



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 1673

DATE SCANNED 1/14/08

SCANNER NO. 2

SCAN OPERATOR EEJ

2009261408



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

COMMISSION
SECRETARIAT

2007 APR -5 A 9:36

April 4, 2007

MEMORANDUM

SENSITIVE

TO: THE COMMISSION

THROUGH: PATRINA M. CLARK *PMC*
STAFF DIRECTOR

MARGARITA MAISONET *MM*
CHIEF COMPLIANCE OFFICER

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

SUBJECT: REASON TO BELIEVE RECOMMENDATION - 2006 12 DAY
PRE-GENERAL (QUARTERLY FILERS) AND 30 DAY POST-
GENERAL REPORT FOR THE ADMINISTRATIVE FINE
PROGRAM

Attached are two lists of political committees and their treasurers who failed to file or timely file the 2006 12 Day Pre-General and/or the 2004 30 Day Post-General Reports in accordance with 2 U.S.C. 434(a). The 12 Day Pre-General list is comprised of unauthorized committees filing quarterly that made general election contributions or expenditures from October 1, 2006 through October 18, 2006. The 30 Day Post-General list is comprised of authorized committees whose candidates sought election in the November 7th General Election, as well as unauthorized committees filing either quarterly or monthly.

The 12 Day Pre-General Report was due on October 26, 2006 and should cover the reporting period from October 1, 2006 through October 18, 2006. The 30 Day Post-General Report was due on December 7, 2006 and should cover the reporting period from October 19, 2006 to November 27, 2006 or from October 1, 2006 through November 27, 2006, if the 12 Day Pre-General Report was not required.

The committees appearing on the 12 Day Pre-General Report list either filed late or failed to file the report prior to four (4) days before the General Election (considered a non-filed report). The committees appearing on the 30 Day Post-General Report list either failed to file the report, filed the report more than five (5) days after the due date or

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filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with 11 C.F.R. 111.43, these committees should be assessed the civil money penalties included on the attached lists.

As noted above, the 12 Day Pre-General Report circulation list includes unauthorized committees filing quarterly that failed to file or failed to timely file the 12 Day Pre-General Report. Unlike unauthorized committees that file on a monthly basis, a quarterly filer need only file this report if it made general election contributions or expenditures between the dates of October 1, 2006 and October 18, 2006. In order to accurately identify the committees for administrative fines purposes, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 12 Day Pre-General Report (12 Day Report) submitted by an unauthorized quarterly filer was reviewed to ensure that it disclosed general election contributions or expenditures made during the coverage dates of the report. Any report meeting this definition that was filed late is included in the list. Any report not disclosing general election contributions or expenditures during this period is not included in the list, as it is not a required filing.
- Every 30 Day Post-General Report (30 Day Report) submitted by an unauthorized quarterly filer that covered the period from October 1, 2006 through November 27, 2006 (58 days), was reviewed for activity which would have required the filing of a 12 Day Pre-General Report. If our research indicated that the filing of a 12 Day Report was required, we utilized a two-step method to arrive at the estimated level of activity on which to base the fine amount. First, if the committee had any unitemized activity, a per diem level of activity was used by multiplying the total amount of activity on the report by 31% (18 days (12G Filing Period)/58 days (30G Filing Period)).
- If the same committee also failed to file the 30 Day Report in a timely manner, we based the 30 Day Report fine on the amount of the remaining level of activity. We arrived at this amount by subtracting the estimated level of activity for the 12 Day Report from the total amount of activity on the 30 Day Report. In these cases, the committees will appear on both lists and will be assessed a fine for both the 12 Day and 30 Day Reports based on the estimated levels of activity described above.

Recommendation

1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Reports violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Reports.
2. Send the appropriate letters.

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Federal Election Commission
Reason to Believe Circulation Report
2006 PRE-GENERAL Election Sensitive 10/26/2006 UNAUTH_Q

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1604	C00169508	AAI CORPORATION POLITICAL ACTION COMMITTEE	RICHARD F. CHRIST	\$196,951	1	11/5/2006	Not Filed	\$7,500	\$750
1605	C00366385	ADVANCED ACOUSTIC CONCEPTS INC POLITICAL ACTION COMMITTEE	SCOTT WILLIAMS	\$203,094	0	12/8/2006	Not Filed	\$3,599	\$500
1606	C00340356	ADVANCED MEDICAL TECHNOLOGY ASSOCIATION POLITICAL ACTION COMMITTEE	KENNETH MENDEZ	\$413,835	0	11/2/2006	7	\$2,000	\$120
1607	C00141242	AGRI-MARK INC LEGISLATIVE AND EDUCATIONAL COMMITTEE (ALEC)	HAROLD LARRABEE	\$106,244	1	12/15/2006	Not Filed	\$2,000	\$625
1608	C00325159	AIRTRAN AIRWAYS INC POLITICAL ACTION COMMITTEE	STANLEY GADEK	\$143,814	0	1/15/2007	Not Filed	\$7,129	\$600
1609	C00352054	ARMENIAN AMERICAN PAC (ARMENPAC)	DR. SARKIS KECHEJIAN	\$281,080	0	12/3/2006	Not Filed	\$5,577	\$600
1610	C00363382	AVAYA INCORPORATED POLITICAL ACTION COMMITTEE	CHARLES E. CROWDERS	\$143,681	0	12/8/2006	Not Filed	\$3,350	\$500
1611	C00204388	BI-COUNTY POLITICAL ACTION COMMITTEE (FKA SUFFOLK PAC)	IRA LAMEL	\$189,003	2	11/2/2006	7	\$6,000	\$255
1612	C00078287	CNA FINANCIAL CORPORATION CITIZENS FOR GOOD GOVERNMENT	KAREN MELCHERT	\$345,872	0	12/12/2006	Not Filed	\$26,149	\$1,400

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1613	C00304832	CONSTELLATION BRANDS INC POLITICAL ACTION COMMITTEE	PERRY HUMPHREY	\$372,102	1	11/6/2006	Not Filed	\$7,554	\$750
1614	C00303818	COUNCIL FOR AFFORDABLE AND RURAL HOUSING PAC INC (CARH PAC)	TRAVIS A. MILLER	\$100,735	0	12/29/2006	Not Filed	\$1,457	\$500
1615	C00160630	DRUMMOND COMPANY, INC POLITICAL ACTION COMMITTEE (DPAC)	MR. SCOTT O STANFIELD	\$128,650	0	11/1/2006	6	\$8,500	\$160
1616	C00135855	ENERGEN CORPORATION POLITICAL ACTION COMMITTEE F/K/A ALAGASCO INC PAC	MR. DUDLEY REYNOLDS	\$171,512	0	11/8/2006	Not Filed	\$13,000	\$900
1618	C00400242	FLORIDA FOR AMERICAS FUTURE PAC	HUGH WESTBROOK	\$112,600	0	12/6/2006	Not Filed	\$24,200	\$900
1619	C00349639	FLORIDA PBA INC FRIENDS OF LAW ENFORCEMENT	DAVID BRUCE MURRELL	\$112,445	0	12/7/2006	Not Filed	\$10,161	\$900
1620	C00012328	FLORIDA SUGAR CANE LEAGUE PAC	RYAN WESTON	\$385,029	0	12/6/2006	Not Filed	\$1,000	\$500
1621	C00242040	FOREST LANDOWNERS ASSOCIATION, INC. POLITICAL ACTION COMMITTEE	SCOTT JONES	\$145,222	0	12/21/2006	Not Filed	\$2,852	\$500
1622	C00297531	GOVERNMENT IS NOT GOD	NANCY M. MURRAY	\$133,277	0	11/8/2006	Not Filed	\$10,769	\$900
1623	C00338848	HOOSIER POLITICAL ACTION COMMITTEE (HOOSIER PAC)	GILEAD KAPEN	\$516,237	1	11/30/2006	Not Filed	\$37,000	\$1,750
1624	C00303073	INTERNATIONAL COUNCIL OF CRUISE LINES POLITICAL ACTION COMM (ICCL-PAC)	J. MICHAEL CRYE	\$317,704	0	12/7/2006	Not Filed	\$6,000	\$600

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1625	C00212142	KIRKLAND	STEPHEN TOMLINSON	\$206,482	0	12/5/2006	Not Filed	\$1,333	\$500
1626	C00284810	MARRIOTT INTERNATIONAL, INC. POLITICAL ACTION COMMITTEE	MS. MELISSA FROEHLICH	\$303,418	0	12/6/2007	Not Filed	\$31,748	\$1,400
1627	C00413575	MMW GROUP INC POLITICAL ACTION COMMITTEE THE	SETH ROSENSTEIN	\$115,565	0	11/22/2006	Not Filed	\$5,305	\$600
1628	C00296657	OHIO FINANCIAL SERVICES POLITICAL ACTION COMMITTEE	MR. JOSEPH R. SANDER	\$127,643	0	11/6/2006	Not Filed	\$9,773	\$600
1629	C00383489	PUBLIC SERVICE ENTERPRISE GROUP INC. POLITICAL ACTION COMMITTEE (PEGRAC)	MR. MARK G. KAHRER	\$217,457	0	11/21/2006	Not Filed	\$13,068	\$900
1630	C00363812	RECREATIONAL FISHING ALLIANCE, PAC	SCHNELLER A. STACEY	\$156,919	0	12/8/2006	Not Filed	\$13,184	\$900
1631	C00407130	REHABCARE GROUP INC PAC	MARK ANTHONY BOGOVICH	\$129,589	0	12/7/2006	Not Filed	\$3,567	\$500
1632	C00345132	REPUBLICAN JEWISH COALITION-POLITICAL ACTION COMMITTEE (RJC-PAC)	MATTHEW BROOKS	\$304,333	0	12/8/2006	Not Filed	\$32,000	\$1,400
1633	C00368696	RESPONSIBILITY AND FREEDOM WORK PAC (REWPAC)	JOHN P. NAIL	\$165,727	0	11/2/2007	Not Filed	\$4,115	\$500
1634	C00411611	SECURE PAC	LONDON THOMPSON	\$101,961	0	12/7/2006	Not Filed	\$57,015	\$3,000
1635	C00402669	SI INTERNATIONAL INC POLITICAL ACTION COMMITTEE	THOMAS E. DUNN	\$183,625	0	12/4/2006	Not Filed	\$6,370	\$600
1636	C00392621	SNOW PAC	STANLEY R. DE WAAL	\$534,667	0	12/8/2006	Not Filed	\$33,367	\$1,400

AF# Committee ID Committee Name Treasurer Threshold PV Receipt Date Days Late LOA RTB Penalty

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1637	C00381459	SOCIETY FOR VASCULAR SURGERY POLITICAL ACTION COMMITTEE	REBECCA MARON	\$169,667	0	11/30/2006	Not Filed	\$2,354	\$500
1638	C00359984	SOUTHEAST MILK INC POLITICAL ACTION COMMITTEE	CHARLES GARRISON	\$101,623	0	12/7/2006	Not Filed	\$7,000	\$600
1639	C00417576	TERRIPAC UNITED ASSN	BRIAN SCHIAVO	\$115,452	1	11/1/2006	6	\$3,615	\$137
1640	C00173419	JOURNEYMEN & APPRENT OF PLUMB & PIPEFITTING IND LOCAL 322 COMM FOR POLED	JAMES REED	\$1,103,402	0	11/1/2006	6	\$24,696	\$210
1641	C00390575	WELLCARE HEALTH PLANS, INC. PAC (WELLCARE PAC)	DAVID K SMITH	\$150,163	0	12/5/2006	Not Filed	\$17,500	\$900

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Federal Election Commission
Reason to Believe Circulation Report
2006 POST-GENERAL Non Election Sensitive 12/07/2006 UNAUTH & AUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1642	C00325159	AIRTRAN AIRWAYS INC POLITICAL ACTION COMMITTEE		STANLEY GADEK	\$148,703	0	1/15/2007	Not Filed	\$4,889	\$250
1643	C00396028	AL GREEN FOR CONGRESS	GREEN, ALEXANDER	WILLIAM A. LAWSON	\$747,829	3	1/7/2007	Not Filed	\$148,867	\$7,875
1644	C00416404	ARCH LEADERSHIP PAC		JOHN ROSS TRUMAN	\$133,843	0		Not Filed	\$48,281 (est)	\$900
1645	C00427617	BLUE AMERICA PAC		HOWARD KLEIN	\$119,155	0	1/23/2007	Not Filed	\$58,689	\$2,700
1646	C00174847	BREWERY SOFT DRINK BEER DISTR OPTICAL DENTAL MISC WORKERS WAREHOUSEMAN HELP LOCAL 830 PAC		DANIEL H. GRACE	\$360,351	1	1/5/2007	29	\$40,003	\$975
1647	C00423335	BYRNE FOR CONGRESS COMMITTEE THE	BYRNE, MARK	JILL K. HUEY	\$143,413	0	3/14/2007	Not Filed	\$36,327	\$900
1649	C00421693	CHRISTIAN BURRIDGE FOR CONGRESS	BURRIDGE, CHRISTIAN	DANIEL CLYDE CARR	\$130,908	0	2/2/2007	Not Filed	\$28,919	\$900
1650	C00415604	CITIZENS FOR ACTION		NANCY T. KANJORSKI	\$305,153	0	1/10/2007	Not Filed	\$40,281	\$900
1651	C00062224	GLOROX COMPANY EMPLOYEES' POLITICAL ACTION COMMITTEE THE		VICTORIA JONES	\$112,106	0	1/9/2007	Not Filed	\$4,438	\$250
1652	C00416321	COMMITTEE TO ELECT BRAD BLANTON	BLANTON, BRAD	JUSTIN BURCHARD	\$112,351	0		Not Filed	\$22,470 (est)	\$500
1653	C00426783	COMMITTEE TO ELECT RICK TRENT THE	TRENT, RICK LYNN	LISA JO TRENT	\$157,095	0	12/13/2006	6	\$26,805	\$320
1654	C00394692	COMMITTEE TO ELECT WILLIAM (WILLIE) VADEN FOR CONGRESS	VADEN, WILLIAM ROSS	WILLIAM ROSS VADEN	\$244,212	1		Not Filed	\$27,135	\$1,125
1655	C00125534	COMPOSITION ROOFERS LOCAL UNION #30 POLITICAL ACTION & EDUCATION FUND		TOM PEDRICK	\$433,371	0	1/2/2007	26	\$62,963	\$2,250

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1656	C0011237	COMPRESSED AIR FREE AIR FOUNDATION TUNNEL CAISSON SUBWAY WORKERS POLITICAL ACTION FUND		RICHARD E. FITZSIMMONS	\$133,149	0	1/11/2007	Not Filed	\$28,574	\$900
1657	C00379834	CONTRA COSTA UNITED DEMOCRATIC CAMPAIGN AKA CCUDC		GREGORY SANBORN	\$39,379	1	2/28/2007	Not Filed	\$24,388	\$625
1658	C00387555	COUNCIL FOR A LIVABLE WORLD CANDIDATE FUND		JOHN D. ISAACS	\$516,010	0	12/13/2006	6	\$76,052	\$1,000
1659	C00303818	COUNCIL FOR AFFORDABLE AND RURAL HOUSING/PAC INC (CARHPAC)		TRAVIS A MILLER	\$103,976	0	12/29/2006	22	\$3,243	\$135
1660	C00369801	DAVID SCOTT FOR CONGRESS	SCOTT, DAVID ALBERT	HANK AARON	\$2,595,854	0	12/16/2006	9	\$435,592	\$3,800
1661	C00242040	FOREST LANDOWNERS ASSOCIATION, INC. POLITICAL ACTION COMMITTEE		SCOTT JONES	\$151,570	0	12/21/2006	14	\$6,348	\$120
1663	C00131557	HEARTLAND PAC		DAVID B ORLEAN	\$140,402	0	1/5/2007	29	\$63,249	\$2,475
1665	C00265603	KERN COUNTY REPUBLICAN CENTRAL COMMITTEE		CRAIG HENDERSON	\$590,830	1	12/18/2006	11	\$14,708	\$193
1666	C00428615	LAKE COUNTY DEMOCRATIC PARTY FEDERAL COMMITTEE		PETER A. COUVALL	\$585,876	0	1/4/2007	28	\$189,533	\$5,000
1667	C00420091	MAATTA FOR CONGRESS CAMPAIGN COMMITTEE	MAATTA, RANDAL G	DEBRA C. MAATTA	\$194,712	3		Not Filed	\$64,904 (est)	\$4,725
1668	C00003111	MAINE REPUBLICAN PARTY		PHILIP ROY, JR.	\$961,378	0	12/20/2006	13	\$26,507	\$460
1669	C00416131	MIDWEST VALUES PAC (MVP)		THOMAS BORMAN	\$2194,927	0	1/11/2007	26	\$354,447	\$9,000
1670	C00424077	MIKE MCGRAW FOR CONGRESS	MCGRAW, MICHAEL EDWARD	A ROBERT MUZIO	\$131,898	0	1/29/2007	Not Filed	\$28,452	\$900
1671	C00174854	MONTANA CREDIT UNIONS LEAGUE POLITICAL ACTION COMMITTEE		JERRY W. GUSTAFSON	\$184,776	0	1/29/2007	Not Filed	\$6,396	\$300

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1673	C00369884	MZM INC PAC		MS JEANNE GINEIL	\$178,705	0		Not Filed	\$35,741 (est)	\$900
1674	C00188987	NATIONAL ASSOCIATION FOR HOME CARE POLITICAL ACTION COMMITTEE		MICHAEL N. WOODS	\$137,626	2	1/11/2007	Not Filed	\$1,357	\$375
1675	C00012211	NORTH CAROLINA DENTAL PAC		AARON TROPMANN	\$124,000	0	1/6/2007	30	\$240	\$175
1676	C00416511	PENNSYLVANIA PAC FOR PROGRESS		JONATHAN ROBERT KING	\$149,370	0		Not Filed	\$37,679 (est)	\$900
1677	C00266536	PHILLIPS INTERNATIONAL INC POLITICAL ACTION COMMITTEE		MR WILLIAM ESTEY	\$231,502	0		Not Filed	\$46,300 (est)	\$900
1679	C00368696	RESPONSIBILITY AND FREEDOM WORK PAC (RFWPAC)		JOHN P NAIL	\$141,142	0	1/16/2007	Not Filed	\$35,415	\$900
1680	C00409359	SAN MATEO COUNTY DEMOCRATIC CENTRAL COMMITTEE		JUDITH A. CHRISTENSEN	\$160,523	0		Not Filed	\$12,832 (est)	\$500
1681	C00278788	SUFF CO DETECTIVES ASSN INC POLITICAL ACTION COMMITTEE		RAYMOND L GRIFFIN JR	\$150,036	0	1/12/2007	Not Filed	\$21,496	\$500
1683	C00178541	TEAMSTERS JOINT COUNCIL 53 POLITICAL ACTION COMMITTEE		PAUL CARDULLO	\$288,780	0	1/12/2007	Not Filed	\$50,002	\$2,700
1684	C00009357	THE RECORDING INDUSTRY ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE		MITCH GLAZIER	\$323,689	0	12/14/2006	7	\$12,000	\$135
1685	C00414417	TOM BARLOW FOR CONGRESS '06	BARLOW, THOMAS J III	SHIRLEY J BARLOW	\$240,749	0	12/14/2006	7	\$86,118	\$1,100
1687	C00173419	UNITED ASSN JOURNEYMEN & APPRENT OF PLUMB & PIPEFITTING IND LOCAL 322 COMM FOR POL ED		JAMES REED	\$1,178,592	0	12/29/2006	22	\$75,121	\$2,600

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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1688	C00063586	UNITED STATES BEET SUGAR ASSOCIATION POLITICAL ACTION COMMITTEE		JAMES JOHNSON	\$154,516	0	1/25/2007	Not Filed	\$1,000	\$250
1690	C00421628	WEGNER FOR CONGRESS	WEGNER, KENNETH ALEXANDER	KENNETH WEGNER	\$192,120	1	3/28/2007	Not Filed	\$23,586	\$625
1691	C00419614	WILSON AURBACH FOR CONGRESS COMMITTEE	AURBACH, WILSON	JORDAN WALDREP	\$147,775	0	1/23/2007	Not Filed	\$8,065	\$300
1693	C00421131	ZANZI FOR CONGRESS	ZANZI, ITALO ANDRES	RYAN ADRIAN MOREIN	\$656,819	1	12/18/2006	11	\$109,643	\$2,468



FEDERAL ELECTION COMMISSION
Washington, DC 20463

SENSITIVE

DATE & TIME OF TRANSMITTAL: Thursday, April 5, 2007 11:00

BALLOT DEADLINE: Tuesday, April 10, 2007 4:00

COMMISSIONER: LENHARD, MASON, von SPAKOVSKY, WALTHER, WEINTRAUB

SUBJECT: RTB Recommendation - 2006 12 Day Pre-General
(Quarterly Filers) and 30 Day Post-General Report For
The Administrative Fine Program. Memorandum from the
Assistant Staff Director, Reports Analysis Division
dated April 4, 2007.

- () I approve the recommendation(s)
- () I object to the recommendation(s)
- () I approve the recommendations except those following
to which I object (please insert AF#)

- () I approve the recommendations except those following
in which I abstain (please insert AF#)

- () I approve the recommendations except those following
in which I am recused (please insert AF#)

- () I am not voting on this tally.

A definite vote is required. All ballots must be signed and dated. Please return
ONLY THE BALLOT to the Commission Secretary. Please return ballot no later
than date and time shown above.

DATE: _____ SIGNATURE: _____

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation 12)
Day Pre-General (Quarterly Filers) and 30)
Day Post-General Report For The)
Administrative Fine Program:)
DAVID SCOTT FOR CONGRESS, and) AF# 1660
HANK AARON as treasurer;)
TOM BARLOW FOR CONGRESS '06, and) AF# 1685
SHIRLEY J BARLOW as treasurer;)

ZANZI FOR CONGRESS, and RYAN) AF# 1693
ADRIAN MORFIN as treasurer;)

COMMITTEE TO ELECT RICK TRENT;) AF# 1653
THE, and LISA JO TRENT as treasurer;)

TAN NGUYEN FOR CONGRESS, and) AF# 1683
Tello, Emilee as treasurer;)
MIKE MCGRAW FOR CONGRESS, and) AF# 1670
A ROBERT MUZIO as treasurer;)

BYRNE FOR CONGRESS COMMITTEE;) AF# 1647
THE, and JILL K HUEY as treasurer;)
WEGNER FOR CONGRESS, and) AF# 1690
KENNETH WEGNER as treasurer;)

MAATTA FOR CONGRESS CAMPAIGN) AF# 1667
COMMITTEE, and DEBRA C MAATTA)
as treasurer;)
AL GREEN FOR CONGRESS, and) AF# 1643
WILLIAM A LAWSON as treasurer;)

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Federal Election Commission
Certification for Administrative Fines
April 10, 2007

COMMITTEE TO ELECT WILLIAM) AF# 1654
(WILLIE) VADEN FOR CONGRESS, and)
WILLIAM ROSS VADEN as treasurer;)
WILSON AURBACH FOR CONGRESS) AF# 1691
COMMITTEE, and JORDAN WALDREP)
as treasurer;)
CHRISTIAN BURRIDGE FOR) AF# 1649
CONGRESS, and DANIEL CLYDE CARR)
as treasurer;)
COMMITTEE TO ELECT BRAD) AF# 1652
BLANTON, and Burchard, Justin as)
treasurer;)
COUNCIL FOR AFFORDABLE AND) AF# 1659
RURAL HOUSING PAC INC (CARH)
PAC), and TRAVIS A MILLER as)
treasurer;)

BREWERY SOFT DRINK BEER DISTR) AF# 1646
OPTICAL DENTAL MISC WORKERS)
WAREHOUSEMAN HELP LOCAL 830)
PAC, and DANIEL H GRACE as treasurer;)
COMPOSITION ROOFERS LOCAL) AF# 1655
UNION #30 POLITICAL ACTION &)
EDUCATION FUND, and TOM PEDRICK)
as treasurer;)
COUNCIL FOR A LIVABLE WORLD) AF# 1658
CANDIDATE FUND, and JOHN D.)
ISAACS as treasurer;)
FOREST LANDOWNERS) AF# 1661
ASSOCIATION INC. POLITICAL)
ACTION COMMITTEE, and Jones, Scott)
as treasurer;)
HEARTLAND PAC FKA:) AF# 1663
YOUNGSTOWN, and DAVID B.)
ORLEAN as treasurer;)
NORTH CAROLINA DENTAL PAC, and) AF# 1675
AARON TROPMANN as treasurer;)

RECORDING INDUSTRY) AF# 1679
ASSOC/AMERICA INC POLITICAL)
ACTION COMMITTEE (FKA)
RECORDING ARTS PAC), and)
JENNIFER L. BENDALL as treasurer;)

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Federal Election Commission
Certification for Administrative Fines
April 10, 2007

UNITED ASSN JOURNEYMEN &) AF# 1687
APPRENT OF PLUMB & PIPEFITTING)
IND LOCAL 322 COMM FOR POL ED,)
and JAMES REED as treasurer;)

LAKE COUNTY DEMOCRATIC PARTY) AF# 1666
FEDERAL COMMITTEE, and Couvall,)

Peter A. as treasurer;)
KERN COUNTY REPUBLICAN) AF# 1665
CENTRAL COMMITTEE, and)

HENDERSON, CRAIG as treasurer;)
MAINE REPUBLICAN PARTY, and) AF# 1668

Philip Roy Jr. as treasurer;)
ARCH LEADERSHIP PAC, and JOHN) AF# 1644

ROSS TRUMAN as treasurer;)
BLUE AMERICA PAC, and HOWARD) AF# 1645

KLEIN as treasurer;)
CITIZENS FOR ACTION, and NANCY T) AF# 1650

KANJORSKI as treasurer;)
CONTRA COSTA UNITED) AF# 1657

DEMOCRATIC CAMPAIGN AKA)
CCUDC, and GREGORY E SANBORN as)

treasurer;)
PENNSYLVANIA PAC FOR PROGRESS,) AF# 1676

and JONATHAN ROBERT KING as)
treasurer;)

AIRTRAN AIRWAYS INC POLITICAL) AF# 1642
ACTION COMMITTEE, and Gadek,)

Stanley as treasurer;)
CLOROX COMPANY EMPLOYEES') AF# 1651
POLITICAL ACTION COMMITTEE, THE,)

and VICTORIA JONES as treasurer;)
COMPRESSED AIR FREE AIR) AF# 1656

FOUNDATION TUNNEL CAISSON)
SUBWAY WORKERS POLITICAL)

ACTION FUND, and RICHARD E)
FITZSIMMONS as treasurer;)

MIDWEST VALUES PAC (MVP), and) AF# 1669
Thomas Borman as treasurer;)

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MONTANA CREDIT UNIONS LEAGUE)	AF# 1671
POLITICAL ACTION COMMITTEE, and)	
JERRY W GUSTAFSON as treasurer;)	
MZM INC. PAC, and O'Neil, Jeanne Ms. as)	AF# 1673
treasurer;)	
NATIONAL ASSOCIATION FOR HOME)	AF# 1674
CARE POLITICAL ACTION)	
COMMITTEE, and MICHAEL N)	
WOODS as treasurer;)	
PHILLIPS INTERNATIONAL INC)	AF# 1677
POLITICAL ACTION COMMITTEE, and)	
Estey, William Mr. as treasurer;)	
RESPONSIBILITY AND FREEDOM)	AF# 1680
WORK PAC (RFPAC), and JOHN P)	
NAIL as treasurer;)	
TEAMSTERS JOINT COUNCIL 53)	AF# 1684
POLITICAL ACTION COMMITTEE, and)	
cardullo, paul as treasurer;)	
UNITED STATES BEET SUGAR)	AF# 1688
ASSOCIATION POLITICAL ACTION)	
COMMITTEE, and JAMES JOHNSON as)	
treasurer;)	
SAN MATEO COUNTY DEMOCRATIC)	AF# 1681
CENTRAL COMMITTEE, and JUDITH A)	
CHRISTENSEN as treasurer;)	

CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby certify that on April 10, 2007 the Commission took the following actions on the Reason To Believe Recommendation 12 Day Pre-General (Quarterly Filers) and 30 Day Post-General Report For The Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated April 04, 2007, on the following committees:

AF#1660 Decided by a vote of 4-0 to: (1) find reason to believe that DAVID SCOTT FOR CONGRESS, and HANK AARON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount

indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1685 Decided by a vote of 4-0 to: (1) find reason to believe that TOM BARLOW FOR CONGRESS '06, and SHIRLEY J BARLOW as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1693 Decided by a vote of 4-0 to: (1) find reason to believe that ZANZI FOR CONGRESS, and RYAN ADRIAN MORFIN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1653 Decided by a vote of 4-0 to: (1) find reason to believe that COMMITTEE TO ELECT RICK TRENT; THE, and LISA JO TRENT as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

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AF#1683 Decided by a vote of 4-0 to: (1) find reason to believe that TAN NGUYEN FOR CONGRESS, and Tello, Emilee as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1670 Decided by a vote of 4-0 to: (1) find reason to believe that MIKE MCGRAW FOR CONGRESS, and A ROBERT MUZIO as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1647 Decided by a vote of 4-0 to: (1) find reason to believe that BYRNE FOR CONGRESS COMMITTEE; THE, and JILL K HUEY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1690 Decided by a vote of 4-0 to: (1) find reason to believe that WEGNER FOR CONGRESS, and KENNETH WEGNER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1667 Decided by a vote of 4-0 to: (1) find reason to believe that MAATTA FOR CONGRESS CAMPAIGN COMMITTEE, and DEBRA C MAATTA as treasurer

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violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1643 Decided by a vote of 4-0 to: (1) find reason to believe that AL GREEN FOR CONGRESS, and WILLIAM A LAWSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1654 Decided by a vote of 4-0 to: (1) find reason to believe that COMMITTEE TO ELECT WILLIAM (WILLIE) VADEN FOR CONGRESS, and WILLIAM ROSS VADEN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1691 Decided by a vote of 4-0 to: (1) find reason to believe that WILSON AURBACH FOR CONGRESS COMMITTEE, and JORDAN WALDREP as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1649 Decided by a vote of 4-0 to: (1) find reason to believe that CHRISTIAN BURRIDGE FOR CONGRESS, and DANIEL CLYDE CARR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1652 Decided by a vote of 4-0 to: (1) find reason to believe that COMMITTEE TO ELECT BRAD BLANTON, and Burchard, Justin as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not object.

AF#1659 Decided by a vote of 4-0 to: (1) find reason to believe that COUNCIL FOR AFFORDABLE AND RURAL HOUSING PAC INC (CARH PAC), and TRAVIS A MILLER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the

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appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1646 Decided by a vote of 4-0 to: (1) find reason to believe that BREWERY SOFT DRINK BEER DISTR OPTICAL DENTAL MISC WORKERS WAREHOUSEMAN HELP LOCAL 830 PAC, and DANIEL H GRACE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1655 Decided by a vote of 4-0 to: (1) find reason to believe that COMPOSITION ROOFERS LOCAL UNION #30 POLITICAL ACTION & EDUCATION FUND, and TOM PEDRICK as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1658 Decided by a vote of 4-0 to: (1) find reason to believe that COUNCIL FOR A LIVABLE WORLD CANDIDATE FUND, and JOHN D. ISAACS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1661 Decided by a vote of 4-0 to: (1) find reason to believe that FOREST LANDOWNERS ASSOCIATION INC. POLITICAL ACTION COMMITTEE, and Jones, Scott as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1663 Decided by a vote of 4-0 to: (1) find reason to believe that HEARTLAND PAC FKA: YOUNGSTOWN, and DAVID B. ORLEAN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard,

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AF#1675 Decided by a vote of 4-0 to: (1) find reason to believe that NORTH CAROLINA DENTAL PAC, and AARON TROPMANN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1679 Decided by a vote of 4-0 to: (1) find reason to believe that RECORDING INDUSTRY ASSOC/AMERICA INC POLITICAL ACTION COMMITTEE (FKA RECORDING ARTS PAC), and JENNIFER L. BENDALL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1687 Decided by a vote of 4-0 to: (1) find reason to believe that UNITED ASSN JOURNEYMEN & APPRENT OF PLUMB & PIPEFITTING IND LOCAL 322 COMM FOR POL ED, and JAMES REED as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1666 Decided by a vote of 4-0 to: (1) find reason to believe that LAKE COUNTY DEMOCRATIC PARTY FEDERAL COMMITTEE, and Couvall, Peter A. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate

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letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1665 Decided by a vote of 4-0 to: (1) find reason to believe that KERN COUNTY REPUBLICAN CENTRAL COMMITTEE, and HENDERSON, CRAIG as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1668 Decided by a vote of 4-0 to: (1) find reason to believe that MAINE REPUBLICAN PARTY, and Philip Roy Jr. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1644 Decided by a vote of 4-0 to: (1) find reason to believe that ARCH LEADERSHIP PAC, and JOHN ROSS TRUMAN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1645 Decided by a vote of 4-0 to: (1) find reason to believe that BLUE AMERICA PAC, and HOWARD KLEIN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1650 Decided by a vote of 4-0 to: (1) find reason to believe that CITIZENS FOR ACTION, and NANCY T KANJORSKI as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1657 Decided by a vote of 4-0 to: (1) find reason to believe that CONTRA COSTA UNITED DEMOCRATIC CAMPAIGN AKA CCUDC, and GREGORY E SANBORN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

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AF#1676 Decided by a vote of 4-0 to: (1) find reason to believe that PENNSYLVANIA PAC FOR PROGRESS, and JONATHAN ROBERT KING as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1642 Decided by a vote of 4-0 to: (1) find reason to believe that AIRTRAN AIRWAYS INC POLITICAL ACTION COMMITTEE, and Gadek, Stanley as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1651 Decided by a vote of 4-0 to: (1) find reason to believe that CLOROX COMPANY EMPLOYEES' POLITICAL ACTION COMMITTEE, THE, and VICTORIA JONES as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1656 Decided by a vote of 4-0 to: (1) find reason to believe that COMPRESSED AIR FREE AIR FOUNDATION TUNNEL CAISSON SUBWAY WORKERS POLITICAL ACTION FUND, and RICHARD E FITZSIMMONS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1669 Decided by a vote of 4-0 to: (1) find reason to believe that MIDWEST VALUES PAC (MVP), and Thomas Borman as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1671 Decided by a vote of 4-0 to: (1) find reason to believe that MONTANA CREDIT UNIONS LEAGUE POLITICAL ACTION COMMITTEE, and JERRY W

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GUSTAFSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1673 Decided by a vote of 4-0 to: (1) find reason to believe that MZM INC. PAC, and O'Neil, Jeanne Ms. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1674 Decided by a vote of 4-0 to: (1) find reason to believe that NATIONAL ASSOCIATION FOR HOME CARE POLITICAL ACTION COMMITTEE, and MICHAEL N WOODS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1677 Decided by a vote of 4-0 to: (1) find reason to believe that PHILLIPS INTERNATIONAL INC POLITICAL ACTION COMMITTEE, and Estey, William Mr. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1680 Decided by a vote of 4-0 to: (1) find reason to believe that RESPONSIBILITY AND FREEDOM WORK PAC (RFPAC), and JOHN P NAIL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1684 Decided by a vote of 4-0 to: (1) find reason to believe that TEAMSTERS JOINT COUNCIL 53 POLITICAL ACTION COMMITTEE, and cardullo, paul as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1688 Decided by a vote of 4-0 to: (1) find reason to believe that UNITED STATES BEET SUGAR ASSOCIATION POLITICAL ACTION COMMITTEE, and JAMES JOHNSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report;

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(2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1681 Decided by a vote of 4-0 to: (1) find reason to believe that SAN MATEO COUNTY DEMOCRATIC CENTRAL COMMITTEE, and JUDITH A CHRISTENSEN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

Attest:

April 11, 2007
Date

Mary W. Dove
Mary W. Dove
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 12, 2007

Ms. Jeanne O'Neil
MZM Inc. PAC
1523 New Hampshire Avenue, N.W.
Washington, DC 20036

C00369884
AF#: 1673

Dear Ms. Jeanne O'Neil:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 30 Day Post-General Report of Receipts and Disbursements in a calendar year in which a regularly scheduled general election is held. This report, covering the period through 11/27/2006, shall be filed no later than 12/7/2006. 2 U.S.C. 434(a). You were previously notified of the due date for this report. Records at the Federal Election Commission ("FEC") indicate that this report was not filed within thirty (30) days of the due date. You should file the report if you have not already done so.

The Act was further amended in 1999 to permit the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. 434(a). 2 U.S.C. 437g(a)(4). On 4/10/2007, the FEC found that there is reason to believe ("RTB") that MZM Inc. PAC and you, as treasurer, violated 2 U.S.C. 434(a) by failing to file timely this report on or before 12/7/2006. Based on the FEC's schedules of civil money penalties at 11 C.F.R. 111.43, the amount of your civil money penalty calculated at the RTB stage is \$900. It is due by 5/20/2007 and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive
Level of Activity: \$35,741
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 0

To Pay the Calculated Civil Money Penalty

To pay the calculated civil money penalty, send the enclosed remittance and your payment to the FEC at the address on page 3. Upon receipt of your payment, the FEC will send you a final determination letter.

To Challenge the RTB Finding and/or Calculated Civil Money Penalty

To challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found on page one, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received by 5/20/2007. Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty. The FEC will only consider challenges that are based on a factual error, miscalculation of the calculated civil money penalty by the FEC, or the existence of extraordinary circumstances that persisted for more than 48 hours that were beyond your control and prevented you

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from filing the report in a timely manner. Your response must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. Examples of circumstances that will not be considered extraordinary include, but are not limited to, negligence, problems with vendors or contractors, staff illness, computer failures and similar circumstances. 11 C.F.R. 111.35(b)(1)(iii) and (4).

Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of your right to present such argument in a petition to the district court under 2 U.S.C. 437g, 11 C.F.R. 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

If You Do Not Pay the Calculated Civil Money Penalty or Submit a Challenge


If you do not pay the calculated civil money penalty or submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that MZM Inc. PAC and you, as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. 3701 et seq. The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 C.F.R. 111.45.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. 437g(a)(4)(B) and 437g(a)(12)(A) until it is placed on the public record in accordance with 11 C.F.R. 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

Additional information on the FEC's administrative fine program, including the final regulations, is located at the FEC's website at www.FEC.gov. If you have questions regarding the payment of the calculated civil money penalty, please contact Rhiannon Ryan in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

Sincerely,



Robert D. Lenhard
Chairman

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ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. 111.43, the amount of your civil money penalty calculated at RTB is \$900 for the 2006 30 Day Post-General Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

The remittance and your payment are due by 5/20/2007. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: MZM Inc. PAC

FEC ID#: C00369884

AF#: 1673

PAYMENT DUE DATE: 5/20/2007

PAYMENT AMOUNT DUE: \$900

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ATTORNEYS AT LAW

Matthew J. Herrington
202.429.8164
mherrington@steptoe.com

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
Tel 202.429.3000
Fax 202.429.3902
steptoe.com

May 15, 2007

Office of Administrative Review
Federal Election Commission
999 E Street N.W.
Washington, D.C. 20463

Re: AF 1673

Dear Sir or Madam:

We represent Jeanne O'Neil. Ms. O'Neil is the addressee on a reason to believe notice (the "Notice") attached hereto at Tab A and addressed to her in her former capacity as Treasurer of the MZM, Inc. PAC ("MZM PAC").

Background

By way of background, Ms. O'Neil was a bookkeeper who worked at MZM, Inc. ("MZM"). She was a low-level employee and was not an officer of the company. Ms. O'Neil did not exercise any managerial control over either the company or the MZM PAC. Rather, her service as Treasurer of the MZM PAC was exclusively ministerial.

Ms. O'Neil's employment with MZM terminated in September of 2005 at the time MZM's operating assets and liabilities were sold to Athena Innovative Solutions, Inc. ("Athena") pursuant to an asset purchase agreement among MZM, its majority shareholder Mitchell J. Wade, and Athena. Under the terms of that agreement all assets and liabilities related to the MZM PAC remained with MZM, which has since changed its name to True Norte, Inc. ("True Norte"). These facts are set forth in detail in the letter attached at Tab B from counsel to Mr. Wade and True Norte, Ronald Machen of Wilmer Hale LLP, to the FEC. While Ms O'Neil for a time worked for Athena, she left that company in October 2006, and in any event Athena has never had any affiliation with the MZM PAC.

In sum, Ms. O'Neil has absolutely no connection with or control over the affairs of MZM, now known as True Norte, or its legacy assets including the MZM PAC, and has had no affiliation with the MZM PAC for more than one year. We have previously discussed and corresponded on Ms. O'Neil's status with Lynn Y. Tran, Esq., of the FEC in connection with FEC MUR 5666.

2007 MAY 17 P 2:49

RECEIVED

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The Notice

The Notice asserts reason to believe that a penalty should be imposed for failure to file an MZM PAC report in December 2006. To be clear, in December 2006 Ms. O'Neil had no affiliation whatsoever with MZM or the MZM PAC, which she believed to have been dissolved, and neither the information nor ability to make any filing on behalf of the MZM PAC. We respectfully suggest that in light of the extraordinary circumstances appertaining no administrative action should be taken against Ms. O'Neil or MZM PAC and respectfully request that the FEC withdraw the Notice.

In addition, we believe that the Notice does not establish an accurate factual basis on which penalties could be imposed. The Notice sets forth a regulatory estimate that there was PAC activity in the third quarter of 2006 in the amount of \$35,740, while we believe there was no activity whatsoever in the PAC.

Thank you for your attention to this matter and please feel free to contact me should you have any questions regarding Ms. O'Neil. We respectfully suggest that any further correspondence related to the MZM PAC be addressed to Mr. Wade's counsel's attention.

Sincerely,



Matthew J. Herrington

cc: Lynn Y. Tran, Esq.
Ronald C. Machen, Esq.

28092614437

STATEMENT OF DESIGNATION OF COUNSEL

AF #: _____

NAME OF COUNSEL: Matthew Herrington

FIRM: Stephoe + Johnson LLP

ADDRESS: 1330 Connecticut Ave NW
Washington DC 20007

TELEPHONE: (202) 429-8164

FAX: (202) 429-3902

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

3.20.07
Date

[Signature]
Signature

RESPONDENT'S NAME: Jeanne O'Neil

COMMITTEE NAME: _____

ADDRESS: _____

TELEPHONE: HOME: () _____

BUSINESS: () _____

28092614438

WILMERHALE

Ronald C. Machen

+1 202 663 6881 (t)

+1 202 663 6363 (f)

ronald.machen@wilmerhale.com

May 15, 2007

Office of Administrative Review
Federal Election Commission
999 E Street, NW
Washington DC 20463

RE: AF# 1673

Dear Sir or Madam:

I am writing on behalf of my client, Mitchell Wade, to support and provide factual background in connection with Ms. Jeanne O'Neil's challenge to the FEC's April 12, 2007 finding that there is reason to believe ("RTB") that MZM Inc. PAC and Ms. O'Neil, as treasurer, violated 2 U.S.C. 434(a) by failing to file timely a 30 Day Post-General Report of Receipts and Disbursements.

On March 9, 2007, I submitted a response to the FEC's February 6, 2007 RTB finding that MZM Inc. PAC and Ms. O'Neil, as treasurer, violated the same statutory provision by failing to file timely an October Quarterly Report of Receipts and Disbursements. Because the same factual predicate applies to both RTB letters, I request consolidation of AF# 1563 and AF# 1673.

As background, Mr. Wade was the founder, President, CEO, and majority shareholder of MZM Inc., the company through which MZM Inc. PAC operated. On September 30, 2005, MZM Inc. was sold to Veritas Capital. (See press release at Exhibit A) In turn, Veritas Capital moved the operations of MZM Inc. into a newly created subsidiary, Athena Innovative Solutions Inc. At the time of the sale, Ms. O'Neil became an employee of Athena Innovative Solutions, Inc. and ceased serving as the treasurer of MZM Inc. PAC. From that time forward, no treasurer was available to act on behalf of MZM Inc. PAC. Furthermore, Ms. O'Neil left Athena Innovative Solutions, Inc. on October 20, 2006.

As you may know, Mr. Wade, through counsel, has been consulting with FEC attorneys Lynn Tran and Mark Shonkwiler on FEC MUR 5666, which involves MZM Inc. PAC. On November 2, 2006, I sent Ms. Tran a letter addressing PAC filing notices that the FEC had sent to Ms. O'Neil. (See Exhibit B) As that letter explains, MZM Inc. PAC was effectively dissolved on February 13, 2006, after ceasing political fundraising and disbursement activity and donating all its remaining funds to the Intrepid Fallen Heroes Fund. (See donation form, MZM

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2007 MAY 17 P 2:49

EL
ADMIN

WILMERHALE

FEC Office of Administrative Review
May 15, 2007
Page 2

Inc. check no. 1057, and MZM Inc. PAC account statement at Exhibit C) At the time of the charitable donation, MZM Inc. PAC had no outstanding debts or obligations, and its sponsoring corporation had disposed of all its assets and dissolved the prior year. Accordingly, on February 13, 2006, MZM Inc. PAC made a good faith attempt to follow FEC procedures and filed a termination notice pursuant to the Federal Election Campaign Act (2 U.S.C. 433(d)(1)) and the associated regulation (11 C.F.R. § 102.3). (See Exhibit D)

On February 22, 2006, the FEC formally denied the termination request due to the pending MUR. A denial of a termination request due to a pending MUR appears to be contemplated by informal FEC guidance (FEC, Campaign Guide for Corporations and Labor Organizations at 58 (June 2001)). However, we are unaware of any express provision in the Federal Election Campaign Act or any other FEC regulations, which allows for the denial of a termination request upon these grounds, particularly where termination does not frustrate the progress of an ongoing inquiry.

As outlined above, it should be apparent that MZM Inc. PAC could not file a 30 Day Post-General Report of Receipts and Disbursements due to the existence of extraordinary circumstances—MZM Inc. PAC did not exist at the time the filing was due, and MZM Inc. PAC had no treasurer. Under such circumstances, filing a report was not realistic, efficient, or necessary.

In addition, on February 13, 2006, the FEC was notified that the actual level of MZM Inc. PAC activity was zero—not the amount listed in the RTB letter. (See Exhibit D) Exhibit C further demonstrates this zero balance. The RTB letter is thus technically deficient and does not describe an accurate factual predicate upon which relief could be sought. For all of the foregoing substantive and technical reasons, and those articulated in summary fashion in Ms. O'Neil's letter, the FEC's April 12, 2007 RTB finding should be reversed, and a determination should be made that no penalty is owed to the FEC.

Sincerely yours,

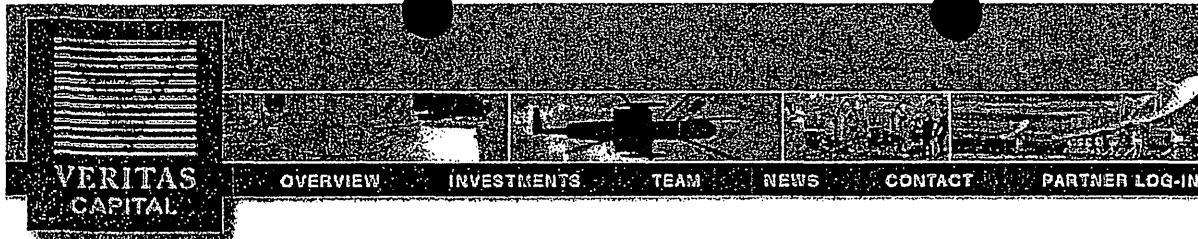


Ronald C. Machen

20092614440

TAB A

2809261441



NEWS

Veritas Capital Completes Acquisition of Selected MZM, Inc. Assets

NEW YORK (Sept. 30, 2005) -- Veritas Capital, a leading private equity firm focused on the defense and federal sectors, announced today it has completed the previously announced agreement to purchase selected assets of MZM, Inc., a provider of services to the national security community. Financial terms of the acquisition have not been disclosed.

The transaction included, but was not limited to, all of the existing contracts, relationships and employees, and included the assumption of only specific liabilities associated with the ongoing operations of those assets, which were acquired through a newly created subsidiary, Athena Innovative Solutions, Inc.

Under the leadership and control of Veritas, Athena will continue to provide a broad array of services to the national security community. Veritas and Athena will retain MZM Inc.'s employees, underscoring their commitment to the high level of service its clients have come to expect. James C. King will serve as the President and Chief Executive Officer for Athena.

About Athena Innovative Solutions, Inc.

Athena is a trusted and respected leader in the national security community providing policy, operational, and technical expertise and solutions to government and industry clients in the fields of intelligence, counterintelligence, counterterrorism, security, and homeland defense.

About Veritas Capital

Veritas Capital is a private equity investment firm headquartered in New York. Founded in 1992 by Robert B. McKeon, Veritas invests primarily in defense and aerospace related companies. Veritas' portfolio of companies include, or have included, DynCorp International, Integrated Defense Technologies, Vertex Aerospace, McNeil Technologies, The Wornick Company, and TRAK Communications, among others. Veritas is dedicated to providing the highest level of critical services and equipment to the defense and federal sectors around the world. For more information, please visit www.veritascapital.com.

[back to news](#)

28092614442

TAB B

28092614443

WILMERHALE

Ronald C. Machen

+1 202 663 6881 (t)

+1 202 663 6363 (f)

ronald.machen@wilmerhale.com

November 2, 2006

Lynn Tran
Federal Election Commission
999 E Street, NW
Washington DC 20463

Dear Ms. Tran:

On October 16, 2006, Ms. Jeannie O'Neil received what appear to be two form notices from the FEC regarding PAC filing procedures. The first was an electronic late filing notification, stating that an October quarterly filing was due the previous day. The second was a General Election Report Notice identifying an October 26, 2006 filing date for the reporting period of October 1, 2006 to October 18, 2006.

I am writing on behalf of my client, Mitchell Wade, to address several points regarding these notices. First, it is our understanding that MZM Inc. PAC was effectively dissolved on February 13, 2006, after ceasing political fundraising and disbursement activity and donating all its remaining funds to the Intrepid Fallen Heroes Fund. At the time of the charitable donation, MZM Inc. PAC had no outstanding debts or obligations, and its sponsoring corporation had disposed of all its assets and dissolved the prior year. Accordingly, on February 13, 2006, MZM Inc. PAC made a good faith attempt to follow FEC procedures and filed a termination notice pursuant to the Federal Election Campaign Act (2 U.S.C. 433(d)(1)) and the associated regulation (11 C.F.R. § 102.3).

I understand that, on February 22, 2006, the FEC formally denied the termination request due to a pending MUR, which appears to have triggered the subsequent filing notices. A denial of a termination request due to a pending MUR appears to be contemplated by informal FEC guidance (FEC, Campaign Guide for Corporations and Labor Organizations at 58 (June 2001)). However, we are unaware of any provision in the Federal Election Campaign Act or any other FEC regulations, which allows for the denial of a termination request upon these grounds, particularly where termination does not frustrate the progress of an ongoing inquiry and settlement discussions. Moreover, we believe that requiring ministerial reports relating to MZM Inc. PAC at this time -- given that MZM Inc. PAC is no longer active and MZM is no longer in existence -- is inefficient and unnecessary. Further, we understand that Ms. O'Neil, who became an employee of Athena Innovative Solutions, Inc. in 2005, left that company on October 20, 2006.

WILMERHALE

Lynn Tran
November 2, 2006
Page 2

I sincerely hope that we can agree that filing any PAC forms at this time is unnecessary and look forward to discussing this matter with you at your earliest convenience.

Sincerely yours,

Ronald C. Machen *RS*

Ronald C. Machen

cc: Matt Herrington, Esq.

28092614445

TAB C

28092614446



DONATION FORM

Please fill out this form and mail it to the below address:

Name: MJ Wade
Title:
Company: True North Inc
Address: PO Box 787
City, State, Zip: Great Falls, VA 22066
E-mail address (optional):
Amount of contribution: 70892.11

The Intrepid Fallen Heroes Fund lists all contributions above \$1,000 on our website, www.fallenheroesfund.org.

If you are donating \$1,000 or more but DO NOT want your name listed on the website, please check here:

Please mail this form and your contribution to:

Intrepid Fallen Heroes Fund
Attn: Contributions
One Intrepid Square
West 46th Street and 12th Avenue
New York, New York 10036

The Intrepid Fallen Heroes Fund will provide a written acknowledgement for your contribution by mail.
The Intrepid Fallen Heroes Fund is a 501(c)(3) not-for-profit organization.
Contributions are tax deductible under applicable laws.
The Intrepid Fallen Heroes Fund's tax identification number is 20-0366717.

26092614447

Check stub from SunTrust Bank for \$70,892.11, dated 2/13/06, payable to Intrepid Fallen Heroes Fund. Includes bank name, amount, date, and MICR line.

TAB D

2809261448

28092614449

DISCLOSE -- FEC Financial Disclosure Filing Acknowledgement

This is to acknowledge the receipt and acceptance of your electronic filing via the DISCLOSE protocol.

Your filing was received and accepted by our system at 02/14/2006 - 09:20:42, and was assigned the Filing ID of: FEC-202051

Please make a note of this, as it will be necessary to refer to this information in the future.

Thank you for using DISCLOSE.

Do not reply to this notice. It is sent from an unattended account that cannot receive email.

For your reference, the output of the validation check was as follows:

FEC File Validator Version 5.3.1.0

Developed for the Federal Election Commission by NIC Technologies, Inc. 1996-2006

=== Identification Section ===

Committee ID: C00369884
Committee Name: MZM INC. PAC
Filing Type: F3XT
From/Through: 20060101 - 20060213

Software/Ver#: FECfile / Ver# 5.3.1.0(f16)

=== Results Section ===

>>>----> FEC data file PASSED validation! <----<<<

=== Summary Page Totals Section ===

Cover/Summary Page Totals for Form: F3X

Table with 3 columns: Line No., Column A, Column B. Rows include 6A, 6B, 6C, 6D, 7, 8 with corresponding numerical values.

28092614450

9	0.00	
10	0.00	
11A1	0.00	0.00
11A2	0.00	0.00
11A3	0.00	0.00
11B	0.00	0.00
11C	0.00	0.00
11D	0.00	0.00
12	0.00	0.00
13	0.00	0.00
14	0.00	0.00
15	0.00	0.00
16	0.00	0.00
17	0.00	0.00
18A	0.00	0.00
19	0.00	0.00
20	0.00	0.00
21A1	0.00	0.00
21A2	0.00	0.00
21B	0.00	0.00
21C	0.00	0.00
22	0.00	0.00
23	0.00	0.00
24	0.00	0.00
25	0.00	0.00
26	0.00	0.00
27	0.00	0.00
28A	0.00	0.00
28B	0.00	0.00
28C	0.00	0.00
28D	0.00	0.00
29	70,892.71	70,892.71
31	70,892.71	70,892.71
32	70,892.71	70,892.71
33	0.00	0.00
34	0.00	0.00
35	0.00	0.00
36	0.00	0.00
37	0.00	0.00
38	0.00	0.00
18B	0.00	0.00
18C	0.00	0.00
30A1	0.00	0.00
30A2	0.00	0.00
30B	0.00	0.00
30C	0.00	0.00

MD5 checksum:
621d37a7c68b72e32d4bd850c1db3b80

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

MZM INC. PAC

ADDRESS (number and street)

1523 New Hampshire Avenue, NW

Check if different than previously reported. (ACC)

Washington

DC

20036

2. FEC IDENTIFICATION NUMBER CITY STATE ZIP CODE

C00369884

3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report(Q1)
- July 15 Quarterly Report(Q2)
- October 15 Quarterly Report(Q3)
- January 31 Quarterly Report(YE)
- July 31 Mid-Year Report(Non-election Year Only) (MY)
- Termination Report (TER)

(b) Monthly Report Due On:

<input type="checkbox"/> Feb 20 (M2)	<input type="checkbox"/> May 20 (M5)	<input type="checkbox"/> Aug 20 (M8)	<input type="checkbox"/> Nov 20 (M11) (Non-Election Year Only)
<input type="checkbox"/> Mar 20 (M3)	<input type="checkbox"/> Jun 20 (M6)	<input type="checkbox"/> Sep 20 (M9)	<input type="checkbox"/> Dec 20 (M12) (Non-Election Year Only)
<input type="checkbox"/> Apr 20 (M4)	<input type="checkbox"/> Jul 20 (M7)	<input type="checkbox"/> Oct 20 (M10)	<input type="checkbox"/> Jan 31 (YE)

(c) 12-Day PRE-Election Report for the:

<input type="checkbox"/> Primary (12P)	<input type="checkbox"/> General (12G)	<input type="checkbox"/> Runoff (12R)
<input type="checkbox"/> Convention (12C)	<input type="checkbox"/> Special (12G)	
Election on		in the State of

(d) 30-Day Post-Election Report for the:

<input type="checkbox"/> General (30G)	<input type="checkbox"/> Runoff (30R)	<input type="checkbox"/> Special (30S)
Election on		in the State of

5. Covering Period 01 01 2006 through 02 13 2006

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 Ms. Jeanne M. O'Neil

Signature of Treasurer Electronically Filed by Ms. Jeanne M. O'Neil Date 02 13 2006

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

Office Use Only

FEC FORM 3X
(Rev. 02/2003)

26092614451

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name
MZM INC. PAC

Report Covering the Period: From:

MM	DD	YYYY
01	01	2006

 To:

MM	DD	YYYY
02	13	2006

	COLUMN A This Period	COLUMN B Calendar Year-to-Date		
6. (a) Cash on Hand January 1 <table border="1" style="display: inline-table; border-collapse: collapse;"><tr><td>YYYY</td></tr><tr><td>2006</td></tr></table>	YYYY	2006		70892.71
YYYY				
2006				
(b) Cash on Hand at Begining of Reporting Period	70892.71			
(c) Total Receipts (from Line 19)	0.00	0.00		
(d) Subtotal (add lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	70892.71	70892.71		
7. Total Disbursements (from Line 31)	70892.71	70892.71		
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	0.00	0.00		
9. Debts and Obligations owed TO the committee (Itemize all on Schedule C and/or Schedule D)	0.00			
10. Debts and Obligations owed BY the committee (Itemize all on Schedule C and/or Schedule D)	0.00			

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

For further information contact:

Federal Election Commission
999 E street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

28092614452

**DETAILED SUMMARY PAGE
OF RECEIPTS**

FEC Form 3X (Rev. 02/2003)

Page 3

Write or Type Committee Name
MZM INC. PAC

Report Covering the Period: From:

M	M
0	1

D	D
0	1

Y	Y	W	Y
2	0	0	6

 To:

M	M
0	2

D	D
1	3

Y	Y	W	Y
2	0	0	6

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	0.00	0.00
(ii) Unitemized	0.00	0.00
(iii) TOTAL (add Lines 11(a)(i) and (ii))	0.00	0.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs)	0.00	0.00
(d) Total Contributions (add Lines 11(a)(iii), (b) and (c)) (Carry Totals to Line 33, page 5)	0.00	0.00
12. Transfers From Affiliated/Other Party Committees	0.00	0.00
13. All Loans Received	0.00	0.00
14. Loan Repayments Received	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5)	0.00	0.00
16. Refunds of Contributions Made to Federal candidates and Other Political Committees	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.)	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3)	0.00	0.00
(b) Levin Funds (from Schedule H5)	0.00	0.00
(c) Total Transfer (add 18(a) and 18(b))	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))	0.00	0.00
20. Total Federal Receipts (subtract Line 18(c) from Line 19)	0.00	0.00

28092614453

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

II. DISBURSEMENTS	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Shared Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share.....	0.00	0.00
(ii) Non-Federal Share.....	0.00	0.00
(b) Other Federal Operating Expenditures.....	0.00	0.00
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii) and (b))..... ▶	0.00	0.00
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	0.00	0.00
24. Independent Expenditure (use Schedule E).....	0.00	0.00
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F).....	0.00	0.00
26. Loan Repayments Made.....	0.00	0.00
27. Loans Made.....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees.....	0.00	0.00
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c))..... ▶	0.00	0.00
29. Other Disbursements.....	70892.71	70892.71
30. Federal Election Activity (2 U.S.C 431(20))		
(a) Shared Federal Election Activity (from Schedule H6)		
(i) Federal Share.....	0.00	0.00
(ii) "Levin" Share.....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds.....	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))....	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))..	70892.71	70892.71
32. Total Federal Disbursements (subtract Line 21(a)(ii) from Line 30(a)(ii) from Line 31).....	70892.71	70892.71

28092614454

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

III. Net Contributions/Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) from Line 11(d), page 3)	0.00	0.00
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	0.00	0.00
36. Total Federal Operating Expenditures (add Line 21(a)(1) and Line 21(b)).....	0.00	0.00
37. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	0.00	0.00

2809251455

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

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

FOR LINE NUMBER:
(check only one)

PAGE 6 / 6

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input checked="" type="checkbox"/> 29	<input type="checkbox"/> 30b

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

NAME OF COMMITTEE (In Full)
MZM INC. PAC

Full Name (Last, First, Middle Initial)
A. INTREPID FALLEN HEROES FUND

Transaction ID: SB29.4493
Date of Disbursement

Mailing Address ONE INTREPID SQUARE
W 46TH ST & 12TH AVE

MM / DD / YYYY
02 / 13 / 2006

City NEW YORK State NY Zip Code 10036

Amount of Each Disbursement this Period

70892.71

Purpose of Disbursement
CONTRIBUTION/DONATION
Candidate Name

Category/
Type

Office Sought: House
 Senate
 President
State: District:

Disbursement For: Primary General
 Other (specify) ▼

SUBTOTAL of Disbursements This Page (optional)

70892.71

TOTAL This Period (last page this line number only)

70892.71

28092614456

Date: June 19, 2007

**REFERRAL TO OFFICE OF ADMINISTRATIVE REVIEW
CHALLENGE RECEIVED**

AF#: 1673

Committee Name: MZM Inc. PAC

Committee ID#: C00369884

Committee Address (if different than in RTB letter): N/A

Treasurer Name (if different than in RTB finding): N/A

Attachments:

Copy of RTB Circulation Report, dated April 4, 2007 and RTB Certification, dated April 10, 2007: Previously Forwarded

Attachment #: N/A

Certified Return Receipt (to be forwarded at later date if not yet received)(Y/N):Y

Attachment #: 1

Original Correspondence Received by RAD in Response to RTB Letter (Y/N): N

Attachment #: N/A

RAD Staff Declaration (Y/N): Y

-2006 Post-General Report Prior Notice, dated October 2, 2006.

-2006 Post-General Report Reminder Notice, dated November 13, 2006.

-RTB Letter, dated April 12, 2007.

Attachment #: 3

Other RAD Information: (Y/N): N

Attachment#: N/A

2007 JUN 20 A 8:39

Administrative Review

28092614457

20092614458

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature: <i>[Handwritten Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name): <i>[Handwritten Name]</i> C. Date of Delivery: <i>[Handwritten Date]</i></p>
<p>1. Article Addressed to:</p> <p>MS. JEANNE O'NEIL MZM INC. PAC 1523 NEW HAMPSHIRE AVENUE, N.W. WASHINGTON, DC 20036</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below. <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7006 0810 0005 9266 6617</p>

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

DECLARATION OF PATRICIA CARMONA

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to MZM Inc. PAC:
 - A) Prior Notice, dated October 2, 2006, referencing the 2006 Post-General Report;
 - B) Reminder Notice, dated November 13, 2006, referencing the 2006 Post-General Report;
 - C) Reason-to-Believe Letter, dated April 12, 2007, referencing the 2006 Post-General Report.
3. I hereby certify that I have searched the Commission's public records and find that MZM Inc. PAC has not yet filed the 2006 Post-General Report with the Commission.
4. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 19th day of June, 2007.



Patricia Carmona
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission

28092614459

GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

October 2, 2006

I. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 18

REPORT	REPORTING PERIOD ¹	REG./CERT. & OVERNIGHT MAILING DATE	FILING DATE
Pre-General ³	10/01/06 - 10/18/06	10/23/06	10/26/06
Post-General	10/19/06 - 11/27/06	12/07/06	12/07/06

II. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 18²

REPORT	REPORTING PERIOD ¹	REG./CERT. & OVERNIGHT MAILING DATE	FILING DATE
Post-General	10/01/06 - 11/27/06	12/07/06	12/07/06

WHO MUST FILE

Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) must follow the above charts in order to determine whether they must file a report 12 days before the general election on November 7 (the Pre-General Election Report). All Party Committees and PACs, regardless of financial activity, must file a report 30 days after the general election (the Post-General Election Report). Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

Certain party committees are required to file monthly reports (quarterly reporting is no longer an option for these committees). For more information, see the January 2006 Record, which can be found on the FEC web site at www.fec.gov/pages/record.shtml.

METHOD OF FILING

Quarterly Reports sent by registered or certified mail must be postmarked by the mailing date (please note that a certificate of mailing is not an acceptable method). Committees should keep the mailing receipt with its postmark as proof of filing.

If using overnight mail, the delivery service must receive the report by the mailing date. "Overnight mail" includes Priority or Express Mail having a delivery confirmation, or an overnight delivery service with an on-line tracking system and scheduled for next business day delivery. Quarterly Reports filed by any other means must be received by the Commission (or Secretary of the Senate for committees supporting only Senate candidates) by the filing date.

¹These 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.

²Committees that made general election contributions or expenditures before October 1 and did not previously report them must also follow Chart I.

(over)

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48- AND 24-HOUR REPORTS OF INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in connection with the general election may also have to file 48-hour or 24-hour reports. The 48-hour reporting requirement will be triggered each time the committee makes independent expenditures aggregating \$10,000 or more between January 1 and October 18, 2006. The 24-hour reporting requirement will be triggered each time the committee makes independent expenditures in connection with the general election aggregating \$1,000 between October 19 and November 5, 2006. See 11 CFR 104.4. These reports are *not* required when a Party Committee or PAC makes a contribution directly to a candidate.

QUARTERLY FILING SCHEDULE FOR REMAINDER OF 2006

REPORT	REPORTING PERIOD¹	REG./CERT. & OVERNIGHT MAILING DATE	FILING DATE
Year-End	11/28/06 - 12/31/06	01/31/07	01/31/07

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COMPLIANCE

- Treasurers of political committees are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time.
- Under the Administrative Fine Program, political committees and their treasurers who fail to file their reports on time may be subject to civil money penalties up to \$16,000 (or more for repeat late- and non-filers). For additional information, see the enclosed handout entitled, “Administrative Fine Program” and visit the FEC web site at www.fec.gov/af.shtml.
- In addition, political committees that file illegible reports or use non-FEC forms (except for FEC-approved, computer-generated forms) will be required to refile their reports.
- Electronic filers who instead file on paper or submit an electronic report (either by direct transmission or on 3.5” diskette) that does not pass the validation test will be considered non-filers and may be subject to enforcement actions (including administrative fines).

ELECTRONIC FILING

Political committees that receive contributions or make expenditures in excess of \$50,000 in a calendar year, or that have reason to expect to do so, must submit their reports electronically. For additional information, review the enclosed handout entitled “Electronic Filing,” call the FEC’s Electronic Filing office at (800) 424-9530 or (202) 694-1642, and visit our web site at www.fec.gov/elecfil/electron.shtml.

CHANGE IN FILING FREQUENCY

Committees able to change their reporting schedule (for example, from quarterly to monthly) who wish to do so must notify the Commission in writing when they file their next report due under their current reporting schedule. Electronic filers must file this request electronically. Committees may change their filing frequency no more than once per calendar year.

¹See footnote #1, on reverse side.

● GENERAL ELECTION ●
REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

November 13, 2006

*****REMINDER REMINDER REMINDER*****

All party committees and PACs (nonconnected committees and separate segregated funds) must file a Post-General Election Report.

Reports sent by registered or certified mail must be postmarked by the mailing date (December 7, 2006). If using overnight mail, the delivery service must receive the report by the mailing date (December 7, 2006). Otherwise, they must be received by the filing date (December 7, 2006).

FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2007 SEP -4 P 2:44

August 31, 2007

MEMORANDUM

To: The Commission

Through: Patrina M. Clark
Staff Director

From: John D. Gibson
Chief Compliance Officer

Shawn Woodhead Wertz
Reviewing Officer
Office of Administrative Review

Jill I. Sugarman
Reviewing Analyst

SENSITIVE

Subject: AF# 1673 – MZM Inc. PAC and Jeanne O’Neil, as Treasurer (C00369884)

The respondents’ challenge for this case and its challenge for AF# 1721 were due after the April 30, 2007 effective date of the revised administrative fine regulations. The Office of General Counsel informed this Office that if the respondents’ challenge is due after the April 30 effective date, the new rules apply. Therefore, the challenges for AF# 1673 and AF# 1721 are analyzed under the new rules. The respondents’ challenge for AF# 1563 was due before the effective date and is analyzed under the old rules.

The respondents were also respondents in MUR 5666. On July 24, 2007, the Commission voted to take no further action and close the file as it pertains to them.

The attached Reviewing Officer recommendation, and the Reviewing Officer recommendations for AF# 1563 and AF# 1721, are being circulated on an informational basis. Copies were also sent to the respondents in accordance with 11 C.F.R. § 111.36(f). The respondents may file with the Commission Secretary written responses within 10 days of transmittal of the recommendations.

After the 10 day period, the Reviewing Officer recommendations and the respondents’ written responses, if any, will be circulated to the Commission to make final determinations.

Attachment

26092614463



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 31, 2007

**REVIEWING OFFICER RECOMMENDATION
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 1673 – MZM Inc. PAC and Jeanne O'Neil, as Treasurer (C00369884)

On April 10, 2007, the Commission found reason to believe ("RTB") that the respondents violated 2 U.S.C. § 434(a) for failing to file the 2006 30 Day Post-General Report, a non-election sensitive report, and made a preliminary determination that the civil money penalty was \$900 based on the schedule of penalties at 11 C.F.R. § 111.43. They were notified by the Reports Analysis Division ("RAD") on April 12, 2007, of the Commission's RTB finding and civil money penalty.

Respondents' Response

On May 17, 2007, the Commission received the written response and supporting documentation ("challenge") from the Treasurer's counsel, Matthew J. Herrington, who raises two issues:

- First, Ms. O'Neil was a bookkeeper and low-level employee whose status with MZM Inc. was terminated in September 2005 when the company was sold to Athena Innovative Solutions, Inc. ("Athena"). Counsel asserts that Athena never had any affiliation with MZM Inc. PAC. When Ms. O'Neil left Athena in October 2006, she had no "affiliation whatsoever" with the Committee or MZM Inc. and believed that the Committee had been dissolved; and
- Second, the amount of the civil money penalty is incorrect. Contrary to the \$35,740 in estimated activity cited in the letter, there was no financial activity during the reporting period.

Included in the challenge is a May 15, 2007 letter from Ronald C. Machen, who represents Mitchell Wade, the former President and CEO of MZM Inc. In addition to the arguments made by Mr. Herrington with respect to the Treasurer's status, the sale of MZM Inc., and how the RTB civil money penalty was calculated, Mr. Machen asserts that they made a good faith attempt to terminate the Committee in February 2006, but the Commission denied the request due to the pending MUR. Mr. Machen contends that the Committee could not file the report because it did not exist when the report was due and there was no Treasurer which constitutes extraordinary circumstances. Mr. Machen's letter references four exhibits, one of which is a letter dated November 2, 2006 addressed to Lynn Tran of the Office of General Counsel ("OGC") in which Mr. Machen argues that the Committee should be relieved of its filing obligations.

Additional attachments and Exhibits include copies of the RTB letter, Veritas Capital press release dated September 30, 2005, Committee check made out to the Intrepid Fallen Heroes Fund dated February 13, 2006, the Committee's Suntrust Account Statement (Page 1) for January 2006, and the Termination Report dated February 13, 2006 along with the corresponding electronic filing confirmation receipt.

On May 21, 2007, the Commission received from Mr. Machen his May 15 letter and four Exhibits.

Analysis of Challenge

The Federal Election Campaign Act ("Act") states that the treasurer of a political committee shall file a 30 day post-general election report no later than 30 days after the general election. 2 U.S.C. § 434(a)(4)(A)(iii) and 11 C.F.R. § 104.5(c)(1)(iii). Reports electronically filed must be received and validated at or before 11:59 p.m., Eastern Standard/Daylight Time on the prescribed filing date to be timely filed. 11 C.F.R. § 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

Although the respondents filed a Termination Report on February 14, 2006 which disclosed no debts and a \$0 cash-on-hand balance, OGC denied their request in a letter dated February 22. That letter explained that because of the pending MUR, they must continue to file reports until the MUR is closed for the Committee. It appears that the respondents understood this because the Treasurer submitted the next two required filings, the 2006 April and July Quarterly Reports, on April 10 and July 5, 2006, respectively. While counsel asserts that the Treasurer had no connection to the Committee in December 2006, there is no record that she or anyone else involved with the Committee filed an amended Statement of Organization as required by 2 U.S.C. § 433(c) prior to December 7. Thus, she was the Treasurer of record at the time of the filing deadline and was required to file the 30 Day Post-General Report electronically and on time.

Mr. Machen states in the letter to Lynn Tran that the Treasurer received two notices from the Commission on October 16, an electronic late filing notice from the Electronic Filing Office citing the October Quarterly Report and a General Election Report Notice referencing the 12 Day Pre-General Report. That same Report Notice also included the filing information for the 30 Day Post-General Report. Therefore, the Treasurer was aware four days before leaving Athena that the Committee still had an obligation to file reports, including the 30 Day Post-General Report.

Counsel asserts that extraordinary circumstances prevented the respondents from filing the report. The extraordinary circumstances defense has been supplanted with the best efforts defense, under which the Commission may decide that no violation occurred because the respondents used their best efforts to file on time. 11 C.F.R. § 111.35(b)(3) and (c). The best efforts defense is a two-part test, the first part of which consists of the respondents demonstrating that they were prevented from filing on time by reasonably unforeseen circumstances that were beyond their control. In this case, the respondents knew ten months before the report was due that they must continue to file reports until the MUR was closed for them. They subsequently filed two reports on time and were aware in October and November 2006 that the Committee still had filing obligations but did not file the 30 Day Post-General Report electronically and on time. Negligence, unavailability of the Treasurer, and the failure to know filing dates are included at 11 C.F.R. § 111.35(d) as examples of circumstances that are not considered reasonably unforeseen and beyond the respondents' control. As a result, the respondents do not meet the best efforts defense.

Counsel also argues that the level of activity cited in the RTB letter is incorrect. Because no report had been received at the time of the RTB finding, the Commission estimated the level of activity for the 30 Day Post-General reporting period to be \$35,741, resulting in a \$900 civil money penalty. 11 C.F.R. § 111.43(a)(2).

The Reviewing Analyst called counsel in an effort to get the respondents to file the outstanding report. In response to those calls, counsel submitted additional documentation on August 10, 2007 in which he restates their position that the Committee has terminated and Ms. O'Neil is no longer the Treasurer, and the Commission's position that the pending MUR negated the Committee's termination and Ms. O'Neil's resignation. He states that "without prejudice to either side's legal position on the matter, we have agreed to submit the ... report []."

Other attachments include copies of a letter dated July 26, 2007 to counsel from Ms. Tran, letter dated July 30, 2007 to counsel from Mr. Machen, Committee check made out to the Intrepid Fallen Heroes Fund dated February 13, 2006, the Committee's Suntrust Account Statement (Page 1) for January 2006, the Committee's Suntrust Account Statement (Page 1) for February 2006 showing a disbursement of \$70,892.71, and paper copies of reports covering activity for the period from July 1, 2006 through June 30, 2007. The enclosed paper copy of the report covering the 30 Day Post-General reporting period discloses \$0 in receipts and \$0 in disbursements. Since the schedule of penalties at 11 C.F.R. § 111.43(a)(2) only provides for civil money penalties if the level of activity is \$1.00 or more, no civil money penalty should be assessed in this matter.

Their challenge fails to address any of the three valid excuses enumerated at 11 C.F.R. § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. The other issue raised in the challenge (the Treasurer was a low level employee of MZM Inc.) also does not fall within the list of defenses at 11 C.F.R. § 111.35(b).

Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$0 (reduced from the RTB civil money penalty of \$900).

OAR Recommendations

- (1) Adopt the Reviewing Officer recommendation for AF# 1673 involving MZM Inc. PAC and Jeanne O'Neil, as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 1673 that MZM Inc. PAC and Jeanne O'Neil, as Treasurer, violated 2 U.S.C. § 434(a) and, based on the actual level of activity disclosed on the paper copy of the report covering the 30 Day Post-General reporting period (\$0), assess a civil money penalty of \$0 (reduced from the RTB civil money of \$900); and
- (3) Send the appropriate letter.

Reviewing Analyst: Jill I. Sugarman

Attachments

- Attachment 1 – Challenge Received from Respondents and Counsel for MZM Inc.
- Attachment 2 – Additional Documentation Received from Respondents
- Attachment 3 – Declaration from RAD
- Attachment 4 – Declaration from OAR

STEPTOE & JOHNSON LLP

ATTORNEYS AT LAW

Attachment # 1
43 Pages

Matthew J. Herrington
202.429.8164
mherrington@steptoe.com

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
Tel 202.429.3000
Fax 202.429.3902
steptoe.com

May 15, 2007

2007 MAY 17 PM 2:49

Office of Administrative Review
Federal Election Commission
999 E Street N.W.
Washington, D.C. 20463

Re: AF 1673

Dear Sir or Madam:

We represent Jeanne O'Neil. Ms. O'Neil is the addressee on a reason to believe notice (the "Notice") attached hereto at Tab A and addressed to her in her former capacity as Treasurer of the MZM, Inc. PAC ("MZM PAC").

Background

By way of background, Ms. O'Neil was a bookkeeper who worked at MZM, Inc. ("MZM"). She was a low-level employee and was not an officer of the company. Ms. O'Neil did not exercise any managerial control over either the company or the MZM PAC. Rather, her service as Treasurer of the MZM PAC was exclusively ministerial.

Ms. O'Neil's employment with MZM terminated in September of 2005 at the time MZM's operating assets and liabilities were sold to Athena Innovative Solutions, Inc. ("Athena") pursuant to an asset purchase agreement among MZM, its majority shareholder Mitchell J. Wade, and Athena. Under the terms of that agreement all assets and liabilities related to the MZM PAC remained with MZM, which has since changed its name to True Norte, Inc. ("True Norte"). These facts are set forth in detail in the letter attached at Tab B from counsel to Mr. Wade and True Norte, Ronald Machen of Wilmer Hale LLP, to the FEC. While Ms O'Neil for a time worked for Athena, she left that company in October 2006, and in any event Athena has never had any affiliation with the MZM PAC.

In sum, Ms. O'Neil has absolutely no connection with or control over the affairs of MZM, now known as True Norte, or its legacy assets including the MZM PAC, and has had no affiliation with the MZM PAC for more than one year. We have previously discussed and corresponded on Ms. O'Neil's status with Lynn Y. Tran, Esq., of the FEC in connection with FEC MUR 5666.

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AF 1673

The Notice

The Notice asserts reason to believe that a penalty should be imposed for failure to file an MZM PAC report in December 2006. To be clear, in December 2006 Ms. O'Neil had no affiliation whatsoever with MZM or the MZM PAC, which she believed to have been dissolved, and neither the information nor ability to make any filing on behalf of the MZM PAC. We respectfully suggest that in light of the extraordinary circumstances appertaining no administrative action should be taken against Ms. O'Neil or MZM PAC and respectfully request that the FEC withdraw the Notice.

In addition, we believe that the Notice does not establish an accurate factual basis on which penalties could be imposed. The Notice sets forth a regulatory estimate that there was PAC activity in the third quarter of 2006 in the amount of \$35,740, while we believe there was no activity whatsoever in the PAC.

Thank you for your attention to this matter and please feel free to contact me should you have any questions regarding Ms. O'Neil. We respectfully suggest that any further correspondence related to the MZM PAC be addressed to Mr. Wade's counsel's attention.

Sincerely,



Matthew J. Herrington

cc: Lynn Y. Tran, Esq.
Ronald C. Machen, Esq.

20092614468

WILMERHALE

Ronald C. Machen

+1 202 663 6881 (t)

+1 202 663 6363 (f)

ronald.machen@wilmerhale.com

May 15, 2007

Office of Administrative Review
Federal Election Commission
999 E Street, NW
Washington DC 20463

RE: AF# 1673

Dear Sir or Madam:

I am writing on behalf of my client, Mitchell Wade, to support and provide factual background in connection with Ms. Jeanne O'Neil's challenge to the FEC's April 12, 2007 finding that there is reason to believe ("RTB") that MZM Inc. PAC and Ms. O'Neil, as treasurer, violated 2 U.S.C. 434(a) by failing to file timely a 30 Day Post-General Report of Receipts and Disbursements.

On March 9, 2007, I submitted a response to the FEC's February 6, 2007 RTB finding that MZM Inc. PAC and Ms. O'Neil, as treasurer, violated the same statutory provision by failing to file timely an October Quarterly Report of Receipts and Disbursements. Because the same factual predicate applies to both RTB letters, I request consolidation of AF# 1563 and AF# 1673.

As background, Mr. Wade was the founder, President, CEO, and majority shareholder of MZM Inc., the company through which MZM Inc. PAC operated. On September 30, 2005, MZM Inc. was sold to Veritas Capital. (See press release at Exhibit A) In turn, Veritas Capital moved the operations of MZM Inc. into a newly created subsidiary, Athena Innovative Solutions Inc. At the time of the sale, Ms. O'Neil became an employee of Athena Innovative Solutions, Inc. and ceased serving as the treasurer of MZM Inc. PAC. From that time forward, no treasurer was available to act on behalf of MZM Inc. PAC. Furthermore, Ms. O'Neil left Athena Innovative Solutions, Inc. on October 20, 2006.

As you may know, Mr. Wade, through counsel, has been consulting with FEC attorneys Lynn Tran and Mark Shonkwiler on FEC MUR 5666, which involves MZM Inc. PAC. On November 2, 2006, I sent Ms. Tran a letter addressing PAC filing notices that the FEC had sent to Ms. O'Neil. (See Exhibit B) As that letter explains, MZM Inc. PAC was effectively dissolved on February 13, 2006, after ceasing political fundraising and disbursement activity and donating all its remaining funds to the Intrepid Fallen Heroes Fund. (See donation form, MZM

Wilmer Cutler Pickering Hale and Dorr LLP, 1875 Pennsylvania Avenue NW, Washington, DC 20006

Baltimore Beijing Berlin Boston Brussels London Munich New York Northern Virginia Oxford Palo Alto Waltham Washington

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Adm.

WILMERHALE

FEC Office of Administrative Review
May 15, 2007
Page 2

Inc. check no. 1057, and MZM Inc. PAC account statement at Exhibit C) At the time of the charitable donation, MZM Inc. PAC had no outstanding debts or obligations, and its sponsoring corporation had disposed of all its assets and dissolved the prior year. Accordingly, on February 13, 2006, MZM Inc. PAC made a good faith attempt to follow FEC procedures and filed a termination notice pursuant to the Federal Election Campaign Act (2 U.S.C. 433(d)(1)) and the associated regulation (11 C.F.R. § 102.3). (See Exhibit D)

On February 22, 2006, the FEC formally denied the termination request due to the pending MUR. A denial of a termination request due to a pending MUR appears to be contemplated by informal FEC guidance (FEC, Campaign Guide for Corporations and Labor Organizations at 58 (June 2001)). However, we are unaware of any express provision in the Federal Election Campaign Act or any other FEC regulations, which allows for the denial of a termination request upon these grounds, particularly where termination does not frustrate the progress of an ongoing inquiry.

As outlined above, it should be apparent that MZM Inc. PAC could not file a 30 Day Post-General Report of Receipts and Disbursements due to the existence of extraordinary circumstances—MZM Inc. PAC did not exist at the time the filing was due, and MZM Inc. PAC had no treasurer. Under such circumstances, filing a report was not realistic, efficient, or necessary.

In addition, on February 13, 2006, the FEC was notified that the actual level of MZM Inc. PAC activity was zero—not the amount listed in the RTB letter. (See Exhibit D) Exhibit C further demonstrates this zero balance. The RTB letter is thus technically deficient and does not describe an accurate factual predicate upon which relief could be sought. For all of the foregoing substantive and technical reasons, and those articulated in summary fashion in Ms. O'Neil's letter, the FEC's April 12, 2007 RTB finding should be reversed, and a determination should be made that no penalty is owed to the FEC.

Sincerely yours,



Ronald C. Machen

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TAB A

28092614471

NEWS

Veritas Capital Completes Acquisition of Selected MZM, Inc. Assets

NEW YORK (Sept. 30, 2005) -- Veritas Capital, a leading private equity firm focused on the defense and federal sectors, announced today it has completed the previously announced agreement to purchase selected assets of MZM, Inc., a provider of services to the national security community. Financial terms of the acquisition have not been disclosed.

The transaction included, but was not limited to, all of the existing contracts, relationships and employees, and included the assumption of only specific liabilities associated with the ongoing operations of those assets, which were acquired through a newly created subsidiary, Athena Innovative Solutions, Inc.

Under the leadership and control of Veritas, Athena will continue to provide a broad array of services to the national security community. Veritas and Athena will retain MZM Inc.'s employees, underscoring their commitment to the high level of service its clients have come to expect. James C. King will serve as the President and Chief Executive Officer for Athena.

About Athena Innovative Solutions, Inc.

Athena is a trusted and respected leader in the national security community providing policy, operational, and technical expertise and solutions to government and industry clients in the fields of intelligence, counterintelligence, counterterrorism, security, and homeland defense.

About Veritas Capital

Veritas Capital is a private equity investment firm headquartered in New York. Founded in 1992 by Robert B. McKeon, Veritas invests primarily in defense and aerospace related companies. Veritas' portfolio of companies include, or have included, DynCorp International, Integrated Defense Technologies, Vertex Aerospace, McNeil Technologies, The Wornick Company, and TRAK Communications, among others. Veritas is dedicated to providing the highest level of critical services and equipment to the defense and federal sectors around the world. For more information, please visit www.veritascapital.com.

[back to news](#)

28092614472

TAB B

2092614473

WILMERHALE

Ronald C. Machen

+1 202 663 6881 (H)

+1 202 663 6363 (H)

ronald.machen@wilmerhale.com

November 2, 2006

Lynn Tran
Federal Election Commission
999 E Street, NW
Washington DC 20463

Dear Ms. Tran:

On October 16, 2006, Ms. Jeannie O'Neil received what appear to be two form notices from the FEC regarding PAC filing procedures. The first was an electronic late filing notification, stating that an October quarterly filing was due the previous day. The second was a General Election Report Notice identifying an October 26, 2006 filing date for the reporting period of October 1, 2006 to October 18, 2006.

I am writing on behalf of my client, Mitchell Wade, to address several points regarding these notices. First, it is our understanding that MZM Inc. PAC was effectively dissolved on February 13, 2006, after ceasing political fundraising and disbursement activity and donating all its remaining funds to the Intrepid Fallen Heroes Fund. At the time of the charitable donation, MZM Inc. PAC had no outstanding debts or obligations, and its sponsoring corporation had disposed of all its assets and dissolved the prior year. Accordingly, on February 13, 2006, MZM Inc. PAC made a good faith attempt to follow FEC procedures and filed a termination notice pursuant to the Federal Election Campaign Act (2 U.S.C. 433(d)(1)) and the associated regulation (11 C.F.R. § 102.3).

I understand that, on February 22, 2006, the FEC formally denied the termination request due to a pending MUR, which appears to have triggered the subsequent filing notices. A denial of a termination request due to a pending MUR appears to be contemplated by informal FEC guidance (FEC, Campaign Guide for Corporations and Labor Organizations at 58 (June 2001)). However, we are unaware of any provision in the Federal Election Campaign Act or any other FEC regulations, which allows for the denial of a termination request upon these grounds, particularly where termination does not frustrate the progress of an ongoing inquiry and settlement discussions. Moreover, we believe that requiring ministerial reports relating to MZM Inc. PAC at this time -- given that MZM Inc. PAC is no longer active and MZM is no longer in existence -- is inefficient and unnecessary. Further, we understand that Ms. O'Neil, who became an employee of Athena Innovative Solutions, Inc. in 2005, left that company on October 20, 2006.

Wilmer Cutler Pickering Hale and Dorr LLP, 1875 Pennsylvania Avenue NW, Washington, DC 20006
Baltimore Beijing Berlin Boston Brussels London Munich New York Northern Virginia Oxford Palo Alto Waltham Washington

28092614474

WILMERHALE

Lynn Tran
November 2, 2006
Page 2

I sincerely hope that we can agree that filing any PAC forms at this time is unnecessary and look forward to discussing this matter with you at your earliest convenience.

Sincerely yours,

Ronald C. Machen *RS*

Ronald C. Machen

cc: Matt Herrington, Esq.

20092614475

TAB C

20092614476



INTREPID FALLEN HEROES FUND

DONATION FORM

Please fill out this form and mail it to the below address:

Name: MJ Wade

Title: _____

Company: True North Inc

Address: PO Box 787

City, State, Zip: Great Falls, VA 22060

E-mail address (optional): _____

Amount of contribution: 70892¹¹

The Intrepid Fallen Heroes Fund lists all contributions above \$1,000 on our website, www.fallenheroesfund.org.

If you are donating \$1,000 or more but DO NOT want your name listed on the website, please check here: _____

Please mail this form and your contribution to:

Intrepid Fallen Heroes Fund
Attn: Contributions
One Intrepid Square
West 46th Street and 12th Avenue
New York, New York 10036

The Intrepid Fallen Heroes Fund will provide a written acknowledgement for your contribution by mail.

The Intrepid Fallen Heroes Fund is a 501(c)(3) not-for-profit organization.

Contributions are tax deductible under applicable laws.

The Intrepid Fallen Heroes Fund's tax identification number is 20-0366717.

28092614477

MZM, INC., PAC	1057
[REDACTED]	05-770/550
[REDACTED]	DATE 04/13/06
PAY TO THE ORDER OF Intrepid Fallen Heroes Fund	\$ 70892 ¹¹
Seventy Thousand Eight Hundred Ninety Two ¹¹ & 10/100	
SUNTRUST SunTrust Bank	
FOR Donation	
[REDACTED]	

TAB D

28092614478

DISCLOSE -- FEC Financial Disclosure Filing Acknowledgement

This is to acknowledge the receipt and acceptance of your electronic filing via the DISCLOSE protocol.

Your filing was received and accepted by our system at 02/14/2006 - 09:20:42, and was assigned the Filing ID of: FEC-202051

Please make a note of this, as it will be necessary to refer to this information in the future.

Thank you for using DISCLOSE.

Do not reply to this notice. It is sent from an unattended account that cannot receive email.

For your reference, the output of the validation check was as follows:

FEC File Validator Version 5.3.1.0

Developed for the Federal Election Commission
by NIC Technologies, Inc. 1996-2006

=== Identification Section ===

Committee ID: C00369884
Committee Name: MZM INC. PAC
Filing Type: F3XT
From/Through: 20060101 - 20060213

Software/Ver#: FECfile / Ver# 5.3.1.0(f16)

=== Results Section ===

>>>----> FEC data file PASSED validation! <----<<<

=== Summary Page Totals Section ===

Cover/Summary Page Totals for Form: F3X

Line No.	Column A	Column B
6A 2006		70,892.71
6B	70,892.71	
6C	0.00	0.00
6D	70,892.71	70,892.71
7	70,892.71	70,892.71
8	0.00	0.00

26092614479

9	0.00	
10	0.00	
11A1	0.00	0.00
11A2	0.00	0.00
11A3	0.00	0.00
11B	0.00	0.00
11C	0.00	0.00
11D	0.00	0.00
12	0.00	0.00
13	0.00	0.00
14	0.00	0.00
15	0.00	0.00
16	0.00	0.00
17	0.00	0.00
18A	0.00	0.00
19	0.00	0.00
20	0.00	0.00
21A1	0.00	0.00
21A2	0.00	0.00
21B	0.00	0.00
21C	0.00	0.00
22	0.00	0.00
23	0.00	0.00
24	0.00	0.00
25	0.00	0.00
26	0.00	0.00
27	0.00	0.00
28A	0.00	0.00
28B	0.00	0.00
28C	0.00	0.00
28D	0.00	0.00
29	70,892.71	70,892.71
31	70,892.71	70,892.71
32	70,892.71	70,892.71
33	0.00	0.00
34	0.00	0.00
35	0.00	0.00
36	0.00	0.00
37	0.00	0.00
38	0.00	0.00
18B	0.00	0.00
18C	0.00	0.00
30A1	0.00	0.00
30A2	0.00	0.00
30B	0.00	0.00
30C	0.00	0.00

MD5 checksum:

621d37a7c62b72e32d4bd850c1db3b80

28092614480

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

MZM INC. PAC

ADDRESS (number and street) 1523 New Hampshire Avenue, NW

Washington DC 20036

Check if different than previously reported. (ACC)

2. FEC IDENTIFICATION NUMBER **C00369884**

3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report(Q1)
- July 15 Quarterly Report(Q2)
- October 15 Quarterly Report(Q3)
- January 31 Quarterly Report(YE)
- July 31 Mid-Year Report(Non-election Year Only) (MY)
- Termination Report (TER)

(b) Monthly Report Due On:

- Feb 20 (M2)
- Mar 20 (M3)
- Apr 20 (M4)
- May 20 (M5)
- Jun 20 (M6)
- Jul 20 (M7)
- Aug 20 (M8)
- Sep 20 (M9)
- Oct 20 (M10)
- Nov 20 (M11) (Non-Election Year Only)
- Dec 20 (M12) (Non-Election Year Only)
- Jan 31 (YE)

(c) 12-Day PRE-Election Report for the:

- Primary (12P)
- General (12G)
- Runoff (12R)
- Convention (12C)
- Special (12G)

Election on _____ in the State of _____

(d) 30-Day Post -Election Report for the:

- General (30G)
- Runoff (30R)
- Special (30S)

Election on _____ in the State of _____

5. Covering Period 01 01 2006 through 02 13 2006

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 Ms. Jeanne M. O'Neil

Signature of Treasurer Electronically Filed by Ms. Jeanne M. O'Neil Date 02 13 2006

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

28092614481

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name
MZM INC. PAC

Report Covering the Period: From:

M	M
0	1

D	D
0	1

Y	Y	W	Y
2	0	0	6

 To:

M	M
0	2

D	D
1	3

Y	Y	W	Y
2	0	0	6

	COLUMN A This Period	COLUMN B Calendar Year-to-Date								
6. (a) Cash on Hand January 1 <table border="1" style="display: inline-table; border-collapse: collapse;"><tr><td>Y</td><td>Y</td><td>Y</td><td>Y</td></tr><tr><td>2</td><td>0</td><td>0</td><td>6</td></tr></table>	Y	Y	Y	Y	2	0	0	6		70892.71
Y	Y	Y	Y							
2	0	0	6							
(b) Cash on Hand at Beginning of Reporting Period	70892.71									
(c) Total Receipts (from Line 19)	0.00	0.00								
(d) Subtotal (add lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	70892.71	70892.71								
7. Total Disbursements (from Line 31)	70892.71	70892.71								
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	0.00	0.00								
9. Debts and Obligations owed TO the committee (Itemize all on Schedule C and/or Schedule D)	0.00									
10. Debts and Obligations owed BY the committee (Itemize all on Schedule C and/or Schedule D)	0.00									

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

For further information contact:

Federal Election Commission
999 E street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

28092614482

**DETAILED SUMMARY PAGE
OF RECEIPTS**

FEC Form 3X (Rev. 02/2003)

Page 3

Write or Type Committee Name
MZM INC. PAC

Report Covering the Period: From:

MM	DD	YYYY
01	01	2006

 To:

MM	DD	YYYY
02	13	2006

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	0.00	0.00
(ii) Unitemized	0.00	0.00
(iii) TOTAL (add Lines 11(a)(i) and (ii))	0.00	0.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs)	0.00	0.00
(d) Total Contributions (add Lines 11(a)(iii), (b) and (c)) (Carry Totals to Line 33, page 5)	0.00	0.00
12. Transfers From Affiliated/Other Party Committees	0.00	0.00
13. All Loans Received	0.00	0.00
14. Loan Repayments Received	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5)	0.00	0.00
16. Refunds of Contributions Made to Federal candidates and Other Political Committees	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.)	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3)	0.00	0.00
(b) Levin Funds (from Schedule H5)	0.00	0.00
(c) Total Transfer (add 18(a) and 18(b))	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))	0.00	0.00
20. Total Federal Receipts (subtract Line 18(c) from Line 19)	0.00	0.00

2609261483

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

II. DISBURSEMENTS	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Shared Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share.....	0.00	0.00
(ii) Non-Federal Share.....	0.00	0.00
(b) Other Federal Operating Expenditures.....	0.00	0.00
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii) and (b)).....	0.00	0.00
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	0.00	0.00
24. Independent Expenditure (use Schedule E).....	0.00	0.00
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F).....	0.00	0.00
26. Loan Repayments Made.....	0.00	0.00
27. Loans Made.....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees.....	0.00	0.00
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)).....	0.00	0.00
29. Other Disbursements.....	70892.71	70892.71
30. Federal Election Activity (2 U.S.C 431(20))		
(a) Shared Federal Election Activity (from Schedule H6)		
(i) Federal Share.....	0.00	0.00
(ii) "Levin" Share.....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds.....	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))....	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))..	70892.71	70892.71
32. Total Federal Disbursements (subtract Line 21(a)(ii) from Line 30(a)(ii) from Line 31).....	70892.71	70892.71

28092614484

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

III. Net Contributions/Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) from Line 11(d), page 3)	0.00	0.00
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	0.00	0.00
36. Total Federal Operating Expenditures (add Line 21(a)(1) and Line 21(b)).....	0.00	0.00
37. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	0.00	0.00

28092614485

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

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

FOR LINE NUMBER:
(check only one)

PAGE 6 / 6

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input checked="" type="checkbox"/> 29	<input type="checkbox"/> 30b

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

NAME OF COMMITTEE (In Full)
MZM INC. PAC

Full Name (Last, First, Middle Initial) A. INTREPID FALLEN HEROES FUND		Transaction ID: SB29.4493
Mailing Address ONE INTREPID SQUARE W 46TH ST & 12TH AVE		Date of Disbursement MM / DD / YYYY 02 / 13 / 2006
City NEW YORK	State NY	Zip Code 10036
Purpose of Disbursement CONTRIBUTION/DONATION		Amount of Each Disbursement this Period 70892.71
Candidate Name		Category/ Type
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	
State: District:		

SUBTOTAL of Disbursements This Page (optional)	70892.71
TOTAL This Period (last page this line number only)	70892.71

26092614486

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

2007 AUG 10 P 4:42
Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

MZM INC. PAC

ADDRESS (number and street) C/O STEPTOE + JOHNSON LLP
1330 CONNECTICUT AVE NW
WASHINGTON DC 20016

Check if different than previously reported. (ACC)

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

C00369884

3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- ✓ October 15 Quarterly Report (Q3)
- January 31 Year-End Report (YE)
- July 31 Mid-Year Report (Non-election Year Only) (MY)
- Termination Report (TER)

(b) Monthly Report Due On:

- Feb 20 (M2)
- Mar 20 (M3)
- Apr 20 (M4)
- May 20 (M5)
- Jun 20 (M6)
- Jul 20 (M7)
- Aug 20 (M8)
- Sep 20 (M9)
- Oct 20 (M10)
- Nov 20 (M11) (Non-Election Year Only)
- Dec 20 (M12) (Non-Election Year Only)
- Jan 31 (YE)

(c) 12-Day PRE-Election Report for the:

- Primary (12P)
- Convention (12C)
- General (12G)
- Special (12S)
- Runoff (12R)

Election on _____ in the State of _____

(d) 30-Day POST-Election Report for the:

- General (30G)
- Runoff (30R)
- Special (30S)

Election on _____ in the State of _____

5. Covering Period 07 01 2006 through 09 30 2006

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 Jeanie M. O'Neill

Signature of Treasurer by her counsel, M. J. Steptoe Date 08 08 2007

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

28092614487

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

MZOR Inc PAC

Report Covering the Period:

From:

07 01 2000

To:

09 30 2000

26092614488

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, v v v y		70,892.70
(b) Cash on Hand at Beginning of Reporting Period.....	0	
(c) Total Receipts (from Line 19)	0	0
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	0	70,892.70
7. Total Disbursements (from Line 31)	0	70,892.70
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	0	0
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	0	

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

For further information contact:

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

• Toll Free 800-424-9530
Local 202-694-1100

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

MZM Inc. PAC

Report Covering the Period: From: ^{M M D D Y Y Y Y} 10 01 2006 To: ^{M M D D Y Y Y Y} 11 27 2006

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, ^{Y Y Y Y} 2006		70,892.71
(b) Cash on Hand at Beginning of Reporting Period.....	0	
(c) Total Receipts (from Line 19).....	0	0
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	0	70,892.71
7. Total Disbursements (from Line 31).....	0	70,892.71
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	0	0
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D).....	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D).....	0	

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

For further information contact:

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

Toll Free 800-424-9530
Local 202-694-1100

29092614490

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type over the lines.

12FE4M5

MIZUM Inc. PAC

ADDRESS (number and street)

C/O STEPTOE + JOHNSON LLP
1330 CONNECTICUT AVE NW
WASHINGTON DC 20016

Check if different than previously reported. (ACC)

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C 00369884

3. IS THIS REPORT

NEW (N) OR

AMENDED (A)

4. TYPE OF REPORT (Choose One)

(b) Monthly Report Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

Nov 20 (M11) (Non-Election Year Only)

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

Dec 20 (M12) (Non-Election Year Only)

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

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

Termination Report (TER)

(c) 12-Day PRE-Election Report for the:

Primary (12P)

Convention (12C)

General (12G)

Special (12S)

Runoff (12R)

Election on

in the State of

(d) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the State of

5. Covering Period

11 28 2006

through

12 31 2006

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

Jeanine M. O'Neil

Signature of Treasurer

Jeanine M. O'Neil

Date

08 08 2007

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

Office Use Only									
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FEC FORM 3X
Rev. 12/2004

26092614491

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

MZM Inc PAC

Report Covering the Period: From: ^M11 ^D28 ^Y2006 To: ^M12 ^D31 ^Y2006

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, ^Y 2006		70,892.71
(b) Cash on Hand at Beginning of Reporting Period.....	0	
(c) Total Receipts (from Line 19)	0	0
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	0	70,892.71
7. Total Disbursements (from Line 31)	0	70,892.71
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	0	0
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	0	

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

For further information contact:

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

Toll Free 800-424-9530
Local 202-694-1100

26092614492

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type over the lines.

12FE4M5

Muzm Inc. PAC

ADDRESS (number and street)

c/o STEPTOE + JOHNSON LLP

1330 CONNECTICUT AVE NW

Check if different than previously reported. (ACC)

WASHINGTON

DC

20016

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C00369884

3. IS THIS REPORT

NEW (N) OR

AMENDED (A)

4. TYPE OF REPORT (Choose One)

(b) Monthly Report Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

Nov 20 (M11) (Non-Election Year Only)

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

Dec 20 (M12) (Non-Election Year Only)

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

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

Termination Report (TER)

(c) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

in the State of

(d) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the State of

5. Covering Period

01 01 2007

through

06 30 2007

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

James M. O'Neil

Signature of Treasurer

by his counsel, M. Heston

Date

08 08 2007

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

Office Use Only

FEC FORM 3X
Rev. 12/2004

28092614493

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

WZM Inc. PAC

Report Covering the Period:

From:

^M ^N ^D ^D ^Y ^Y ^Y
01 01 2007

To:

^M ^M ^D ^D ^Y ^Y ^Y
06 30 2007

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2007	,	,
(b) Cash on Hand at Beginning of Reporting Period.....	0	0
(c) Total Receipts (from Line 19).....	0	0
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	0	0
7. Total Disbursements (from Line 31).....	0	0
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	0	0
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D).....	0	0
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D).....	0	0

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

For further information contact:

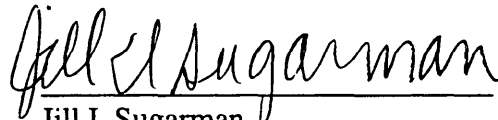
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

20092614494

DECLARATION OF JILL I. SUGARMAN

1. I am the Reviewing Analyst in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Analyst, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
2. The 2006 30 Day Post-General Report is due December 7, 2006. If electronically filed, it must be received and validated by the Commission at or before 11:59 p.m., Eastern Standard/Daylight Time on December 7 to be timely filed.
3. It is the practice of the Office of General Counsel to send a letter denying a request to terminate when committees and treasurers are involved in an ongoing enforcement matter and file a termination report. It is also the practice of this Office to tell committees and treasurers in this letter that they must continue to file reports until the matter is closed for them.
4. I hereby certify that I have searched the Commission's public records and that the documents identified herein are true and accurate copies of:
 - (a) Page 1 of the Summary Page of the Termination, April Quarterly, and July Quarterly Reports filed electronically by MZM Inc. PAC and Jeanne O'Neil, as Treasurer. According to Commission records, the reports were received on February 14, April 10 and July 5, 2006, respectively; and
 - (b) Pages 1 and 2 of the Summary Page and the Envelope Replacement Page for the paper copy of the report submitted via hand delivery for MZM Inc. PAC and Jeanne O'Neil, as Treasurer. According to Commission records, the paper copy covers the period from October 1 through November 27, 2006, and was received on August 10, 2007. The Signature of Treasurer line is signed "by her counsel." Lines 6(c) and 7 list \$0 in total receipts and \$0 in total disbursements, respectively, for this reporting period.
5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington on the 31st of August, 2007.



Jill I. Sugarman
Reviewing Analyst
Office of Administrative Review
Federal Election Commission

20092614495

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full)

USE FEC MAILING LABEL OR TYPE OR PRINT

Example: If typing, type over the lines

MZM INC. PAC

ADDRESS (number and street)

1523 New Hampshire Avenue, NW

Check if different than previously reported. (ACC)

Washington

DC

20036

2. FEC IDENTIFICATION NUMBER

CITY

STATE

ZIP CODE

C00369884

3. IS THIS REPORT

x

NEW (N) OR

AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Quarterly Report (YE)

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

x Termination Report (TER)

(b) Monthly Report Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

Nov 20 (M11) (Non-Election Year Only)

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

Dec 20 (M12) (Non-Election Year Only)

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(c) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

in the State of

(d) 30-Day Post-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the State of

5. Covering Period

01

01

2006

through

02

13

2006

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 Ms. Jeanne M. O'Neil

Signature of Treasurer Electronically Filed by Ms. Jeanne M. O'Neil

Date 02 13 2006

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

Office Use Only

FEC FORM 3X
(Rev. 02/2005)

20092614496

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

MZM INC. PAC

ADDRESS (number and street) 1523 New Hampshire Avenue, NW
 Check if different than previously reported. (ACC) Washington DC 20036

2. FEC IDENTIFICATION NUMBER C00369884
 CITY STATE ZIP CODE

3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)
 (a) Quarterly Reports:
 April 15 Quarterly Report (Q1)
 July 15 Quarterly Report (Q2)
 October 15 Quarterly Report (Q3)
 January 31 Quarterly Report (YE)
 July 31 Mid-Year Report (Non-election Year Only) (MY)
 Termination Report (TER)
 (b) Monthly Report Due On:
 Feb 20 (M2) May 20 (M5) Aug 20 (M8) Nov 20 (M11) (Non-Election Year Only)
 Mar 20 (M3) Jun 20 (M6) Sep 20 (M9) Dec 20 (M12) (Non-Election Year Only)
 Apr 20 (M4) Jul 20 (M7) Oct 20 (M10) Jan 31 (YE)
 (c) 12-Day PRE-Election Report for the: Primary (12P) General (12G) Runoff (12R)
 Convention (12C) Special (12S)
 Election on _____ in the State of _____
 (d) 30-Day Post-Election Report for the: General (30G) Runoff (30R) Special (30S)
 Election on _____ in the State of _____

5. Covering Period 02 14 2006 through 03 31 2006

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 Ms. Jeanne M. O'Neil

Signature of Treasurer Electronically Filed by Ms. Jeanne M. O'Neil Date 04 10 2006

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

Office Use Only

FEC FORM 3X
(Rev. 02/2005)

28092614497

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

MZM INC. PAC

ADDRESS (number and street) 1523 New Hampshire Avenue, NW
 Check if different than previously reported. (ACC) Washington DC 20036

2. FEC IDENTIFICATION NUMBER CITY STATE ZIP CODE

C00369884 3. IS THIS REPORT NEW OR AMENDED
 NEW (N) AMENDED (A)

4. TYPE OF REPORT (Choose One)	(b) Monthly Report Due On:	Feb 20 (M2)	May 20 (M5)	Aug 20 (M8)	Nov 20 (M11) (Non-Election Year Only)
	(e) Quarterly Reports:	Mar 20 (M3)	Jun 20 (M6)	Sep 20 (M9)	Dec 20 (M12) (Non-Election Year Only)
<input checked="" type="checkbox"/> April 15 Quarterly Report (Q1) <input type="checkbox"/> July 15 Quarterly Report (Q2) <input type="checkbox"/> October 15 Quarterly Report (Q3) <input type="checkbox"/> January 31 Quarterly Report (YE) <input type="checkbox"/> July 31 Mid-Year Report (Non-election Year Only) (MY) <input type="checkbox"/> Termination Report (TER)	(c) 12-Day PRE-Election Report for the:	Primary (12P)	General (12G)	Runoff (12R)	
	(d) 30-Day Post-Election Report for the:	Convention (12C)	Special (12G)		
	Election on				in the State of
	Election on	General (30G)	Runoff (30R)	Special (30S)	in the State of

5. Covering Period 04 01 2006 through 06 30 2006

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 Ms. Jeanne M. O'Neil

Signature of Treasurer Electronically Filed by Ms. Jeanne M. O'Neil Date 07 05 2006

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

2009261498

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

RECEIVED
FEC MAIL
OPERATIONS CENTER
2007 AUG 10 P 4:42
Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

M2M Inc. PAC

ADDRESS (number and street) C/O S. STEPTOE + JOHNSON LLP

Check if different than previously reported. (ACC) 11730 CONNECTICUT AVE NW
WASHINGTON DC 20016

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

C00369884

3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Year-End Report (YE)
- July 31 Mid-Year Report (Non-election Year Only) (MY)
- Termination Report (TER)

- (b) Monthly Report Due On:
- | | | | |
|--------------------------------------|--------------------------------------|---------------------------------------|--|
| <input type="checkbox"/> Feb 20 (M2) | <input type="checkbox"/> May 20 (M5) | <input type="checkbox"/> Aug 20 (M8) | <input type="checkbox"/> Nov 20 (M11) (Non-Election Year Only) |
| <input type="checkbox"/> Mar 20 (M3) | <input type="checkbox"/> Jun 20 (M6) | <input type="checkbox"/> Sep 20 (M9) | <input type="checkbox"/> Dec 20 (M12) (Non-Election Year Only) |
| <input type="checkbox"/> Apr 20 (M4) | <input type="checkbox"/> Jul 20 (M7) | <input type="checkbox"/> Oct 20 (M10) | <input type="checkbox"/> Jan 31 (YE) |

- (c) 12-Day PRE-Election Report for the:
- | | | |
|---|--|---------------------------------------|
| <input type="checkbox"/> Primary (12P) | <input type="checkbox"/> General (12G) | <input type="checkbox"/> Runoff (12R) |
| <input type="checkbox"/> Convention (12C) | <input type="checkbox"/> Special (12S) | |

Election on / / in the State of

- (d) 30-Day POST-Election Report for the:
- | | | |
|--|---------------------------------------|--|
| <input type="checkbox"/> General (30G) | <input type="checkbox"/> Runoff (30R) | <input type="checkbox"/> Special (30S) |
|--|---------------------------------------|--|

Election on / / in the State of

5. Covering Period 10 / 01 / 2006 through 11 / 27 / 2006

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 Jessie M. O'Neil

Signature of Treasurer by her counsel, W. H. Heston Date 08 / 09 / 2007

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

Office Use Only							
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FEC FORM 3X
Rev. 12/2004

2703951020092614499

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

MZM Inc. PAC

Report Covering the Period:

From:

10 01 2006

To:

11 27 2006

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2006		7089271
(b) Cash on Hand at Beginning of Reporting Period.....	0	
(c) Total Receipts (from Line 19).....	0	0
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	0	7089271
7. Total Disbursements (from Line 31).....	0	7089271
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	0	0
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D).....	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D).....	0	



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

For further information contact:

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

Toll Free 800-424-9530
Local 202-694-1100

2703951010592614500

Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

Hand Delivered Date of Receipt
8/10/07

USPS First Class Mail Postmarked

USPS Registered/Certified Postmarked (R/C)

USPS Priority Mail Postmarked
 Delivery Confirmation™ or Signature Confirmation™ Label

USPS Express Mail Postmarked

Postmark Illegible

No Postmark

Overnight Delivery Service (Specify): Shipping Date
 Next Business Day Delivery

Received from House Records & Registration Office Date of Receipt

Received from Senate Public Records Office Date of Receipt

Received from Electronic Filing Office Date of Receipt

Other (Specify): Date of Receipt or Postmarked

 8/14/07
PREPARER **DATE PREPARED**

2703951010092614501



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

VIA OVERNIGHT DELIVERY

September 6, 2007

Matthew J. Herrington, Esq.
Steptoe & Johnson LLP
1330 Connecticut Avenue, NW
Washington, DC 20036

C00369884
AF# 1563, AF# 1673 and AF# 1721

Dear Mr. Herrington:

On February 6, April 10 and May 15, 2007, the Federal Election Commission ("Commission") found reason to believe ("RTB") that MZM Inc. PAC and Jeanne O'Neil, as Treasurer ("respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2006 October Quarterly Report, 2006 30 Day Post-General Report and 2006 Year-End Report. The Commission also made a preliminary determination that the civil money penalties, based on the schedule of penalties at 11 C.F.R. § 111.43, were \$1,400 for the October Quarterly Report, \$900 for the 30 Day Post-General Report, and \$900 for the Year-End Report.

After reviewing the written responses submitted by you, and any supplemental information submitted by Commission staff, the Reviewing Officer has recommended that the Commission make final determinations in these matters. Copies of the Reviewing Officer's recommendations are attached.

You may file with the Commission Secretary a written response to the recommendations within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463. As a result of the anthrax threat in the Washington, DC area, US Postal Service mail delivery to federal agencies, including the Commission, has been interrupted. Until regular mail delivery resumes, you may also file your written response with the Commission Secretary via facsimile (202-208-3333) or by courier at the same address (if you use an overnight delivery service, please use zip code 20004 instead of zip code 20463). Please include the AF numbers in your response. Your response may not raise any arguments not raised in the original written responses or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make final determinations in these matters.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1660 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Jill I. Sugarman".

Jill I. Sugarman
Reviewing Analyst
Office of Administrative Review

Attachment

26092614502



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2007 SEP 18 A 9:08
September 17, 2007

MEMORANDUM

SENSITIVE

To: The Commission

Through: Patrina M. Clark *PK*
Staff Director

From: John D. Gibson *JG*
Chief Compliance Officer

Shawn Woodhead *SW*
Reviewing Officer
Office of Administrative Review

By: Jill I. Sugarman *JIS*
Reviewing Analyst

Subject: Final Determination Recommendation in AF# 1673 – MZM Inc. PAC and
Jeanne O'Neil, as Treasurer (C00369884)

On April 10, 2007, the Commission found reason to believe that the respondents violated 2 U.S.C. § 434(a) for failing to file the 2006 30 Day Post-General Report, a non-election sensitive report. Because they had not filed the report, the Commission made a preliminary determination, using the estimated level of activity, that the civil money penalty was \$900 based on the schedule of penalties at 11 C.F.R. § 111.43.

On May 17, 2007, the Commission received the respondents' written response ("challenge"). On August 10, 2007, the respondents submitted a paper copy of the report covering the 30 Day Post-General reporting period which discloses \$0 in total receipts and \$0 in total disbursements. As of this date, the report has not been filed electronically.

Since the paper copy indicates that the Committee had no activity during the 2006 30 Day Post-General reporting period and the schedule of penalties at 11 C.F.R. § 111.43(a)(2) only provides for civil money penalties if the level of activity is \$1.00 or more, no civil money penalty should be assessed.

After reviewing the challenge, the Reviewing Officer's recommendation dated August 31, 2007 was forwarded to the Commission. A copy was simultaneously forwarded to the respondents and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination that they violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$0 because they submitted no evidence that the RTB finding was based on factual errors, that the civil money penalty was improperly calculated at RTB, or that they used best efforts to file on time but were prevented from doing so by reasonably unforeseen

28092614503

circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances.

Within 10 days of transmittal of the recommendation, the respondents may file a written response with the Commission Secretary which may not raise any arguments not raised in the respondents' challenge or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). As of this date, a written response has not been received.

OAR Recommendations

- (1) Adopt the Reviewing Officer recommendation for AF# 1673 involving MZM Inc. PAC and Jeanne O'Neil, as Treasurer, in making a final determination;
- (2) Make a final determination in AF# 1673 that MZM Inc. PAC and Jeanne O'Neil, as Treasurer, violated 2 U.S.C. § 434(a) and based on the actual level of activity disclosed on the paper copy of the report covering the 30 Day Post-General reporting period (\$0), assess a civil money penalty of \$0 (reduced from the RTB civil money penalty of \$900); and
- (3) Send the appropriate letter.

28092614504



FEDERAL ELECTION COMMISSION

Washington, DC 20463

SENSITIVE

DATE & TIME OF TRANSMITTAL: Tuesday, September 18, 2007 11:00

BALLOT DEADLINE: Friday, September 21, 2007 4:00

COMMISSIONER: LENHARD, MASON, von SPAKOVSKY, WALTHER, WEINTRAUB

SUBJECT: **Final Determination Recommendation in
AF 1673 – MZM Inc. PAC and Jeanne O’Neil,
as Treasurer (C00369884) Memorandum from the
Chief Compliance Officer and the Reviewing Officer
dated September 17, 2007**

- I approve the recommendation(s)
- I object to the recommendation(s)
- I am recused from voting
- No vote by ballot

COMMENTS: _____

DATE: _____

SIGNATURE: _____

A definite vote is required. All ballots must be signed and dated. Please return ONLY THE BALLOT to the Commission Secretary. Please return ballot no later than date and time shown above.

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION

28092614505

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Final Determination Recommendation:) AF 1673
MZM Inc. PAC and Jeanne O'Neil, as)
Treasurer (C00369884))

CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby certify that on September 21, 2007, the Commission decided by a vote of 5-0 to take the following actions in AF 1673:

1. Adopt the Reviewing Officer recommendation for AF 1673 involving MZM Inc. PAC and Jeanne O'Neil, as Treasurer, in making a final determination.
2. Make a final determination in AF 1673 that MZM Inc. PAC and Jeanne O'Neil, as Treasurer, violated 2 U.S.C. § 434(a) and based on the actual level of activity disclosed on the paper copy of the report covering the 30 Day Post-General reporting period (\$0), assess a civil money penalty of \$0 (reduced from the RTB civil money penalty of \$900).
3. Send the appropriate letter.

Commissioners Lenhard, Mason, von Spakovsky, Walther and Weintraub voted affirmatively for the decision.

Attest:

September 21, 2007
Date

Mary W. Dove
Mary W. Dove
Secretary of the Commission

28092614506



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 25, 2007

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Matthew J. Herrington, Esq.
Steptoe & Johnson LLP
1330 Connecticut Avenue, NW
Washington, DC 20036

ID# C00369884
AF# 1673

Dear Mr. Herrington:

On April 10, 2007, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that MZM Inc. PAC and Jeanne O'Neil, as Treasurer, violated 2 U.S.C. § 434(a) for failing to file the 2006 30 Day Post-General Report. By letter dated April 12, 2007, the Commission sent you notification of the RTB finding that included a civil money penalty calculated at RTB of \$900 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On May 17, 2007, the Office of Administrative Review received the written response from you challenging the RTB civil money penalty.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that MZM Inc. PAC and Jeanne O'Neil, as Treasurer, violated 2 U.S.C. § 434(a) and, based on the actual level of activity disclosed on the paper copy of the report submitted August 10, 2007 (\$0), assess a civil money penalty of \$0 in accordance with 11 C.F.R. § 111.43. The basis for the Reviewing Officer's recommendation was included in the Final Determination Report, a copy of which was sent to you on September 6, 2007.

On September 21, 2007, the Commission adopted the Reviewing Officer's recommendation, made a final determination that MZM Inc. PAC and Jeanne O'Neil, as Treasurer, violated 2 U.S.C. § 434(a), and assessed a civil money penalty of \$0 (reduced from the RTB civil money penalty of \$900). A copy of the final determination memorandum is attached.

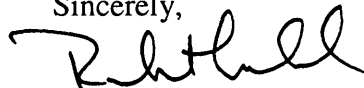
The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 C.F.R. § 111.42(b). Although the file must be placed on the public record within 30

20092614507

days from the date of the Commission's notification, this could occur at any time following certification of the Commission's vote.

If you have any questions regarding this matter, please contact Jill Sugarman on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,



Robert D. Lenhard
Chairman

Attachment

28092614508



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 1673

DATE SCANNED 1/14/08

SCANNER NO. 2

SCAN OPERATOR EEJ

28092614509