



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3334

DATE FILMED 9/5/91 CAMERA NO. 3

CAMERAMAN AS

114063373



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

January 17, 1991

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SUBINA
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF UNAUTHORIZED COMMITTEES FOR LATE/NON-
FILING OF THE 1990 OCTOBER QUARTERLY REPORT

Attached is a listing of thirteen (13) unauthorized committees which failed to file the 1990 October Quarterly Report by Election Day, November 6, 1990. Three (3) of the committees

failed to file the report within thirty (30) days from the date of the Non-Filer Notice.

For your information, each committee was sent prior notice of the due date of the report on September 21, 1990 (Attachment 11). Non-Filer Notices were sent to the committees on November 7, 1990 (Attachment 12).

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

Attachment

405374

C00237073

William Lyon Company Federal Political
Action Committee

91NF-13

71040363375

4 1 3 4 0 3 5 3 7 5

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILE# ATCH

REPORTS FILED/
RESPONSES

.....
C09217073

WILLIAM LYON COMPANY FEDERAL POLITICAL ACTION COMMITTEE; THE
TREASURER'S NAME: PAUL PEIFFER
4400 VON KARMAN, P.O. BOX 7520
NEWPORT BEACH CA 92650

11/13/90 12b

Letter and Octob
Quarterly Report
filed 11/15/90
(Att. 12c-12e)

110405377

THE WILLIAM LYON COMPANY FEDERAL POLITICAL ACTION COMMITTEE

(Attachments 12a - 12e)

FEDERAL ELECTION COMMISSION
 1989-1990
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 9JAN91
 PAGE 13

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF MICROFILM	
					PAGES	LOCATION
					TYPE OF FILER	
WILLIAM LYON COMPANY FEDERAL POLITICAL ACTION COMMITTEE: THE CONNECTED ORGANIZATION: WILLIAM LYON COMPANY				ID #C00237073	NON-PARTY NON-QUALIFIED	
	STATEMENT OF ORGANIZATION			21JUN89	3	89FED/598 146
	REQUEST FOR ADDITIONAL INFORMATION			12JUL89	1	89FED/599 478
	STATEMENT OF ORGANIZATION - AMENDMENT			31JUL89	2	89FED/608 203
	YTD-YEAR REPORT	10,000	0	1JAN89 - 30JUN89	9	89FED/608 14
	YEAR-END	27,775	10,000	1JUL89 - 31DEC89	12	90FED/627 81
	1ST QUARTERLY	2,800	0	1JAN90 - 31MAR90	9	90FED/635 483
	2ND QUARTERLY	981	175	1APR90 - 30JUN90	5	90FED/645 14
	3RD QUARTERLY	602	1,000	1JUL90 - 30SEP90	9	90FED/671 194
	NOTICE OF FAILURE TO FILE			1JUL90 - 30SEP90	1	90FED/671 194
	4TH QUARTERLY	215	0	30SEP90 - 26NOV90	5	90FED/677 194
	TOTAL	42,373	0 11,175		0	56 TOTAL PAGES

21040533/B

All reports have been reviewed.
 Ending cash-on-hand as of 11/26/90: \$31,016
 Outstanding debts and obligations owed by the committee as of 11/26/90: \$0

ANALYST: DAVID J. WEIDMAN

CONVERSATION WITH: PEGGY A. CHILDERS

COMMITTEE: WILLIAM LYON COMPANY FEDERAL POLITICAL ACTION COMMITTEE

DATE: 11/13/90

SUBJECT(S): FAILURE TO FILE THE OCTOBER QUARTERLY REPORT

THE COMMITTEE CALLED THE ANALYST IN RESPONSE TO AN RQ-7 SENT FOR THE OCTOBER QUARTERLY REPORT. THE COMMITTEE CLAIMED TO HAVE MAILED THE REPORT AND THAT IT SHOULD HAVE BEEN RECEIVED BY THE FEC ON TIME. THE ANALYST INFORMED THE COMMITTEE THAT THE FEC HAD NO RECORD OF THE REPORT EVER BEING RECEIVED AND THAT THE REPORT SHOULD BE SUBMITTED AS SOON AS POSSIBLE.

405379

...



The WILLIAM LYON *Company* 90 NOV 20 11:10:40

4493 VON KARMAN, PO BOX 7520, NEWPORT BEACH, CA 92668-7520 • (714) 833-3600 • FAX (714) 476-8604

November 14, 1990

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

RE: OCTOBER QUARTERLY REPORT (7/1/90 - 9/30/90)
Identification Number: C00237073

Dear Mr. Gibson:

Your letter of November 7, 1990 pertaining to the failure of our Company to file the above referenced Report of Receipts and Disbursements was received in our office November 9, 1990.

Upon my conversation with Mr. David Weidman on Tuesday, November 13, 1990, enclosed please find a copy The William Lyon Company Federal PAC Report of Receipts and Disbursements filed on October 12, 1990. I have also requested Mr. Pfeiffer to once again sign and date this copy under his previous signature of October 11, 1990. Also enclosed please find the following receipts which have been dated and returned with the exception of the Federal Election Committee:

1. Secretary of State Political Reform Division
File Date: October 15, 1990
2. Registrar of Voters City & County of San Francisco
File Date: October 17, 1990
3. Orange County Registrar of Voters
File Date: October 13, 1990
4. Registrar-Recorder of Los Angeles County
(Report postmarked October 12, 1990 and stamped in
October 30, 1990 per Stella Matthews/Campaign Reporting
Unit (213) 725-5776.)

I trust that the enclosed will be sufficient evidence to correct this situation. I respectfully request a response from the Commission as to their decision on the matter.

Sincerely,

Peggy A. Childers
Senior Administrator to Paul W. Pfeiffer

/pac
JOG_1113

cc: file

2 1 J 3 6 7 1 J 2 4 9

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) WILLIAM LYON COMPANY FEDERAL PAC	90 NOV 20 AM 10:40
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 4490 Von Karman	2. FEC IDENTIFICATION NUMBER C 00237073
CITY, STATE and ZIP CODE Newport Beach, CA 92660	3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report
- Monthly Report Due On:
- | | | |
|--------------------------------------|---------------------------------------|--------------------------------------|
| <input type="checkbox"/> February 28 | <input type="checkbox"/> June 30 | <input type="checkbox"/> October 30 |
| <input type="checkbox"/> March 31 | <input type="checkbox"/> July 31 | <input type="checkbox"/> November 30 |
| <input type="checkbox"/> April 30 | <input type="checkbox"/> August 31 | <input type="checkbox"/> December 31 |
| <input type="checkbox"/> May 31 | <input type="checkbox"/> September 30 | <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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period <u>7/01/90</u> through <u>9/30/90</u>		
6	(a) Cash on Hand January 1, 19 <u>90</u>		\$ 27,775.00
	(b) Cash on Hand at Beginning of Reporting Period	\$ 31,377.52	
	(c) Total Receipts (from Line 10)	\$ 602.49	\$ 4,384.42
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 31,980.01	\$ 32,159.42
7	Total Disbursements (from Line 20)	\$ 1,000.00	\$ 1,179.41
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 30,980.01	\$ 30,980.01
9	Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	\$ -0-	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3130
10	Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)	\$ -0-	

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 Paul W. Pfeiffer	
Signature of Treasurer 	Date 10-11-90

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. (a)(37)

2 J J 3 670 1 J 9 5 1 3 1

CERTIFIED

427 447 251

MAIL

9 0 0 3 6 4 7 0 1 0 9 5 7 5 2



FROM Peggy A. Childers/Paul W. Pfeiffer



The WILLIAM LYON *Company*

6470 VON KARMAN • PO BOX 7320
NEWPORT BEACH CA 92688 7320

TO: Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

FIRST CLASS MAIL

ATTACHMENT 12c

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 21, 1990

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
October Quarterly	07/01/90**-09/30/90	10/15/90	10/15/90

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

Disclose 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 Summary Page of Form 3X. 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.

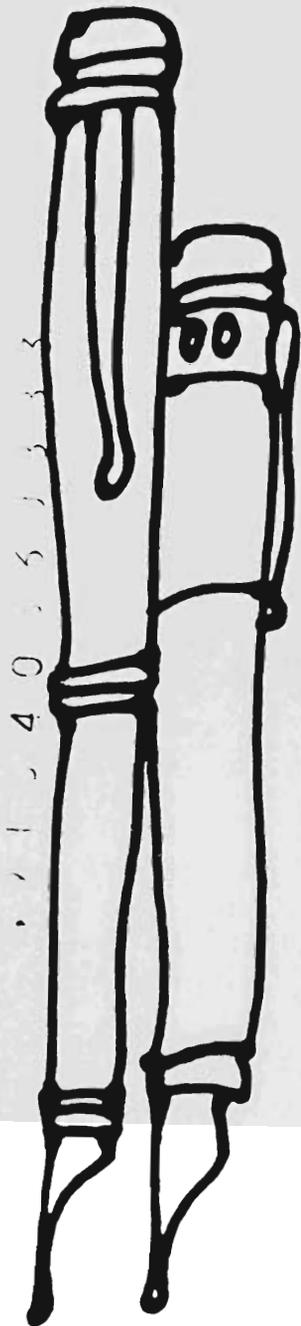
LAST-MINUTE INDEPENDENT EXPENDITURES

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.

*Reports sent by registered or certified mail will be considered filed on the date of the U.S. postmark. Reports hand delivered or mailed first class 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.

(over)



PARTIES AND PACS

OCTOBER QUARTERLY

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.

110405554

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



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RQ-7

November 7, 1990

**TREASURER
COMMITTEE
STREET
CITY, STATE ZIP**

Identification Number: ID NUMBER

Reference: October Quarterly Report (7/1/90-9/30/90)

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

91040350335

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral 91NF 2-14
Staff Member: Todd Hageman

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

RESPONDENTS:

11,40,5,336

1991 11 13 10:10

The William Lyon Company Federal Political
Action Committee and Paul Pfeiffer, as
treasurer (91NF-13)

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

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the above thirteen committees to the Office of the General Counsel on January 17, 1991. The basis for the attached referral is the committees' failure to file the 1990 October Quarterly Report or to do so in a timely fashion.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act, as amended, ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file quarterly reports, in a calendar year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(A)(i). Quarterly Reports are to be filed no later than the 15th day after the last day of each calendar quarter. Thus, the due date for the 1990 October Quarterly Report was October 15, 1990. Each of the respondent committees, with the exception of _____ has failed to file its report, filed the 1990 October Quarterly Report in an untimely manner. See attached Factual and Legal Analyses for each respective committee. On September 21, 1990 RAD sent the respondent committees and their treasurers prior notice for the October Quarterly Report due date. See Attachment 1 at pages 73 and 74. On November 7, 1990, Non-Filer

10405557

Notices were sent to the respondent committees and their treasurers. Id. at 75.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

0 1 2 3 4 5 6 7 8

PAGES 4 THROUGH 14 DO NOT PERTAIN TO THESE RESPONDENTS.

403339

IV. RECOMMENDATIONS

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

- a.
- b.
- c.
- d.
- e.
- f.
- g.
- h.
- i.
- j.
- k.

100-40151370

1. The William Lyon Company Federal Political Action Committee and Paul Pfeiffer, as treasurer (91NF-13)

2. Enter into conciliation with the following committees and their treasurers prior to a finding of probable cause to believe:

a.

b.

c.

d.

e.

f.

g.

h.

i.

j.

k.

1. The William Lyon Company Federal Political Action Committee and Paul Pfeiffer, as treasurer (91NF-13)

104036371

m.

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

Lawrence M. Noble
General Counsel

5/28/91
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Referral Materials
2. Factual and Legal Analyses
3. Proposed Conciliation Agreements

71040351372

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) RAD Referrals
Twelve Committees and their) #91NF 2-14
treasurers)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on June 4, 1991, do hereby certify that the Commission decided by a vote of 4-0 to take the following actions with respect to RAD Referrals #91NF 2-14:

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

(continued)

210405333

Federal Election Commission
Certification for RAD Referrals
91NF 2-14
June 4, 1991

Page 2

d.

e.

f.

g.

h.

i. The William Lyon Company Federal
Political Action Committee and Paul
Pfeiffer, as treasurer (91NF-13)

j.

2. Enter into conciliation with the following
committees and their treasurers prior to a
finding of probable cause to believe:

a.

b.

(continued)

91NF 2-14

Federal Election Commission
Certification for RAD Referrals
91NF 2-14
June 4, 1991

Page 3

c.

d.

e.

f.

g.

h.

i. The William Lyon Company Federal
Political Action Committee and Paul
Pfeiffer, as treasurer (91NF-13)

j.

(continued)

Federal Election Commission
Certification for RAD Referrals
91NF 2-14
June 4, 1991

Page 4

3.

4. Approve the Factual and Legal Analyses, proposed conciliation agreements, and appropriate letters as recommended in the General Counsel's report dated May 28, 1991, subject to any change required by the actions noted above.

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

Attest:

6/6/91
Date

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

01040053385



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

June 14, 1991

The William Lyon Company Federal
Political Action Committee
Mr. Paul Pfeiffer, Treasurer
4490 Von Karman, P.O. Box 7520
Newport Beach, CA 92658

RE: MUR 3334

Dear Mr. Pfeiffer:

On June 4, 1991, the Federal Election Commission found that there is reason to believe The William Lyon Company Federal Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), 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.

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.

210405337

Mr. Pfeiffer
Page 2

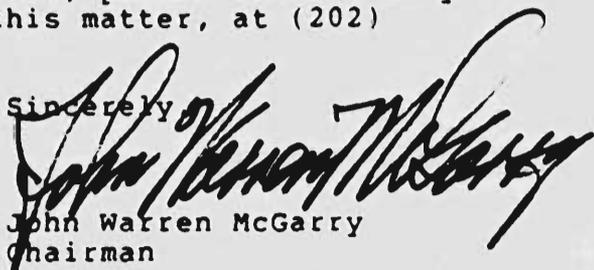
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Tony Buckley, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,


John Warren McGarry
Chairman

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

40351373

**FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS**

RESPONDENT: The William Lyon Company Federal
Political Action Committee and
Paul Pfeiffer, as treasurer

MUR: 3334

210403322
The Federal Election Campaign Act, as amended, ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file quarterly reports, in a calendar year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(A)(i). Quarterly Reports are to be filed no later than the 15th day after the last day of each calendar quarter. Thus, the due date for the 1990 October Quarterly Report was October 15, 1990. The William Lyon Company Federal Political Action Committee and Paul Pfeiffer, as treasurer, filed its 1990 October Quarterly Report on November 15, 1990, thirty-one days late. Therefore, there is reason to believe The William Lyon Company Federal Political Action Committee and Paul Pfeiffer, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i).



The WILLIAM LYON Company

4490 VON KARMAN, P.O. BOX 7520, NEWPORT BEACH, CA 92658-7520 • (714) 833-3600 • FAX (714) 476-8604

June 27, 1991

Mr. Lawrence M. Noble
General Counsel
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

RE: MUR 334

WILLIAM LYON COMPANY FEDERAL PAC
FEC I.D. NO.: C00237073
OCTOBER QUARTERLY REPORT (7/1/90 - 9/30/90)

Dear Mr. Noble:

Mr. McGarry's letter, postmarked June 12, 1991, was received in our office on June 14, 1991, charging The William Lyon Company Federal PAC, and Mr. Paul W. Pfeiffer as Treasurer, to be in violation of 2 U.S.C. 434(a) (4)(A)(i), a provision of the Federal Election Campaign Act of 1971.

According to the Federal Election Commission Factual and Legal Analysis, "the Act" provides for the filing of quarterly reports no later than the 15th day after the last day of each calendar quarter. In this case, The William Lyon Company Federal Election Committee and Paul Pfeiffer, as Treasurer, filed its October 1990 Quarterly Report on November 15, 1990, which was thirty-one (31) days late.

The William Lyon Company Federal Election Committee filed its 1990 Quarterly Report with the Secretary of State, Registrar of Voters City & County of San Francisco, Registrar-Recorder of Los Angeles, and the Orange County Registrar of Voters, on October 11, 1991 (Certified Receipts attached). In November, we received a letter dated November 7, 1990, by Mr. John D. Gibson, Assistant Staff Director of the Reports Analysis Division for the Federal Election Committee, stating that the Commission had failed to receive our Committee's quarterly report for this period. A call was immediately placed to Mr. David Weidman at the Commission, informing him that the report had been completed and filed, however, due to an oversight, the Federal Election Commission did not receive their copy. I was, at this time instructed to send a copy of our Committee's report, along with any receipts, to Mr. John D. Gibson. As of March 19, 1991 the Committee had yet to receive a response from the Commission, and another letter was sent - this time to Mr. Weidman.

HAND DELIVERED

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH
91 JUL - 1 AM 9:14

91 JUL - 1 AM 10:43

FEDERAL ELECTION COMMISSION

June 27, 1991

Page 2

The Committee's report was filed with the Secretary of State, per Mr. Gibson's November 7, 1990 letter, and failure to file with the Federal Election Commission in a timely manner was an oversight. I might also add that I had just returned to work from a six (6) week medical leave, having gone through major surgery, and was extremely concerned with making the October 15th deadline.

Sincerely,



Peggy A. Childers
Senior Administrator

/pac
FECAGMT

cc: Tony Buckley
Robert Bonham

Enclosures

010405131



The WILLIAM LYON *Company*

4490 VON KARMAN, P.O. BOX 7520, NEWPORT BEACH, CA 92658-7520 • (714) 833-3600 • FAX (714) 476-8604

March 19, 1991

Mr. David Weidman
Reports Analysis Division
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

RE: WILLIAM LYON COMPANY FEDERAL PAC
FEC I.D. NO.: C00237073
October Quarterly Report (7/1/90 - 9/30/90)

Dear Mr. Weidman:

A letter dated November 7, 1990 from John D. Gibson, Assistant Staff Director, was received in our office November 9, 1990 pertaining to William Lyon Company's failure to file the above referenced report (copy attached).

Our report had, in fact, been filed on time, and pursuant to my phone conversation with you on Tuesday, November 13th; my November 14, 1990 letter of response, along with a copy of the report, and Certified Receipts, was sent to the attention of Mr. Gibson as proof. To date, I have as yet to receive a written acknowledgement from the Federal Election Commission regarding the status of my response.

I realize the importance of our Company's obligation to file these reports in a timely manner, and to date these deadlines have been met. It is therefore, extremely important that this matter be resolved as quickly as possible.

Should you have any questions, please feel free to contact me at (714) 476-5290.

Sincerely,

Peggy A. Childers
Senior Administrator

pac
MAR19_90

Enclosures



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-7

November 7, 1990

Paul Pfeiffer, Treasurer
The William Lyon Company Federal
Political Action Committee
4490 Von Karman
Newport Beach, CA 92658

Identification Number: C00237073

Reference: October Quarterly Report (7/1/90-9/30/90)

Dear Mr. Pfeiffer:

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 David Weidman 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

10040353904

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. David Weidman Reports Analysis Division FEDERAL ELECTION COMMISSION Washington, D.C. 20463	4. Article Number P 779 544 178 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt Merchandise Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature - Addressee X	8. Addressee's Address (ONLY if requested) fee \$2.00 RECEIVED FEDERAL ELECTION COMMISSION SECURITY DIVISION AH 10: 17
6. Signature - Agent X	
7. Date of Delivery	

PS Form 3811, Apr. 1989 U.S.G.P.O. 1989-238-815 DOMESTIC RETURN REC

PS Form 3800, June 1990

Postmaster Date Mailed 3/30/91 (see)	Return Receipt Showing to Whom & Date Delivered 1.00
Return Receipt Showing Date, & Address of Delivery	
TOTAL Postage & Fees \$2.52	

Sent to Mr. David Weidman FEDERAL ELECTION COMMISSION Reports Analysis Division
Street & No. Washington, D.C. 20463
P.O. State & Zip Code
Postage \$.52
Certified Fee 1.00
Special Delivery Fee
Restricted Delivery Fee

P 779 544 178
Certified Mail Receipt
 No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

5
6
7
8
9
0
4
0
1

Form 3800, June 1985

U.S.G.P.O. 1985-234-555

Sent to Mr. John D. Gibson	
Street and No. FEDERAL ELECTION COMMISSION	
City, State and ZIP Code Washington, D.C. 20463	
Postage \$.85	
Certified Fee .85	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	.70
Return Receipt showing to whom Date and Address of Delivery	
TOTAL Postage and Fees	\$2.60
Postmark or Date Madeira 11/15/90	

P 427 847 251
RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge)
 2. Restricted Delivery (Extra charge)

3. Article Addressed to: FEDERAL ELECTION COMMISSION Washington, D.C. 20463 Attn: Mr. John D. Gibson Reports Analysis Division	4. Article Number P 427 847 251 Type of Service: <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> COD <input type="checkbox"/> Return Receipt for Merchandise
5. Signature - Address X	Always obtain signature of addressee or agent and DATE DELIVERED.
6. Signature - Agent X	8. Addressee's Address (ONLY if requested and fee paid)
7. Date of Delivery 03-20-05	

11/15 - Copy to letter

Federal

50050711

3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge)
2. Restricted Delivery (Extra charge)

<p>3. Article Addressed to:</p> <p>SECRETARY OF STATE POLITICAL REFORM DIVISION 1700 "J" Street, Room 219 Sacramento, CA 95812</p>	<p>4. Article Number P 427 846 802</p> <p>Type of Service:</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise</p> <p>Always obtain signature of addressee or agent and DATE DELIVERED.</p>
<p>5. Signature — Address X</p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p>
<p>6. Signature — Agent X</p>	
<p>7. Date of Delivery</p>	

PS Form 3811, Mar. 1988 • U.S.G.P.O. 1988-212-865 • DOMESTIC RETURN RECEIPT

40307

SEND Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge)
2. Restricted Delivery (Extra charge)

<p>9. Article Addressed to:</p> <p>REGISTRAR OF VOTERS CITY & COUNTY OF SAN FRANCISCO Room 155 City Hall 400 Van Ness San Francisco, CA 94102</p>	<p>4. Article Number P 427 846 803</p> <p>Type of Service:</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise</p> <p>Always obtain signature of addressee or agent and DATE DELIVERED.</p>
<p>5. Signature — Address X</p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p>
<p>6. Signature — Agent X</p>	
<p>7. Date of Delivery</p>	

PS Form 3811, Mar. 1988 • U.S.G.P.O. 1988-212-865 • DOMESTIC RETURN RECEIPT

SEND Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to: SECRETARY OF STATE POLITICAL REFORM DIVISION 1730 J Street, Room 219 Sacramento, CA 95812	4. Article Number P 427 846 802
5. Signature <input checked="" type="checkbox"/> Address X	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature <input type="checkbox"/> Agent X	Always obtain signature of addressee or agent and DATE DELIVERED.
7. Date of Delivery	8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Mar. 1988 U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

403379

SEND Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to: REGISTRAR OF VOTERS CITY & COUNTY OF SAN FRANCISCO Room 155 City Hall 400 Van Ness San Francisco, CA 94102	4. Article Number P 427 846 803
5. Signature <input checked="" type="checkbox"/> Address X	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature <input type="checkbox"/> Agent X	Always obtain signature of addressee or agent and DATE DELIVERED.
7. Date of Delivery	8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Mar. 1988 U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery (Extra charge)

3. Article Addressed to:
REGISTRAR-RECORDER OF LOS ANGELES
Campaign Reporting Unit
557 Ferguson Drive
Los Angeles, CA 90222

4. Article Number
P 427 846 804

Type of Service:
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee
X

8. Addressee's Address (ONLY if requested and fee paid)

6. Signature - Agent
X *Walt Hart*

7. Date of Delivery
OCT 30 1990

PS Form 3811, Mar 1988 U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT
10/28 Federal

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery (Extra charge)

3. Article Addressed to:
ORANGE COUNTY REGISTRAR OF VOTERS
P O Box 11298
Santa Ana, CA 92711

4. Article Number
P 427 846 805

Type of Service:
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee
X

8. Addressee's Address (ONLY if requested and fee paid)

6. Signature - Agent
X *Carlson West*

7. Date of Delivery
OCT 13 1990

PS Form 3811, Mar 1988 U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT
10/28 Federal

40,000,000

REPORT OF RECEIPTS AND DISBURSEMENTS

Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) WILLIAM LYON COMPANY FEDERAL PAC	2. FEC IDENTIFICATION NUMBER C 00237073
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 4490 Von Karman	3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).
CITY, STATE and ZIP CODE Newport Beach, CA 92660	

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report
- Monthly Report Due On:
- February 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		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period <u>7/01/90</u> through <u>9/30/90</u>		
6	(a) Cash on Hand January 1, 19 <u>90</u>		\$ 27,775.00
	(b) Cash on Hand at Beginning of Reporting Period	\$ 31,377.52	
	(c) Total Receipts (from Line 18)	\$ 602.49	\$ 4,384.42
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 31,980.01	\$ 32,159.42
7	Total Disbursements (from Line 28)	\$ 1,000.00	\$ 1,179.41
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 30,980.01	\$ 30,980.01
9	Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	\$ -0-	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800 424-9530 Local 202-376-3120
10	Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)	\$ -0-	

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

Name of Print Name of Treasurer
Paul W. Pfeiffer

Signature of Treasurer: *Paul W. Pfeiffer* *Paul W. Pfeiffer* 11-15-90

Date
 10-11-90

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

DETAILED SUMMARY PAGE

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

Name of Committee (in full)	Report Covering the Period	
WILLIAM LYON COMPANY FEDERAL PAC	From: 7/01/90	To: 9/30/90
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11 CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	-0-	3,000.00
(ii) Unitemized	-0-	300.00
(iii) Total of contributions from individuals	-0-	3,300.00
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees (such as PACs)	-0-	-0-
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	-0-	3,300.00
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-
13 ALL LOANS RECEIVED	-0-	-0-
14 LOAN REPAYMENTS RECEIVED	-0-	-0-
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-
17 OTHER RECEIPTS (Dividends, Interest, etc.)	602.49	1,084.42
18 TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	602.49	4,384.42
II. DISBURSEMENTS		
19 OPERATING EXPENDITURES	-0-	179.41
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	1,000.00	1,000.00
22 INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	-0-	-0-
24 LOAN REPAYMENTS MADE	-0-	-0-
25 LOANS MADE	-0-	-0-
26 REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	-0-	-0-
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees (such as PACs)	-0-	-0-
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	-0-	-0-
27 OTHER DISBURSEMENTS	-0-	-0-
28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1,000.00	1,179.41
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29 TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	-0-	3,300.00
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	-0-	-0-
31 NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	-0-	3,300.00
32 TOTAL OPERATING EXPENDITURES (from Line 19)	-0-	179.41
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)	-0-	-0-
34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)	-0-	179.41

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

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

NAME OF COMMITTEE (in Full)

WILLIAM LYON COMPANY FEDERAL PAC

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement I.D.#125920 Christopher Cox - U.S. Congress, 40th District Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Christopher Cox P. O. Box 8088-C Newport Beach, CA 92658		8/08/90	\$1,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL (Total Disbursements This Page (optional))

\$1,000.00

TOTAL This Period (last page this line number only)

\$1,000.00

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

NAME OF COMMITTEE (in Full)
WILLIAM LYON COMPANY FEDERAL PAC

<p>A. Full Name, Mailing Address and ZIP Code Merril Lynch, Pierce, Fenner and Smith, Inc. 19000 MacArthur Blvd., #200 Newport Beach, CA 92660</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Interest Income</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$ 220.45</p>	<p>Date (month, day, year) 6/30/90 to 7/31/90</p>	<p>Amount of Each Receipt this Period \$220.45</p>
<p>B. Full Name, Mailing Address and ZIP Code Merril Lynch, Pierce, Fenner and Smith, Inc. 19000 MacArthur Blvd., #200 Newport Beach, CA 92660</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Interest Income</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$ 423.77</p>	<p>Date (month, day, year) 8/1/90 to 8/31/90</p>	<p>Amount of Each Receipt this Period \$203.32</p>
<p>C. Full Name, Mailing Address and ZIP Code Merril Lynch, Pierce, Fenner and Smith, Inc. 19000 MacArthur Blvd., #200 Newport Beach, CA 92660</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Interest Income</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$ 602.49</p>	<p>Date (month, day, year) 9/1/90 to 9/28/90</p>	<p>Amount of Each Receipt this Period \$178.72</p>
<p>D. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>E. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>F. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>G. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>SUBTOTAL of Receipts This Page (optional)</p>			<p>\$602.49</p>
<p>TOTAL This Period (last page this line number only)</p>			<p>\$602.49</p>

405714

REPORT OF RECEIPTS AND DISBURSEMENTS

Of Other Than An Authorized Committee

(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) WILLIAM LYON COMPANY FEDERAL PAC		2. FEC IDENTIFICATION NUMBER C 00237073
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 4490 Von Karman		
CITY, STATE and ZIP CODE Newport Beach, CA 92660		
3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).		

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report
- Monthly Report Due On:
- | | | |
|--------------------------------------|---------------------------------------|--------------------------------------|
| <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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period <u>7/01/90</u> through <u>9/30/90</u>		
6	(a) Cash on Hand January 1, 19 <u>90</u>		\$ 27,775.00
	(b) Cash on Hand at Beginning of Reporting Period	\$ 31,377.52	
	(c) Total Receipts (from Line 18)	\$ 602.49	\$ 4,384.42
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 31,980.01	\$ 32,159.42
7	Total Disbursements (from Line 28)	\$ 1,000.00	\$ 1,179.41
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 30,980.01	\$ 30,980.01
9	Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	\$ -0-	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10	Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)	\$ -0-	

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

Paul W. Pfeiffer

Signature of Treasurer

Paul W Pfeiffer

Date

10-11-90

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 3X

(revised 4/87)

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

Name of Committee (in full)	Report Covering the Period	
WILLIAM LYON COMPANY FEDERAL PAC	From: 7/01/90	To: 9/30/90
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11 CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	-0-	3,000.00
(ii) Unitemized	-0-	300.00
(iii) Total of contributions from individuals	-0-	3,300.00
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees (such as PACs)	-0-	-0-
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	-0-	3,300.00
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-
13 ALL LOANS RECEIVED	-0-	-0-
14 LOAN REPAYMENTS RECEIVED	-0-	-0-
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-
17 OTHER RECEIPTS (Dividends, Interest, etc.)	602.49	1,084.42
18 TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	602.49	4,384.42
II. DISBURSEMENTS		
19 OPERATING EXPENDITURES	-0-	179.41
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	1,000.00	1,000.00
22 INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	-0-	-0-
24 LOAN REPAYMENTS MADE	-0-	-0-
25 LOANS MADE	-0-	-0-
25 REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	-0-	-0-
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees (such as PACs)	-0-	-0-
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	-0-	-0-
27 OTHER DISBURSEMENTS	-0-	-0-
28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1,000.00	1,179.41
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29 TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	-0-	3,300.00
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	-0-	-0-
31 NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	-0-	3,300.00
32 TOTAL OPERATING EXPENDITURES (from Line 19)	-0-	179.41
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)	-0-	-0-
34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)	-0-	179.41

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

NAME OF COMMITTEE (in Full)

WILLIAM LYON COMPANY FEDERAL PAC

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement I.D.#125920, Christopher Cox - U.S. Congress, 40th District	Date (month, day, year)	Amount of Each Disbursement This Period
Christopher Cox P. O. Box 8088-C Newport Beach, CA 92658	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/08/90	\$1,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL (Total Disbursements This Page (optional))	\$1,000.00
TOTAL (This Period (last page this line number only))	\$1,000.00

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

NAME OF COMMITTEE (in Full)

WILLIAM LYON COMPANY FEDERAL PAC

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Merril Lynch, Pierce, Fenner and Smith, Inc. 19000 MacArthur Blvd., #200 Newport Beach, CA 92660		6/30/90 to 7/31/90	\$220.45
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Interest Income	Occupation	Aggregate Year-to-Date > \$ 220.45	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Merril Lynch, Pierce, Fenner and Smith, Inc. 19000 MacArthur Blvd., #200 Newport Beach, CA 92660		8/1/90 to 8/31/90	\$203.32
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Interest Income	Occupation	Aggregate Year-to-Date > \$ 423.77	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Merril Lynch, Pierce, Fenner and Smith, Inc. 19000 MacArthur Blvd., #200 Newport Beach, CA 92660		9/1/90 to 9/28/90	\$178.72
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Interest Income	Occupation	Aggregate Year-to-Date > \$ 602.49	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

UBTOTAL of Receipts This Page (optional)

\$602.49

TOTAL This Period (last page this line number only)

\$602.49

RECEIVED
F.E.C.
SECRETARIAT

91 AUG 14 PM 4:12

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The William Lyon Company Federal) MUR 3334
Political Action Committee and)
Paul Pfeiffer, as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Paul Pfeiffer, the treasurer of The William Lyon Company Federal Political Action Committee. Attachment 1.

The attached agreement contains no changes from the revised agreement approved by the Commission on June 27, 1991. A check for the civil penalty has been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with The William Lyon Company Federal Political Action Committee and Paul Pfeiffer, as treasurer.
2. Approve the appropriate letter.
3. Close the file.

Lawrence M. Noble
General Counsel

8/13/91
Date

BY: 
Lois G. Lerner
Associate General Counsel

- Attachments
1. Conciliation Agreement
 2. Photocopy of civil penalty check

Staff Assigned: Tony Buckley

1004050711

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The William Lyon Company Federal) MUR 3334
Political Action Committee and)
Paul Pfeiffer, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 19, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 3334:

1. Accept the conciliation agreement with The William Lyon Company Federal Political Action Committee and Paul Pfeiffer, as treasurer.
2. Approve the appropriate letter, as recommended in the General Counsel's Report dated August 13, 1991.
3. Close the file.

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

Attest:

8-19-91

Date

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

Received in the Secretariat: Wed., August 14, 1991 4:12 p.m.
Circulated to the Commission: Thurs., August 15, 1991 11:00 a.m.
Deadline for vote: Mon., August 19, 1991 11:00 a.m.

dr



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 22, 1991

CLOSED

Paul Pfeiffer, Treasurer
The William Lyon Company Federal
Political Action Committee
4490 Von Karman, P.O. Box 7520
Newport Beach, CA 92658

RE: MUR 3334
The William Lyon Company
Federal Political Action
Committee and Paul Pfeiffer,
as treasurer

Dear Mr. Pfeiffer:

On August 19, 1991, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on behalf of The William Lyon Company Federal Political Action Committee and you, as treasurer, in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(i), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

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

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner
by *HLK*

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

11040051921

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 3334
The William Lyon Company Federal)	
Political Action Committee and)	
Paul Pfeiffer, 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 William Lyon Company Federal Political Action Committee and Paul Pfeiffer, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i).

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 William Lyon Company Federal Political Action

40532

Committee is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Paul Pfeiffer is the treasurer of The William Lyon Company Federal Political Action Committee.

3. Section 434(a)(4)(A)(i) of Title 2 provides that all political committees, other than authorized committees of a candidate, filing quarterly reports shall file quarterly reports in a calendar year in which a regularly scheduled general election is held. Quarterly Reports are to be filed no later than the 15th day after the last day of each calendar quarter delineating all receipts and disbursements made during the preceding quarter and complete as of the last day of the quarter.

4. Respondents were required to file the 1990 October Quarterly Report no later than October 15, 1990. Respondents did not file the report until November 15, 1990, thirty-one days late, disclosing \$602 in receipts and \$1,000 in disbursements.

V. Respondents failed to timely file the 1990 October Quarterly Report in violation of 2 U.S.C. § 434(a)(4)(A)(i).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Three Hundred and Fifty dollars (\$350), 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



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE END OF MUR # 3334

DATE FILMED 9/5/91 CAMERA NO. 3

CAMERAMAN AS

110403025