



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3278

DATE FILMED 8/22/91 CAMERA NO. 1

CAMERAMAN AS

91040855305



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

4 February 1991

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF MONTHLY UNAUTHORIZED COMMITTEES
FOR FAILING TO FILE THE 1990 12 DAY PRE-GENERAL
REPORT BY ELECTION DAY

91040355306

Attached is a listing of thirty-five (35) monthly unauthorized committees which failed to file the 1990 12 Day Pre-General Report by Election Day, November 6, 1990.

For your information, each committee was sent Prior Notice of the due date of the report on October 1, 1990 (Attachment 36). Twenty-nine (29) of the committees were sent Non-Filer Notices on November 15, 1990 (Attachment 37). Six (6) of the committees

were not sent Non-Filer Notices because their 12 Day Pre-General Reports were filed by November 15, 1990.

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

Attachment

C00092809

Armco Employees' Political Action
Committee (APAC)

91NF-20

91040855307

91040855308

ARMC0 EMPLOYEES' POLITICAL ACTION COMMITTEE (APAC)

(Attachment 4a - 4f)

RECEIPTS DISBURSEMENTS 6 OF PAGE TYPE OF FUND

1990 EMPLOYEE EXPENSES (PARTIAL YEAR) 11 0000000000 NON-PARTY DISBURSEMENTS

DESCRIPTION	AMOUNT		DATE	ACCOUNT	AMOUNT	DATE	ACCOUNT
STATEMENT OF ORGANIZATION - AMERICAN							
FEBRUARY MONTHLY	2,543	0		100000	100000		
MARCH MONTHLY	2,543			100000	100000		
APRIL MONTHLY	2,754	2,754		100000	100000		
MAY MONTHLY	3,000	3,000		100000	100000		
JUNE MONTHLY	3,342	3,342		100000	100000		
JULY MONTHLY	3,553	300		100000	100000		
AUGUST MONTHLY	3,147	6,000		100000	100000		
SEPTEMBER MONTHLY	3,143	1,300		100000	100000		
OCTOBER MONTHLY	3,136	1,500		100000	100000		
NOVEMBER MONTHLY	3,230	300		100000	100000		
DECEMBER MONTHLY	3,224	2,000		100000	100000		
YEAR-END	3,214	2,200		100000	100000		
STATEMENT OF ORGANIZATION - AMERICAN							
FEBRUARY MONTHLY	3,243			100000	100000		
MARCH MONTHLY	3,157	10,000		100000	100000		
APRIL MONTHLY	3,241	2,000		100000	100000		
MAY MONTHLY	2,922	2,000		100000	100000		
JUNE MONTHLY	2,972	2,000		100000	100000		
JULY MONTHLY	2,921	4,000		100000	100000		
AUGUST MONTHLY	2,125	2,000		100000	100000		
SEPTEMBER MONTHLY	2,700	2,000		100000	100000		
OCTOBER MONTHLY	2,721			100000	100000		
NOVEMBER MONTHLY	2,721			100000	100000		
DECEMBER MONTHLY	2,721	2,000		100000	100000		
YEAR-END	2,721	2,000		100000	100000		
STATEMENT OF FACILITIES OF FUND							
NOVEMBER MONTHLY				100000	100000		
YEAR-END	2,721	1,500		100000	100000		
TOTAL	71,000	0		50,500	0		TOTAL PAID

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ALL REPORTS HAVE BEEN REVIEWED EXCEPT YEAR-END
 ENDING CASH ON HAND AS OF 12/31/90: 15,673.00
 OUTSTANDING DEBTS OWED BY THE COMMITTEE AS OF 12/31/90: 0.00

ANALYST: Ed Ryan, Reports Analyst

CONVERSATION WITH: Jacqueline A. Anderson, Treasurer

COMMITTEE: ARMCO Employees' Political Action Committee (APAC)

DATE: 11/16/90

SUBJECT(S): Filing the November Monthly Report in lieu of the 12 Day Pre-General Report.

I spoke to Jacqueline A. Anderson, Treasurer of ARMCO Employees' Political Action Committee (APAC), when she had filed the November Monthly Report in lieu of the 12 Day Pre-General Election Report. She had received a Non-Filer Notice and was confused as to which report to file. I explained the Pre and Post General Election Reports should be submitted in lieu of the November and December Monthly Reports during an election year. She understood and said she would submit the report in a few days.

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REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
Armed Employees Political Action Committee

ADDRESS (number and street) Check if different than previously reported
1667 E St. N.W. Suite 630

CITY, STATE AND ZIP CODE
Wash. D.C. 20005

2. FEC IDENTIFICATION NUMBER
00002808

3. This committee qualified as a multicandidate committee (CUMMIS) (See Reporting Period on Form 3X)

9/11/90 19 PM 1:13

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 (Plan-classen Year Only)
- Termination Report
- Monthly Report Due On:
- February 28 June 30 October 31
- March 31 July 31 November 30
- April 30 August 31 December 31
- May 31 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

910387553712

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>10/1/90</u> through <u>10/31/90</u>		
6. (a) Cash on Hand January 1, 19 <u>90</u>			\$ 15,286.41
(b) Cash on Hand at Beginning of Reporting Period		\$ 13,699.77	
(c) Total Receipts (from Line 1b)		\$ 2,712.74	\$ 29,265.46
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 16,312.51	\$ 44,551.87
7. Total Disbursements (from Line 3b)		\$ 2,500.00	\$ 30,739.36
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 13,812.51	\$ 13,812.51
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)		\$	

For further information contact:
 Federal Election Commission
 909 E Street, NW
 Washington, DC 20469
 Toll Free 800-424-9630
 Local 202-376-3130

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
Jacqueline A. Anderson

Signature of Treasurer
Jacqueline A. Anderson

Date
11/16/90

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 9437g.



JACKIE ANDERSON
SITLAND GOVT AFFAIRS

Nov 20, 1990

Mr. Lynn,
Thanks for
your advice! If
there are any
questions don't
hesitate to call.

J. Anderson

AMICO INC.
1457 K Street, N.W.
Washington, D.C. 20005
PHONE (202) 546-0000

0408583172
90036711517

THE CLAYTON



APAC 1990 Political Action Committee 1607 E St NW #550 Washington DC 20006

HAND DELIVERED

NOV 20 11:12:47

November 20, 1990

Mr. John D. Gibbons
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
999 E Street, N. W.
Washington, D. C. 20463

Dear Sir:

Enclosed is the Pre-General Report, which I inadvertently failed to file. I instead, filed our usual monthly report. I mistakenly understood the General Election Notice to read that only certain committees were expected to file the Pre-General Report, but that all committees were required to file the Post-General Report.

I have only been Treasurer of our Political Action Committee since April 1990, and I am still learning how to maintain the books. We are now in the process of having our books audited internally because of the change in officers. I apologize for being remiss in filing this report. The Post-General Report will be filed on time as required.

Sincerely yours,

Jacqueline A. Anderson

Jacqueline A. Anderson
Treasurer

JAA:ja
Enclosure

cc: Ed Ryan

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9

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

Form No. 270-100-1000000
 Date of Filing: 12/17

TYPE OR PRINT

1. NAME OF COMMITTEE (or list)
Armed Employees Political Action Committee

ADDRESS (number and street) (Check if different than previously reported)
1667 K St. N.W. Suite 650

CITY, STATE and ZIP CODE
Wash. D.C. 20006

2. FEC IDENTIFICATION NUMBER
00092809

3. This committee qualified as a multicandidate committee DURING THIS Reporting Period

4. TYPE OF REPORT

- 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 20
 - March 20
 - April 20
 - May 20
 - June 20
 - July 20
 - August 20
 - September 20
 - October 20
 - November 20
 - December 20
 - January 21

Tenth day report preceding Pre-General (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 <u>10/1/90</u> through <u>10/17/90</u>		
6. (a) Cash on Hand January 1, 19 <u>90</u>		\$ 15,286.41
(b) Cash on Hand at Beginning of Reporting Period	\$ 13,599.77	
(c) Total Receipts (from Line 9B)	\$ 1187.25	\$ 27,739.97
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 14787.02	\$ 45,026.38
7. Total Disbursements (from Line 2B)	\$ 2,000.00	\$ 30,239.36
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 12,787.02	\$ 12,787.02
9. Debts and Obligations Owed TO the Committee (Itemize as on Schedule C and/or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize as on Schedule C and/or Schedule D)	\$	

For further information contact:
 Federal Election Commission
 999 E Street, NW
 Washington, DC 20468
 Toll Free 800-424-9633
 Local 202-376-3100

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
Jacqueline A. Anderson

Signature of Treasurer
Jacqueline A. Anderson

Date
11/20/90

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

FEC FORM 270
 (rev. 10/87)

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ATTACHMENT 36
(Page 1 of 2)

GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACs

October 1, 1990

I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
Pre-General	10/01/90**-10/17/90	10/22/90	10/25/90
Post-General	10/18/90 - 11/26/90	12/06/90	12/06/90

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 17***

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
Pre-General	10/01/90**-10/17/90	10/22/90	10/25/90
Post-General	10/18/90 - 11/26/90	12/06/90	12/06/90

III. QUARTERLY FILERS WHICH DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 17***

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
Post-General	10/01/90**-11/26/90	12/06/90	12/06/90

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) 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

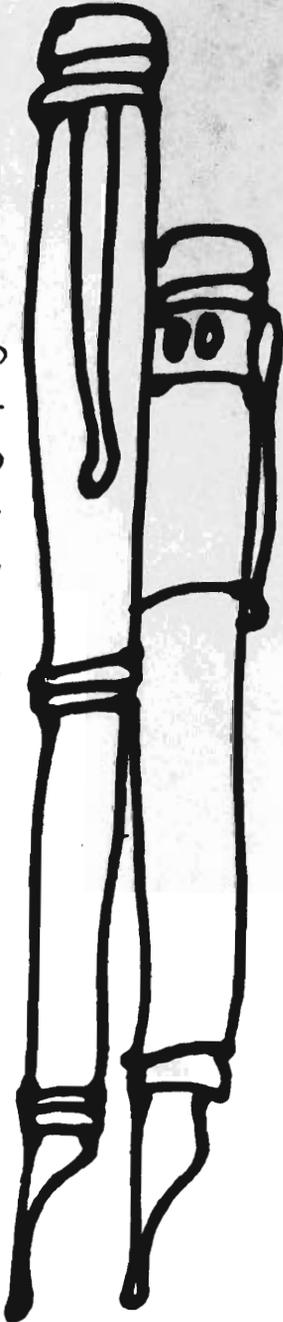
All financial activity (not previously reported) that occurred during the reporting period.

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

**The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

***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.

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PARTIES AND PACs

GENERAL ELECTION

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 18 and ending November 4 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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FOR INFORMATION, Call: 202/376-3120 or 800/424-9530



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

November 15, 1990

TREASURER
COMMITTEE
STREET
CITY, STATE ZIP

Identification Number: ID NUMBER

Reference: 12 Day Pre-General Report (10/1/90-10/17/90)

Dear TREASURER:

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 previously notified 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 its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§108.2, 108.3, 108.4).

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 ANALYST 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

21040855317

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral: 91NF 17 - 51
Staff Member: Noriega E. James

SOURCE: INTERNALLY GENERATED

RESPONDENTS:

Armco Employees' Political Action Committee
(APAC) and Jacqueline A. Anderson, as
treasurer (91NF-20)

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RELEVANT STATUTES:	434(a)(4)(B)
INTERNAL REPORTS CHECKED:	Referral Materials
FEDERAL AGENCIES CHECKED:	None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the above thirty-five (35) committees and their treasurers to the Office of the General Counsel on February 5, 1991. The basis of the attached RAD referral is the committees' failure to file the

1990 12 Day Pre-General Report in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(B).

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that all unauthorized political committees that file monthly reports, shall file a pre-general election report in lieu of filing the report otherwise due in November of any year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(B). According to Section 434(a)(2)(A)(i) the pre-election report must be filed no later than the 12th day before any election, and should be complete as of the 20th day before the election.

With regard to the 1990 general election, unauthorized committees were required to file a 12 Day Pre-General Election Report, covering the pre-election period of October 1 through October 17, by October 25, 1990. The committees referred by RAD failed to file the 1990 Pre-General Report or a report covering the pre-election period by the required deadline. However, seven of the committees filed 1990 November Monthly Reports with coverage dates of October 1 through 31, 1990. These reports

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were received after the due date for the 12 Day Pre-General Report.

On October 1, 1990, prior notification was sent to all unauthorized committees which specifically informed monthly filers of the requirement to file a 12 Day Pre-General Report by October 25, 1990 (Attachment 1, pages 177 - 178). Each committee which failed to submit either a 12 Day Pre-General Report or a November Monthly Report was sent a Non-Filer Notice on November 15, 1990 (Attachment 1, page 179).

Accordingly, the Office of the General Counsel recommends that the Commission open Matters Under Review and find reason to believe that 34 of the 35 previously referenced committees and their treasurers (See Recommendation I) violated 2 U.S.C. § 434(a)(4)(B) by failing to file timely the 1990 12 Day Pre-General Report.

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III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

This Office also recommends that the Commission offer to enter into conciliation with the respondents prior to a finding of probable cause to believe.

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

PAGES 7 THROUGH 27 DO NOT PERTAIN TO THESE RESPONDENTS.

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IV. RECOMMENDATIONS

1. Open Matters Under Review, find reason to believe that the following committees and their treasurer violated 2 U.S.C. § 434(a)(4)(B) and enter into conciliation prior to a finding of probable cause to believe:

A.

B.

C.

D. Armco Employees' Political Action Committee (APAC)
and Jacqueline A. Anderson, as treasurer (91NF-20)

E.

F.

G.

H.

I.

J.

K.

L.

M.

N.

O.

P.

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Q.

R.

S.

T.

U.

V.

W.

X.

Y.

Z.

AA.

BB.

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GG.

HH.

2.

3. Approve the attached Factual and Legal Analyses and proposed conciliation agreements and the appropriate letters.

Lawrence M. Noble
General Counsel

5/2/91
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments:

- 1. RAD Referral
- 2. Factual and Legal Analysis (34)
- 3. Conciliation Agreement (34)

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Thirty-five (35) Committees and) RAD Referrals
their treasurers) #91NF 17-51
)

CERTIFICATION

I, Marjorie W. Emmons, do hereby certify that
the Commission took the following actions with respect
to the above-captioned referrals:

1. Decided by a vote of 6-0 to
- a) Open Matters Under Review, find reason to believe that the following committees and their treasurer violated 2 U.S.C. § 434(a)(4)(B) and enter into conciliation prior to a finding of probable cause to believe:
 - A.
 - B.
 - C.

(continued)

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D. Armco Employees' Political Action
Committee (APAC) and Jacqueline
A. Anderson, as treasurer
(91NF-20)

E.

F.

G.

H.

I.

J.

K.

(continued)

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L.

M.

N.

Q.

P.

Q.

R.

S.

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(continued)

T.

U.

V.

W.

X.

Y.

Z.

AA.

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(continued)

BB.

CC.

DD.

EE.

FF.

GG.

b)

c) Approve the Factual and Legal Analyses
and proposed conciliation agreements
and the appropriate letters as
recommended in the General Counsel's
Report dated May 2, 1991.

(continued)

91040855333

Federal Election Commission
Certification: RAD 91NF 17-51
May 14, 1991

Page 6

Commissioners Aikens, Elliott, Josefak, de
McDonald, McGarry, and Thomas voted
affirmatively for this decision.

Attest:

5-17-91
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 28, 1991

Jacqueline A. Anderson, Treasurer
Armco Employees'
Political Action Committee (APAC)
1667 K Street N.W., Suite 650
Washington, DC 20006

RE: MUR 3278
Armco Employees' Political Action
Committee (APAC) and
Jacqueline A. Anderson, as treasurer

Dear Ms. Anderson:

On May 14, 1991, the Federal Election Commission found that there is reason to believe Armco Employees' Political Action Committee (APAC) ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), 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.

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.

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Jacqueline A. Anderson, Treasurer
Page 2

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 Cheryl S. Kornegay, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Vice Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

91040855336

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 3278

RESPONDENTS: Armco Employees' Political Action Committee (APAC)
and Jacqueline A. Anderson, as treasurer

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that all unauthorized political committees that file monthly reports, shall file a pre-general election report in lieu of filing the report otherwise due in November of any year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(B). According to Section 434(a)(2)(A)(i) the pre-election report must be filed no later than the 12th day before any election, and should be complete as of the 20th day before the election.

With regard to the 1990 general election, unauthorized committees were required to file a 12 Day Pre-General Election Report, covering the pre-election period of October 1 through October 17, by October 25, 1990. The above referenced committee failed to file the 1990 Pre-General Report or a report covering the pre-election period by the required deadline. Therefore, there is reason to believe the Armco Employees' Political Action Committee (APAC) and Jacqueline A. Anderson, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) by failing to timely file the 1990 12 Day Pre-General Report.

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08C 1523

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

PATTON, BOGGS & BLOW
2550 M STREET, N.W.
WASHINGTON, D.C. 20037
(202) 457-6000

91 JUN 13 PM 1:40

TRY TELE: 67780
TELECOPIER: 457-6315

WRITER'S DIRECT DIAL
(202) 457-6094

June 13, 1991

BY HAND

Cheryl S. Kornegay
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3278 - Armco Employees' PAC

Dear Ms. Kornegay:

The Armco Employees' Political Action Committee (the "Committee") has designated me as counsel (see Attachment I) to respond to the Federal Election Commission letter of May 28, 1991 regarding the Committee's filing of its 1990 Pre-General Report 26 days late.

While the Committee acknowledges its untimely filing of this one report, we believe that the mitigating circumstances discussed below warrant a Commission decision to take no further action against the Committee other than to close the file.

First, according to Commission records (see Attachment II), this Committee was established in April of 1978 and, every month for the ensuing 12 years, it timely filed its required monthly reports and Pre-General, Post-General and Year End Reports.

Second, the Committee's perfect record of timely filings was altered only by one aberrant late filing which occurred because the new Committee Treasurer was not aware of the requirement to file a Pre-General Report. Instead she filed a November Quarterly Report. As soon as she received the Commission's letter dated November 15, 1990 notifying the Committee of its failure to file the 1990 Pre-General Report, the Treasurer immediately contacted the appropriate Reports Analyst to explain her misunderstanding. She then promptly submitted the required Pre-General Report on November 20, 1990.

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PATTON, BOGGS & BLOW

Cheryl S. Kornegay
June 13, 1991
Page 2

Considering the Committee's near-perfect record of timely filings, we believe that assessing a monetary penalty is not warranted. The Commission's inquiry alone has had the necessary prophylactic effect on the Committee and its Treasurer, and all required reports will be timely filed in the future, just as all but one have been in the past.

It is urged that the Commission close the file. I would be happy to discuss this response in more detail with you if you will call me at the above number at your earliest convenience.

Respectfully submitted,



Katharine R. Boyce
Counsel to Armco Employees'
Political Action Committee

KRB/vsa
Enclosures

cc: Jacqueline A. Anderson, Treasurer
Armco Employees' Political Action Committee

Robert W. Kent, General Counsel
Armco, Inc.

91040355339

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3278
NAME OF COUNSEL: Katharine R. Boyce
ADDRESS: Patton, Boggs & Blow
2550 M. Street, N.W.
Washington, DC 20036
TELEPHONE: (202) 457- 6094

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.

June 10, 1991
Date

Robert W. Kent, Vice Chairman
Signature

RESPONDENT'S NAME: Armco Employees Political Action Committee
ADDRESS: 1667 K Street, N.W., #650
Washington, DC 20006
HOME PHONE: _____
BUSINESS PHONE: (202) 223-5370

91040855340

FEDERAL ELECTION COMMISSION
 1977-1978
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 11JUN91

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION		
					TYPE OF FILER			
ARMCO EMPLOYEES' POLITICAL ACTION COMMITTEE				ID #C00092809 NON-PARTY QUALIFIED				
CONNECTED ORGANIZATION: ARMCO STEEL CORPORATION								
1978 STATEMENT OF ORGANIZATION				13APR78	15	78FEC/072/0109		
STATEMENT OF ORGANIZATION - AMENDMENT				27OCT78	4	78FEC/093/4697		
STATEMENT OF ORGANIZATION - AMENDMENT				2NOV78	6	78FEC/095/1067		
STATEMENT OF ORGANIZATION - AMENDMENT				11DEC78	4	78FEC/099/4025		
MAY MONTHLY				1APR78 -30APR78	4	78FEC/074/2683		
JUNE MONTHLY				1MAY78 -31MAY78	4	78FEC/076/2981		
JULY MONTHLY				1JUN78 -30JUN78	4	78FEC/080/3566		
AUGUST MONTHLY				1JUL78 -31JUL78	4	78FEC/082/3642		
SEPTEMBER MONTHLY				1AUG78 -31AUG78	4	78FEC/084/3934		
OCTOBER MONTHLY				1SEP78 -30SEP78	4	78FEC/087/5521		
PRE-GENERAL				1OCT78 -23OCT78	6	78FEC/092/5279		
POST-GENERAL				24OCT78 -27NOV78	9	78FEC/097/1786		
YEAR-END				28NOV78 -31DEC78	6	79FEC/117/2389		
TOTAL				7,367	0	4,050	0	74 TOTAL PAGES

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FEDERAL ELECTION COMMISSION
1979-1980
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 11JUN91

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
					TYPE OF FILER	
ARNCO EMPLOYEES' POLITICAL ACTION COMMITTEE						
CONNECTED ORGANIZATION: ARNCO INC						
1979 STATEMENT OF ORGANIZATION - AMENDMENT						ID #C00092809 NON-PARTY QUALIFIED
	FEBRUARY MONTHLY	1,002	0	28MAR79	5	79FEC/122/3831
	MARCH MONTHLY	1,266	0	1JAN79 -31JAN79	4	79FEC/120/2826
	APRIL MONTHLY	1,272	250	1FEB79 -28FEB79	4	79FEC/121/3821
	MAY MONTHLY	1,147	0	1MAR79 -30MAR79	5	79FEC/123/0786
	JUNE MONTHLY	1,140	0	1APR79 -30APR79	5	79FEC/126/5197
	REQUEST FOR ADDITIONAL INFORMATION			1MAY79 -31MAY79	7	79FEC/128/3426
	JULY MONTHLY	1,332	0	1MAY79 -31MAY79	1	81FEC/204/0011
	REQUEST FOR ADDITIONAL INFORMATION			1JUN79 -30JUN79	7	79FEC/131/3909
	AUGUST MONTHLY	1,165	0	1JUN79 -30JUN79	1	81FEC/204/0012
	REQUEST FOR ADDITIONAL INFORMATION			1JUL79 -31JUL79	8	79FEC/134/2537
	SEPTEMBER MONTHLY	1,400	0	1JUL79 -31JUL79	1	81FEC/204/0013
	REQUEST FOR ADDITIONAL INFORMATION			1AUG79 -31AUG79	8	79FEC/136/0617
	OCTOBER MONTHLY	1,105	0	1AUG79 -31AUG79	1	81FEC/204/0014
	REQUEST FOR ADDITIONAL INFORMATION			1SEP79 -30SEP79	8	79FEC/138/3266
	NOVEMBER MONTHLY	1,735	0	1SEP79 -30SEP79	1	81FEC/204/0015
	REQUEST FOR ADDITIONAL INFORMATION			1OCT79 -31OCT79	10	79FEC/141/0050
	DECEMBER MONTHLY	1,480	0	1OCT79 -31OCT79	1	81FEC/204/0016
	REQUEST FOR ADDITIONAL INFORMATION			1NOV79 -30NOV79	10	79FEC/142/4690
	YEAR-END	1,688	0	1NOV79 -30NOV79	1	81FEC/204/0017
	YEAR-END - AMENDMENT	1,688	0	1DEC79 -31DEC79	11	80FEC/144/0303
	REQUEST FOR ADDITIONAL INFORMATION			1DEC79 -31DEC79	12	81FEC/204/3092
1980	STATEMENT OF ORGANIZATION - AMENDMENT			1DEC79 -31DEC79	1	81FEC/204/0018
	FEBRUARY MONTHLY	1,853	250	10JAN80	4	80FEC/144/1206
	MARCH MONTHLY	1,903	0	1JAN80 -31JAN80	5	80FEC/148/4677
	APRIL MONTHLY	1,703	0	1FEB80 -29FEB80	4	80FEC/150/0058
	MAY MONTHLY	1,879	300	1MAR80 -31MAR80	4	80FEC/153/4754
	JUNE MONTHLY	2,413	1,850	1APR80 -30APR80	5	80FEC/156/0077
	REQUEST FOR ADDITIONAL INFORMATION			1MAY80 -31MAY80	6	80FEC/158/0329
	JULY MONTHLY	2,373	0	1MAY80 -31MAY80	1	81FEC/204/0019
	AUGUST MONTHLY	2,630	0	1JUN80 -30JUN80	5	80FEC/160/2729
	SEPTEMBER MONTHLY	1,608	7,412	1JUL80 -31JUL80	5	80FEC/163/2600
	REQUEST FOR ADDITIONAL INFORMATION			1AUG80 -31AUG80	8	80FEC/165/0458
	OCTOBER MONTHLY	1,678	0,450	1AUG80 -31AUG80	1	81FEC/204/0020
	REQUEST FOR ADDITIONAL INFORMATION			1SEP80 -30SEP80	8	80FEC/168/4498
	PRE-GENERAL	200	13,000	1SEP80 -30SEP80	1	81FEC/204/0010
	POST-GENERAL	2,783	6,250	1OCT80 -15OCT80	7	80FEC/171/1146
	REQUEST FOR ADDITIONAL INFORMATION			16OCT80 -24NOV80	10	80FEC/184/2243
	YEAR-END	2,453	0	16OCT80 -24NOV80	1	81FEC/204/0021
	YEAR-END - AMENDMENT	2,453	0	25NOV80 -31DEC80	10	81FEC/188/1276
	REQUEST FOR ADDITIONAL INFORMATION			25NOV80 -31DEC80	9	81FEC/204/3104
				25NOV80 -31DEC80	2	81FEC/203/0264
	TOTAL	39,288	0		208	TOTAL PAGES

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FEDERAL ELECTION COMMISSION
1981-1982

DATE 11JUN91

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
ARMCO EMPLOYEES' POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: ARMCO INC				ID #C00092809	NON-PARTY QUALIFIED	
1981	FEBRUARY MONTHLY	1,619	0	1JAN81 -31JAN81	3	81FEC/190/4909
	MARCH MONTHLY	1,802	631	1FEB81 -28FEB81	5	81FEC/192/2687
	APRIL MONTHLY	1,713	0	1MAR81 -31MAR81	4	81FEC/193/3372
	MAY MONTHLY	1,739	0	1APR81 -30APR81	4	81FEC/195/3912
	JUNE MONTHLY	1,584	0	1MAY81 -31MAY81	4	81FEC/197/0102
	JULY MONTHLY	1,569	0	1JUN81 -30JUN81	4	81FEC/198/2180
	AUGUST MONTHLY	1,709	0	1JUL81 -31JUL81	5	81FEC/204/0434
	SEPTEMBER MONTHLY	1,759	0	1AUG81 -31AUG81	5	81FEC/205/4267
	OCTOBER MONTHLY	1,569	0	1SEP81 -30SEP81	5	81FEC/207/1088
	NOVEMBER MONTHLY	1,685	0	1OCT81 -31OCT81	9	81FEC/209/1370
	DECEMBER MONTHLY	1,739	0	1NOV81 -30NOV81	8	81FEC/211/2118
	YEAR-END	1,824	0	1DEC81 -31DEC81	10	82FEC/221/0621
1982	FEBRUARY MONTHLY	2,751	0	1JAN82 -31JAN82	4	82FEC/223/4579
	MARCH MONTHLY	1,626	0	1FEB82 -28FEB82	4	82FEC/224/5304
	APRIL MONTHLY	1,731	588	1MAR82 -31MAR82	5	82FEC/226/1378
	MAY MONTHLY	2,415	0	1APR82 -30APR82	5	82FEC/230/4754
	JUNE MONTHLY	1,620	1,500	1MAY82 -31MAY82	5	82FEC/233/0905
	JULY MONTHLY	1,630	6,650	1JUN82 -30JUN82	6	82FEC/238/0669
	AUGUST MONTHLY	3,328	0	1JUL82 -31JUL82	6	82FEC/241/2871
	SEPTEMBER MONTHLY	1,742	11,650	1AUG82 -31AUG82	8	82FEC/243/2030
	OCTOBER MONTHLY	1,732	800	1SEP82 -30SEP82	6	82FEC/247/2561
	PRE-GENERAL	0	21,850	1OCT82 -13OCT82	9	82FEC/251/1264
	POST-GENERAL	3,251	500	14OCT82 -22NOV82	9	82FEC/257/4918
	YEAR-END	2,596	0	23NOV82 -31DEC82	10	83FEC/263/0379
	TOTAL	44,733	0	44,169	0	143 TOTAL PAGES

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FEDERAL ELECTION COMMISSION
1983-1984
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 11JUN91

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
ARMCO EMPLOYEES' POLITICAL ACTION COMMITTEE (APAC)				ID #C00092809		NON-PARTY QUALIFIED
CONNECTED ORGANIZATION: ARMCO INC						
1983 STATEMENT OF ORGANIZATION - AMENDMENT						
	FEBRUARY MONTHLY	1,757	500	12DEC83	3	83FEC/288/5025
	MARCH MONTHLY	1,456	0	1JAN83 -31JAN83	4	83FEC/266/2498
	APRIL MONTHLY	2,531	1,629	1FEB83 -28FEB83	4	83FEC/267/4507
	MAY MONTHLY	1,606	1,000	1MAR83 -31MAR83	6	83FEC/269/5481
	JUNE MONTHLY	1,750	0	1APR83 -30APR83	5	83FEC/272/0438
	JULY MONTHLY	1,718	0	1MAY83 -31MAY83	5	83FEC/273/1905
	AUGUST MONTHLY	2,034	0	1JUN83 -30JUN83	5	83FEC/275/1284
	SEPTEMBER MONTHLY	1,489	0	1JUL83 -31JUL83	5	83FEC/281/0057
	OCTOBER MONTHLY	2,013	0	1AUG83 -31AUG83	5	83FEC/282/4201
	NOVEMBER MONTHLY	1,804	1,250	1SEP83 -30SEP83	5	83FEC/284/2768
	DECEMBER MONTHLY	1,627	250	1OCT83 -31OCT83	8	83FEC/287/3307
	YEAR-END	1,667	4,750	1NOV83 -30NOV83	8	83FEC/289/0044
1984	FEBRUARY MONTHLY	2,192	250	1DEC83 -31DEC83	9	84FEC/291/4094
	MARCH MONTHLY	1,580	500	1JAN84 -31JAN84	4	84FEC/296/5127
	MARCH MONTHLY - AMENDMENT	1,580	500	1FEB84 -29FEB84	5	84FEC/306/1400
	1'ST LETTER INFORMATIONAL NOTICE			1FEB84 -29FEB84	5	84FEC/316/0098
	APRIL MONTHLY	1,623	61	1FEB84 -29FEB84	1	84FEC/314/4365
	APRIL MONTHLY - AMENDMENT	1,623	61	1MAR84 -31MAR84	4	84FEC/311/4926
	1'ST LETTER INFORMATIONAL NOTICE			1MAR84 -31MAR84	5	84FEC/325/1289
	MAY MONTHLY	2,333	3,000	1MAR84 -31MAR84	1	84FEC/323/0925
	MAY MONTHLY - AMENDMENT	2,333	3,000	1APR84 -30APR84	5	84FEC/314/1668
	JUNE MONTHLY	1,614	2,000	1APR84 -30APR84	3	84FEC/325/1294
	JUNE MONTHLY - AMENDMENT	1,614	2,000	1MAY84 -31MAY84	6	84FEC/310/0535
	JUNE MONTHLY - AMENDMENT	1,614	2,000	1MAY84 -31MAY84	3	84FEC/325/1297
	JULY MONTHLY	1,323	5,250	1MAY84 -31MAY84	3	84FEC/327/2772
	JULY MONTHLY - AMENDMENT	1,323	5,250	1JUN84 -30JUN84	7	84FEC/324/2417
	JULY MONTHLY - AMENDMENT	1,323	5,250	1JUN84 -30JUN84	3	84FEC/325/1300
	AUGUST MONTHLY	2,033	1,500	1JUN84 -30JUN84	3	84FEC/327/2763
	SEPTEMBER MONTHLY	1,750	2,300	1JUL84 -31JUL84	6	84FEC/327/2766
	OCTOBER MONTHLY	1,583	5,300	1AUG84 -31AUG84	6	84FEC/336/0758
	PRE-GENERAL	0	5,500	1SEP84 -30SEP84	7	84FEC/338/4599
	POST-GENERAL	2,741	6,250	1OCT84 -17OCT84	5	84FEC/344/1604
	YEAR-END	2,451	0	1OCT84 -26NOV84	9	84FEC/350/3536
	YEAR-END - AMENDMENT	2,507	0	27NOV84 -31DEC84	7	85FEC/361/3248
				27NOV84 -31DEC84	4	85FEC/366/3873
	TOTAL	42,731	0		174	TOTAL PAGES

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FEDERAL ELECTION COMMISSION
1985-1986
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 11JUN81

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
					TYPE OF FILER	
ARMCO EMPLOYEES' POLITICAL ACTION COMMITTEE (APAC)				ID #C00092809 NON-PARTY QUALIFIED		
CONNECTED ORGANIZATION:						
1985	FEBRUARY MONTHLY	1,730	0	1JAN85 -31JAN85	3	85FEC/366/3877
	MARCH MONTHLY	1,552	0	1FEB85 -28FEB85	4	85FEC/369/0151
	MARCH MONTHLY - AMENDMENT	1,552	0	1FEB85 -28FEB85	6	86FEC/374/0528
	REQUEST FOR ADDITIONAL INFORMATION			1FEB85 -28FEB85	1	85FEC/392/4425
	APRIL MONTHLY	1,486	1,897	1MAR85 -31MAR85	6	85FEC/371/1860
	MAY MONTHLY	889	1,350	1APR85 -30APR85	5	85FEC/373/3604
	JUNE MONTHLY	1,984	7,750	1MAY85 -31MAY85	5	85FEC/376/0561
	JULY MONTHLY	1,319	1,250	1JUN85 -30JUN85	5	85FEC/378/2310
	AUGUST MONTHLY	653	500	1JUL85 -31JUL85	5	85FEC/386/3785
	SEPTEMBER MONTHLY	1,209	250	1AUG85 -31AUG85	5	85FEC/388/3446
	OCTOBER MONTHLY	1,804	2,750	1SEP85 -30SEP85	5	85FEC/390/2290
	NOVEMBER MONTHLY	1,312	1,250	1OCT85 -31OCT85	6	85FEC/391/4931
	DECEMBER MONTHLY	1,183	300	1NOV85 -30NOV85	6	85FEC/393/1860
	YEAR-END	1,264	450	1DEC85 -31DEC85	7	86FEC/397/3988
1986	STATEMENT OF ORGANIZATION - AMENDMENT			21APR86	1	86FEC/411/2033
	FEBRUARY MONTHLY	1,037	0	1JAN86 -31JAN86	3	86FEC/403/4773
	MARCH MONTHLY	885	2,760	1FEB86 -28FEB86	5	86FEC/406/5332
	APRIL MONTHLY	1,483	2,281	1MAR86 -31MAR86	5	86FEC/411/3746
	MAY MONTHLY	949	4,150	1APR86 -30APR86	5	86FEC/413/3676
	JUNE MONTHLY	900	100	1MAY86 -31MAY86	5	86FEC/416/4098
	JUNE MONTHLY - AMENDMENT	1,023		1MAY86 -31MAY86	4	86FEC/419/4222
	JULY MONTHLY	1,110	808	1JUN86 -30JUN86	7	86FEC/419/4226
	AUGUST MONTHLY	993	0	1JUL86 -31JUL86	5	86FEC/427/3102
	AUGUST MONTHLY - AMENDMENT			1JUL86 -31JUL86	3	86FEC/430/1981
	REQUEST FOR ADDITIONAL INFORMATION			1JUL86 -31JUL86	1	86FEC/430/1630
	SEPTEMBER MONTHLY	1,082	0	1AUG86 -31AUG86	5	86FEC/430/1976
	OCTOBER MONTHLY	1,141	5,100	1SEP86 -30SEP86	6	86FEC/432/3967
	PRE-GENERAL	541	0	1OCT86 -15OCT86	4	86FEC/435/5209
	PRE-GENERAL - AMENDMENT			1OCT86 -15OCT86	3	86FEC/443/2108
	REQUEST FOR ADDITIONAL INFORMATION			1OCT86 -15OCT86	1	86FEC/443/1663
	POST-GENERAL	2,201	0	16OCT86 -24NOV86	6	86FEC/445/1525
	POST-GENERAL - AMENDMENT	2,201		16OCT86 -24NOV86	6	87FEC/453/2685
	POST-GENERAL - AMENDMENT	2,201	750	16OCT86 -24NOV86	7	87FEC/456/1963
	YEAR-END	2,135	2,750	25NOV86 -31DEC86	7	87FEC/453/2691
	YEAR-END - AMENDMENT	2,141	2,750	25NOV86 -31DEC86	7	87FEC/456/1970
TOTAL		30,971	0	36,446	0	165 TOTAL PAGES

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

DATE 11JUN91

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
					TYPE OF FILER	
ARMCO EMPLOYEES' POLITICAL ACTION COMMITTEE (APAC)						
CONNECTED ORGANIZATION: ARMCO INC						
1987	FEBRUARY MONTHLY	1,317	-	1JAN87 - 31JAN87	4	87FEC/461/1912
	FEBRUARY MONTHLY - AMENDMENT	-	-	1JAN87 - 31JAN87	3	87FEC/492/5380
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JAN87 - 31JAN87	1	87FEC/492/3589
	MARCH MONTHLY	1,278	-	1FEB87 - 28FEB87	3	87FEC/463/0969
	APRIL MONTHLY	1,320	2,750	1MAR87 - 31MAR87	4	87FEC/465/3597
	APRIL MONTHLY - AMENDMENT	-	-	1MAR87 - 31MAR87	3	87FEC/492/5377
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1MAR87 - 31MAR87	1	87FEC/492/3588
	MAY MONTHLY	1,372	1,000	1APR87 - 30APR87	5	87FEC/467/2264
	JUNE MONTHLY	1,324	2,000	1MAY87 - 31MAY87	6	87FEC/469/1777
	JULY MONTHLY	1,340	250	1JUN87 - 30JUN87	5	87FEC/474/4683
	AUGUST MONTHLY	1,334	1,000	1JUL87 - 31JUL87	6	87FEC/483/1087
	SEPTEMBER MONTHLY	1,314	0	1AUG87 - 31AUG87	5	87FEC/484/5189
	OCTOBER MONTHLY	1,315	4,300	1SEP87 - 30SEP87	6	87FEC/491/4925
	NOVEMBER MONTHLY	1,814	1,000	1OCT87 - 31OCT87	7	87FEC/494/3040
	DECEMBER MONTHLY	1,423	-	1NOV87 - 30NOV87	7	87FEC/496/3454
	YEAR-END	1,410	-	1DEC87 - 31DEC87	7	88FEC/498/3338
1988	FEBRUARY MONTHLY	1,851	1,500	1JAN88 - 31JAN88	6	88FEC/509/3713
	MARCH MONTHLY	1,368	-	1FEB88 - 29FEB88	4	88FEC/513/2583
	APRIL MONTHLY	1,373	1,850	1MAR88 - 31MAR88	6	88FEC/519/4600
	MAY MONTHLY	1,375	3,150	1APR88 - 30APR88	6	88FEC/525/1486
	JUNE MONTHLY	1,336	3,600	1MAY88 - 31MAY88	6	88FEC/529/4750
	JULY MONTHLY	1,272	3,500	1JUN88 - 30JUN88	6	88FEC/536/1348
	AUGUST MONTHLY	1,283	0	1JUL88 - 31JUL88	5	88FEC/541/2741
	SEPTEMBER MONTHLY	1,387	0	1AUG88 - 31AUG88	5	88FEC/545/3608
	OCTOBER MONTHLY	1,292	2,600	1SEP88 - 30SEP88	7	88FEC/549/4497
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP88 - 30SEP88	3	89FEC/578/5029
	PRE-GENERAL	611	1,000	1OCT88 - 19OCT88	6	88FEC/560/1459
	PRE-GENERAL - AMENDMENT	611	1,000	1OCT88 - 19OCT88	3	89FEC/578/5032
	POST-GENERAL	1,376	-	20OCT88 - 28NOV88	6	88FEC/566/2504
	POST-GENERAL - AMENDMENT	1,341	-	20OCT88 - 28NOV88	3	89FEC/578/5035
	YEAR-END	3,733	2,550	29NOV88 - 31DEC88	8	89FEC/578/5038
	TOTAL	34,783	0	32,050	0	153 TOTAL PAGES

TD #000092809 NON-PARTY QUALIFIED

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1991-1992
 COMMITTEE INDEX OF DISCLOSED DOCUMENTS - (C)

PAGE 2

DOCUMENT

RECEIPTS

DISBURSEMENTS

DATE OF RECEIPT OR DISBURSEMENT
 TYPE OF ITEM

ARMCO EMPLOYEES' POLITICAL ACTION COMMITTEE (APAC)

REPORTING ORGANIZATION: ARMCO INC

FD 100002009 NON-PARTY QUALIFIED

DOCUMENT	RECEIPTS	DISBURSEMENTS
1991 FEBRUARY MONTHLY	2,545	500
MARCH MONTHLY	2,531	
APRIL MONTHLY	2,540	4,915
MAY MONTHLY	2,525	3,500
TOTAL	10,141	8,915

199102	01000001	4	01FEC/688/1000
199103	01000001	4	01FEC/690/2000
199104	01000001	5	01FEC/693/4700
199105	01000001	5	01FEC/696/1000

15 TOTAL PAGES

STATES OF

9104085348

2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

8/2/91
Date

BY: [Signature]
Lois G. Lerner
Associate General Counsel

Attachment
Conciliation Agreement

Staff assigned: Cheryl S. Kornegay

91040855350

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Armco Employees' Political Action) MUR 3278
Committee (APAC) and Jacqueline A.)
Anderson, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 7, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 3278:

1. Accept the conciliation agreement with the Armco Employees' Political Action Committee (APAC) and Jacqueline A. Anderson, as treasurer.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated August 2, 1991.

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

Attest:

8-7-91
Date

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

Received in the Secretariat: Mon., Aug., 5, 1991 12:42 p.m.
Circulated to the Commission: Mon., Aug., 5, 1991 4:00 p.m.
Deadline for vote: Wed., Aug., 7, 1991 4:00 p.m.

bjf

91040855351



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 16, 1991

CLOSED

Katherine R. Boyce, Esq.
Patton, Boggs & Blow
2550 M Street, N.W.
Washington, D.C. 20037

RE: NUR 3278
Arnco Employees Political
Action Committee and
Jacqueline A. Anderson, as treasurer

Dear Ms. Boyce:

On August 7, 1991, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(b), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the Commission closed the file in this matter on the same date.

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 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. I remind you that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact Cheryl S. Kornegay, 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)
) MUR: 3278
 Armco Employees' Political Action)
 Committee (APAC) and)
 Jacqueline A. Anderson, 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 Armco Employees' Political Action Committee (APAC) and Jacqueline A. Anderson, as treasurer, ("Respondents") violated 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. Armco Employees' Political Action Committee (APAC) is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Jacqueline A. Anderson is the treasurer of Armco Employees' Political Action Committee (APAC).

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 FEDERAL ELECTION COMMISSION
 OFFICE OF LEGAL COUNSEL
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3. Section 434(a)(4)(B) of the Federal Election Campaign Act of 1971, as amended ("the Act"), provides that all unauthorized political committees that file monthly reports, shall file a pre-general election report in lieu of filing the report otherwise due in November of any year in which a regularly scheduled general election is held. According to Section 434(a)(2)(A)(i), the pre-election report must be filed no later than the 12th day before any election, and should be complete as of the 20th day before the election.

4. Respondents were required to file the 12-Day Pre-General Election Report, covering the pre-election period of October 1 through October 17, by October 25, 1990. Respondents were notified by letter of November 15, 1990, that they had failed to file the 1990 12-Day Pre-General Report or a report covering the pre-election period. The day after receipt of such notification on November 19, 1990, Respondents submitted the required report on November 20, 1990, 26 days late, disclosing \$1,187 in receipts and \$2,000 in disbursements for the relevant reporting period.

V. Respondents failed to file the 1990 12-Day Pre-General Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(B).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Two Hundred Fifty Dollars (\$250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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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 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.

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: *Lois G. Lerner*
Lois G. Lerner

8/14/91
Date

FOR THE RESPONDENTS:

Katharine R. Boyce
Katharine R. Boyce
Counsel to
Armco Employees' Political
Action Committee

July 26, 1991
Date

21040855355



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3278

DATE FILMED 8/28/91 CAMERA NO. 4

CAMERAMAN AS

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3278.

10/18/91

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PATTON, BOGGS & BLOW
2550 M STREET, N.W.
WASHINGTON, D.C. 20037
(202) 457-6000

TRT TELE: 197780
TELECOPIER: 457-6315

WRITER'S DIRECT DIAL
(202) 457-6094

September 5, 1991

CLOSED

BY HAND

Cheryl S. Kornegay
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3278

91 SEP -6 PM 3:47

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Dear Ms. Kornegay:

Enclosed is a check in the amount of Two Hundred Fifty Dollars (\$250.00) in payment of the civil penalty imposed in the above-referenced matter under review. We do not wish to submit any additional factual or legal materials and do not consent to inclusion in the public record of any information derived in connection with any conciliation attempt.

If you have any questions, please feel free to give me a call at the above number.

Sincerely,

Kate Boyce

Katharine R. Boyce
Counsel to Armco Employees'
Political Action Committee

KRB/vsa
Enclosure

91040371718



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Sept 6, 1991

TWO WAY MEMORANDUM

TO: Fabrae Brunson
OGC, Docket

FROM: Philomena Brooks *RB*
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Armo Employees PSE, check number 0265, dated Aug 26, 1991, and in the amount of \$ 250.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

TO: Philomena Brooks
Accounting Technician

FROM: Fabrae Brunson *JOB*
OGC, Docket

In reference to the above check in the amount of \$ 250.00, the MUR number is 3278 and in the name of Armo Employees PSE. The account into which it should be deposited is indicated below:

- Budget Clearing Account (OGC), 95F3875.16
- Civil Penalties Account, 95-1099.160
- Other: _____

Fabrae O. Brunson
Signature

September 9, 1991
Date

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ARMCO EMPLOYEES' POLITICAL ACTION COMMITTEE

1667 K ST., N.W., SUITE 650
WASHINGTON, DC 20006

0265

15-7015/2540

August 1991

DAY TO THE ORDER OF

Federal Election Commission | \$ *250.⁰⁰/₁₀₀*
Two hundred fifty and 00/100 DOLLARS



WASHINGTON FEDERAL
WASHINGTON, D.C. 20006

FOR

John L. Davis Jr.

⑆000265⑆ ⑆254070158⑆ 12⑆⑆102073206⑆⑆

91040871720