



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3811

DATE FILMED 1-12-54 CAMERA NO. 2

CAMERAMAN J.M.H.

24043561056

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: April 23, 1993

ANALYST: Kenneth Davis

- I. COMMITTEE: National Albanian American PAC
(C00224097)
Martin V. Delisi, Treasurer
11380 Prosperity Farms Road
Suite 204
Palm Beach Gardens, FL 33410
- II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(i), (ii), (iii) &
(iv)
11 CFR §104.5(c)(1) & (2)(i)(A)

III. BACKGROUND:

Failure to Timely File Reports and Chronic Late Filing of Reports

The National Albanian American PAC ("the PAC") failed to file seven (7) Reports of Receipts and Disbursements in a timely manner for the 1991-1992 election cycle (see Late Filing History Chart). The reports were filed between twelve (12) and one hundred and twenty-four (124) calendar days late.

A Chronic Late Filer Notice was sent to the PAC on August 14, 1992, for failing to file the 1991 Mid-Year, the 1992 April Quarterly and the 1992 July Quarterly Reports in a timely manner (Attachment 9). The Notice advised the PAC that any additional late filing of reports may result in legal enforcement action. Subsequent to the mailing of the Chronic Late Filer Notice, the PAC filed the 1992 October Quarterly, 12 Day Pre-General, 30 Day Post-General and Year End Reports late.

On September 28, 1992 the PAC was notified that the committees making contributions or expenditures in connection with the general election during the period ending October 14, 1992 must file a pre-election report by October 22, 1992

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if such activity has not previously been disclosed (Attachment 8). This notice also indicated that a 30 Day Post-General Report was due on December 3, 1992. A Non-Filer Notice was sent to the PAC on December 30, 1992 for failure to file the 1992 30 Day Post-General Report (Attachment 14).

On January 26, 1993 the Reports Analysis Division ("RAD") analyst tried to contact Martin Delisi, treasurer of the PAC. A secretary informed the RAD analyst that Mr. Delisi was not in the office, but she would give him the message (Attachment 15).

On February 16, 1993 Aldo Vitagalino, a lawyer representing the PAC contacted the RAD analyst (Attachment 16). The RAD analyst informed Mr. Vitagalino that the 30 Day Post-General and Year End Reports had not been filed and advised him that the PAC should file the reports as soon as possible. Mr. Vitagalino stated that the reports would be sent within a week.

On February 23, 1993 the Committee filed the 1992 30 Day Post-General Report (Attachment 18). The 30 Day Post-General Report contained activity that covered the 12 Day Pre-General reporting period. The report disclosed a \$5,000 contribution to one (1) federal candidate on October 1, 1992. This activity indicates the PAC was required to timely file the 1992 12 Day Pre-General Report.

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LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1991 Mid-Year (1/1/91-6/30/91)	7/5/91 (Attachment 2)	7/31/91	8/20/91 (Attachment 3)	11/6/91 (Attachment 4)
1992 April Quarterly (1/1/92-3/31/92)	3/20/92 (Attachment 5)	4/15/92	N/A	4/27/92 (Attachment 6)
1992 July Quarterly (4/1/92-6/30/92)	6/19/92 (Attachment 7)	7/15/92	N/A	7/29/92 (Attachment 8)
1992 October Quarterly (7/1/92-9/30/92)	9/21/92 (Attachment 10)	10/15/92	N/A	10/27/92 (Attachment 12)
1992 12 Day Pre-General ^{1/}	9/28/92 (Attachment 11)	10/22/92	N/A	2/23/93 (Attachment 18)
1992 30 Day Post-General ^{2/} (10/01/92-11/23/92)	9/28/92 (Attachment 11)	12/3/92	12/30/92 (Attachment 14)	2/23/93 (Attachment 18)
1992 Year End ^{2/} (11/23/92-12/31/92)	12/28/92 (Attachment 13)	1/31/93	2/18/93 (Attachment 17)	2/23/93 (Attachment 19)

^{1/} The PAC filed a 1992 30 Day Post-General Report which included the 12 Day Pre-General reporting period.

^{2/} These reports covered the periods of October 1 through November 4, 1992 and November 5 through December 31, 1992, respectively.

FEDERAL ELECTION COMMISSION
1991-1992
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 21APR93

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
NATIONAL ALBANIAN AMERICAN PAC						ID #000224097 NON-PARTY QUALIFIED
CONNECTED ORGANIZATION:	NONE					
1991	MID-YEAR REPORT	14,110	14,291	1JAN91 - 30JUN91	6	91FEC/717/4707
	MID-YEAR REPORT - AMENDMENT			1JAN91 - 30JUN91	5	92FEC/753/1554
	NOTICE OF FAILURE TO FILE			1JAN91 - 30JUN91	1	91FEC/709/3673
	REQUEST FOR ADDITIONAL INFORMATION			1JAN91 - 30JUN91	2	92FEC/741/2927
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN91 - 30JUN91	3	92FEC/743/5463
	YEAR-END	5,610	5,106	1JUL91 - 31DEC91	6	92FEC/734/1344
	YEAR-END - AMENDMENT			1JUL91 - 31DEC91	6	92FEC/753/1553
	REQUEST FOR ADDITIONAL INFORMATION			1JUL91 - 31DEC91	2	92FEC/741/2930
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL91 - 31DEC91	3	92FEC/743/5460
1992	MISCELLANEOUS NOTICE FROM FEC			14AUG92	1	92FEC/773/1691
	APRIL QUARTERLY	4,000	76	1JAN92 - 31MAR92	5	92FEC/753/1888
	JULY QUARTERLY	26,390	29,598	1APR92 - 30JUN92	9	92FEC/772/0949
	JULY QUARTERLY - AMENDMENT			1APR92 - 30JUN92	7	92FEC/800/3343
	REQUEST FOR ADDITIONAL INFORMATION			1APR92 - 30JUN92	2	92FEC/782/2158
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR92 - 30JUN92	3	92FEC/786/5307
	OCTOBER QUARTERLY	26,000	14,026	1JUL92 - 30SEP92	10	92FEC/800/3350
	POST-GENERAL	28,630	20,046	1OCT92 - 4NOV92	19	93FEC/829/3847
	REQUEST FOR ADDITIONAL INFORMATION			1OCT92 - 4NOV92	2	93FEC/833/1100
	NOTICE OF FAILURE TO FILE			1OCT92 - 23NOV92	1	93FEC/818/3259
	YEAR-END	9,500	25,510	5NOV92 - 31DEC92	5	93FEC/829/4564
	NOTICE OF FAILURE TO FILE			24NOV92 - 31DEC92	1	93FEC/828/5319
	TOTAL	114,240	0 108,653		99	TOTAL PAGES

All reports have been reviewed.

Ending cash-on-hand as of 12/31/92: \$6303

Debts and obligations owed to/by the committee as of 12/31/92:\$0

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REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

July 5, 1991

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Mid-Year	01/01/91-06/30/91	07/31/91	07/31/91

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) which normally file on a quarterly basis must file a Mid-Year Report in July.

WHAT MUST BE REPORTED

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

REPORTING FORMS

Party committees and PACs use newly revised Form 3X (enclosed). See Record Supplement on Allocation (November 1990) for a description of which committees must file Schedules H1 - H4.

WHERE TO FILE

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

LABEL

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

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from semiannual to monthly) must notify the Commission in writing when they file this report or the next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

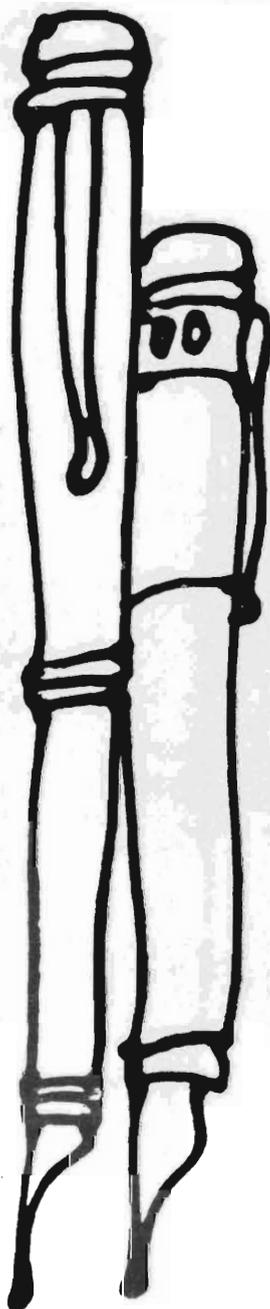
COMPLIANCE

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-PEC FORMS WILL BE REQUIRED TO REFILE.

*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.

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

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



24043561061



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

HQ-7

August 20, 1991

Martin V. Delisi, Treasurer
National Albanian American PAC
11380 Prosperity Farms Road-St. 204
Palm Beach Gardens, FL 33410

Identification Number: C00224097

Reference: Mid-Year Report (1/1/91-6/30/91)

Dear Mr. Delisi:

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 Edward Ryan 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

2494337893873

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

91 NOV 18 PM 12:04

USE FEC NUMBER LABEL OR TYPE ON FRONT

1. NAME OF COMMITTEE (in full)
NATIONAL REAGAN-ANDERSON AC

ADDRESS (number and street) Check if different than previously reported
1156 Prosperity Lane Road, S.W. 200

CITY, STATE and ZIP CODE
Ann Arbor, Michigan 48106

2. FEC IDENTIFICATION NUMBER
C 00000007

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

4. TYPE OF REPORT

- April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)

- 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 _____
- Termination Report

(b) Is this Report an Amendment? YES NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <i>January 1, 1991 through Feb 14, 1991</i>		
6. a. Cash on Hand January 1, 1991		\$ 718. ³⁵
b. Cash on Hand at Beginning of Reporting Period	\$ 718. ³⁵	
c. Total Receipts (from Line 19)	\$ 1411. ³³	\$ 1411. ³³
d. Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 2130. ⁷⁰	\$ 2130. ⁷⁰
7. Total Disbursements (from Line 30)	\$ 1429. ⁷⁰	\$ 1429. ⁷⁰
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 537. ⁰⁰	\$ 537. ⁰⁰
9. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)	\$	

For further information contact:
Federal Election Commission
1100 E Street, NW
Washington, DC 20543
Tel. Fax 202-451-6520
Local 202-376-3128

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
MARTIN V. DALISI

Signature of Treasurer

Date
11/5/91

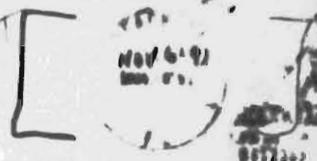
NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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2,40

35010624
7 A 303 003 25324

MAIL



Return Receipt Requested

Federal Election Commission
999 East Street NW
Washington DC 20543

91 NOV 16 PM 03
Attachment 4
Page 2 of 2

Thank you for using
Return Receipt Service

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 20, 1992

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April Quarterly	01/01/92-03/31/92	04/15/92	04/15/92

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in April.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election, must also file a Pre-Election Report, if the activity was not previously reported. See January 1992 Record.

LAST-MINUTE INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the election.

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

LABEL

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

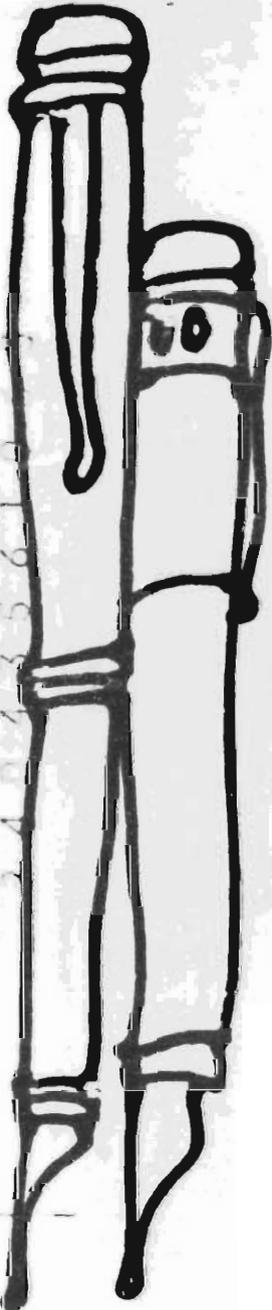
COMPLIANCE

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.

*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.

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

FOR INFORMATION, Call: 800/424-9530 or 202/219-3420



RECEIVED
FEDERAL ELEC
COMM'S

For Other Than An Authorized Candidate
(Summary Page)

Jan 27 9 47

1. NAME OF CANDIDATE OR CA

Abraham Robinson Agnew Inc

ADDRESS (number and street) *1116 Prosperity Lane Rd Suite 204*

CITY, STATE and ZIP CODE *Pro-Bone Louisiana Rouge 71400*

2. FEC IDENTIFICATION NUMBER

C. 0000092

This committee qualified as a non-federally financed committee SUBJECT TO THE Reporting Period on

3. TYPE OF REPORT

April 15 Quarterly Report

July 15 Quarterly Report

October 15 Quarterly Report

January 31 Year End Report

July 31 Mid Year Report (Non-election Year Only)

Transition Report

Monthly Report Due On:

- February 28
- March 31
- April 30
- May 31
- June 30
- July 31
- August 31
- September 30
- October 31
- November 30
- December 31
- January 31

Twelve day report preceding _____ (Type of Election) election on _____ in the State of _____

Twelve day report following the General Election on _____ in the State of _____

4. Is this Report an Amendment? YES NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <i>January 1, 1997 through June 30, 1997</i>		
6. (a) Cash on Hand January 1, 1997	\$	\$ 1040.87
(b) Cash on Hand at Beginning of Reporting Period	\$ 1040.87	
(c) Total Receipts (from Line 1b)	\$ 400.00	\$ 400.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(b) and 6(c) for Column B)	\$ 1440.87	\$ 1440.87
7. Total Disbursements (from Line 2b)	\$ 760.00	\$ 760.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 680.87	\$ 680.87
9. Debts and Obligations Owed TO the Committee (Reported as on Schedule C and/or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Reported as on Schedule C and/or Schedule D)	\$	

Type or Full Name of Treasurer *Abraham Robinson Agnew Inc*

Signature of Treasurer *[Signature]*

Date *4/21/97*

NOTE: Submission of false, erroneous, or deceptive information may subject the person signing this Report to the penalties of 2 U.S.C. 1993.

USE FOR PREVIOUS EDITIONS

2037531000

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

June 19, 1992

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
July Quarterly	04/01/92 - 06/30/92	07/15/92	07/15/92

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in July.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1992 Record.

LAST-MINUTE INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the election.

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

LABEL

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

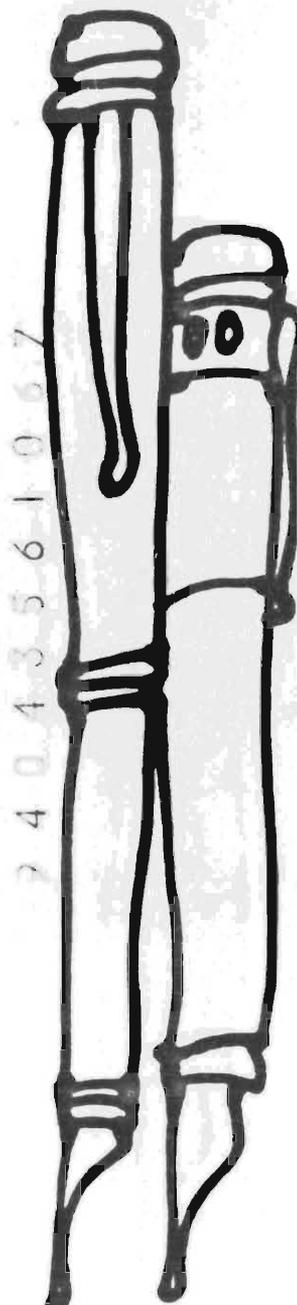
COMPLIANCE

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*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.

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

FOR INFORMATION, Call: 800/424-9530 or 202/219-3470



REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

NAME OF COMMITTEE (in full)
Norfolk School Auction Co.

ADDRESS (number and street) Check if different than previously reported
1150 Prosperity Lane, Los Angeles, CA 90001

CITY STATE and ZIP CODE
Los Angeles, California 90001

2. FEC IDENTIFICATION NUMBER
C 00000000

3. This committee qualified as a multicandidate committee DURING THE Reporting Period on date _____

4. TYPE OF REPORT

a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Termination Report

Monthly Report Due On
 February 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 _____
 election on _____ in the State of _____
 Type of Election: _____

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: <i>April 1, 1990 through June 30, 1990</i>		
6. (a) Cash on Hand January 1, 1991		\$ 1000.00
(b) Cash on Hand at Beginning of Reporting Period	\$ 496.00	
(c) Total Receipts (from Line 10)	\$ 2639.00	\$ 3039.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 3135.00	\$ 31039.00
7. Total Disbursements (from Line 30)	\$ 2989.00	\$ 2989.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 146.00	\$ 146.00
9. Debt and Obligations Owed TO the Committee (Reported on Schedule C and/or Schedule D)	\$	
10. Debt and Obligations Owed BY the Committee (Reported on Schedule C and/or Schedule D)	\$	

For further information contact:
Federal Election Commission
900 E Street, NW
Washington, DC 20463
Tel: 202-456-4630
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
MARVIN J. DE LUCA

Signature of Treasurer _____ Date _____

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

92037720949

*Very Beloved ...
136 ...
...
... 2890*

3 7 7 2 0 9 5
5 5 3 0 3 8 0 5 2 0 5 7 3 9
MAIL



... keep ...

Thank you for using
Return Receipt Service.

*... Commission
...
... DC 20543*

Attachment 8
Page 2 of 2

completed on the reverse side?



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20461

NS-L

Martin V. Delisl, Treasurer
National Albanian American PAC
11380 Prosperity Farms Road, St. 204
Palm Beach Gardens, FL 33410

AUG 14 1992

Identification Number: C80224097

Reference: 1991-1992 Election Cycle Reports

Dear Mr. Delisl:

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

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
1991 Mid-Year (1/1/91-6/30/91)	7/31/91	11/6/91
1992 April Quarterly (1/1/92-3/31/92)	4/15/92	4/27/92
1992 July Quarterly (4/1/92-6/30/92)	7/15/92	7/29/92

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

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Kenneth Davis, Jr. on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

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

74043501070
92037731691

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 21, 1992

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
October Quarterly	07/01/92 - 09/30/92	10/15/92	10/15/92

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.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1992 Record.

LAST-MINUTE INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the election.

CHANGE IN FILING FREQUENCY

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REPORTING BANK LOANS

Bank loans must be reported on Schedule C-1. Call the number below to request forms.

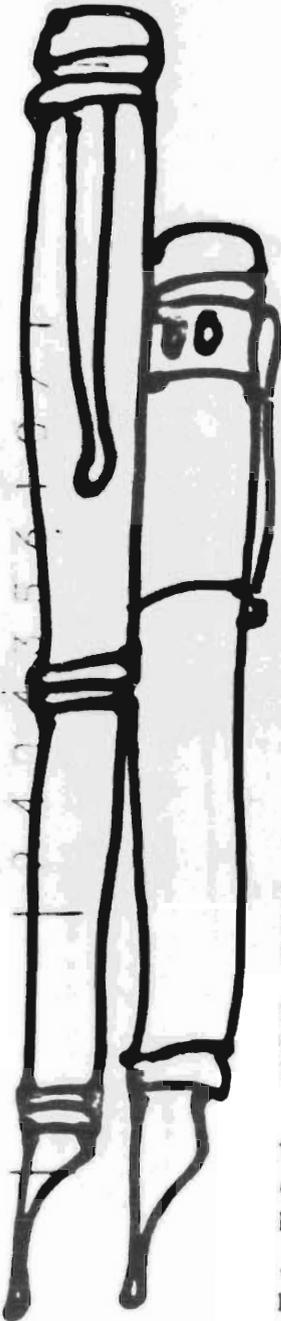
LABEL

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

(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-PEC
FORMS WILL BE REQUIRED TO REFILE.

240435610/2

FOR INFORMATION, Call: 800/424-9530 or 202/219-3420

GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 28, 1992

I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/92 - 10/14/92	10/19/92	10/22/92
Post-General	10/15/92 - 11/23/92	12/03/92	12/03/92

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 14

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/92 - 10/14/92	10/19/92	10/22/92
Post-General	10/15/92 - 11/23/92	12/03/92	12/03/92

III. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 14***

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Post-General	10/01/92 - 11/23/92	12/03/92	12/03/92

WHO MUST FILE

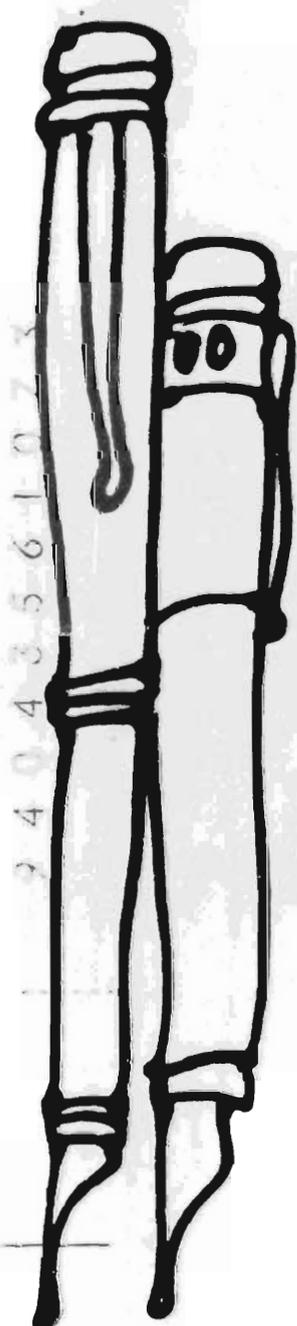
Party committees and PACs must follow the above charts in order to determine whether they must file the Pre-General Election Report. All Party committees and PACs, regardless of financial activity, must file the Post-General Election Report.

*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.

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

***Committees that made general election contributions or expenditures before October 1 and that did not report them previously must also follow the Chart III reporting requirements.

(over)



94043561073

PARTIES AND PACS

GENERAL ELECTION

LAST-MINUTE INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures aggregating \$1,000 or more during the period beginning October 15 and ending November 1 must report them within 24 hours.

REPORTING BANK LOANS

Bank loans must be reported on Schedule C-1. Call the number below to request forms.

LABEL

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

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-PEC FORMS WILL BE REQUIRED TO REFILE.

24043561074

FOR INFORMATION, Call: 800/424-9530 or 202/219-3420

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE ON PRISTINE

NAME OF COMMITTEE (in full)
National Association of...

ADDRESS (number and street) (check if different than previously reported)
11365 Phosphoryl...

CITY, STATE and ZIP CODE
Palmdale, California 91354

FEC IDENTIFICATION NUMBER
C 00000000

This committee qualified as a non-federally
connected committee DURING THIS Reporting Period on
(2000)

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
- Twelve day report preceding _____ (Type of Election)
 election on _____ in the State of _____
- Twelve 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 <i>July 1, 2001 through Sept 30, 2001</i>		
6. a. Cash on hand January 1, 1997		\$ 1000.00
b. Cash on hand at Beginning of Reporting Period	\$ 1776.00	
c. Total Receipts from Line 10	\$ 26000.00	\$ 26000.00
d. Subtotal: add Lines 6-b and 6-c for Column A and Lines 6-b and 6-c for Column B	\$ 27776.00	\$ 27000.00
7. Total Disbursements from Line 30	\$ 10000.00	\$ 10000.00
8. Cash on hand at Close of Reporting Period: subtract Line 7 from Line 6-d	\$ 17776.00	\$ 17000.00
9. Debts and Obligations Owed TO the Committee reported on Schedule C and/or Schedule D	\$	
10. Debts and Obligations Owed BY the Committee reported 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 of Print Name of Treasurer

Signature of Treasurer

Date

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

05/03/01

NATIONAL ASSOCIATION...
to Prosperity...
Em Bell... 1992



Return Receipt Requested

Is your RETURN ADDRESS completed on the reverse side?

Federal Election Commission
999...
Washington DC 20543

Attachment 12
Page 2 of 2

Thank you for using
Return Receipt Service.

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 28, 1992

QUARTERLY AND MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	11/24/92 - 12/31/92	01/31/93	01/31/93

WHO MUST FILE

All party committees and PACs (nonconnected committees and separate segregated funds) must file a Year-End Report.

LABEL

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

COMPLIANCE

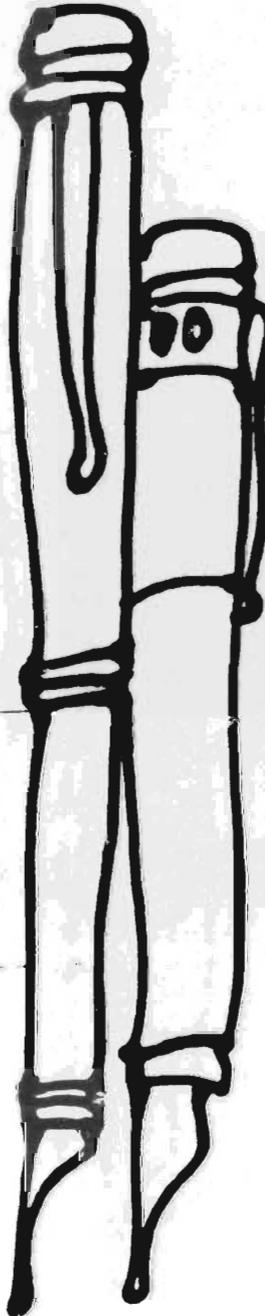
Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms will be required to refile.

*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.

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

(over)

94043561077



**1993 REPORTING SCHEDULE
PACS AND PARTIES***

I. SEMIANNUAL FILERS**

REPORT	PERIOD COVERED	REG./CERT. MAILING DATE***	FILING DATE
Mid-Year	01/01/93 - 06/30/93	07/31/93	07/31/93
Year-End	07/01/93 - 12/31/93	01/31/94	01/31/94

II. MONTHLY FILERS

REPORT	PERIOD COVERED	REG./CERT. MAILING DATE***	FILING DATE
February	01/01/93 - 01/31/93	02/20/93	02/20/93
March	02/01/93 - 02/28/93	03/20/93	03/20/93
April	03/01/93 - 03/31/93	04/20/93	04/20/93
May	04/01/93 - 04/30/93	05/20/93	05/20/93
June	05/01/93 - 05/31/93	06/20/93	06/20/93
July	06/01/93 - 06/30/93	07/20/93	07/20/93
August	07/01/93 - 07/31/93	08/20/93	08/20/93
September	08/01/93 - 08/31/93	09/20/93	09/20/93
October	09/01/93 - 09/30/93	10/20/93	10/20/93
November	10/01/93 - 10/31/93	11/20/93	11/20/93
December	11/01/93 - 11/30/93	12/20/93	12/20/93
Year-End	12/01/93 - 12/31/93	01/31/94	01/31/94

*Committees that wish to change their filing status must notify the Commission in writing.

**Committees that filed quarterly reports in 1992 are only required to file semiannually in 1993.

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

FOR INFORMATION, Call: 800/424-9530 or 202/219-3420

240435610/8



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20541

EQ-7

December 30, 1992

Martin V. Delisi, Treasurer
National Albanian American PAC
11380 Prosperity Farms Road
Suite 204
Palm Beach Gardens, FL 33410

Identification Number: C00224097

Reference: 30 Day Post-General Report (10/1/92-11/23/92)

Dear Mr. Delisi:

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 Kenneth Davis, Jr. on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

4338 P d 32/59

ANALYST: Kenneth Davis

CONVERSATION WITH: a secretary

COMMITTEE: National Albanian American PAC

DATE: 1/26/93

SUBJECT(S): Failure to file the 30 Day Post General Report

I tried to contact the treasurer, Martin Delisi. A secretary stated that Mr. Delisi was not in the office at the moment, but she would have him call me back.

24043561030

ANALYST: Kenneth Davis

CONVERSATION WITH: Aldo Vitagalino, a lawyer representing the PAC

COMMITTEE: National Albanian American PAC

DATE: 2/16/93

SUBJECT(S): Failure to file the 30 Day Post-General and Year End Reports

Mr. Vitagalino, a lawyer representing the PAC contacted me. I told him that the 30 Day Post-General and the Year End Reports were not filed. I advised him that the PAC should file these reports as soon as possible. Mr. Vitagalino stated that the reports would be sent within a week.

24043561031

...



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

BQ-7

February 18, 1993

Martin V. Delisi, Treasurer
National Albanian American PAC
11380 Prosperity Farms Road, Suite 204
Palm Beach Gardens, FL 33410

Identification Number: C00224097

Reference: Year End Report (11/26/92-12/31/92)

Dear Mr. Delisi:

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 §§100.2, 100.3, 100.4).

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 Ken Davis on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

2 4 0 34 35 86 21 905 83 2 9

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

FEB 23 8 53 AM '93

1992 30 Day Post General

1. NAME OF COMMITTEE (in full)
National Albanian American PAC

ADDRESS (number and street) Check if different than previously reported
11350 Prosperity Farms Road, Suite 204

CITY, STATE and ZIP CODE
Palm Beach Gardens, Florida 39410

2. FEC IDENTIFICATION NUMBER Report
C 00224097

3. This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report

Monthly Report Due On:

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

- 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	10/1 /92 through 11/4 /92		
6. (a) Cash on Hand January 1, 1992			\$ 1,040.87
(b) Cash on Hand at Beginning of Reporting Period		\$ 13,730.42	
(c) Total Receipts (from Line 10)		\$ 28,630.00	\$ 25,020.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 42,360.42	\$ 26,060.87
7. Total Disbursements (from Line 20)		\$ 20,046.35	\$ 63,746.90
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 22,314.07	\$ 22,314.07
9. Debts and Obligations Owed TO the Committee (Report all on Schedule C under Schedule D)		\$ 0	
10. Debts and Obligations Owed BY the Committee (Report all on Schedule C under Schedule D)		\$ 0	

For further information contact:
Federal Election Commission
600 E Street, NW
Washington, DC 20545
Toll Free 800-424-9530
Local 202-576-3120

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
Martin W. Tallal

Signature of Treasurer 

Date
2/16/93

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 9507.

403438293547

FEC FORM 278
TYPE ON FRONT

SCHEDULE B **ITEMIZED DISBURSEMENTS**
1992 30 Day Post General Report

Use separate schedule(s) for each category of the Detailed Summary Page	PAGE	OF
	FOR LINE NUMBER	

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)
NATIONAL RENAISSANCE AMERICAN POLITICAL ACTION COMMITTEE

243038293384

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Kasten for Senate	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/23/92	\$5,000.00
People for Dioguardi 175 Main Street White Plains, N.Y. 10604	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/1/92	\$5,000.00
Pressler for Senate	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/28/92	\$5,000.00
Citizens for Gilman	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/28/92	\$5,000.00
Hudson Valley National Bank Central Avenue White Plains, New York	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		\$46.35
	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional)	
TOTAL This Period (last page this line number only)	\$20,046.35

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

FEB 23 8 53 AM '93

1. NAME OF COMMITTEE (Print)
National Albanian American PAC

ADDRESS (number and street) Check if different than previously reported
11350 Prosperity Farms Road, Suite 204

CITY, STATE and ZIP CODE
Palm Beach Gardens, Florida 33410

2. FEC IDENTIFICATION NUMBER
C 00224097

3. This committee qualified as a multicandidate committee **DISBURSED TYPE** Reporting Period on _____ (date).

1992 Year End Report **4. TYPE OF REPORT**

- April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report

- Monthly Report Due On:**
- February 20 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 _____

(a) Is this Report an Amendment? YES NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
1. Covering Period	11/5 /92 through 12/31 /92		
2. (a) Cash on Hand January 1, 1992			\$ 1,040.87
2. (b) Cash on Hand at Beginning of Reporting Period		\$ 22,314.87	
2. (c) Total Receipts (from Line 16)		\$ 9,500.00	\$ 94,520.00
2. (d) Subtotal (add Lines 2(b) and 2(c) for Column A and Lines 2(a) and 2(c) for Column B)		\$ 31,814.87	\$ 95,560.87
3. Total Disbursements (from Line 28)		\$ 25,510.74	\$ 82,257.54
4. Cash on Hand at Close of Reporting Period (subtract Line 3 from Line 2(d))		\$ 6,303.33	\$ 13,303.33
5. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$ 0	
6. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$ 0	

For further information contact
Federal Election Commission
800 E Street, NW
Washington, DC 20545
Toll Free 800-424-9630
Local 202-470-3120

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
Martin W. Dillai

Signature of Treasurer 

Date
2/16/93

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

2 4 9 4 3 5 8 6 2 1 9 0 4 3 5 6 4

USE PREVIOUS EDITIONS FOR YOUR COPY

93 SEP 2 10:01

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral 93NF-17
STAFF MEMBER: Frances B. Hagan

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

RESPONDENTS: National Albanian American PAC
Martin V. Delisi, Treasurer

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

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the National Albanian American PAC ("the Committee" or "the PAC") and Martin V. Delisi, as treasurer, to the Office of the General Counsel on April 23, 1993. The basis for the attached referral is the Committee's repeated failure to timely file reports during the 1991-1992 election cycle. The Committee was the subject of closed MUR 3518, a matter previously referred from RAD for failure to file certain reports during the 1989-1990 election cycle.¹

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees, such committees

1. The attached RAD referral includes the 1991 Mid-Year Report. This Report was dealt with in MUR 3518, and the issue was settled through conciliation. Thus it will not be included again in this matter.

24043561037

shall file quarterly reports--for years in which regularly scheduled elections are held--no later than the 15th day after the last day of each calendar quarter, except that the report for the quarter ending on December 31 shall be filed by January 31 of the following year. 2 U.S.C. § 434(a)(4)(A)(i). The Act provides that such committees shall file the 12 Day Pre-Election Report no later than the 12th day before any election in which the committee makes a contribution or expenditure on behalf of a candidate in such election. 2 U.S.C. § 434(a)(4)(A)(ii).

The Act also provides that unauthorized committees shall file a 30 Day Post-General Election Report, which shall be filed no later than the 30th day after the general election. 2 U.S.C. § 434(a)(4)(A)(iii).

Despite RAD's sending prior notice of filing dates for each required report, the Committee failed to file six reports in a timely manner as follows:

<u>REPORT</u>	<u>REPORT DUE</u>	<u>REPORT FILED</u>	<u>DAYS LATE</u>
1992 April Quarterly	4/15/92	4/27/92	12
1992 July Quarterly	7/15/92	7/29/92	14
1992 October Quarterly	10/15/92	10/27/92	12
1992 Pre-General	10/22/92	2/23/93	124
1992 Post-General	12/03/92	2/23/93	82
1992 Year End	1/31/93	2/23/93	23

Accordingly, the Office of the General Counsel recommends that the Commission open a Matter Under Review and find reason to believe that the Committee violated 2 U.S.C. §§ 434(a)(4)(A)(i), (ii), and

24043561038

(iii).

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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24043561090

24043561091

24043561092

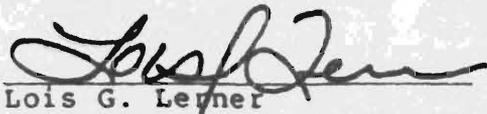
24043561093

IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the National Albanian American PAC and Martin V. Delisi, as treasurer, violated:
 - a) 2 U.S.C. § 434(a)(4)(A)(i);
 - b) 2 U.S.C. § 434(a)(4)(A)(ii); and
 - c) 2 U.S.C. § 434(a)(4)(A)(iii).
3. Enter into conciliation with the National Albanian American PAC and Martin V. Delisi, as treasurer, prior to a finding of probable cause to believe.
4. Approve the appropriate letter, the attached factual and legal analysis, and the attached proposed conciliation agreement.

Lawrence M. Noble
General Counsel

Date 9/1/93

BY: 
Lois G. Lerner
Associate General Counsel

- Attachments:
- A. Referral Materials
 - B. Factual and Legal Analysis
 - C. Proposed Conciliation Agreement

24943561094

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

National Albanian American Political)
Action Committee and Martin V.)
Delisi, as treasurer.)

RAD Referral)
#93NF-17)

(MUR 3810)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 8, 1993, the Commission decided by a vote of 4-0 to take the following actions in RAD Referral #93NF-17:

1. Open a MUR.

2. Find reason to believe that the National Albanian American Political Action Committee and Martin V. Delisi, as treasurer, violated:
 - a) 2 U.S.C. § 434(a)(4)(A)(i);
 - b) 2 U.S.C. § 434(a)(4)(A)(ii); and
 - c) 2 U.S.C. § 434(a)(4)(A)(iii).

(continued)

24043561095

3. Enter into conciliation with the National Albanian American Political Action Committee and Martin V. Delisi, as treasurer, prior to a finding of probable cause to believe.

4. Approve the appropriate letter, the factual and legal analysis, and the proposed conciliation agreement, as recommended in the General Counsel's Report dated September 1, 1993.

Commissioners Aikens, Elliott, Potter, and Thomas voted affirmatively for the decision; Commissioners McDonald and McGarry did not cast votes.

Attest:

9-8-93
Date

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

Received in the Secretariat: Thurs., Sept. 2, 1993 10:01 a.m.
Circulated to the Commission: Thurs., Sept. 2, 1993 4:00 p.m.
Deadline for vote: Wed., Sept. 8, 1993 4:00 p.m.

bjr

24043561096



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

SEPTEMBER 22, 1993

Martin V. Delisi, Treasurer
National Albanian American PAC
11380 Prosperity Farms Road
Suite 204
Palm Beach Gardens, FL 33410

RE: MUR 3011
National Albanian American PAC

Dear Mr. Delisi:

On September 8, 1993, the Federal Election Commission found that there is reason to believe the National Albanian American PAC ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), (ii), and (iii), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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 additional information, 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 probable 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.

24043561097

Martin V. Delisi, Treasurer
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 Frances B. Hagan, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,



Scott E. Thomas
Chairman

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

24043561098

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: National Albanian American PAC MUR: 3811
Martin V. Delisi, Treasurer

24043561099
The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees, such committees shall file quarterly reports--for years in which regularly scheduled elections are held--no later than the 15th day after the last day of each calendar quarter, except that the report for the quarter ending on December 31 shall be filed by January 31 of the following year. 2 U.S.C. § 434(a)(4)(A)(i). The Act provides that such committees shall file the 12 Day Pre-Election Report no later than the 12th day before any election in which the committee makes a contribution or expenditure on behalf of a candidate in such election. 2 U.S.C. § 434(a)(4)(A)(ii).

The Act also provides that unauthorized committees shall file a 30 Day Post-General Election Report, which shall be filed no later than the 30th day after the general election. 2 U.S.C. § 434(a)(4)(A)(iii).

Despite the Reports Analysis Division's sending prior notice of filing dates for each required report, the National Albanian American PAC and Martin V. Delisi, as treasurer, failed to file six reports in a timely manner as follows:

<u>REPORT</u>	<u>REPORT DUE</u>	<u>REPORT FILED</u>	<u>DAYS LATE</u>
1992 April Quarterly	4/15/92	4/27/92	12
1992 July Quarterly	7/15/92	7/29/92	14
1992 October Quarterly	10/15/92	10/27/92	12

<u>REPORT</u>	<u>REPORT DUE</u>	<u>REPORT FILED</u>	<u>DAYS LATE</u>
1992 Pre-General	10/22/92	2/23/93	124
1992 Post-General	12/03/92	2/23/93	82
1992 Year End	1/31/93	2/23/93	23

Therefore, there is reason to believe the National Albanian American PAC and Martin V. Delisi, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), (ii), and (iii).

24043561100



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

December 30, 1993

Martin V. Delisi, Treasurer
National Albanian American PAC
11380 Prosperity Farms Road
Suite 204
Palm Beach Gardens, FL 33410

RE: MUR 3811
Albanian American PAC
Martin V. Delisi, as treasurer

Dear Mr. Delisi:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on September 8, 1993, the Federal Election Commission found reason to believe that the Albanian American PAC ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), and (iii), and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that violations have occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

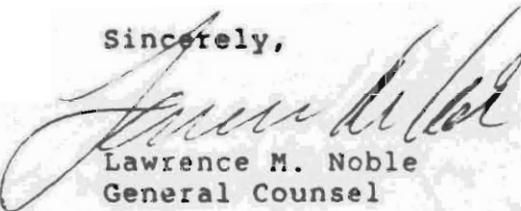
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Martin V. Delisi, Treasurer
Page 2

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

24043561102

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3811
National Albanian American PAC)
Martin V. Delisi, treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

In the course of carrying out its supervisory responsibilities, on September 8, 1993, the Federal Election Commission found reason to believe that the Albanian American PAC ("Committee") and Martin V. Delisi, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), and (iii). The finding was based on the Committee's failure to file reports of receipts and expenditures in a timely manner.

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees, such committees shall file quarterly reports--for years in which regularly scheduled elections are held--no later than the 15th day after the last day of each calendar quarter, except that the report for the quarter ending on December 31 shall be filed by January 31 of the following year. 2 U.S.C. § 434(a)(4)(A)(i). The Act provides that such committees shall file the 12 Day Pre-Election Report no later than the 12th day before any election in which the committee makes a contribution or expenditure on behalf of a candidate in such election. 2 U.S.C. § 434(a)(4)(A)(ii).

The Act also provides that unauthorized committees shall file a 30 Day Post-General Election Report, which shall be filed

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no later than the 30th day after the general election. 2 U.S.C. § 434(a)(4)(A)(iii).

Despite the FEC's prior notice of filing dates for each required report, the Committee failed to file six reports in a timely manner as follows:

<u>REPORT</u>	<u>REPORT DUE</u>	<u>REPORT FILED</u>	<u>DAYS LATE</u>
1992 April Quarterly	4/15/92	4/27/92	12
1992 July Quarterly	7/15/92	7/29/92	14
1992 October Quarterly	10/15/92	10/27/92	12
1992 Pre-General	10/22/92	2/23/93	124
1992 Post-General	12/03/92	2/23/92	82
1992 Year End	1/31/93	2/23/93	23

This Office received no response to the written reason to believe notification. A follow-up telephone call to the treasurer was not returned. Accordingly, this Office is prepared to recommend that the Commission find probable cause to believe that the National Albanian American PAC and Martin V. Delisi, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), (ii), and (iii).

IV. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that the National Albanian American PAC and Martin V. Delisi, as treasurer, violated:

- a) 2 U.S.C. § 434(a)(4)(A)(i);
- b) 2 U.S.C. § 434(a)(4)(A)(ii); and
- c) 2 U.S.C. § 434(a)(4)(A)(iii).

Date 12/30/93


Lawrence M. Noble
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
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SECRETARIAT

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In the Matter of)
National Albanian American PAC)
Martin V. Delisi, Treasurer)

NUR 3811

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On September 8, 1993, the Federal Election Commission found reason to believe that the National Albanian American PAC ("Committee") and Martin V. Delisi, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), and (iii), and proposed pre-probable cause conciliation. The findings were based on the Committee's failure to file reports of receipts and expenditures in a timely manner. The Committee failed to respond to these findings; hence, this Office prepared and mailed Respondents a General Counsel's Brief on December 30, 1993.

II. RECOMMENDED ACTIONS IN LIGHT OF FEC v. NRA

Consistent with the Commission's November 9, 1993 decisions concerning compliance with the opinion in FEC v. NRA Political Victory Fund, et al., 6 F.3d 821 (D.C. Cir. 1993), petition for cert. filed (U.S. Jan. 18, 1994)(No. 93-1151)("NRA"), this Office recommends that the Commission ratify the determination to find reason to believe that the National Albanian American PAC and Martin V. Delisi, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), and (iii). See Attachment B.

III. ANALYSIS

As set forth in the General Counsel's Brief, the Federal Election Campaign Act of 1971, as amended ("the Act"), provides that unauthorized committees shall file quarterly reports--for

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years in which regularly scheduled elections are held--no later than the 15th day after the last day of each calendar quarter, except that the report for the quarter ending on December 31 shall be filed by January 31 of the following year. 2 U.S.C.

§ 434(a)(4)(A)(i). The Act provides that such committees shall file the 12 Day Pre-Election Report no later than the 12th day before any election in which the committee makes a contribution or expenditure on behalf of a candidate in such election. 2 U.S.C.

§ 434(a)(4)(A)(ii). The Act also provides that unauthorized committees shall file a 30 Day Post-General Election Report no later than the 30th day after the general election. 2 U.S.C. § 434(a)(4)(A)(iii).

Despite the FEC's prior notice of filing dates for each required report, the Committee failed to file six reports in a timely manner as follows:

<u>REPORT</u>	<u>REPORT DUE</u>	<u>REPORT FILED</u>	<u>DAYS LATE</u>
1992 April Quarterly	4/15/92	4/27/92	12
1992 July Quarterly	7/15/92	7/29/92	14
1992 October Quarterly	10/15/92	10/27/92	12
1992 Pre-General	10/22/92	2/23/93	124 ¹
1992 Post-General	12/03/92	2/23/93	82
1992 Year End	1/31/93	2/23/93	23

The Committee failed to respond to the original findings regarding these violations. Thus, on December 30, 1993, this Office mailed the General Counsel's Brief to respondents. After

1. The Committee filed the pre-general election activity in the 1992 30 Day Post-General Report.

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mailing the Brief to the address of record and receiving no response, we contacted the treasurer by telephone. Mr. Delisi stated that he had not received the notices in this matter because the Committee address had changed in August of 1993. To accommodate Mr. Delisi, this Office sent him copies of prior correspondence and a copy of the Brief by facsimile. We requested that Mr. Delisi call us by February 3, 1994 and reminded him of the requirements of 2 U.S.C. § 433(c). To date, Mr. Delisi has not called nor has he otherwise responded to our communication.

Therefore, this Office recommends that the Commission find probable cause to believe that the National Albanian American PAC and Martin V. Delisi, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), (ii), and (iii).

IV. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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Accordingly, this Office recommends that the Commission:

1) ratify the determination to find reason to believe that the National Albanian American PAC and Martin V. Delisi, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), (ii), and (iii); and 2) find probable cause to believe that the Committee and its treasurer violated 2 U.S.C. §§ 434(a)(4)(A)(i), (ii), and (iii).

V. RECOMMENDATIONS

1. Ratify the Commission's determination to find reason to believe that the National Albanian American PAC and Martin V. Delisi, as treasurer, violated:

- a) 2 U.S.C. § 434(a)(4)(A)(i);
- b) 2 U.S.C. § 434(a)(4)(A)(ii); and
- c) 2 U.S.C. § 434(a)(4)(A)(iii).

2. Find probable cause to believe that the National Albanian American PAC and Martin V. Delisi, as treasurer, violated:

- a) 2 U.S.C. § 434(a)(4)(A)(i);
- b) 2 U.S.C. § 434(a)(4)(A)(ii); and
- c) 2 U.S.C. § 434(a)(4)(A)(iii).

3. Approve the attached conciliation agreement and the appropriate letter.

2/19/94
Date


Lawrence M. Noble
General Counsel

Attachments:
A. Conciliation Agreement
B. Certification

Staff assigned: Frances B. Hagan

24943561108

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Albanian American) MUR 3811
Political Action Committee and)
Martin V. Delisi, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 17, 1994, the Commission decided by a vote of 6-0 to take the following actions in MUR 3811:

1. Ratify the Commission's determination to find reason to believe that the National Albanian American Political Action Committee and Martin V. Delisi, as treasurer, violated:
 - a) 2 U.S.C. § 434(a)(4)(A)(i);
 - b) 2 U.S.C. § 434(a)(4)(A)(ii); and
 - c) 2 U.S.C. § 434(a)(4)(A)(iii).

2. Find probable cause to believe that the National Albanian American Political Action Committee and Martin V. Delisi, as treasurer, violated:
 - a) 2 U.S.C. § 434(a)(4)(A)(i);
 - b) 2 U.S.C. § 434(a)(4)(A)(ii); and
 - c) 2 U.S.C. § 434(a)(4)(A)(iii).

(continued)

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4. Approve the conciliation agreement and the appropriate letter, as recommended in the General Counsel's Report dated February 19, 1994.

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

Attest:

2-17-94
Date

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

Received in the Secretariat: Mon., Feb. 14, 1994 3:06 p.m.
Circulated to the Commissions: Mon., Feb. 14, 1994 4:00 p.m.
Deadline for vote: Thurs., Feb. 17, 1994 4:00 p.m.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

FEBRUARY 18, 1994

Martin V. Delisi, Treasurer
National Albanian American PAC
2934 Forest Hill Boulevard
West Palm Beach, FL 33406

RE: MUR 3811
National Albanian American PAC
Martin V. Delisi, as treasurer

Dear Mr. Delisi:

On February 17, 1994, the Federal Election Commission found that there is probable cause to believe the National Albanian American Political Action Committee ("the Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(i), (ii), and (iii), provisions of the Federal Election Campaign Act of 1971, as amended, in connection with the Committee's failure to file reports of receipts and expenditures in a timely manner.

As you may be aware, on October 22, 1993, the D.C. Circuit declared the Commission unconstitutional on separation of powers grounds due to the presence of the Clerk of the House of Representatives and Secretary of the Senate or their designees as members of the Commission. Thus, the Commission has taken several actions to comply with the requirements of the court's decision in FEC v. NRA Political Victory Fund, 6 F.3d 821 (D.C. Cir. 1993), petition for cert. filed (U.S. Jan. 18, 1994)(No. 93-1151)("NRA"). While the Commission petitions the Supreme Court for a writ of certiorari, the Commission, consistent with that opinion, has remedied any possible constitutional defect identified by the Court of Appeals by reconstituting itself as a six member body without ex officios. In addition, the Commission has adopted specific procedures for revoting or ratifying decisions pertaining to open enforcement matters.

In this matter, on February 17, 1994, the Commission ratified its prior finding of reason to believe that the Committee and its treasurer violated 2 U.S.C. §§ 434(a)(4)(A)(i), (ii), and (iii). As a result, the NRA decision does not further affect this enforcement action.

As to the probable cause finding, the Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States

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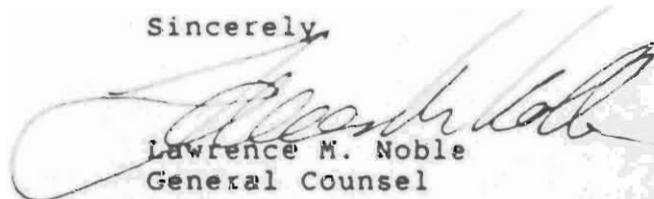
Martin V. Delisi, Treasurer
Page 2

District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement.

24043561112



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20001

March 22, 1994

Martin V. Delisi, Treasurer
National Albanian American PAC
2934 Forest Hill Boulevard
West Palm Beach, FL 33406

RE: MUR 3811
National Albanian American PAC
Martin V. Delisi, as treasurer

Dear Mr. Delisi:

On February 18, 1994, you were notified that the Federal Election Commission found probable cause to believe that the National Albanian American PAC ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(i), (ii), and (iii). On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days, but may cease after 30 days. Insofar as more than 30 days have elapsed without a substantive response from you, a recommendation concerning the filing of a civil suit will be made to the Commission by the Office of the General Counsel unless we receive a response from you within five days of receipt of this letter.

Should you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan

Frances B. Hagan
Paralegal Specialist

2404356113

06C#733

FEDERAL ELECTION
COMMISSION
MAIL ROOM

LAW OFFICES
WEBSTER, CHAMBERLAIN & BEAN
1747 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 785-9500
FAX: (202) 835-0243

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GEORGE D WEBSTER
J COLEMAN BEAN
ARTHUR L HEROLD
ALAN P DYE
EDWARD D COLEMAN
BURRETT VAN KIRK
FRANK M NORTHAM
GERARD P PANARO
JOHN W HAZARD JR
CHARLES M WATKINS
HUGH R WEBSTER
DAVID P GOCH
TIMOTHY W SMITH

OF COUNSEL
CHARLES E CHAMBERLAIN
ASSOCIATION ADVISOR
HUGH MCCANEY

VIA FACSIMILE 219-3923

March 30, 1994

Frances B. Hagen
Paralegal Specialist
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 3811
National Albanian American PAC

Dear Ms. Hagen:

Attached is a Designation of Counsel authorizing our firm to represent the above-referenced respondent in connection with MUR 3811. This file has only this week been sent to me, and I would like to discuss it with you as soon as possible. There is a history to this MUR which predates the reason to believe finding, and I think that the history is relevant to the resolution of the issue. I would appreciate it if you would give me a call when you have the opportunity.

Very truly yours,
Alan P. Dye
Alan P. Dye

APD/tcm

Attachment

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MAY 11 1994
FEDERAL ELECTION COMMISSION

FEC General Counsel

TEL:202-219-3923

Feb 01 94

11:40 No.006 P.02

STATEMENT OF DESIGNATION OF COUNSEL

NO: 3811

NAME OF COUNSEL: ALAN P. DYE

ADDRESS: FRANK NORTHAM

WEBSTER, CHAMBERLAIN & BEAN

1747 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D.C. 20006

TELEPHONE: (202) 785-9500

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

2/25/94
Date

[Signature]
Signature

RESPONDENT'S NAME: MARTIN V. DELISI

ADDRESS: NATIONAL ALBANIAN AMERICAN PAC

2934 FOREST HILL BOULEVARD

WEST PALM BEACH, FLORIDA 33406

HOME PHONE: _____

BUSINESS PHONE: 407 641 8305

24043561115

BEFORE THE FEDERAL ELECTION COMMISSION JUN 19 10 05 AM '94

In the Matter of)
) MUR 3811
National Albanian American PAC)
Martin V. Delisi, Treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

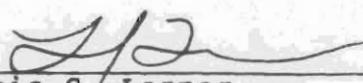
Attached is a conciliation agreement which has been signed by counsel for the National Albanian American PAC and Martin V. Delisi, as treasurer. The attached agreement contains no changes from the agreement approved by the Commission on June 22, 1994. We have not yet received the civil penalty check.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the National Albanian American PAC and Martin V. Delisi, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

7/18/94
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachment
A. Conciliation Agreement

Staff Assigned: Frances B. Hagan

24043561116

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Albanian American Political) MUR 3811
Action Committee and Martin V.)
Delisi, Treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 21, 1994, the Commission decided by a vote of 6-0 to take the following actions in MUR 3811:

1. Accept the conciliation agreement with the National Albanian American Political Action Committee and Martin V. Delisi, as treasurer, as recommended in the General Counsel's Report dated July 18, 1994.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated July 18, 1994.

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

Attest:

7-22-94
Date

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

Received in the Secretariat: Tues., July 19, 1994 10:05 a.m.
Circulated to the Commission: Tues., July 19, 1994 11:00 a.m.
Deadline for vote: Fri., July 22, 1994 4:00 p.m.

bjr

24043561117



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20006

AUGUST 3, 1994

Alan Dye, Esquire
Webster, Chamberlain & Bean
1747 Pennsylvania Ave., N.W.
Washington, D.C. 20006

RE: MUR 3811
National Albanian American PAC
Martin V. Delisi, as treasurer

Dear Mr. Dye:

On July 21, 1994, the Federal Election Commission accepted the signed conciliation agreement submitted on your clients' behalf in settlement of violations of 2 U.S.C. §§ 434(a)(4)(i), (ii), and (iii), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan
Paralegal Specialist

Enclosure
Conciliation Agreement

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JUL 26 12 34 PM '94

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3811
National Albanian American PAC)
Martin V. Delisi, 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 probable cause to believe that the National Albanian American PAC and Martin V. Delisi, as treasurer ("Respondents"), violated 2 U.S.C. §§ 434(a)(4)(A)(i), (ii), and (iii).

NOW, THEREFORE, the Commission and the Respondents, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding.

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 National Albanian American PAC is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Martin V. Delisi is treasurer of the respondent committee.

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3. The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees, such committees shall file quarterly reports--for years in which regularly scheduled elections are held--no later than the 15th day after the last day of each calendar quarter, except that the report for the quarter ending on December 31 shall be filed by January 31 of the following year. 2 U.S.C. § 434(a)(4)(A)(i).

4. The Act provides that such committees shall file the 12 Day Pre-Election Report no later than the 12th day before any election in which the committee makes a contribution or expenditure on behalf of a candidate in such election. 2 U.S.C. § 434(a)(4)(A)(ii).

5. The Act also provides that unauthorized committees shall file a 30 Day Post-General Election Report, which shall be filed no later than the 30th day after the general election. 2 U.S.C. § 434(a)(4)(A)(iii).

6. Pursuant to the Act, Respondents were to file the 1992 April, July, and October Quarterlies, the 1992 12 Day Pre-General and 30 Day Post-General Reports, and the 1992 Year End Report on the due dates listed below. The actual dates filed, the number of days late, and the reported receipts and expenditures for each report are also listed below.

<u>REPORT</u>	<u>RECEIPTS</u>	<u>EXPENDITURES</u>	<u>REPORT DUE</u>	<u>REPORT FILED</u>	<u>DAYS LATE</u>
1992 April Quarterly	\$ 4,000	\$ 76	4/15/92	4/27/92	12

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<u>REPORT</u>	<u>RECEIPTS</u>	<u>EXPENDITURES</u>	<u>REPORT DUE</u>	<u>REPORT FILED</u>	<u>DAYS LATE</u>
1992 July Quarterly	\$26,390	\$29,598	7/15/92	7/29/92	14
1992 October Quarterly	\$26,000	\$14,026	10/15/92	10/27/92	12
1992 Pre-General	\$ 0	\$ 5,000	10/22/92	2/23/93	124
1992 Post-General	\$28,630	\$20,046	12/03/92	2/23/93	82
1992 Year End	\$ 9,500	\$25,510	1/31/93	2/23/93	23

V. 1. Respondents failed to file timely the 1992 April, July and October Quarterly Reports and the 1992 Year End Report in violation of 2 U.S.C. § 434(a)(4)(A)(i).

2. Respondents failed to file timely the 1992 12 Day Pre-General Report in violation of 2 U.S.C. § 434(a)(4)(A)(ii).

3. Respondents failed to file timely the 1992 30 Day Post-General Report in violation of 2 U.S.C. § 434(a)(4)(A)(iii).

VI. 1. Respondents will pay a civil penalty to the Federal Election Commission in the amount of one thousand dollars (\$1,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

2. Respondents agree to terminate existence as a political committee.

3. Respondent treasurer agrees henceforth not to serve as treasurer of another federal political committee.

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

24043561121

relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY:

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

Date

8-3-94

FOR THE RESPONDENTS:

Alan P. Dye
(Name)
(Position) *Power of Attorney*

Date

7-15-94

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3811

DATE FILMED 8-12-94 CAMERA NO. 2

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Date: 10/11/94

Microfilm
 Public Records
 Press

94043590604

THE ATTACHED MATERIAL IS BEING ADDED TO CLOSED HUR 3811

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

OFFICES
WEBSTER, CHAMBERLAIN & DEAN

1747 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 785-9500
FAX: (202) 635-0243

Oct 5 3 52 PM '94

GEORGE D. WEBSTER
J. COLEMAN DEAN
ARTHUR L. HEROLD
ALAN P. DYE
EDWARD G. COLEMAN
BURNETT VAN RISS
FRANK M. NORTHAJE
GERARD P. HANARD
JOHN W. HANARD, JR.
CHARLES H. WATKINS
KUSH K. WEBSTER
DAVID F. BOCH
BRENNLEY J. LOCKE*

OF COUNSEL
CHARLES E. CHAMBERLAIN
ASSOCIATION ADVISOR
HUGH MCCANEY

VIA COURIER

October 5, 1994

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COMMISSION
OFFICE OF GENERAL
COUNSEL
Oct 6 12 42 PM '94

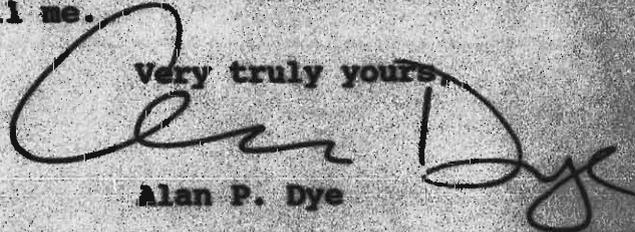
Ms. Frances B. Hagan
Paralegal Specialist
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 10463

RE: MUR 3811

Dear Ms. Hagan:

Attached is the check from Martin Delisi finally resolving the above-referenced matter under review. If you have any additional questions, do not hesitate to call me.

Very truly yours,



Alan P. Dye

APD/tcm

Attachment

94043590605

RECEIVED
FEDERAL ELECTION
COMMISSION
ACCOUNTING OFFICE
Oct 5 3 56 PM '94

①

Martin V. Bellini No. 0435906064102

No. 622-3162
Prosperity Farm Bank
11200 Prosperity Farms Rd. So. 304
Palm Beach Gardens, FL 33410

02-000/075
11

Feb 11 1971

Payable to the order of Paula Elaine Crossin \$ 1000⁰⁰
One Thousand Dollars / Dollars



02-014
0001 PBA Endorsement
Palm Beach Gardens, FL 33410

For [Signature]

Signature line



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

OFFICE OF GENERAL COUNSEL
FEDERAL ELECTION COMMISSION
OCT 6 12 42 PM '94

10/6/94

TWO WAY MEMORANDUM

TO: OGC, Docket
FROM: Rosa E. Swinton
Accounting Technician
SUBJECT: Account Determination for Funds Received

We recently received a check from Martin Delisi
Prosperity Farms Gardens, check number 4102, dated 9/13/94, and in the amount of \$ 1000.00.
Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the NUR number and name.

TO: Rosa E. Swinton
Accounting Technician
FROM: OGC, Docket Byaa

In reference to the above check in the amount of \$ 1,000.00, the NUR number is 3811 and in the name of National Albanian American PAC. The account into which it should be deposited is indicated below:

- Budget Clearing Account (OGC), 9573875.15
- Civil Penalties Account, 95-1099.160
- Other: _____

Anita Alexander
Signature

10-06-94
Date

94043590607