, 1989, the Reports Analysis Division ("RAD") made a referral of alleged violations to the Office of the General Counsel. (Attachment I). The referral alleges that the Masters, Mates and Pilots Political Contribution Fund and Harry Seidman, as treasurer (the "Committee"), failed to file in a timely manner its 1988 July Quarterly Report, 1988 October Quarterly Report and 1988 30 Day Post-General Report.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended (the "Act"), at Section 434(a)(4)(A)(i) requires unauthorized committees to file quarterly reports no later than the 15th day after the last day of each calendar quarter delineating the committee's receipts and disbursements during the preceding quarter.

Under 2 U.S.C. § 434(a)(4)(A)(iii), unauthorized committees are further required to file a post-general election report no

89040750077

later than the 30th day after the general election delineating the committee's receipts and disbursements as of the 20th day after the general election.

The Committee was required to file its 1988 July Quarterly Report on July 15, 1988. The report was filed on August 1, 1988, 17 days late. The Committee was required to file its 1988 October Quarterly Report on October 15, 1988. This report was filed on October 22, 1988, seven days late.

Accordingly, the Office of the General Counsel recommends that the Commission find reason to believe the Masters, Mates and Pilots Political Contribution Fund and Harry Seidman, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i).

The Committee was required to file its 1988 30 Day Post-General Report on December 8, 1988. The report was filed on January 17, 1989, 40 days late.

Accordingly, the Office of the General Counsel recommends that the Commission find reason to believe the Masters, Mates and Pilots Political Contribution Fund and Hary Seidman, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii).

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III. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe the Masters, Mates and Pilots Political Contribution Fund and Harry Seidman, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii).
3. Enter into conciliation with the Masters, Mates and Pilots Political Contribution Fund and Harry Seidman, as treasurer, prior to a finding of probable cause to believe.

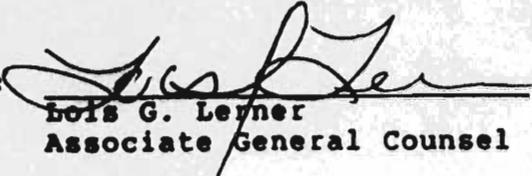
4. Approve the attached letter, Factual and Legal Analysis, and proposed conciliation agreement.

Lawrence M. Noble
General Counsel

Date

3/7/89

BY:


Lois G. Lerner
Associate General Counsel

Attachments

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

89040750090

BEFORE THE FEDERAL ELECTION COMMISSION

(MUR
2842)

In the Matter of)	
)	
Masters, Mates and Pilots)	RAD Referral 89NF-27
Political Contribution Fund)	
and Harry Seidman, as)	
treasurer)	

CERTIFICATION

I, Hilda Arnold, recording secretary for the Federal Election Commission executive session of March 28, 1989, do hereby certify that the Commission decided by a vote of 4-0 to take the following actions in RAD Referral 89NF-27:

1. Open a MUR.
2. Find reason to believe the Master, Mates and Pilots Political Contribution Fund and Harry Seidman, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii).
3. Enter into conciliation with the Masters, Mates and Pilots Political Contribution Fund and Harry Seidman, as treasurer, prior to a finding of probable cause to believe.
4. Approve the letter, Factual and Legal Analysis, and proposed conciliation agreement.

Commissioners Aikens, Josefiak, McDonald and Thomas voted affirmatively for this decision. Commissioners Elliott and McGarry were not present.

Attest:

March 29, 1989

Date

Hilda Arnold

Hilda Arnold
Administrative Assistant

89040750081



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 4, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Harry Seidman, Treasurer
Masters, Mates and Pilots Political
Contribution Fund
700 Maritime Blvd., Suite 500
Linthicum Heights, MD 21090

RE: MUR 2842
Masters, Mates and Pilots
Political Contribution
Fund and Harry Seidman, as
treasurer

Dear Mr. Seidman:

On March 28, 1989, the Federal Election Commission found that there is reason to believe the Masters, Mates and Pilots Political Contribution Fund ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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Harry Seidman
Page 2

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 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.

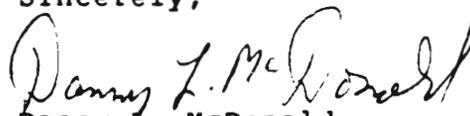
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Kenneth E. Kellner, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

89040750083



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

April 20, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Harry Seidman, Treasurer
Masters, Mates and Pilots Political
Contribution Fund
700 Maritime Blvd., Suite 500
Linthicum Heights, MD 21090

RE: MUR 2842
Masters, Mates and Pilots
Political Contribution
Fund and Harry Seidman, as
treasurer

Dear Mr. Seidman:

On April 4, 1989, you were notified that the Federal Election Commission determined to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. On that same date you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that conciliation negotiations entered into prior to a finding of probable cause to believe are limited to a maximum of 30 days. To date, you have not responded to the proposed agreement. The 30 day period for negotiations will soon expire. Unless we receive a response from you within five days, this Office will consider these negotiations terminated and will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Kenneth E. Kellner, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Acting Associate General Counsel

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International Organization
of Masters, Mates & Pilots

POLITICAL CONTRIBUTION FUND

AFL-CIO

89 APR 19 PM 3:53

April 17, 1989

Mr. Danny L. McDonald, Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 2842
Masters, Mates and Pilots
Political Contribution
Fund and Harry Seidman, as
treasurer

Dear Mr. Chairman:

I am writing in behalf of the Masters, Mates & Pilots Political Contribution Fund to inform you of our decision to enter into a conciliation agreement in settlement of the above-referenced matter. The agreement approved by the commission has been signed and it, along with the civil penalty assessed, are enclosed.

We feel it important to note for the record that the delays in filing the requisite quarterly and post-general election reports were entirely inadvertent. In fact, the delays were a direct result of our practice to provide only the most up-to-date information to the FEC. In our effort to do so, we unintentionally allowed delays in our receipt of the necessary information to cause the delays in our submissions to the commission.

In short, our internal procedures in place to ensure we file the most complete reports resulted in complete but late reports. These procedures have been changed to guarantee the timely filing of reports with the Commission.

Sincerely,

Harry Seidman
Harry Seidman
Treasurer

Enclosures
HS/jen

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RECEIVED
FEDERAL ELECTION COMMISSION

262 2537

89 APR 25 PM 3:49

BEFORE THE FEDERAL ELECTION COMMITTEE

In the Matter)
)
 Masters, Mates and Pilots Political) MUR 2842
 Contribution Fund and Harry Seidman,)
 as treasurer)
)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND AND DISCUSSION OF CONCILIATION PROVISIONS

Attached is a conciliation agreement which has been signed by Harry Seidman, the treasurer of the Masters, Mates and Pilots Political Contribution Fund (the "Committee").

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This Office recommends that the Commission accept the

attached conciliation agreement with the Masters, Mates and Pilots Political Contribution Fund and Harry Seidman, as treasurer, and close the file.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Masters, Mates and Pilots Political Contribution Fund and Harry Seidman, as treasurer
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

April 26, 1989
Date

BY: George F. Rishel
George F. Rishel
Acting Associate General
Counsel

Attachments

1. Committee response
2. Conciliation Agreement
3. Copy of civil penalty check
4. Letter to Respondent

Staff Assigned: Kenneth Kellner

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Masters, Mates and Pilots Political)
Contribution Fund and Harry Seidman,)
as treasurer)

MUR 2842

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 1, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 2842:

1. Accept the conciliation agreement with the Masters, Mates and Pilots Political Contribution Fund and Harry Seidman, as treasurer, as recommended in the General Counsel's report signed April 26, 1989.
2. Close the file
3. Approve the letter, as recommended in the General Counsel's report signed April 26, 1989.

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

Attest:

May 1, 1989
Date

Hilda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Wed., 4-26-89,	3:49
Circulated on 48 hour tally basis:	Thurs., 4-27-89,	11:00
Deadline for vote:	Mon., 5-01-89,	11:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 3, 1989

=

Harry Seidman, Treasurer
Masters, Mates and Pilots Political
Contribution Fund
700 Maritime Blvd., Suite 500
Linthicum Heights, MD 21090

RE: MUR 2842
Masters, Mates and Pilots
Political Contribution
Fund and Harry Seidman, as
treasurer

Dear Mr. Seidman:

On May 1, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. § 434(a)(2)(A)(i) and (iii), 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.

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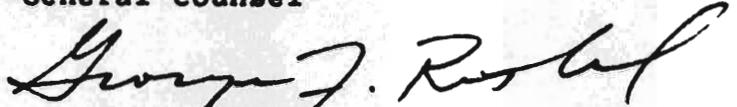
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Harry Seidman
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Kenneth E. Kellner, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel



BY: George F. Rishel
Acting Associate General
Counsel

Enclosure
Conciliation Agreement

89040750090

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Masters, Mates and Pilots) MUR 2842
Political Contribution Fund)
and Harry Seidman, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Masters, Mates and Pilots Political Contribution Fund and Harry Seidman, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii).

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. The Masters, Mates and Pilots Political Contribution Fund is a political committee within the meaning of 2 U.S.C. § 431(4).

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2. Harry Seidman is the treasurer of the Masters, Mates and Pilots Political Contribution Fund.

3. 2 U.S.C. § 434(a)(4)(A)(i) requires unauthorized committees to file quarterly reports no later than the 15th day after the last day of each calendar quarter delineating the committee's receipts and disbursements during the preceding quarter.

4. 2 U.S.C. § 434(a)(4)(A)(iii) requires unauthorized committees to file a post-general election report no later than the 30th day after the general election delineating the committee's receipts and expenditures as of the 20th day after the general election.

5. Respondents were required to file the 1988 July Quarterly Report no later than July 15, 1988. Respondents filed the 1988 July Quarterly Report on August 1, 1988, 17 days late, disclosing \$23,078 in receipts and \$32,773 in disbursements.

6. Respondents were required to file the 1988 October Quarterly Report no later than October 15, 1988. Respondents filed the 1988 October Quarterly Report on October 22, 1988, seven days late, disclosing \$21,696 in receipts and \$20,231 in disbursements.

7. Respondents were required to file the 1988 30 Day Post-General Report on December 8, 1988. Respondents filed the 1988 30 Day Post-General Report on January 17, 1989, 40 days late, disclosing \$13,279 in receipts and \$14,500 in disbursements.

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V. 1. Respondents failed to file the 1988 July Quarterly Report and the 1988 October Quarterly Report in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(A)(i).

2. Respondents failed to file the 1988 30 Day Post-General Report in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(A)(iii).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of two thousand six hundred dollars (\$2,600), 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 executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: George F. Rishel
George F. Rishel
Acting Associate General Counsel

May 3, 1989
Date

FOR THE RESPONDENTS:

Harry Sedman, Treasurer
Name
Position

April 17, 1989
Date

89040750094



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2842

DATE FILMED 5/19/89 CAMERA NO. 4

CAMERAMAN J.A.D.

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