



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

THIS IS THE BEGINNING OF MUR # 4278

DATE FILMED 2/8/96 CAMERA NO. 4

CAMERAMAN ZL7

96043721003

REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: July 7, 1995

ANALYST: NEIL EVANS

I. COMMITTEE: Pakistani Physicians Political Action
Committee (PAK/PAC) (C00238204)
Hassan I. Bukhari, MD, Treasurer
4001 Worth Street
Dallas, TX 75246

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

III. BACKGROUND:

Chronic Late Filing of Reports

Pakistani Physicians Political Action Committee (PAK/PAC) ("the Committee") has failed to file five (5) Reports of Receipts and Disbursements in a timely manner for the 1993-1994 election cycle (see Chart on Page 2). The reports were filed between seventeen (17) and two hundred twenty-six (226) calendar days late.

On May 5, 1994, a Chronic Late Filer Notice was sent to the Committee for failing to file the 1993 Mid-Year and 1993 Year End Reports in a timely manner (Attachment 7).^{1/} The Notice advised the Committee that any additional late filing of reports may result in legal enforcement action. Subsequent to the mailing of the Chronic Late Filer Notice, the Committee failed to file the 1994 October Quarterly and 1994 12 Day Pre-General Reports in a timely manner.

On May 23, 1994, in response to the Non-Filer Notice sent for the 1994 April Quarterly Report, the treasurer responded on the cover letter to the report by saying, "the first quarterly report is being filed a few days behind time, because of the mistaken understanding that I was to be filing a mid-year report" (Attachment 9).

^{1/} It was originally sent April 22, 1994; returned and remailed.

96043721004

LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1993 Mid-Year* (1/1/93-6/30/93)	7/05/93 (Attachment 2)	7/31/93	3/22/94 (Attachment 4)**	3/14/94 (Attachment 5)
1993 Year End* (7/1/93-12/31/93)	12/27/93 (Attachment 3)	1/31/94	3/22/94 (Attachment 4)**	3/14/94 (Attachment 5)
1994 April Quarterly (1/1/94-3/31/94)	3/22/94 (Attachment 6)	4/15/94	5/10/94 (Attachment 8)	5/14/94 (Attachment 9)
1994 October Quarterly (7/1/94-9/30/94)	9/21/94 (Attachment 10)	10/15/94	None	11/01/94 (Attachment 12)
1994 12 Day Pre-General (10/1/94-10/19/94)	10/03/94 (Attachment 11)	10/27/94	None	11/17/94 (Attachment 13)

* Instead of filing the 1993 Mid-Year and 1993 Year End Reports separately, the Committee filed one report covering the whole year.

** The Non-Filer Notice was first mailed February 25, 1994; however, the letter was returned.

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
PAKISTANI PHYSICIANS POLITICAL ACTION COMMITTEE (PAK/PAC)						ID #C00238204 NON-PARTY QUALIFIED
CONNECTED ORGANIZATION:	NONE					
1993	NOTICE OF FAILURE TO FILE			1JAN93 -30JUN93	2	94FEC/885/5343
	YEAR-END	32,106	11,175	1JAN93 -31DEC93	17	94FEC/887/2503
	YEAR-END - AMENDMENT	32,106	11,175	1JAN93 -31DEC93	20	94FEC/904/4174
	YEAR-END - AMENDMENT	32,106	11,175	1JAN93 -31DEC93	5	94FEC/936/3465
	NOTICE OF FAILURE TO FILE			1JUL93 -31DEC93	2	94FEC/885/5345
	REQUEST FOR ADDITIONAL INFORMATION			1JAN93 -31DEC93	3	94FEC/897/1022
	REQUEST FOR ADDITIONAL INFORMATION			1JAN93 -31DEC93	1	94FEC/924/3407
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN93 -31DEC93	3	94FEC/934/2539
1994	MISCELLANEOUS REPORT TO FEC			29MAR94	2	94FEC/889/2303
	MISCELLANEOUS NOTICE FROM FEC			5MAY94	2	94FEC/897/2296
	APRIL QUARTERLY	414	1,480	1JAN94 -30MAR94	7	94FEC/900/1970
	NOTICE OF FAILURE TO FILE			1JAN94 -31MAR94	2	94FEC/898/1092
	JULY QUARTERLY	5,385	3,342	1APR94 -30JUN94	6	94FEC/906/2833
	JULY QUARTERLY - AMENDMENT	-	-	1APR94 -30JUN94	2	94FEC/923/4000
	JULY QUARTERLY - AMENDMENT	5,385	3,342	1APR94 -30JUN94	10	94FEC/936/3455
	REQUEST FOR ADDITIONAL INFORMATION			1APR94 -30JUN94	3	94FEC/921/2213
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR94 -30JUN94	3	94FEC/925/2321
	OCTOBER QUARTERLY	39	4,822	1JUL94 -30SEP94	6	94FEC/941/2390
	PRE-GENERAL	0	3,028	1OCT94 -19OCT94	5	94FEC/944/1754
	POST-GENERAL	13,356	19,879	20OCT94 -28NOV94	10	94FEC/950/5151
	POST-GENERAL - AMENDMENT	13,356	19,878	20OCT94 -28NOV94	11	95FEC/967/2446
	POST-GENERAL - AMENDMENT	13,356	19,878	20OCT94 -28NOV94	17	95FEC/971/2495
	REQUEST FOR ADDITIONAL INFORMATION			20OCT94 -28NOV94	2	95FEC/965/3022
	REQUEST FOR ADDITIONAL INFORMATION			20OCT94 -28NOV94	5	95FEC/970/1267
	YEAR-END	262	5,462	29NOV94 -31DEC94	6	95FEC/965/1014
	YEAR-END - AMENDMENT	262	2,462	29NOV94 -31DEC94	10	95FEC/971/2485
	REQUEST FOR ADDITIONAL INFORMATION			29NOV94 -31DEC94	3	95FEC/970/1272
	TOTAL	51,562	0 46,187	0	165	TOTAL PAGES

96043721006

All reports have been reviewed.
Cash-On-Hand as of 12/31/94: \$7,406.41
Debts and Obligations owed to/by the committee as of 12/31/94: \$0

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

July 5, 1993

REPORT	REPORTING PERIOD*	REG./CERT.	
		MAILING DATE**	FILING DATE
Mid-Year	01/01/93 - 06/30/93	07/31/93	07/31/93

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.

INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with a special 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 semiannual to monthly) must notify the Commission in writing when filing a 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

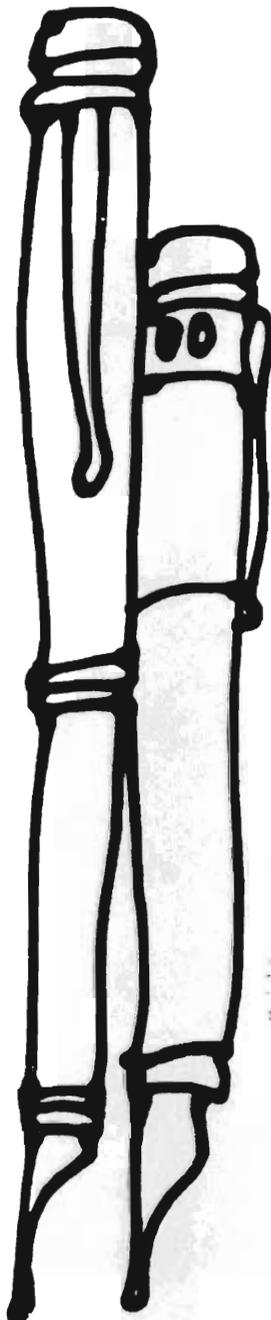
TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

*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

96043721077



REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 27, 1993

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) must file a Year-End Report on January 31, 1994.

REPORT CONTENT AND DATES

I. Semiannual Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	07/01/93 - 12/31/93	01/31/94	01/31/94

Semiannual filers must disclose financial activity that occurred from July 1 through December 31, 1993, on their Year-End Report.

II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	12/01/93 - 12/31/93	01/31/94	01/31/94

Monthly filers must disclose financial activity from December 1 through December 31, 1993, on their Year-End Report.

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 their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

LABEL

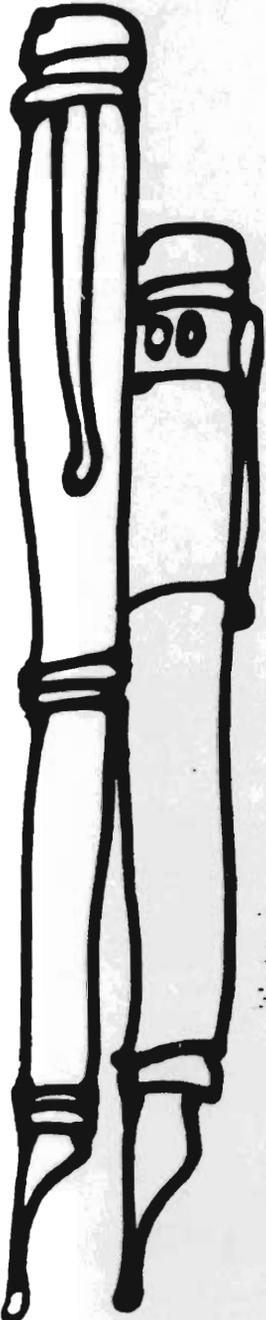
Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

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(over)

96043721008



PARTIES AND PACS

YEAR-END

1994 FILING SCHEDULE

I. Quarterly Filers

REPORT	PERIOD COVERED*	REG./CERT.	
		MAILING DATE**	FILING DATE
April	01/01/94 - 03/31/94	04/15/94	04/15/94
July	04/01/94 - 06/30/94	07/15/94	07/15/94
October	07/01/94 - 09/30/94	10/15/94	10/15/94
Pre-General	10/01/94 - 10/19/94	10/24/94	10/27/94
Post-General	10/20/94 - 11/28/94	12/08/94	12/08/94
Year-End	11/29/94 - 12/31/94	01/31/95	01/31/95

II. Monthly Filers

REPORT	PERIOD COVERED*	REG./CERT.	
		MAILING DATE**	FILING DATE
February	01/01/94 - 01/31/94	02/20/94	02/20/94
March	02/01/94 - 02/28/94	03/20/94	03/20/94
April	03/01/94 - 03/31/94	04/20/94	04/20/94
May	04/01/94 - 04/30/94	05/20/94	05/20/94
June	05/01/94 - 05/31/94	06/20/94	06/20/94
July	06/01/94 - 06/30/94	07/20/94	07/20/94
August	07/01/94 - 07/31/94	08/20/94	08/20/94
September	08/01/94 - 08/31/94	09/20/94	09/20/94
October	09/01/94 - 09/30/94	10/20/94	10/20/94
Pre-General	10/01/94 - 10/19/94	10/24/94	10/27/94
Post-General	10/20/94 - 11/28/94	12/08/94	12/08/94
Year-End	11/29/94 - 12/31/94	01/31/95	01/31/95

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

96043721099



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

RQ-7

February 25, 1994

Hassan I. Bukharti MD, Treasurer
Pakistani Physicians Political
Action Committee (PAK/PAC)
4121 South Fairview Avenue, Suite L2
Downers Grove, IL 60515

Identification Number: C00238204

Reference: Mid-Year (1/1/93-6/30/93) and Year End (7/1/93-12/31/93) reports

Dear Dr. Bukharti:

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 Reports of Receipts and Disbursements. You were previously notified of the due dates for these reports.

It is important that you file these reports 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). Copies of the reports or the relevant portions should also be filed with the Secretary of State or equivalent state officer (see 2 U.S.C. §439).

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions regarding this matter, please contact Robyn Jameson 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

9 62 04 4 3 8 2; 15 1; 3 0 4 3

REPORT OF RECEIPTS AND DISBURSEMENTS

ATTACHMENT #5

PAGE 1 of 2

For Other Than An Authorized Committee
(Summary Page)

MAR 18 10 31 AM '94

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) PAKISTANI PHYSICIANS POLITICAL ACTION COMMITTEE (PAC)	2. FEC IDENTIFICATION NUMBER C - 00238204
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 4001 WORTH STREET	3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).
CITY, STATE and ZIP CODE DALLAS, TEXAS, 75246	

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 |

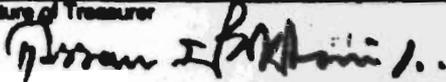
- Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? YES NO

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>JAN. 1, 1993</u> through <u>DEC. 31, 1993</u>		
6. (a) Cash on Hand January 1, 1993		\$ 2032.32
(b) Cash on Hand at Beginning of Reporting Period	\$ 2032.32	
(c) Total Receipts (from Line 18)	\$ 32,106.61	\$ 32,106.61
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 34,138.93	\$ 34,138.93
7. Total Disbursements (from Line 30)	\$ 11,175.13	\$ 11,175.13
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 22,963.80	\$ 22,963.80
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ - - -	For further information contact: Federal Election Commission 900 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
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
HASSAN I. BOKHARI M.D.

Signature of Treasurer


Date
1/31/94

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

99 44 43 8 13 27 12 15 0 13

**Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

Hand Delivered

DATE OF RECEIPT

First Class Mail

POSTMARKED

Registered/Certified Mail

POSTMARKED

3-14-94

No Postmark

Postmark Illegible

Received from the House Office of Records
and Registration

DATE OF RECEIPT

Received from the Senate Office of Public
Records

DATE OF RECEIPT

Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

SLS

PREPARER

3-18-94

DATE PREPARED

99 64 00 43 38 73 27 12 15 7 29

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 22, 1994

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April Quarterly	01/01/94-03/31/94	04/15/94	04/15/94

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 1994 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 day.

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

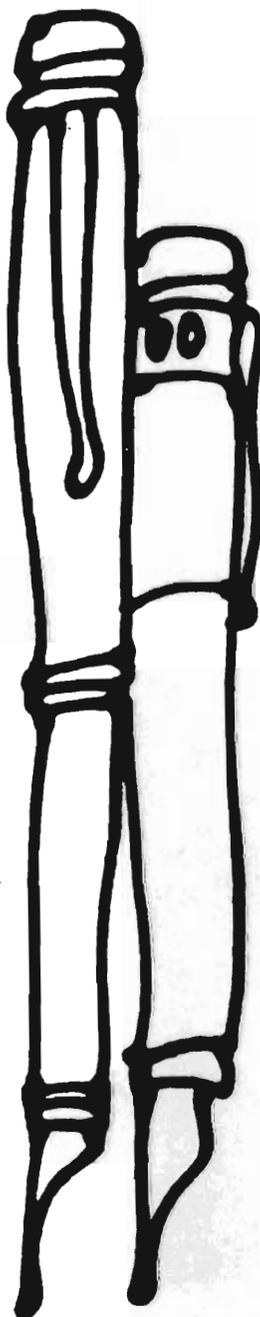
TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

*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

95043721103





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

MS-L

Hassan I. Bakhari, M.D.
Pakistani Physicians Political
Action Committee (PAK/PAC)
4121 Fairview Avenue, Suite L2
Downers Grove, IL 60515

APR 22 1994

Identification Number: C00238204

Reference: 1993-1994 Election Cycle Reports

Dear Dr. Bakhari:

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>
Mid-Year (1/1/93-6/30/93)	7/31/93	3/14/94
Year End (7/1/93-12/31/93)	1/31/94	3/14/94

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 Robyn Jimson 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

9464004338792712120946



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20461

RQ-7

May 10, 1994

Hassan I. Bukhari MD, Treasurer
Pakistani Physicians Political Action
Committee (PAK/PAC)
4001 Worth Street
Dallas, TX 75246

Identification Number: C00238204

Reference: April Quarterly Report (1/1/94-3/31/94)

Dear Dr. Bukhari:

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 Robyn Jameson 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

94038981092

HASSAN I. BUKHARI, M.D., F.A.C.S.

SURGICAL ASSOCIATES OF DALLAS

4001 WORTH STREET

DALLAS, TEXAS 75248

GENERAL SURGERY
PERIPHERAL VASCULAR SURGERY

May 23 11 04 AM '94
214 528-2714
1-800-828-9999

May 13, 1994

John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
Washington D.C. 20463

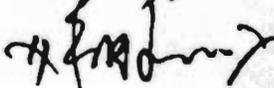
Dear Mr. Gibson:

I am in receipt of your letter of May 10th, 1994, a copy of which is enclosed. Unfortunately, a misunderstanding occurred on my behalf whereby I was somewhat confused about the appropriate time for filing the reports on an election and non-election year. After talking to the Federal Election Commission and to an analyst, and having been appraised of the situation, I am quite clear that I need to file quarterly reports this year, rather than a mid-year report.

Therefore, the first quarterly report is being filed a few days behind time, because of the mistaken understanding that I was to be filing a mid-year report. However, the situation is quite clear to me now and will be handled in the most appropriate and efficient manner, as is should be.

I hope for your kind consideration of this misunderstanding.

Sincerely,



Hassan Bukhari, M.D.

ck

916-0045377J2J11190/60

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
PAKISTANI AMERICANS POLITICAL ACTION COMMITTEE (PAC)

ADDRESS (number and street) Check if different than previously reported
11001 LIBERTY STREET

CITY, STATE AND ZIP CODE
DALLAS TEXAS 75246

2. FEC IDENTIFICATION NUMBER
Mar 23 11 04 AM '94
C - 00238264

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 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 JAN 1, 1994 through MARCH 30, 1994		
6. (a) Cash on Hand January 1, 1994		\$ 22,963.20
(b) Cash on Hand at Beginning of Reporting Period	\$ 22,963.20	
(c) Total Receipts (from Line 19)	\$ 144.18	\$ 411.10
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 23,377.98	\$ 23,377.98
7. Total Disbursements (from Line 30)	\$ 1480.60	\$ 1480.60
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 21,897.38	\$ 21,897.38
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
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
HASSAN I. BOKHARI M.D.

Signature of Treasurer
Hassan I. Bokhari

Date
4/15/94

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

96039001972

Federal Election Commission
**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

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PREPARER

5-24-94

DATE PREPARED

9 2 4 3 9 2 1 9 8 6

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 21, 1994

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
October Quarterly	07 01 94 - 09 30 94	10/15/94	10.15.94

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 1994 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 day.

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

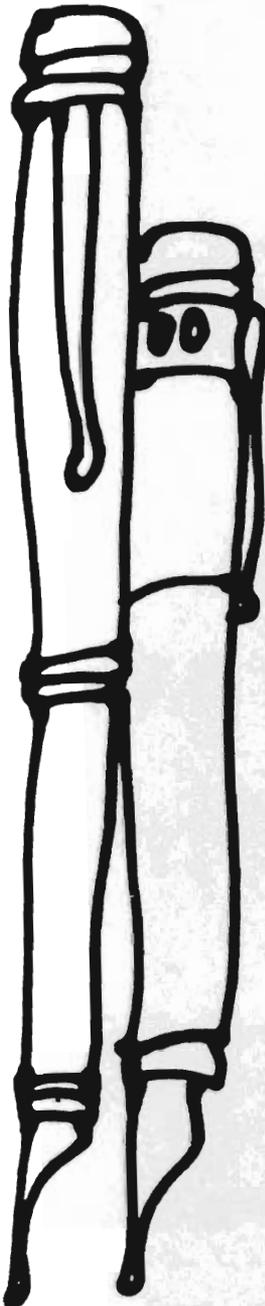
Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

*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

95043721109



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.

9 6 0 4 3 7 2 1 1 1 0

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

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

October 3, 1994

I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/94 - 10/19/94	10/24/94	10/27/94
Post-General	10/20/94 - 11/28/94	12/08/94	12/08/94

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

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/94 - 10/19/94	10/24/94	10/27/94
Post-General	10/20/94 - 11/28/94	12/08/94	12/08/94

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

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Post-General	10/01/94 - 11/28/94	12/08/94	12/08/94

WHO MUST FILE

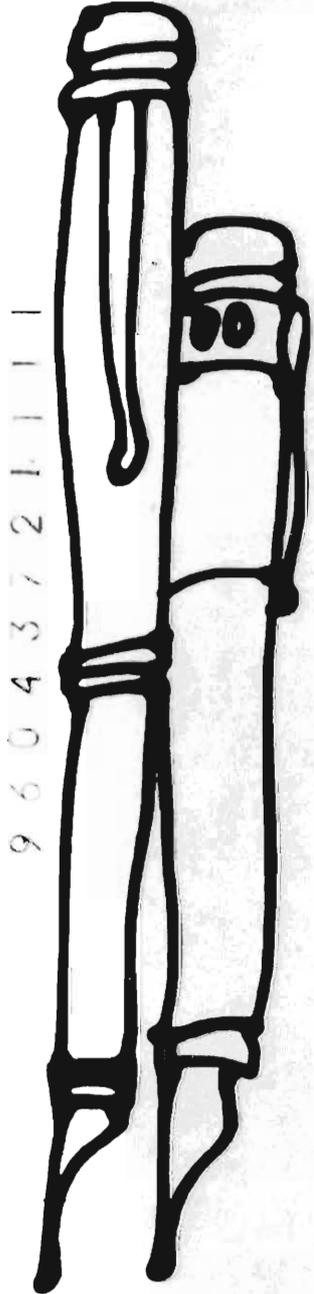
Party committees and PACs must follow the above charts in order to determine whether they must file the Pre-General Election Report. All Party committees and PACs, regardless of financial activity, must file the Post-General Election Report.

*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 previously report them must also follow the Chart 2I reporting requirements.

(over)



9604372111

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 20 and ending November 6 must report them within 24 hours.

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.

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

9 6 0 4 3 7 2 1 1 1 2

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

ATTACHMENT #12
PAGE 1 of 2
FEDERAL ELECTION
COMMISSION
HALL BLDG

Nov 3 12 00 PM '94

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
PAKISTANI PHYSICIANS POLITICAL ACTION COMMITTEE

ADDRESS (number and street) Check if different than previously reported
4001 NORTH STREET

CITY, STATE and ZIP CODE
DALLAS TX. 75246

2. FEC IDENTIFICATION NUMBER
C - 00238204

3. This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

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
 - March 20
 - April 20
 - May 20
 - June 20
 - July 20
 - August 20
 - September 20
 - October 20
 - November 20
 - December 20
 - January 31

- Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? YES NO

94039412300

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period <u>7-1-94</u> through <u>9-30-94</u>		
6	(a) Cash on Hand January 1, 19 <u>94</u>		\$ 22,963. ⁰⁰
	(b) Cash on Hand at Beginning of Reporting Period	\$ 23,940. ⁴⁶	
	(c) Total Receipts (from Line 19)	\$ 39. ⁰⁹	\$ 5838. ⁶⁷
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 23,979. ⁵⁵	\$ 28,522. ⁶⁷
7	Total Disbursements (from Line 30)	\$ 4822. ³⁵	\$ 9645. ⁴⁷
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 19,157. ²⁰	\$ 19,157. ²⁰
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ - 0 -	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ - 0 -	

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

Type or Print Name of Treasurer
HASSAN I. BUKHARI M.D.

Signature of Treasurer
Hassan I. Bukhari

Date
10/15/94

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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JMH
PREPARER

11-3-94
DATE PREPARED

94039412395

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

Nov 22 11 45 AM '94

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
PAKISTANI PHYSICIANS POLITICAL ACTION COMMITTEE

ADDRESS (number and street) Check if different than previously reported
11001 WORTH STREET

CITY, STATE and ZIP CODE
DALLAS TX. 75216

2. FEC IDENTIFICATION NUMBER
C-00-38720

3. This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

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
 - March 20
 - April 20
 - May 20
 - June 20
 - July 20
 - August 20
 - September 20
 - October 20
 - November 20
 - December 20
 - January 31
- Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? YES NO

24334374175.5

SUMMARY	COLUMN A This Period	COLUMN D Calendar Year-to-Date
5. Covering Period 10.1.94 through 10.19.94		
6. (a) Cash on Hand January 1, 19 94		\$ 2,700.00
(b) Cash on Hand at Beginning of Reporting Period	\$ 14,157.00	
(c) Total Receipts (from Line 16)	\$ -	\$ 5,000.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column D)	\$ 14,157.00	\$ 22,800.00
7. Total Disbursements (from Line 30)	\$ 3,028.00	\$ 12,670.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 16,129.00	\$ 16,129.00
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
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-219-3420

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 **HASSAN I. BUKHARI M.D.**

Signature of Treasurer *Hassan I. Bukhari* Date **10/21/94**

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 5437g.

Federal Election Commission
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JMH

PREPARER

11-22-94

DATE PREPARED

8) 6 9 4 3 7 2 4 1 7 15 9

Oct 26 4 06 PM '95

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral: 95NF-22
Date Activated: 8/28/95

Staff Member: Tamara K. Kapper

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

RESPONDENTS: Pakistani Physicians Political Action Committee
and Ikram U. Kahn, MD, as treasurer

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

INTERNAL REPORTS CHECKED: Disclosure Reports
Referral Material

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Office of the General Counsel received a referral from the Reports Analysis Division ("RAD") on July 10, 1995. Attachment 1. The basis of the attached referral is the failure of the Pakistani Physicians Political Action Committee and Ikram U. Kahn, MD, as treasurer,¹ ("PAKPAC") to timely file five (5) disclosure reports during the 1993-1994 election cycle. Specifically, PAKPAC failed to timely file its 1993 Mid-Year and Year End Reports; and its 1994 April Quarterly, October Quarterly and 12 Day Pre-General Reports.

1. On October 11, 1995, PAKPAC filed an amendment to its Statement of Organization notifying the Commission that the previous treasurer, Hassan Bukhari, MD, resigned from the position as of October 1, 1995, and that Mr. Kahn was the new treasurer.

9604372117

II. FACTUAL AND LEGAL ANALYSIS

Based on the Factual and Legal Analysis, see Attachment 2, this Office recommends the Commission find reason to believe the Respondents violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), and (iv).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

In addition to recommending that the Commission find reason to believe that Respondents violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), and (iv), this Office also recommends that the Commission offer to enter into conciliation with the Respondents prior to a finding of probable cause to believe. Attached for the Commission's approval is a proposed conciliation agreement.

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IV. RECOMMENDATIONS

1. Open a MUR.

2. Find reason to believe the Pakistani Physicians Political Action Committee and Ikram U. Kahn, MD, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), and (iv), and enter into conciliation prior to a finding of probable cause to believe.

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

Lawrence M. Noble
General Counsel

10/26/95
Date

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

Attachments

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

96043721123



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/BONNIE J. ROSS
COMMISSION SECRETARY

DATE: OCTOBER 31, 1995

SUBJECT: RAD REFERRAL #95NF-22 - FIRST GENERAL COUNSEL'S
REPORT DATED OCTOBER 26,
1995.

The above-captioned document was circulated to the
Commission on Friday, October 27, 1995 at 12:00.

Objection(s) have been received from the
Commissioner(s) as indicated by the name(s) checked below:

Commissioner Aikens _____
Commissioner Elliott XXX
Commissioner McDonald _____
Commissioner McGarry _____
Commissioner Potter _____
Commissioner Thomas _____

This matter will be placed on the meeting agenda
for Tuesday, November 7, 1995.

Please notify us who will represent your Division before
the Commission on this matter.

96043721104

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Pakistani Physicians Political)
Action Committee and Ikram U.)
Kahn, MD, as treasurer.)

RAD Referral
#95NF-22

MUR 4278

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 1, 1995, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral #95NF-22:

1. Open a MUR.
2. Find reason to believe the Pakistani Physicians Political Action Committee and Ikram U. Kahn, MD, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), (ii), and (iv), and enter into conciliation prior to a finding of probable cause to believe.

(continued)

96043721195

Federal Election Commission
Certification for Pakistani Physicians
Political Action Committee and Ikram U.
Kahn, MD, as treasurer.
November 1, 1995

Page 2

3. Approve the proposed Factual and Legal Analysis, the proposed conciliation agreement and the appropriate letter, as recommended in the General Counsel's Report dated October 26, 1995.

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

Attest:

11-1-95
Date

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

Received in the Secretariat:	Thurs., Oct. 26, 1995	4:06 p.m.
Circulated to the Commission:	Fri., Oct. 27, 1995	12:00 p.m.
Deadline for vote:	Wed., Nov. 01, 1995	4:00 p.m.
Received Objection:	Tues., Oct. 31, 1995	1:18 p.m.
Placed on Agenda for:	Tues., Nov. 07, 1995	
Objection Withdrawn:	Wed., Nov. 01, 1995	3:27 p.m.
Withdrawn from Agenda		

bjr

96043721196



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 3, 1995

Ikram U. Kahn, MD, Treasurer
Pakistani Physicians Political
Action Committee
3006 S. Maryland Parkway
Suite 315
Las Vegas, NV 89109

RE: MUR 4278
Pakistani Physicians
Political Action Committee
and Ikram U. Kahn, MD, as
treasurer

Dear Dr. Kahn:

On November 1, 1995, the Federal Election Commission found that there is reason to believe that the Pakistani Physicians Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), and (iv), 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.

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.

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

26043721197

Dr. Kahn
Page 2

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

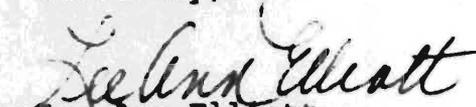
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at the local number (202) 219-3690 or the toll free number (800) 424-9530.

Sincerely,


Lee Ann Elliott
Vice Chairman

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

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Pakistani Physicians Political MUR: 4278
Action Committee and Ikram U.
Kahn, MD, as treasurer

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2).

The Federal Election Campaign Act of 1971, as amended, ("the Act") requires treasurers of political committees, other than authorized committees of a candidate, to file periodic reports of receipts and disbursements. 2 U.S.C. § 434(a)(4)(A). Such committees may choose to file reports either on a monthly or a quarterly basis. Id.

In any calendar year in which a regularly scheduled general election is held, committees that choose to file on a quarterly basis shall file quarterly reports no later than the 15th day after the last day of each calendar quarter. 2 U.S.C. § 434(a)(4)(A)(i). In addition, such committees shall file a pre-election report no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. 2 U.S.C. § 434(a)(4)(A)(ii).

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In any calendar year in which a regularly scheduled general election is not held, such committees shall file a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31. Such committees shall also file a report covering the period beginning July 1 and ending December 31, which is to be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv).

The Pakistani Physicians Political Action Committee and Ikram U. Kahn, MD, as treasurer, ("PAKPAC") is a political committee not authorized by any candidate, and has elected to file disclosure reports on a quarterly basis.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), the due date for PAKPAC's 1993 Mid-Year End Report was July 31, 1993, and the due date for its 1993 Year End Report was January 31, 1994. PAKPAC was notified on July 5, 1993, that its 1993 Mid-Year Report was due on July 31, 1993. Similarly, on December 27, 1993, PAKPAC was notified that its 1993 Year End Report was due on January 31, 1994. On February 25, 1994, the Commission sent PAKPAC a Non-Filer Notice¹ regarding the 1993 Mid-Year and Year End Reports. The Notice advised PAKPAC that the Commission may initiate an audit or legal enforcement action concerning its

1. The Non-Filer Notice was subsequently returned to the Commission by the United States Postal Service. On March 22, 1994, the Commission remailed the Notice.

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failure to file the reports. On March 14, 1994, PAKPAC filed its 1993 Year End Report, 42 days late, disclosing receipts totaling \$32,106 and disbursements totaling \$11,175.

The 1993 Year End Report disclosed that PAKPAC included the activity from the 1993 Mid-Year Reporting period (from January 1 through June 30, 1993) in its 1993 Year End Report. For the time period covered by the 1993 Mid-Year Report, PAKPAC disclosed receipts totaling \$578 and disbursements totaling \$295. For the time period covered by its 1993 Year End Report, (July 1 through December 31, 1993) PAKPAC disclosed receipts totaling \$31,528 and disbursements totaling \$10,880. For the purposes of disclosure, the Commission received the information regarding the 1993 Mid-Year Report on March 14, 1994, 226 days after PAKPAC was required to file the report.

On April 22, 1994,² the Commission sent PAKPAC a Chronic Late Filer Notice, notifying the PAKPAC that its 1993 Mid-Year and Year End Reports had not been filed in a timely manner. The Notice also advised PAKPAC that any additional late filing of reports could result in legal enforcement action.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), the due date for PAKPAC's 1994 April Quarterly Report was April 15, 1994. PAKPAC was notified on March 22, 1994, that its 1994 April Quarterly Report was due on April 15, 1994. On May 10, 1994, the Commission sent PAKPAC a Non-Filer Notice. The Notice informed PAKPAC that failure to file the report could result in an audit

2. This Notice was returned to the Commission by the U.S. Postal Service. On May 5, 1994, the Commission remailed the Notice.

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or legal enforcement action. On May 14, 1994, PAKPAC filed its 1994 April Quarterly Report, 29 days late, disclosing receipts totaling \$414 and disbursements totaling \$1,480.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), the due date for PAKPAC's 1994 October Quarterly Report was October 15, 1994. PAKPAC was notified on September 21, 1994, that its 1994 October Quarterly Report was due on October 15, 1994. On November 1, 1994, PAKPAC filed its 1994 October Quarterly Report, 17 days late, disclosing receipts totaling \$39 and disbursements totaling \$4,822.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), the due date for PAKPAC's 1994 12 Day Pre-General Report was October 27, 1994. PAKPAC was notified on October 3, 1994, that its 1994 12 Day Pre-General Report was due on October 27, 1994. On November 17, 1994, PAKPAC filed its 1994 12 Day Pre-General Report, 21 days late, disclosing \$0 receipts and disbursements totaling \$3,028.

Based on the foregoing, there is reason to believe that the Pakistani Physicians Political Action Committee and Ikram U. Kahn, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), and (iv).

9804372112



**PAKISTANI PHYSICIANS POLITICAL ACTION COMMITTEE
PAK PAC**

3006 S. Maryland Parkway, Suite 315 • Las Vegas, Nevada 89109 • (702) 734-1800



Board of Directors

President

Ikram U Khan, M.D.
3006 S. Maryland Pkwy.
Suite 315
Las Vegas, NV 89109
(702) 734-1800
fax (702) 734-0548

Secretary/Treasurer

Akram Choudhry
(201) 744-8572

Members

Nasim Ashraf, M.D.
(503) 673-5177

Hassan Bukhari, M.D.
(214) 826-2144

Parvez Shah, M.D.
(301) 384-9203

Arif Toor, M.D.
(203) 224-3133

Aman Khan, M.D.
(214) 905-1300

Mushtaq Khan, M.D.
(815) 726-6611

Murtaza Arain, M.D.
(708) 968-2700

November 9, 1995

Federal Election Commission
Washington, DC 20463

Re: Pakistani Physicians Political Action Committee
MUR: 4278

To Whom It May Concern:

Kindly note the change in the name of the above organization, as approved by the Board of Directors on October 18th, 1995. The new name to read as follows:

**Pakistani Physicians Public Affairs Committee
(PAK PAC)**

Sincerely,

Ikram U. Khan, M.D., President

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
NOV 21 9 30 AM '95

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FEDERAL ELECTION
COMMISSION
SECRETARIAT

BEFORE THE FEDERAL ELECTION COMMISSION
DEC 12 5 39 PM '95

In the Matter of)
) MUR 4278
Pakistani Physicians Political)
Action Committee and)
Ikram U. Khan, MD, as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On November 1, 1995, the Federal Election Commission ("the Commission") found reason to believe that the Pakistani Physicians Political Action Committee and Ikram U. Khan, MD,¹ as treasurer ("PAKPAC") violated 2 U.S.C. § 434(a)(4)(A)(i), (ii) and (iv), by failing to file timely five (5) disclosure reports during the 1993-1994 election cycle. On that same date, the Commission determined to offer to enter into conciliation with Respondents prior to a finding of probable cause to believe, and approved a proposed agreement in resolution of this matter.

On November 27, 1995, PAKPAC submitted a signed counteroffer. Attachment 1.

A check in payment of the civil penalty has been received. Attachment 2.

II. DISCUSSION OF COUNTEROFFER

1. In the First General Counsel's Report dated October 26, 1995, Dr. Khan's last name was misspelled. The error has been corrected.

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II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Pakistani Physicians Political Action Committee and Ikram U. Khan, MD, as treasurer.
2. Close the file in this matter.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

12/12/95
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Signed Conciliation Agreement
2. Photocopy of civil penalty check

Staff Assigned: Tamara Kapper

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Pakistani Physicians Political) MUR 4278
Action Committee and Ikram U.)
Khan, MD, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 22, 1995, the Commission decided by a vote of 4-0 to take the following actions in MUR 4278:

1. Accept the conciliation agreement with the Pakistani Physicians Political Action Committee and Ikram U. Khan, MD, as treasurer, as recommended in the General Counsel's Report dated December 12, 1995.
2. Close the file in this matter.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated December 12, 1995.

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

Attest:

12-27-95
Date

for Donnie J. Rose
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tues., Dec. 12, 1995 3:39 p.m.
Circulated to the Commission: Wed., Dec. 13, 1995 11:00 a.m.
Deadline for vote: Fri., Dec. 22, 1995 4:00 p.m.

bjr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 4, 1996

Dr. Ikram U. Khan, Treasurer
Pakistani Physicians Political Action
Committee (PAK/PAC)
3006 S. Maryland Parkway, Suite 315
Las Vegas, NV 89109

RE: MUR 4278
Pakistani Physicians Political Action
Committee (PAK/PAC) and Dr. Ikram U.
Khan, as treasurer

Dear Dr. Khan:

On December 22, 1995, the Federal Election Commission accepted the signed conciliation agreement and civil penalty that you submitted in settlement of a violation of 2 U.S.C. §§ 434(a)(4)(A)(i), (ii), and (iv), 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.

Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

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Page 2
Dr. Khan, Treasurer

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact me at the toll-free number (800) 424-9530 or my local number (202) 219-3690.

Sincerely,



Tamara Kapper
Paralegal

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 4278
Pakistani Physicians Political)
Action Committee and Ikram U.)
Khan, MD, as treasurer)

Dec 4 12 18 PM '95

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Pakistani Physicians Political Action Committee and Ikram U. Khan, MD, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), and (iv).

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.

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

1. Pakistani Physicians Political Action Committee is a political committee within the meaning of 2 U.S.C. § 431(4), and is not an authorized committee of any candidate.

2. Ikram U. Khan, MD, has been the treasurer of the Pakistani Physicians Political Action Committee since October 1995. Prior to October 1995, the treasurer of the Pakistani Physicians Political Action Committee was Hassan I. Bukhari, MD.

3. In any calendar year in which a regularly scheduled general election is held, political committees that elect to file on a quarterly basis shall file their reports no later than the 15th day after the last day of each calendar quarter.

2 U.S.C. § 434(a)(4)(A)(i).

4. In addition to filing quarterly reports, all political committees, other than authorized committees of a candidate, shall file a pre-general report no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. 2 U.S.C. § 434(a)(4)(A)(ii).

5. In any calendar year without a regularly scheduled general election, political committees that elect to file on a quarterly basis shall file a report covering the period beginning January 1 and ending June 30, to be filed no later than July 31. Such political committees shall also file a report covering the period beginning July 1 and ending December 31, and is to be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv).

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6. Respondents elected to file their reports on a quarterly basis.

7. Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), Respondents' 1993 Mid-Year Report was due on July 31, 1993. Respondents filed a 1993 Year End Report which was a comprehensive report for calendar year 1993, and included the activity that took place during the 1993 Mid-Year reporting period. Respondents filed the 1993 Year End Report containing the 1993 Mid-Year Report activity on March 14, 1994, 226 days after the due date for the 1993 Mid-Year Report, and disclosed receipts totaling \$578 and disbursements totaling \$295.

8. Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), Respondents' 1993 Year End Report was due on January 31, 1994. Respondents filed their 1993 Year End Report on March 14, 1994, 42 days late, disclosing receipts totaling \$31,528 and disbursements totaling \$10,880.

9. Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), Respondents' 1994 April Quarterly Report was due on April 15, 1994. Respondents filed their 1994 April Quarterly Report on May 14, 1994, 29 days late, disclosing receipts totaling \$414 and disbursements totaling \$1,480.

10. Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), Respondents' 1994 October Quarterly Report was due on October 15, 1994. Respondents filed their 1994 October Quarterly on November 1, 1994, 17 days late, disclosing receipts totaling \$39 and disbursements totaling \$4,822.

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11. Pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), Respondents' 1994 12 Day Pre-General Report was due on October 27, 1994. Respondents filed their 1994 12 Day Pre-General Report on November 17, 1994, 21 days late, disclosing \$0 receipts and disbursements totaling \$3,028.

V. Respondents failed to timely file their 1993 Mid-Year and Year End Reports in violation of 2 U.S.C. § 434(a)(4)(A)(iv); their 1994 April and October Quarterly Reports in violation of 2 U.S.C. § 434(a)(4)(A)(i); and their 1994 12 Day Pre-General Report 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 two thousand three hundred dollars (\$2,300), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

VIII. This agreement shall become effective as of the date that all parties hereto 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.

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: *LGL* Date 1-3-94
Lois G. Lerner
Associate General Counsel

FOR THE RESPONDENTS:

Likram U. Kattan Date 11.27.95
(Name) Treasurer
(Position) *JM*

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SMITH BARNEY SHEARSON
A PRUDENTIAL COMPANY

PAK-PAC
4801 WORTH STREET
DALLAS TX 75246

267
3-5/310

Nov. 7th 95

Federal Election Commission \$ *2300⁰⁰*

PAY TO THE ORDER OF
Twenty three hundred ⁰⁰/₁₀₀ DOLLARS

FINANCIAL MANAGEMENT ACCOUNT™
PNC BANK N A
Philadelphia, PA

[Signature]

MEMO _____

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FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE END OF MJR # 4278
DATE FILMED 2/8/96 CAMERA NO. 4
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