



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3394

DATE FILMED 11/2/91 CAMERA NO. 2

CAMERAMAN AS

91040374207



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1991

MEMORANDUM

**TO:** LAWRENCE C. NOBLE  
GENERAL COUNSEL

**THROUGH:** JOHN C. SURINA  
STAFF DIRECTOR

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

**SUBJECT:** UNAUTHORIZED QUARTERLY FILERS WHICH FAILED TO FILE  
THE 1990 12 DAY PRE-GENERAL REPORT BY ELECTION DAY

The attached list of unauthorized committees consists of thirty-two (32) quarterly filers which failed to file a 1990 12 Day Pre-General Report by Election Day, November 6, 1990.

Unlike the mandatory reporting requirement placed upon monthly filers, 2 U.S.C. §434(a)(4)(A)(ii) requires quarterly filers to submit 12 Day Pre-General Reports only if the committees make contributions to or expenditures on behalf of federal candidates in the general election. All unauthorized committees were sent prior notification regarding the pre- and post-general filing requirements on October 1, 1990 (Attachment 33).

The Party/Non-Party Branch conducted a thorough examination to identify quarterly filers disclosing contributions or expenditures between October 1 and October 17, 1990. The research revealed committees that submitted:

- a) 12 Day Pre-General Reports in an untimely manner; or
- b) 30 Day Post-General Reports indicating that 12 Day Pre-General Reports should have been filed.

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

Attachment

00001

91040374208

**List of Committees and Prior Commission Actions**

9  
1  
0  
4  
0  
3  
7  
4  
2  
0  
9

9. C00077347 First Chicago Corp Government Affairs 91NF-79  
C/O The First National Bank of Chicago

COMMITTEE ID, NAME AND ADDRESS

CONTACTS  
WITH FILER A/CN

REPORTS FILED/  
RESPONSES

0374210

0087347

Bone

Attachments 9a-9f

FIRST CHICAGO CORP GOVERNMENT AFFAIRS C/O THE FIRST NATIONAL BANK OF CHICAGO

TREASURER'S NAME: FRANK J BOUSKA

FIRST NATIONAL PLAZA

CHICAGO

IL 60607

1990 30 Day Post-

General Report

filed 12/5/90

9

91040374211

**First Chicago Corp Government Affairs  
c/o The First National Bank of Chicago**

**(Attachments 9a - 9f)**

00073

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

ATTACHMENT 9a 25APR91

PAGE 2

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
FIRST CHICAGO CORP GOVERNMENT AFFAIRS C/O THE FIRST NATIONAL BANK OF CHICAGO						ID 0C00077347 NON-PARTY QUALIFIED
CONNECTED ORGANIZATION: FIRST CHICAGO CORPORATION						
1989	MID-YEAR REPORT	53,888	64,971	1JAN89 -30JUN89	19	89FEC/605/0003
	MID-YEAR REPORT - AMENDMENT	53,888	64,971	1JAN89 -30JUN89	20	89FEC/611/0832
	1 <sup>ST</sup> LETTER INFORMATIONAL NOTICE			1JAN89 -30JUN89	1	89FEC/610/3895
	YEAR-END	36,114	32,350	1JUL89 -31DEC89	12	90FEC/622/1080
1990	APRIL QUARTERLY	15,169	14,150	1JAN90 -31MAR90	6	90FEC/635/0369
	JULY QUARTERLY	33,300	41,050	1APR90 -30JUN90	15	90FEC/647/5229
	JULY QUARTERLY - AMENDMENT	36,779	41,050	1APR90 -30JUN90	15	90FEC/660/5272
	OCTOBER QUARTERLY	21,042	24,800	1JUL90 -30SEP90	18	90FEC/660/5254
	POST-GENERAL	13,558	13,800	1OCT90 -26NOV90	24	90FEC/675/4123
	YEAR-END	10,114	0	27NOV90 -31DEC90	25	91FEC/683/2287
	TOTAL	186,664	0 191,321	0	155	TOTAL PAGES

2  
1  
0  
4  
0  
3  
7  
4  
2  
1  
2

All reports have been reviewed  
Cash-on-hand as of 12/31/90: \$21,986.20  
Debts owed to Committee as of 12/31/90: -0-  
Debts owed by Committee as of 12/31/90: -0-

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

90 DEC -8 AM 11:37

USE FEC MAILING LABEL OR PRINT TYPE OR PRINT

<b>1. NAME OF COMMITTEE (in full)</b> First Chicago Corporation Political Action Committee ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported The First National Bank of Chicago One First National Plaza, Suite 9200 CITY, STATE and ZIP CODE Chicago, Illinois 60670	<b>2. FEC IDENTIFICATION NUMBER</b> C00077347 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 31
<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 11-06-90 in the State of Illinois

(b) Is this Report an Amendment?  YES  NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6.	Covering Period <u>10-01-90</u> through <u>11-26-90</u>		
	(a) Cash on Hand January 1, 19 <u>90</u>		\$ 19,121.45
	(b) Cash on Hand at Beginning of Reporting Period	\$ 12,113.38	
	(c) Total Receipts (from Line 1B)	\$ 13,558.61	\$ 86,550.54
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 25,671.99	\$ 105,671.99
7.	Total Disbursements (from Line 2B)	\$ 13,800.00	\$ 93,800.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 11,871.99	\$ 11,871.99
9.	Debts and Obligations Owed TO the Committee (Remove all on Schedule C and/or Schedule D)	\$	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 (Remove all on Schedule C and/or Schedule D)	\$	

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

Type or Print Name of Treasurer

*Raymond J. Hark*

Signature of Treasurer

*Raymond J. Hark - Asst. Treasurer*

Date

12/4/90

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

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# DETAILED SUMMARY PAGE

of Receipts and Disbursements  
Page 2, FEC FORM 280

Name of Committee in Full <b>POLITICAL ACTION COMMITTEE</b>	Period Covered by Period From: <b>10-1-90</b> To: <b>11-30-90</b>	
<b>I. RECEIPTS</b>	<b>COLUMN A</b> Total This Period	<b>COLUMN B</b> Calendar Year-To-Date
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>		
<b>(a) Individuals/Persons Other Than Political Committees</b>		
(i) Itemized (use Schedule A)	\$ 7,711.00	\$ 21,014.04
(ii) Unitemized	\$ 852.25	\$ 24,222.32
(iii) Total of contributions from individuals		
<b>(b) Political Party Committees</b>		
<b>(c) Other Political Committees (such as PACs)</b>		
<b>(d) TOTAL CONTRIBUTIONS (add 11(a)(i), (b), and (c))</b>	<b>\$ 13,564.43</b>	<b>\$ 86,056.36</b>
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b>		
<b>13. ALL LOANS RECEIVED</b>		
<b>14. LOAN REPAYMENTS RECEIVED</b>		
<b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)</b>		
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>		500.00
<b>17. OTHER RECEIPTS (Dividends, Interest, etc.)</b>	(5.02)	(5.02)
<b>18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)</b>	<b>\$ 13,559.61</b>	<b>\$ 86,550.54</b>
<b>II. DISBURSEMENTS</b>		
<b>19. OPERATING EXPENDITURES</b>		
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b>		
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>	\$ 13,800.00	\$ 93,800.00
<b>22. INDEPENDENT EXPENDITURES (use Schedule E)</b>		
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)</b>		
<b>24. LOAN REPAYMENTS MADE</b>		
<b>25. LOANS MADE</b>		
<b>26. REFUNDS OF CONTRIBUTIONS TO:</b>		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		
<b>27. OTHER DISBURSEMENTS</b>		
<b>28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)</b>	<b>\$ 13,800.00</b>	<b>\$ 93,800.00</b>
<b>III. NET CONTRIBUTIONS/OPERATING EXPENDITURES</b>		
<b>29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))</b>	\$ 13,564.43	\$ 86,056.36
<b>30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))</b>		
<b>31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)</b>	<b>\$ 13,564.43</b>	<b>\$ 86,056.36</b>
<b>32. TOTAL OPERATING EXPENDITURES (from Line 19)</b>		
<b>33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)</b>		
<b>34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)</b>		

29 JU 3 46 9 5 A 4 2 A 4

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**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Use separate schedules for each category of the Detailed Summary Page

PAGE 1 of 3  
FOR LINE NUMBER 21

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)

**FIRST CHICAGO CORPORATION POLITICAL ACTION COMMITTEE**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
David Price for Congress P.O. Box 2474 Washington, DC 20013	U.S. Representative - North Carolina Candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-16-90	\$ 500.00
Simon for Senate 176 W. Adams St. Suite 1940 Chicago, IL 60603	U.S. Senator - Illinois Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-16-90	\$ 500.00
Hiler for Congress 5650 W. Eighth Street Arlington, VA 22205	U.S. Representative - Indiana Candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-16-90	\$ 500.00
Bill McCollum for Congress P.O. Box 150732 Altamonte Springs, FL 32715	U.S. Representative-Florida Candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-16-90	\$ 500.00
Dudycs for Congress P.O. Box 31397 Chicago, IL 60632	U.S. Representative - Illinois Candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-16-90 11-01-90 11-05-90	\$ 1,500.00 100.00 2,000.00
Al McCandless for Congress 5650 W. Eighth St. Arlington, VA 22205	U.S. Representative - California Candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-16-90	\$ 500.00
The Carper for Congress Committee P.O. Box 2882 Wilmington, DE 19805	U.S. Representative - Delaware Candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-16-90	\$ 1,000.00
Barney Frank for Congress Committee P.O. Box 2884 Washington, DC 20013	U.S. Representative - Massachusetts Candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-16-90	\$ 500.00
Lipinski for Congress Committee 5832 S. Archer ave. Chicago, IL 60638	U.S. Representative - Illinois Candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-16-90	\$ 500.00

SUBTOTAL of Disbursements This Page (optional) ..... \$ 8,100.00

TOTAL This Period (last page this line number only) .....

19 31 034607 5 A 4 2 3 5

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**SCHEDULE B ITEMIZED DISBURSEMENTS**

Use separate schedules for each category of the Detailed Summary Page

PAGE 2 OF 3  
FOR LINE NUMBER 21

Any information received from such Reports and Statements may not be sold or used by any person for the purpose of obtaining 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)

**FIRST CHICAGO CORPORATION POLITICAL ACTION COMMITTEE**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Boagland for Congress 1990 Committee P.O. Box 631 Omaha, NE 68101	U.S. Representative - Nebraska Candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-16-90	\$ 500.00
B. Full Name, Mailing Address and ZIP Code Bangmeister for Congress 1312 W. Jefferson St. Joliet, IL 60435	U.S. Representative - Illinois Candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-16-90	\$ 1,000.00
C. Full Name, Mailing Address and ZIP Code Russo for Congress Committee P.O. Box 627 Oak Lawn, IL 60454	U.S. Representative - Illinois Candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-16-90	\$ 500.00
D. Full Name, Mailing Address and ZIP Code Josie Heath for U.S. Senate 1555 Welton St. Denver, CO 80202	U.S. Senator - Colorado Candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-16-90	\$ 500.00
E. Full Name, Mailing Address and ZIP Code Dan Coats for Indiana P.O. Box 2365 Indianapolis, IN 46206	U.S. Senator - Indiana Candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-31-90	\$ 500.00
F. Full Name, Mailing Address and ZIP Code Committee to Re-Elect Lafalce P.O. Box 2884 Washington, DC 20013	U.S. Representative - NY Candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-31-90	\$ 500.00
G. Full Name, Mailing Address and ZIP Code Durbin for Congress Committee 176 West Adams, Suite 1940 Chicago, IL 60603	U.S. Representative - Illinois Candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-31-90	\$ 500.00
H. Full Name, Mailing Address and ZIP Code Toby Roth for Congress '90 P.O. Box 2673 Appleton, WI 54913	U.S. Representative - Wisconsin Candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11-05-90	\$ 500.00
I. Full Name, Mailing Address and ZIP Code Lis Patterson for Congress P.O. Box 5564 Spartanburg, SC 29304	U.S. Representative - So. Carolina Candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11-05-90	\$ 1,000.00

SUBTOTAL of Disbursements This Page (total) ..... \$ 5,500.00

TOTAL This Period (list page this line number only) .....

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280

**FIRST CHICAGO**  
The First National Bank of Chicago

One First National Plaza  
Chicago, Illinois 60670

IL PERMIT 3303251 = 2.8 J

Federal Election Commission  
999 E. Street, NW  
Washington, DC 20463

90 DEC -8 AM 11:37

FEDERAL ELECTION COMMISSION  
MAIL ROOM

ATTACHMENT 92

00079

**CERTIFIED MAIL**  
P 060 794 811

RECEIVED  
F.E.C.  
SECRETARIAT

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

91 AUG 19 PM 4:06

FIRST GENERAL COUNSEL'S REPORT

**SENSITIVE**

RAD Referral: 91NF 71 - 102  
Staff Member Jeffrey D. Long

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

RESPONDENTS:

91040874218

First Chicago Corp. Government Affairs c/o The  
First National Bank of Chicago and Frank J. Bouska,  
as treasurer

91040374219

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

INTERNAL REPORTS CHECKED: Referral Materials  
Disclosure Documents

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Report Analysis Division ("RAD") referred the above thirty-two (32) committees and their treasurers to the Office of the General Counsel on May 10, 1991. The basis for 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)(A)(ii).

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that all unauthorized committees filing quarterly reports shall file a pre-election report before any election in which the committee makes a contribution or expenditure on behalf of a candidate in such election. According to 2 U.S.C. § 434(a)(4)(A)(ii), the pre-election report shall be filed no later than the 12th day before the election and shall be complete as of the 20th day before the election.

With regard to the 1990 general election, unauthorized committees which made contributions or expenditures during the period of October 1 through October 17 were required to file a 12 Day Pre-General Election Report covering that period by

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October 25, 1990. On October 1, 1990, all unauthorized committees were sent prior notification regarding the filing of the pre-general and post-general reports, which specifically informed quarterly filers of the requirement to file a pre-general report if contributions or expenditures were made during the period between October 1 and October 17, 1990. (Attachment 1, page 253).

Of the thirty-two referred committees, twenty-four of the committees disclosed on their 30 Day Post-General Reports contributions or expenditures for the period between October 1 and October 17, 1990, indicating that the 12 Day Pre-General Reports should have been filed. The remaining eight of the referred committees filed the 12 Day Pre-General Reports but not in a timely manner. Accordingly, the Office of the General Counsel recommends that the Commission open Matters Under Review and find reason to believe that the 32 referred committees and their

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treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file timely the 1990 12 Day Pre-General Report.

**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.

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PAGES 6 THROUGH 23 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 treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii) and enter into conciliation prior to a finding of probable cause to believe:
  - A.
  - B.

- C.
- D.
- E.
- F.
- G.
- H.
- I.
- J.
- K.
- L.
- M.
- N.
- O.
- P.
- Q.
- R.
- S.
- T.

**First Chicago Corp. Government Affairs c/o The First National Bank of Chicago, and Frank J. Bouska, as treasurer**

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U.

V.

W.

X.

Y.

Z.

AA.

BB.

CC.

DD.

EE.

FF.

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- 2. Approve the attached Factual and Legal Analyses and conciliation agreements, and the appropriate letters.

Lawrence M. Noble  
 General Counsel

8-19-91  
 Date

BY: Lois G. Lerner  
 Associate General Counsel

**Attachments**

- 1. Referral Materials
- 2. Factual and Legal Analysis (32)
- 3. Proposed agreements (32)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	RAD Referrals
	)	# 91NF 71-102
Thirty-two Committees and their	)	
treasurers.	)	

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CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on August 27, 1991, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions with respect to RAD Referrals 91NF 71 - 102:

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

A.

B.

C.

(continued)

91040374227

Federal Election Commission  
Certification: RAD Referrals  
#91NF 71 - 102  
August 27, 1991

Page 2

D.

E.

F.

G.

H.

I. First Chicago Corp. Government  
Affairs, c/o The First National  
Bank of Chicago, and Frank J.  
Bouska, as treasurer;

J.

K.

L.

91040374228

(continued)

Federal Election Commission  
Certification: RAD Referrals  
#91NF 71 - 102  
August 27, 1991

Page 3

M.

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O.

P.

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(continued)

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(continued)

Federal Election Commission  
Certification: RAD Referrals  
#91NF 71 - 102  
August 27, 1991

Page 5

2. Approve the Factual and Legal Analyses, conciliation agreements, and the appropriate letters as recommended in the General Counsel's report dated August 19, 1991.

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

Attest:

9-4-91  
Date

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

91040374231



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 13, 1991

**CLOSED**

Frank J. Bouska, Treasurer  
First Chicago Corp. Government Affairs  
c/o The First National Bank of Chicago  
1 First National Plaza  
Chicago, IL 60607

RE: MUR 3394  
First Chicago Corp. Government  
Affairs c/o The First National Bank  
of Chicago and Frank J. Bouska, as  
treasurer

Dear Mr. Bouska:

On August 27, 1991, the Federal Election Commission found that there is reason to believe First Chicago Corp. Government Affairs c/o The First National Bank of Chicago ("Committee"), violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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

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.

91040374232

Frank J. Bouska, Treasurer  
Page 2

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

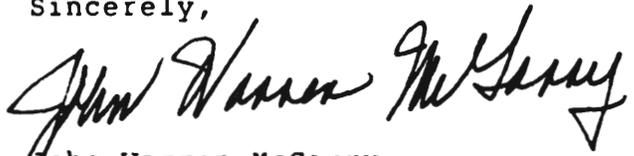
If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

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 Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

  
John Warren McGarry  
Chairman

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

91040374233

**FEDERAL ELECTION COMMISSION**

**FACTUAL AND LEGAL ANALYSIS**

MUR: 3394

**RESPONDENTS: First Chicago Corp. Government  
Affairs c/o The First National  
Bank of Chicago**

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that all unauthorized committees filing quarterly reports, shall file a pre-election report before any election in which the committee makes a contribution to expenditure on behalf of a candidate in such election. According to 2 U.S.C. § 434(a)(4)(A)(ii), the pre-election report shall be filed no later than the 12th day before the election and which shall be complete as of the 20th day before the election.

With regard to the 1990 general election, unauthorized committees which made contributions or expenditures during the period of October 1 through October 17, were required to file a 12 Day Pre-General Election Report covering that period, by October 25, 1990. On October 1, 1990, all unauthorized committees were sent prior notification regarding the filing of the pre- and post-general reports, which specifically informed quarterly filers of the requirement to file a pre-general if contributions or expenditures were made during the period between October 1 and October 17, 1990.

The Respondents disclosed on their 30 Day Post-General Report contributions or expenditures for the period between October 1 and October 17, 1990, indicating that the 12 Day Pre-General Reports should have been filed. Therefore, there is reason to believe the

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Respondents violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to  
timely file the 1990 Pre-General Election Report.

91040874235



Mail Suite  
One First National Plaza  
Chicago, Illinois 60670  
Telephone: (312) 732-4000

06-G 2937  
RECEIVED  
FEDERAL ELECTION COMMISSION  
91 SEP 27 AM 10:17

September 24, 1991

Lawrence M. Noble  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 3394 First Chicago Corporation Government Affairs  
c/o The First National Bank of Chicago and  
Frank J. Bouska as Treasurer

Dear Mr. Noble:

On September 19th I received a notice (attached) dated September 13th detailing a possible violation of Federal Election Commission requirements for the pre-election filing of a report for the period October 1 to October 17, 1990. Such report was part of a post-election report covering the period October 1 to November 26, 1990 which was filed on December 4 of last year. A draft Conciliation Agreement was attached to such notice.

In the absence of Mr. Jeffrey Long, the staff member assigned to this matter, I spoke to Mr. George Riskel of your office last Friday. He suggested I write to you with the factual material we had for your consideration and recommendation to the Commissioners.

We do not dispute the basic facts. We inadvertently did not file such report for the period October 1 through 17, 1990 by the due date, October 25. When we realized our error, we included it as part of the post-election filing. This filing then covered the period October 1 to November 26, 1990 with the post-election portion of the filing being timely filed on December 4.

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91 SEP 27 PM 12:28



**FIRST CHICAGO**  
The First National Bank of Chicago

Mail Suite  
One First National Plaza  
Chicago, Illinois 60670  
Telephone: (312) 732-4000

Page 2

In asking your consideration, I would like to point out that the Assistant Treasurer of the Political Action Committee was on maternity leave during that period of time. In addition to filing the regular quarterly report for the period July 1 through September 30, 1990 on October 12, I also discovered an error in the receipt portion of the report previously filed for the period July 1 through September 30, 1990. This amended quarterly report was filed on the same date. Thus we had filed two reports on the same date during the pre-election period.

We did not receive the notice referring to such pre and post election reporting requirements which the Commission states was mailed out October 1. If we had received it, we would have made a timely pre-election filing.

I await your reply and ask that the informal conciliation process continue and that any necessary extension of time be given so that the matter may be brought to a satisfactory conclusion.

Again I apologize for our error.

Very truly yours,

Frank J. Bouska, Treasurer  
First Chicago Political Action Committee

cc: Mr. Jeffrey Long  
Federal Election Commission  
Washington, D.C. 20463

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AFFIDAVIT

Frank J. Bouska being first duly sworn on oath deposes and states as follows:

1. That he is currently Treasurer of First Chicago Corporation Political Action Committee (FCCPAC) and was Treasurer during the year 1990.
2. That on September 19, 1991, he received a letter from the Federal Election Commission dated September 13, 1991 detailing a violation of the reporting requirements for the pre-election period October 1 through October 7, 1990 as well as factual and legal analysis procedures, designation of counsel form and conciliation agreement in connection with the above designated failure to file (see attachments).
3. That the second quarterly report for the period April 1 to June 30, 1990 was filed on July 12, 1990 (see first two pages of report attached).
4. That corrections in the addition of \$3,479.82 to the receipts of the FCCPAC for the period April 1 through June 30, 1990 were discovered by affiant and an amended return for the second quarter was filed on October 12, 1990. In addition, the third quarter report for the period July 1 through September 30, 1990 was also filed on October 12, 1990 together with a cover letter enclosing the above reports (see cover letter attached together with first two pages of said reports).
5. A Report Notice from the Federal Election Commission was received September 21, 1990 detailing the due date of the quarterly report for the period July 1, 1990 through September 30, 1990, due on October 15. Said notice makes no mention of pre-election reporting requirements during the period October 1 through October 17, 1990 other than making reference to reporting requirements in connection with candidates primary elections (see attachments).

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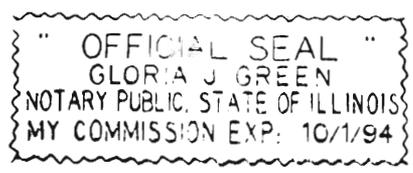
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- 6. The Factual and Legal Analysis received by respondent from the Federal Election Commission states that on October 1, 1990 all unauthorized committees were sent a notice regarding the requirement to file pre and post election reports. To the best of affiant's knowledge such notice was not received.
- 7. Subsequent to the federal election on November 6, 1990, respondent became aware of such interim reporting requirement for 1990. Consequently, a report dated October 1 through November 26, 1990 covering both the pre and post election reporting was filed on December 4, 1990. (See first two pages of report attached.)
- 8. Thayer J. Herte, Assistant Treasurer of First Chicago Corporation Political Action Committee was on maternity leave after the birth of her baby in August, 1990 until after November 1, 1990.
- 9. Affiant admits that the pre-election report covering that period, October 1 to October 17, 1990 inadvertently was not timely filed and was instead included in the report covering the period October 1 through November 26, 1990, filed on December 4, 1990.

Frank J. Bouska  
 Frank J. Bouska

Sept. 24, 1991  
 Date

Subscribed and sworn before me this 24 day of September, 1991.



Gloria J. Green  
 Notary Public

# 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) <b>First Chicago Corporation Political Action Committee</b>	2. FEC IDENTIFICATION NUMBER <b>C00077347</b>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <b>The First National Bank of Chicago                  One First National Plaza, Suite 0308</b>	3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).
CITY, STATE and ZIP CODE <b>Chicago, Illinois 60670</b>	

### 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>04-01-90</u> through <u>06-30-90</u>		
6. (a) Cash on Hand January 1, 19 <u>90</u>		\$ 19,121.45
(b) Cash on Hand at Beginning of Reporting Period	\$ 20,140.98	
(c) Total Receipts (from Line 18)	\$ 33,300.04	\$ 48,469.57
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 53,441.02	\$ 67,591.02
7. Total Disbursements (from Line 28)	\$ 41,050.00	\$ 55,200.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 12,391.02	\$ 12,391.02
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	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)	\$	

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  
*Frank J. Bonasia*

Signature of Treasurer

Date  
*July 12, 1990*

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

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

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1

Name of Committee (in full) First Chicago Corporation Political Action Committee		Report Covering the Period From: 04-01-90 To: 06-30-90	
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)		\$ 13,574.81	\$ 15,822.52
(ii) Unitemized		19,725.23	32,647.05
(iii) Total of contributions from individuals		33,300.04	48,469.57
(b) Political Party Committees			
(c) Other Political Committees (such as PACs)			
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))		\$ 33,300.04	\$ 48,469.57
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			
13. ALL LOANS RECEIVED			
14. LOAN REPAYMENTS RECEIVED			
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			
17. OTHER RECEIPTS (Dividends, Interest, etc.)			
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)		\$ 33,300.04	\$ 48,469.57
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES			
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		\$ 41,050.00	\$ 55,200.00
22. INDEPENDENT EXPENDITURES (use Schedule E)			
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			
24. LOAN REPAYMENTS MADE			
25. LOANS MADE			
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			
(b) Political Party Committees			
(c) Other Political Committees (such as PACs)			
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			
27. OTHER DISBURSEMENTS			
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		\$ 41,050.00	\$ 55,200.00
III. NET CONTRIBUTIONS OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))		\$ 33,300.04	\$ 48,469.57
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))			
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)		\$ 33,300.04	\$ 48,469.57
32. TOTAL OPERATING EXPENDITURES (from Line 19)			
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)			
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)			

October 12, 1990

Public Records Office  
Federal Election Committee  
999 E Street, N.W.  
Washington, D.C. 20463

Gentlemen:

Enclosed find Federal Election Commission Quarterly Report for the period ended September 30, 1990 for First Chicago Corporation Political Action Committee. In addition we enclose an amended return for the second quarter for the same Committee to correct an amount erroneously not included in the original report. If you have any questions please call me at area code 312-407-8054. We apologize for the error.

Very truly yours,



Frank J. Bouska  
Treasurer  
First Chicago Corporation  
Political Action Committee

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# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

<b>1. NAME OF COMMITTEE (in full)</b> First Chicago Corporation Political Action Committee	<b>2. FEC IDENTIFICATION NUMBER</b> C00077347
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported The First National Bank of Chicago One First National Plaza, Suite 0308	<b>3.</b> <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).
CITY, STATE and ZIP CODE Chicago, Illinois 60670	

## 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>04-01-90</u> through <u>06-30-90</u>		
6. (a) Cash on Hand January 1, 19 <u>90</u>		\$ 19,121.45
(b) Cash on Hand at Beginning of Reporting Period	\$ 20,140.98	
(c) Total Receipts (from Line 18)	\$ 36,779.86	\$ 51,949.39
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 56,920.84	\$ 71,070.84
7. Total Disbursements (from Line 28)	\$ 41,050.00	\$ 55,200.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 15,870.84	\$ 15,870.84
9. Debts and Obligations Owed <b>TO</b> the Committee (Itemize all on Schedule C and/or Schedule D)	\$	<b>For further information contact:</b>
10. Debts and Obligations Owed <b>BY</b> the Committee (Itemize all on Schedule C and/or Schedule D)	\$	Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120

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

Type or Print Name of Treasurer

*Thomas J. Rowan*

Signature of Treasurer

*Thomas J. Rowan*

Date

*25 June 1990*

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

91040374243

# DETAILED SUMMARY PAGE

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

Name of Committee (in full) <b>First Chicago Corporation Political Action</b>	Report Covering the Period From: <b>04-01-90</b> To: <b>06-30-90</b>	
Committee	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
<b>I. RECEIPTS</b>		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	\$ 13,574.81	\$ 15,822.52
(ii) Unitemized	23,205.05	36,126.87
(iii) Total of contributions from individuals	36,779.86	51,949.39
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	\$ 36,779.86	\$ 51,949.39
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.)		
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	\$ 36,779.86	\$ 51,949.39
<b>II. DISBURSEMENTS</b>		
19. OPERATING EXPENDITURES		
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	\$ 41,050.00	\$ 55,200.00
22. INDEPENDENT EXPENDITURES (use Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		
27. OTHER DISBURSEMENTS		
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	\$ 41,050.00	\$ 55,200.00
<b>III. NET CONTRIBUTIONS/OPERATING EXPENDITURES</b>		
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	\$ 36,779.86	\$ 51,949.39
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))		
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	\$ 36,779.86	\$ 51,949.39
32. TOTAL OPERATING EXPENDITURES (from Line 19)		
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)		
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)		

91040374244

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

<b>1. NAME OF COMMITTEE (in full)</b> First Chicago Corporation Political Action Committee	<b>2. FEC IDENTIFICATION NUMBER</b>  C00077347
<b>ADDRESS (number and street)</b> <input type="checkbox"/> Check if different than previously reported The First National Bank of Chicago One First National Plaza, Suite 0308	<b>3.</b> <input type="checkbox"/> This committee qualified as a multicandidate committee <b>DURING THIS</b> Reporting Period on _____ (date).
<b>CITY, STATE and ZIP CODE</b>  Chicago, Illinois 60670	

## 4. TYPE OF REPORT

- (a)  April 15 Quarterly 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
- October 15 Quarterly Report
- January 31 Year End Report       Twelfth day report preceding \_\_\_\_\_ (Type of Election)
- July 31 Mid Year Report (Non-election Year Only)      election on \_\_\_\_\_ in the State of \_\_\_\_\_
- Termination Report       Thirtieth day report following the General Election \_\_\_\_\_ 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>07/01/90</u> through <u>09/30/90</u>		
6. (a) Cash on Hand January 1, 19 <u>90</u>		\$ 19,121.45
(b) Cash on Hand at Beginning of Reporting Period	\$ 15,870.84	
(c) Total Receipts (from Line 18)	\$ 21,042.54	\$ 72,991.93
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 36,913.38	\$ 92,113.38
7. Total Disbursements (from Line 28)	\$ 24,800.00	\$ 80,000.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 12,113.38	\$ 12,113.38
9. Debts and Obligations Owed <b>TO</b> the Committee (Itemize all on Schedule C and/or Schedule D)	\$	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 <b>BY</b> the Committee (Itemize all on Schedule C and/or Schedule D)	\$	

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

Type or Print Name of Treasurer  
Frank S. Bauer

Signature of Treasurer  
Frank S. Bauer

Date  
Oct 11 1990

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

91040374245

# DETAILED SUMMARY PAGE

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

Name of Committee (in full) First Chicago Corporation Political Action Committee	Report Covering the Period From: 07-01-90 To: 09-30-90	
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>		
<b>(a) Individuals/Persons Other Than Political Committees</b>		
(i) Itemized (use Schedule A)	\$ 8,300.44	\$ 24,122.96
(ii) Unitemized	12,242.10	48,368.97
(iii) Total of contributions from individuals	20,542.54	72,491.93
<b>(b) Political Party Committees</b>		
<b>(c) Other Political Committees (such as PACs)</b>		
<b>(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))</b>	\$ 20,542.54	\$ 72,491.93
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b>		
<b>13. ALL LOANS RECEIVED</b>		
<b>14. LOAN REPAYMENTS RECEIVED</b>		
<b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)</b>		
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>	500.00	500.00
<b>17. OTHER RECEIPTS (Dividends, Interest, etc.)</b>		
<b>18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)</b>	\$ 21,042.54	\$ 72,991.93
<b>II. DISBURSEMENTS</b>		
<b>19. OPERATING EXPENDITURES</b>		
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b>		
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>	\$ 24,800.00	\$ 80,000.00
<b>22. INDEPENDENT EXPENDITURES (use Schedule E)</b>		
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)</b>		
<b>24. LOAN REPAYMENTS MADE</b>		
<b>25. LOANS MADE</b>		
<b>26. REFUNDS OF CONTRIBUTIONS TO:</b>		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
<b>(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))</b>		
<b>27. OTHER DISBURSEMENTS</b>		
<b>28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)</b>	\$ 24,800.00	\$ 80,000.00
<b>III. NET CONTRIBUTIONS/OPERATING EXPENDITURES</b>		
<b>29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))</b>	\$ 20,542.54	\$ 72,491.93
<b>30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))</b>		
<b>31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)</b>	\$ 20,542.54	\$ 72,491.93
<b>32. TOTAL OPERATING EXPENDITURES (from Line 19)</b>		
<b>33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)</b>		
<b>34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)</b>		

91040374246

# 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

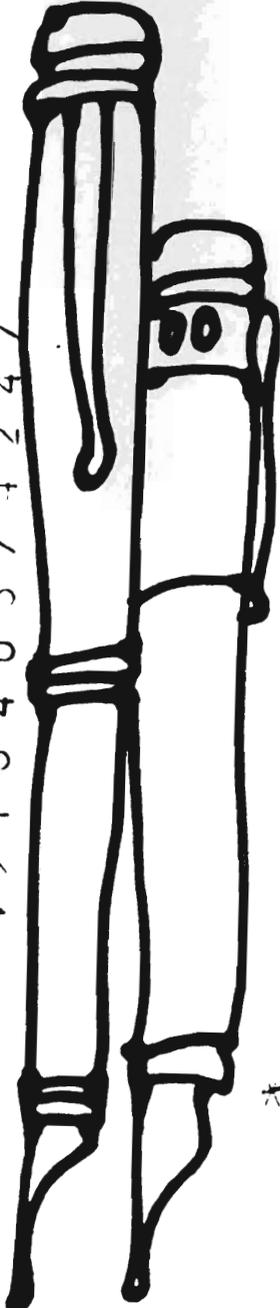
Committees which make an independent expenditure of \$1,000 or more, after the 20th day, but more than 24 hours before an election, must report it within 24 hours.

\*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)

91040374247



**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.**

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

# 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) <b>First Chicago Corporation                  Political Action Committee</b>	2. FEC IDENTIFICATION NUMBER  <b>C00077347</b>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <b>The First National Bank of Chicago                  One First National Plaza, Suite 0308</b>	3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).
CITY, STATE and ZIP CODE <b>Chicago, Illinois 60670</b>	

### 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 11-06-90 in the State of Illinois
- (b) Is this Report an Amendment?     YES     NO

### SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>10-01-90</u> through <u>11-26-90</u>		
6. (a) Cash on Hand January 1, 19 <u>90</u>		\$ 19,121.45
(b) Cash on Hand at Beginning of Reporting Period	\$ 12,113.38	
(c) Total Receipts (from Line 18)	\$ 13,558.61	\$ 86,550.54
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 25,671.99	\$ 105,671.99
7. Total Disbursements (from Line 28)	\$ 13,800.00	\$ 93,800.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 11,871.99	\$ 11,871.99
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	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)	\$	

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

*Thayer J. Herte - Asst. Treasurer*

Signature of Treasurer

*Thayer J. Herte - Asst. Treasurer*

Date

*12-4-90*

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)

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

Name of Committee (in full) **FIRST CHICAGO CORPORATION  
POLITICAL ACTION COMMITTEE**

Report Covering the Period  
From: **10-1-90** To: **11-26-90**

<b>I. RECEIPTS</b>		<b>COLUMN A Total This Period</b>	<b>COLUMN B Calendar Year-To-Date</b>	
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>				
(a) Individuals/Persons Other Than Political Committees				11(a)
(i) Itemized (use Schedule A)		\$ 7,711.08	\$ 31,834.04	11(a)
(ii) Unitemized		5,853.35	54,222.32	11(a)
(iii) Total of contributions from individuals				11(a)
(b) Political Party Committees				11(b)
(c) Other Political Committees (such as PACs)				11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))		\$ 13,564.43	\$ 86,056.36	11(d)
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b>				12
<b>13. ALL LOANS RECEIVED</b>				13
<b>14. LOAN REPAYMENTS RECEIVED</b>				14
<b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)</b>				15
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>			500.00	16
<b>17. OTHER RECEIPTS (Dividends, Interest, etc.)</b>		(5.82)	(5.82)	17
<b>18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)</b>		\$ 13,558.61	\$ 86,550.54	18
<b>II. DISBURSEMENTS</b>				
<b>19. OPERATING EXPENDITURES</b>				19
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b>				20
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>		\$ 13,800.00	\$ 93,800.00	21
<b>22. INDEPENDENT EXPENDITURES (use Schedule E)</b>				22
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)</b>				23
<b>24. LOAN REPAYMENTS MADE</b>				24
<b>25. LOANS MADE</b>				25
<b>26. REFUNDS OF CONTRIBUTIONS TO:</b>				
(a) Individuals/Persons Other Than Political Committees				26(a)
(b) Political Party Committees				26(b)
(c) Other Political Committees (such as PACs)				26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))				26(d)
<b>27. OTHER DISBURSEMENTS</b>				27
<b>28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)</b>		\$ 13,800.00	\$ 93,800.00	28
<b>III. NET CONTRIBUTIONS/OPERATING EXPENDITURES</b>				
<b>29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))</b>		\$ 13,564.43	\$ 86,056.36	29
<b>30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))</b>				30
<b>31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)</b>		\$ 13,564.43	\$ 86,056.36	31
<b>32. TOTAL OPERATING EXPENDITURES (from Line 19)</b>				32
<b>33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)</b>				33
<b>34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)</b>				34

RECEIVED  
F.E.C.  
SECRETARIAT

BEFORE THE FEDERAL ELECTION COMMISSION

91 OCT -8 PM 3:42

In the Matter of )  
 )  
First Chicago Corp. Government )  
Affairs c/o The First National )  
Bank of Chicago and Frank J. )  
Bouska, as treasurer )

MUR 3394

**SENSITIVE**

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

Attached is a conciliation agreement which has been signed by Frank Bouska, the treasurer of First Chicago Government Affairs c/o The First National Bank of Chicago.

**II. RECOMMENDATIONS**

1. Accept the attached conciliation agreement with First Chicago Corp. Government Affairs c/o The First National Bank of Chicago and Frank J. Bouska, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble  
General Counsel

10/8/91  
Date

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

**Attachments**

1. Conciliation Agreement
2. Photocopy of civil penalty check

Staff Assigned: Jeffrey Long

91040374251

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
First Chicago Corp. Government )  
Affairs c/o The First National ) MUR 3394  
Bank of Chicago and Frank J. )  
Bouska, as treasurer. )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 11, 1991, the Commission decided by a vote of 5-0 to take the following actions in MUR 3394:

1. Accept the conciliation agreement with First Chicago Corp. Government Affairs c/o The First National Bank of Chicago and Frank J. Bouska, as treasurer, as recommended in the General Counsel's Report dated October 8, 1991.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated October 8, 1991.

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

Attest:

10/11/91  
Date

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

Received in the Secretariat: Tues., Oct. 8, 1991 3:42 p.m.  
Circulated to the Commission: Wed., Oct. 9, 1991 11:00 a.m.  
Deadline for vote: Fri., Oct. 11, 1991 11:00 a.m.

21040374252



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 16, 1991

Frank Bouska, Treasurer  
First Chicago Corp. Government Affairs  
One First National Plaza  
Chicago, Illinois 60670

RE: MUR 3394  
First Chicago Corp. Government  
Affairs c/o The First National Bank  
of Chicago and Frank J. Bouska, as  
treasurer

Dear Mr. Bouska:

On October 11, 1991, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

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

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

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

First Chicago Corp. Government  
Affairs c/o The First National  
Bank of Chicago and Frank J.  
Bouska, as treasurer

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MUR 3394

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 First Chicago Corp. Government Affairs c/o The First National Bank of Chicago and Frank J. Bouska, as treasurer ("Respondents") violated 2 U.S.C. § 434(a) (4) (A) (ii).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a) (4) (A) (i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. First Chicago Corp. Government Affairs c/o The First National Bank of Chicago is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Frank J. Bouska is the treasurer of First Chicago Corp. Government Affairs c/o The First National Bank of Chicago.

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3. The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that all unauthorized committees filing quarterly reports, shall file a pre-election report before any election in which the committee makes a contribution or expenditure on behalf of a candidate in such election. According to 2 U.S.C. § 434(a) (4) (A) (ii), the pre-election report shall be filed no later than the 12th day before the election and which shall be complete as of the 20th day before the election.

4. Respondents disclosed on their 30 Day Post-General Report contributions or expenditures for the period between October 1 and October 17, 1990, indicating that the 12 Day Pre-General Reports should have been filed.

5. Respondents were required to file the 12 Day Pre-General Report, covering the period of October 1 through October 17, by October 25, 1990. Respondents failed to file the 1990 Pre-General Report. Respondents instead filed one report covering the pre- and post-election reporting periods. That report was filed 40 days late, and disclosed pre-general election period activity of \$2,694.00 in receipts and \$8,700 in disbursements.

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

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of five hundred dollars (\$500), pursuant to 2 U.S.C. § (437g(a) (5) (A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a) (1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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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 requirements contained in this agreement and to so notify the Commission.

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

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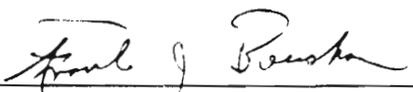
FOR THE COMMISSION:

Lawrence M. Noble  
General Counsel

BY:   
Lois G. Verner  
Associate General Counsel

10-15-91  
Date

FOR THE RESPONDENTS:

  
(Name)  
(Position) Treasurer

October 2, 1991  
Date



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3394

DATE FILMED 11/2/91 CAMERA NO. 2

CAMERAMAN AS

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