



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4776

DATE FILMED 8/14/98 CAMERA NO. 1

CAMERAMAN EES

98043894757

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: June 16, 1998

ANALYST: Neil Evans

- I. COMMITTEE: Allegheny Teledyne Incorporated Political Action Committee (AT-PAC) (C00141697)
Dale G. Reid, Treasurer
(April 18, 1997 - Present)
Douglas J. Grant
(January 9, 1997 - April 17, 1997)
Richard R. Roeser
(Prior to January 1, 1993 - January 8, 1997)
1000 Six PPG Place
Pittsburgh, PA 15222
- II. RELEVANT STATUTE: 2 U.S.C. §434 (a)(4)(A)(iv)
11 CFR §104.5 (c)(2)(i)(B)
- III. BACKGROUND: Failure to Timely File the 1997 Year End Report

The Allegheny Teledyne Incorporated Political Action Committee (AT-PAC) ("the Committee") has failed to timely file the 1997 Year End Report of Receipts and Disbursements covering the period July 1, 1997 through December 31, 1997. The Committee was notified on December 30, 1996 and December 29, 1997 that the Year End Report was due on January 31, 1998. (Attachment #2) A Non-Filer Notice was sent to the Committee on February 23, 1998, referencing the 1997 Year End Report. (Attachment #3)

On March 20, 1998, the Reports Analysis Division ("RAD") analyst called Mr. Dale Reid, treasurer of the Committee. The analyst left a voice mail message for Mr. Reid, informing him that failure to file the 1997 Year End Report could result in legal action. The analyst advised him to file the report immediately, using certified mail, to avert potential legal issues.

98043894758

On March 23, 1998, Mr. Reid returned the March 20, 1998 phone call. He stated that the original 1997 Year End Report was returned by the Post Office as undeliverable. The analyst informed Mr. Reid of the correct address and asked him to forward the report today using certified mail to reduce the likelihood of any possible enforcement action. Mr. Reid replied that he would forward the report. (Attachment #4)

The Committee filed a report on March 27, 1997, by certified mail, covering the 1997 Year End Report reporting period. The Committee provided the certification card and envelope of the original filing. The envelope was postmarked in February 1998 and addressed to the Federal Election Commission at 1325 K Street, NW, Washington, DC 20643. (Attachment #5)

98043894759

FEDERAL ELECTION COMMISSION
 1997-1998
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

Attachment #1
 Page 1 of 1

DATE 6/15/1998

PAGE 2

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	IMAGE LOCATION	TYPE OF FILER
ALLEGHENY TELEDYNE INCORPORATED POLITICAL ACTION COMMITTEE (AT-PAC)							ID #C00141697 NON-PARTY QUALIFIED
CONNECTED ORGANIZATION: ALLEGHENY TELEDYNE INCORPORATED							
	1997 STATEMENT OF ORGANIZATION - AMENDMENT			17JAN97	3	97FEC/167/2963	
	STATEMENT OF ORGANIZATION - AMENDMENT			6MAY97	3	97FEC/200/4604	
	MID-YEAR REPORT	26,019	19,200	1JAN97 - 30JUN97	12	97FEC/230/4580	
	1'ST LETTER INFORMATIONAL NOTICE			1JAN97 - 30JUN97	2	97FEC/243/4086	
	YEAR-END	16,525	21,950	1JUL97 - 31DEC97	12	98FEC/290/1742	
	NOTICE OF FAILURE TO FILE			1JUL97 - 31DEC97	2	98FEC/285/0897	
	1998 STATEMENT OF ORGANIZATION - AMENDMENT			2JAN98	1	98FEC/258/0377	
	APRIL QUARTERLY	17,851	16,500	1JAN98 - 31MAR98	9	98FEC/302/4973	
	TOTAL	60,395	57,650		44	TOTAL PAGES	

98043894760

ALL REPORTS HAVE BEEN REVIEWED
 ENDING CASH ON HAND AS OF 3/31/98 = \$13,677
 DEBTS OWED BY THE COMMITTEE AS OF 3/31/98 = \$0

YEAR-END REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 30, 1996

QUARTERLY AND MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

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.

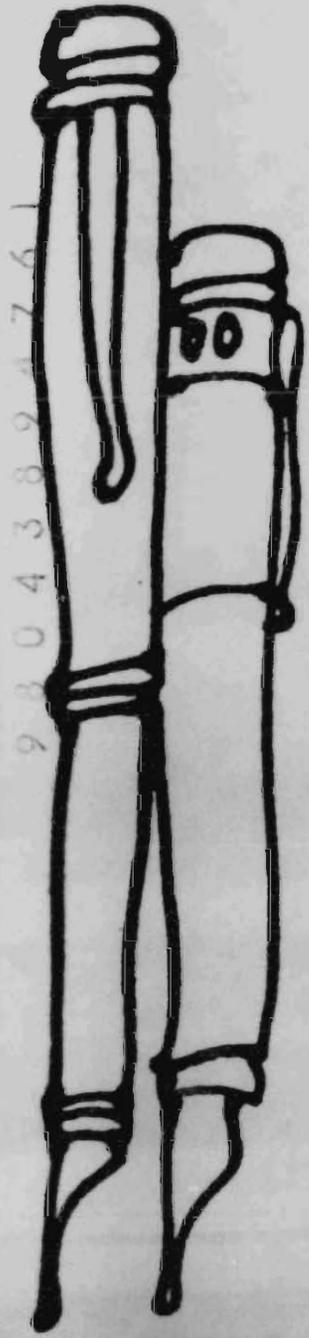
COMPLIANCE

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-PEC forms (except for FEC approved computer generated forms) will be required to refile.

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)



PARTIES AND PACS

YEAR-END

1997 REPORTING SCHEDULE
PARTIES AND PACS*

I. SEMIANNUAL FILERS**

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE***	FILING DATE
Mid-Year	01/01/97 - 06/30/97	07/31/97	07/31/97
Year-End	07/01/97 - 12/31/97	01/31/98	01/31/98

II. MONTHLY FILERS

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE***	FILING DATE
February	01/01/97 - 01/31/97	02/20/97	02/20/97
March	02/01/97 - 02/28/97	03/20/97	03/20/97
April	03/01/97 - 03/31/97	04/20/97	04/20/97
May	04/01/97 - 04/30/97	05/20/97	05/20/97
June	05/01/97 - 05/31/97	06/20/97	06/20/97
July	06/01/97 - 06/30/97	07/20/97	07/20/97
August	07/01/97 - 07/31/97	08/20/97	08/20/97
September	08/01/97 - 08/31/97	09/20/97	09/20/97
October	09/01/97 - 09/30/97	10/20/97	10/20/97
November	10/01/97 - 10/31/97	11/20/97	11/20/97
December	11/01/97 - 11/30/97	12/20/97	12/20/97
Year-End	12/01/97 - 12/31/97	01/31/98	01/31/98

*Committees that wish to change their filing status must notify the Commission in writing when they file their next report due under their current reporting schedule.

**Committees that filed quarterly reports in 1996 are only required to file semiannually in 1997.

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

FOR MORE INFORMATION CALL: 800/424-9530 OR 202/219-3420

98043894762

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 29, 1997

WHO MUST FILE

Party committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file a Year-End Report on January 31, 1998.

I. Semi-annual Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	07/01/97 - 12/31/97	01/31/98	01/31/98

II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	12/01/97 - 12/31/97	01/31/98	01/31/98

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 (except for FEC approved computer generated forms) will be required to refile.

ELECTRONIC FILING

For reports covering activity occurring in 1997 (and later), political committees have the option of filing electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing Gets Underway at FEC," and call the Data Division at (800) 424-9530 or (202) 219-3730.

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)

98043894763

1998 FILING SCHEDULE

I. QUARTERLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April Quarterly	01/01/98 - 03/31/98	04/15/98	04/15/98
July Quarterly	04/01/98 - 06/30/98	07/15/98	07/15/98
October Quarterly	07/01/98 - 09/30/98	10/15/98	10/15/98
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98
Year-End	11/24/98 - 12/31/98	01/31/99	01/31/99

II. MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
February	01/01/98 - 01/31/98	02/20/98	02/20/98
March	02/01/98 - 02/28/98	03/20/98	03/20/98
April	03/01/98 - 03/31/98	04/20/98	04/20/98
May	04/01/98 - 04/30/98	05/20/98	05/20/98
June	05/01/98 - 05/31/98	06/20/98	06/20/98
July	06/01/98 - 06/30/98	07/20/98	07/20/98
August	07/01/98 - 07/31/98	08/20/98	08/20/98
September	08/01/98 - 08/31/98	09/20/98	09/20/98
October	09/01/98 - 09/30/98	10/20/98	10/20/98
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98
Year-End	11/24/98 - 12/31/98	01/31/99	01/31/99

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

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

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

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CCM 30

FEB 23 1998

**WESTERN
UNION**

CONFIRMATION OF MAILGRAM TO: WESTERN UNION COMMERCIAL SERVICES
ALLEGHENY TELEDYNE INCORPORATED PAC
DALE G REID
1000 SIX PPG PLACE
PITTSBURGH PA 15222

FEDERAL ELECTION COMMISSION
SHAWN WERTH
999 E ST. NW.
WASHINGTON DC 204630001

98043894765

IDENTIFICATION NUMBER: C00141697

REFERENCE: YEAR-END (07/01/1997 - 12/31/1997)

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. 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, N.W., WASHINGTON, D.C., 20463. A COPY OF THE REPORT OR RELEVANT PORTIONS SHOULD ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER.

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 NEIL A. EVANS 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

TELECON

ANALYST:	Neil Evans
COMMITTEE:	Allegheny Teledyne Incorporated Political Action Committee
SUBJECT(S):	Non-Filing of the 1997 Year End Report

DATE:	March 20, 1998
CONVERSATION WITH:	Dale G. Reid

I called Dale Reid and left a voice mail informing him that the Commission has not received the 1997 Year End Report. I told him to immediately file the report, using certified mail, to avert potential legal issues.

DATE:	March 23, 1998
CONVERSATION WITH:	Dale G. Reid

Mr. Reid returned the March 20, 1998 phone call. He stated that their original 1997 Year End Report was returned by the Post Office as undeliverable. The analyst informed Mr. Reid of the correct address and asked him to forward the report today using certified mail to reduce any possible enforcement action. He replied that he would forward the report.

98043894766

ALLEGHENY TELEDYNE INCORPORATED

Attachment # 5
Page 1 of 4

**Political Action
Committee**

AT-PAC

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

1000 Six PPG Place
Pittsburgh, PA 15222-5479
412.394.2800

MAR 31 11 19 AM '98

January 29, 1998

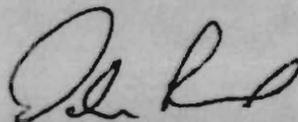
**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Federal Election Commission
1325 K Street , N. W.
Washington D. C. 20643

Dear Sir:

Enclosed is the 1997 Year End Report for the Allegheny
Teledyne Corporation Political Action Committee, covering
the period 07/01/97 through 12/31/97.

Very truly yours,



Dale G. Reid
Treasurer

Enclosure

98043894767

Allegheny Teledyne Incorporated Political Action Committee (AT-PAC) is a committee established to support candidates for elective office who believe in the free-enterprise system and will foster the environment in which Allegheny Teledyne Incorporated can prosper. AT-PAC is supported by voluntary contributions from executive & administrative employees of Allegheny Teledyne Incorporated and its subsidiaries and stockholders of Allegheny Teledyne Incorporated. Any employee or stockholder has the right to refuse to contribute without reprisal. A copy of our report is filed and available for purchase from the Federal Election Commission, Washington, D.C. 20463.

**ALLEGHENY TELEDYNE INCORPORATED
Political Action Committee
AT-PAC**

1000 Six PPG Place • Pittsburgh, PA 15222-5700

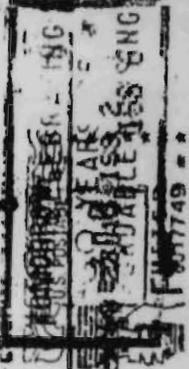
the right of the return address

CERTIFIED

P 460 915 085

MAIL

Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20643



F. D. G. [Signature]

SENDER:

- Complete items 1 and/or 2 for address.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse or use form so that we can return the card to you.
- Address this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requester" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

3. Article Addressed to:

Federal Election Commission
1325 K Street, N. W.
Washington D.C. 20643

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

X

PS Form 3811, December 1994

I also wish to receive the following services (for an extra fee):

1. Addressee's Address
2. Restricted Delivery
Consult postmaster for fee.

4a. Article Number
P 460 915 085

4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD
 7. Date of Delivery

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

Thank you for using Return Receipt Service.

1025-95-87-6-0179 Domestic Return Receipt

REPORT OF RECEIPT AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

Attachment # 5
Page 3 of 4

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

MAR 31 11 20 AM '98

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Allegheny Teledyne Incorporated - Political Action Committee	
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 1000 Six PPG Place	2. FEC IDENTIFICATION NUMBER C00141697
CITY, STATE and ZIP CODE Pittsburgh, PA 15222	3. <input type="checkbox"/> 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 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	COLUMN B
5. Covering Period <u>7/1/97</u> through <u>12/31/97</u>		This Period	Calendar Year-to-Date
6. (a)	Cash on Hand January 1, 19_____		\$ 10,932.00
(b)	Cash on Hand at Beginning of Reporting Period	\$ 17,751.00	
(c)	Total Receipts (from Line 19)	\$ 16,525.00	\$ 42,644.00
(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 34,276.00	\$ 53,476.00
7.	Total Disbursements (from Line 30)	\$ 21,950.00	\$ 41,150.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 12,326.00	\$ 12,326.00
9.	Debits 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 20545 Toll Free 800-424-9530 Local 202-219-3420
10.	Debits 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 Dale G. Reid, Treasurer	Date 1/27/98
Signature of Treasurer 	

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

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FEC FORM 3X
(revised 9/93)

98043894769

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
3-27-98

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

Electronic Filing

[Signature]
PREPARER

3-31-98
DATE PREPARED

9804389477C

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

FEDERAL ELECTION COMMISSION
Jul 10 12 00 PM '98

FIRST-GENERAL COUNSEL'S REPORT

SENSITIVE

98043894771

RAD REFERRAL: 98NF-07

DATE ACTIVATED: June 18, 1998

STAFF MEMBERS:

Susan Lebeaux

Eric Brown

RESPONDENTS:

Allegheny Teledyne Incorporated
Political Action Committee (AT-PAC) and
Dale G. Reid, as treasurer

3

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

SOURCE: INTERNALLY GENERATED

INTERNAL REPORTS CHECKED: Referral Materials
Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTERS

On June 16, 1998, RAD

referred the Allegheny Teledyne Incorporated Political Action Committee (AT-PAC) and Dale G. Reid, as treasurer, based on the failure to timely file the 1997 Year End Report.

98043894772

II. FACTUAL AND LEGAL ANALYSES

Based on the Factual and Legal Analysis, Attachment 3, this Office recommends that the Commission find reason to believe that the Allegheny Teledyne Incorporated Political Action Committee (AT-PAC) and Dale G. Reid, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTIES

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9 8 0 4 3 8 9 4 7 7 6

IV. RECOMMENDATIONS

- a. Open a MUR in RAD Referral 98NF-07.
- b. Find reason to believe that the Allegheny Teledyne Incorporated Political Action Committee (AT-PAC) and Dale G. Reid, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).
- c. Approve the attached Factual and Legal Analysis.
- d. Take no further action and close the file.

98043894777

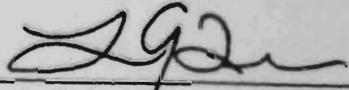
Approve the appropriate letters.

Lawrence M. Noble
General Counsel

Date

7/19/98

BY:



Lois G. Lerner
Associate General Counsel

Attachments:

Allegheny Teledyne Incorporated Political Action Committee Factual and Legal Analysis

98043894778

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Allegheny Teledyne Incorporated
Political Action Committee (AT-PAC)
and Dale G. Reid, as treasurer

) RAD Referral *MUR 4776*
) #98NF-07

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 16, 1998, the Commission decided by a vote of 5-0 to take the following actions in RAD Referrals #98NF- 07

98043894779

(continued)

- 9804389478C
- a. Open a MUR in RAD Referral 98NF-07. MUR 4776
 - b. Find reason to believe that the Allegheny Teledyne Incorporated Political Action Committee (AT-PAC) and Dale G. Reid, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).
 - c. Approve the Factual and Legal Analysis, as recommended in the General Counsel's Report dated July 10, 1998.
 - d. Take no further action and close the file.

Approve the appropriate letters, as recommended in the General Counsel's Report dated July 10, 1998.

(Continued)

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

Attest:

7-16-98
Date

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

Received in the Secretariat: Fri., July 10, 1998 12:03 p.m.
Circulated to the Commission: Mon., July 13, 1998 11:00 a.m.
Deadline for vote: Thurs., July 16, 1998 4:00 p.m.

lrd

98043894781



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 22, 1998

Dale G. Reid, Treasurer
Allegheny Teledyne Incorporated
Political Action Committee (AT-PAC)
1000 Six PPG Place
Pittsburgh, PA 15222

RE: MUR 4776
Allegheny Teledyne Incorporated
Political Action Committee (AT-PAC) and
Dale G. Reid, as treasurer

Dear Mr. Reid:

On July 16, 1998, the Federal Election Commission found reason to believe Allegheny Teledyne Incorporated Political Action Committee (AT-PAC) ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

The Commission reminds you that failure to timely file reports is a violation of the Act. You should take steps to ensure that this activity does not occur in the future.

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.

If you have any questions, please contact Eric Brown, the staff member assigned to this matter, at (202) 694-1650.

Sincerely,

Jean D. Aikens

Jean D. Aikens
Chairman

Enclosure
Factual and Legal Analysis

98043894782

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Allegheny Teledyne Incorporated MUR 4776
Political Action Committee (AT-PAC) and
Dale G. Reid, as treasurer

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

The Federal Election Campaign Act of 1971, as amended, (the "Act") requires that in calendar years in which no general election is scheduled, the treasurer of an unauthorized political committee must file a year end report covering the period beginning July 1 and ending December 31, to be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv). The 1997 Year End Report was due January 31, 1998. The Allegheny Teledyne Incorporated Political Action Committee (AT-PAC) filed the 1997 Year End Report, disclosing \$16,525 in receipts and \$21,950 in disbursements, on March 27, 1998, 55 days late.¹ Therefore, there is reason to believe that Allegheny Teledyne Incorporated Political Action Committee (AT-PAC) and Dale G. Reid, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).

¹ On December 30, 1996 and December 29, 1997, prior notices were sent to the Committee informing them that the 1997 Year End Report was due on January 31, 1998. A Non-Filer Notice was sent to the Committee via mailgram on February 23, 1998 for failure to file the 1997 Year End Report.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4776

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Date: 10/7/98

 Microfilm

 Press

THE ATTACHED MATERIAL IS BEING ADDED TO CLOSED MUR 4776

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FEDERAL ELECTION COMMISSION

999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION

JUL 13 12 00 PM '98

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD REFERRAL: 98NF-01

DATE ACTIVATED: June 18, 1998

STAFF MEMBERS:

Kamau Philbert

Deborah Rice

RESPONDENTS:

TECO Energy Inc. Employees' PAC and
Robin J. Hastings, as treasurer

RAD REFERRAL: 98NF-03

DATE ACTIVATED: June 18, 1998

STAFF MEMBERS:

Ruth Heilizer

Deborah Rice

RESPONDENTS:

Harry S. Truman Club - Federal and
Linda Tochtermann, as treasurer

RAD REFERRAL: 98NF-07

DATE ACTIVATED: June 18, 1998

STAFF MEMBERS:

Susan Lebeaux

Eric Brown

RESPONDENTS:

Allegheny Teledyne Incorporated
Political Action Committee (AT-PAC) and
Dale G. Reid, as treasurer

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RAD REFERRAL: 98NF-08

DATE ACTIVATED: June 18, 1998

STAFF MEMBERS:

Mary Taksar

Eric Brown

RESPONDENTS: North Side Good Government Committee and
Michael Hagan, as treasurer

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

SOURCE: INTERNALLY GENERATED

INTERNAL REPORTS CHECKED: Referral Materials
Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTERS

These matters were generated by four referrals that the Office of the General Counsel received from the Reports Analysis Division ("RAD"). On March 4, 1998, RAD referred TECO Energy Inc. Employees' PAC and its treasurer based on the failure to timely file the 1997 Mid-Year Report. On March 6, 1998, RAD referred the Harry S. Truman Club - Federal and its treasurer based on the failure to timely file the 1997 Mid-Year Report. On June 16, 1998, RAD referred the Allegheny Teledyne Incorporated Political Action Committee (AT-PAC) and Dale G. Reid, as treasurer, based on the failure to timely file the 1997 Year End Report. On June 16, 1998, RAD referred the North Side Good Government Committee and Michael Hagan, as treasurer, based on the failure to timely file the 1997 Mid-Year Report.

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II. FACTUAL AND LEGAL ANALYSES

Based on the Factual and Legal Analysis, Attachment 1, this Office recommends that the Commission find reason to believe that TECO Energy Inc. Employees' PAC and Robin J. Hastings, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).

Based on the Factual and Legal Analysis, Attachment 2, this Office recommends that the Commission find reason to believe that the Harry S. Truman Club - Federal and Linda Tochterman, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).

Based on the Factual and Legal Analysis, Attachment 3, this Office recommends that the Commission find reason to believe that the Allegheny Teledyne Incorporated Political Action Committee (AT-PAC) and Dale G. Reid, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).

Based on the Factual and Legal Analysis, Attachment 4, this Office recommends that the Commission find reason to believe North Side Good Government Committee and Michael Hagan, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTIES

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IV. RECOMMENDATIONS

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1.
 - a. Open a MUR in RAD Referral 98NF-01.
 - b. Find reason to believe TECO Energy Inc. Employees' PAC and Robin J. Hastings, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), and enter into conciliation prior to a finding of probable cause to believe.
 - c. Approve the attached Factual and Legal Analysis and Conciliation Agreement.
 2.
 - a. Open a MUR in RAD Referral 98NF-03.
 - b. Find reason to believe Harry S. Truman Club - Federal and Linda Tochterman, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).
 - c. Approve the attached Factual and Legal Analysis.
 - d. Take no further action and close the file.
 3.
 - a. Open a MUR in RAD Referral 98NF-07.
 - b. Find reason to believe that the Allegheny Teledyne Incorporated Political Action Committee (AT-PAC) and Dale G. Reid, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).
 - c. Approve the attached Factual and Legal Analysis.
 - d. Take no further action and close the file.
 4.
 - a. Open a MUR in RAD Referral 98NF-08.

b. Find reason to believe that North Side Good Government Committee and Michael Hagan, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), and enter into conciliation prior to a finding of probable cause to believe.

c. Approve the attached Factual and Legal Analysis and Conciliation Agreement.

5. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

7/19/98
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments:

- 1. TECO Energy Inc. Employees' PAC Factual and Legal Analysis
- 2. Harry S. Truman Club - Federal Factual and Legal Analysis
- 3. Allegheny Teledyne Incorporated Political Action Committee Factual and Legal Analysis
- 4. North Side Good Government Committee Factual and Legal Analysis
- 5. TECO Energy Inc. Employees' PAC Conciliation Agreement
- 6. North Side Good Government Committee Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
TECO Energy Inc. Employees' PAC and) RAD Referral MUR 4774
Robin J. Hastings, as treasurer;) #98NF-01
)
Harry S. Truman Club - Federal and) RAD Referral MUR 4775
Linda Tochterman, as treasurer;) #98NF-03
)
Allegheny Teledyne Incorporated) RAD Referral MUR 4776
Political Action Committee (AT-PAC)) #98NF-07
and Dale G. Reid, as treasurer;)
)
North Side Good Government Committee) RAD Referral MUR 4777
and Michael Hagan, as treasurer.) #98NF-08

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 16, 1998, the Commission decided by a vote of 5-0 to take the following actions in RAD Referrals #98NF-01, 03, 07, 08:

1. a. Open a MUR in RAD Referral 98NF-01. MUR 4774
- b. Find reason to believe TECO Energy Inc. Employees' PAC and Robin J. Hastings, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), and enter into conciliation prior to a finding of probable cause to believe.
- c. Approve the Factual and Legal Analysis and Conciliation Agreement, as recommended in the General Counsel's Report dated July 10, 1998.
2. a. Open a MUR in RAD Referral 98NF-03. MUR 4775
- b. Find reason to believe Harry S. Truman Club - Federal and Linda Tochterman, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).

(continued)

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- c. Approve the Factual and Legal Analysis, as recommended in the General Counsel's Report dated July 10, 1998.
 - d. Take no further action and close the file.
 3.
 - a. Open a MUR in RAD Referral 98NF-07. MUR 4776
 - b. Find reason to believe that the Allegheny Teledyne Incorporated Political Action Committee (AT-PAC) and Dale G. Reid, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).
 - c. Approve the Factual and Legal Analysis, as recommended in the General Counsel's Report dated July 10, 1998.
 - d. Take no further action and close the file.
 4.
 - a. Open a MUR in RAD Referral 98NF-08. MUR 4777
 - b. Find reason to believe that North Side Good Government Committee and Michael Hagan, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), and enter into conciliation prior to a finding of probable cause to believe.
 - c. Approve the Factual and Legal Analysis and Conciliation Agreement, as recommended in the General Counsel's Report dated July 10, 1998.
 5. Approve the appropriate letters, as recommended in the General Counsel's Report dated July 10, 1998.

(Continued)

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

Attest:

7-16-98
Date

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

Received in the Secretariat: Fri., July 10, 1998 12:03 p.m.
Circulated to the Commission: Mon., July 13, 1998 11:00 a.m.
Deadline for vote: Thurs., July 16, 1998 4:00 p.m.

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