



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 1721

DATE SCANNED 11-29-07

SCANNER NO. 2

SCAN OPERATOR JnA

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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FEDERAL ELECTION
COMMISSION
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2007 MAY -9 P 4:52

May 9, 2007

MEMORANDUM

SENSITIVE

TO: THE COMMISSION *JMG*

THROUGH: PATRINA M. CLARK *P.M.C.*
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 YEAR
END REPORT FOR THE ADMINISTRATIVE FINE PROGRAM

Attached is a list of political committees and their treasurers who failed to file or failed to timely file the 2006 Year End Report in accordance with 2 U.S.C. 434(a). The Year End Report was due on January 31, 2007.

The committees listed in the attached RTB Circulation Report either failed to file the report, filed the report more than five (5) days after the due date, or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 C.F.R. 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

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Recommendation

- 1.
2. Find reason to believe that all other political committees and their treasurers listed on the RTB Circulation Report 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 Report.
3. Send the appropriate letters.

Federal Election Commission
Reason to Believe Circulation Report
2006 YEAR-END Not Election Sensitive 01/31/2007 H_S_P_UNAOUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1697	C00038604	AMERICAN FINANCIAL SERVICES ASSOCIATION PAC		MR. BILL HIMPLER	\$626,701	0	2/14/2007	14	\$11,400	\$170
1698	C00413534	ANDY MICHAUD FOR CONGRESS	MICHAUD, ANDY	ANDY MICHAUD	\$349,922	0		Not Filed	\$49,989 (est)	\$900
1699	C00416404	ARCH LEADERSHIP PAC		JOHN ROSS TRUMAN	\$133,843	0		Not Filed	\$44,614 (est)	\$900
1701	C00423608	BEATTY FOR CONGRESS COMMITTEE	BEATTY, JEFFREY K	JUDITH GRANDINETTI	\$181,670	0	4/27/2007	Not Filed	\$1,387	\$250
1702	C00423335	BYRNE FOR CONGRESS COMMITTEE, THE	BYRNE, MARK	JILL K. HUEY	\$148,107	0	4/6/2007	Not Filed	\$4,694	\$250
1704	C00416321	COMMITTEE TO ELECT BRAD BLANTON	BLANTON, BRAD	JUSTIN BURCHARD	\$112,352	0		Not Filed	\$22,470 (est)	\$500
1705	C00420505	COMMITTEE TO ELECT MARVELL MITCHELL FOR CONGRESS	MITCHELL, MARVELL R	RICHARD B. CAMPBELL	\$257,039	1	3/12/2007	Not Filed	\$1,751	\$312
1706	C00427229	COMMITTEE TO ELECT SEKHON FOR CONGRESS	SEKHON, ARJINDERPAL SINGH	DALJIT KAUR SEKHON	\$356,831	0	3/12/2007	Not Filed	\$7,498	\$800
1707	C00111237	COMPRESSED AIR FREE AIR FOUNDATION TUNNEL CAISSON SUBWAY WORKERS POLITICAL ACTION FUND		RICHARD E. FITZSIMMONS	\$141,104	0	2/15/2007	15	\$7,954	\$125
1708	C00218172	CONSERVATIVE VICTORY COMMITTEE		LEIF E. NOREN	\$180,252	0		Not Filed	\$16,709 (est)	\$500
1709	C00379834	CONTRA COSTA UNITED DEMOCRATIC CAMPAIGN AKA CCUDC		GREGORY E. SANBORN	\$145,026	1	2/28/2007	28	\$5,647	\$237
1710	C00424978	DONZELLA JAMES FOR US CONGRESS CAMPAIGN 2006	JAMES DONZELLA	ELMO JAMES	\$117,025	1		Not Filed	\$1,475 (est)	\$312
1711	C00424051	GREEN FOR CHANGE	GREEN, ROGER LEON	CORAMINITA MAHR	\$122,014	1	3/7/2007	Not Filed	\$4,200	\$312
1712	C00414177	HOMERHARTAGE	HARTAGE, HOMER	BLAUG, ERICA	\$353,490	0	4/14/2007	Not Filed	\$9,254	\$300

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1713	C00201491	INTERGRAPH CORPORATION POLITICAL ACTION COMMITTEE		KERRY M. FEHRENBACH	\$163,850	1	2/14/2007	14	\$4,939	\$118
1714	C00418152	JACOBS FOR CONGRESS	JACOBS, THOR MICHAEL	WILLARD STEPHEN HAYNES	\$121,238	0		Not Filed	\$40,413 (est)	\$900
1716	C00411512	KANNO FOR CONGRESS	KANNO, JOHN	LEE NEVES	\$294,209	0		Not Filed	\$36,776 (est)	\$900
1717	C00393702	KING FOR CONGRESS	KING, GARY KENNETH	BRUCE MALOTT	\$118,789	0	2/7/2007	7	\$14,561	\$135
1720	C00424077	MIKE MCGRAW FOR CONGRESS	MCGRAW, MICHAEL EDWARD	A. ROBERT MUZIO	\$131,898	0		Not Filed	\$32,975 (est)	\$900
1721	C00369884	MZM INC. PAC		JEANNE O'NEIL	\$178,705	0		Not Filed	\$35,741 (est)	\$900
1722	C00399287	NEXT POLITICAL ACTION COMMITTEE		PATRICK LINEHAN	\$103,302	0	3/2/2007	30	\$3,600	\$175
1724	C00300939	OHIO ASSOCIATION OF MORTGAGE BROKERS PAC (OAMB PAC)		JIM STEINBERG	\$115,420	1		Not Filed	\$16,489 (est)	\$625
1725	C00422329	OSTROW FOR CONGRESS	OSTROW, PAUL TIMOTHY	SUSAN H. HANNA	\$459,687	0	3/5/2007	Not Filed	\$38,560	\$900
1726	C00412742	PAUL R. NELSON FOR CONGRESS COMMITTEE	NELSON, PAUL R.	JEFF ANDERSON	\$492,369	0		Not Filed	\$61,545 (est)	\$2,700
1727	C00416511	PENNSYLVANIA PAC FOR PROGRESS		JONATHAN ROBERT KING	\$165,851	0	2/8/2007	8	\$15,130	\$140
1728	C00266536	PHILLIPS INTERNATIONAL INC POLITICAL ACTION COMMITTEE		WILLIAM ESTEY	\$231,502	0		Not Filed	\$46,300 (est)	\$900
1729	C00416503	RIGGER FOR CONGRESS	RIGGER, DARREN J	JENNIFER I. BUTLER	\$254,644	0		Not Filed	\$50,928 (est)	\$2,700
1730	C00409359	SAN MATEO COUNTY DEMOCRATIC CENTRAL COMMITTEE		JUDITH A. CHRISTENSEN	\$160,523	0		Not Filed	\$14,465 (est)	\$500
1731	C00395822	SCHWARZ FOR CONGRESS	SCHWARZ, JOHN	ROBERT HANS SCHULER	\$3,296,783	0		Not Filed	\$329,677 (est)	\$8,000
1732	C00393488	STOP HILARY PAC		JOHN LEBOUILLER	\$108,808	0		Not Filed	\$27,202 (est)	\$900

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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1733	C00278788	SUFF CO DETECTIVES ASSN INC POLITICAL ACTION COMMITTEE		RAYMOND L GRIFFIN, JR.	\$154,093	0	4/29/2007	Not Filed	\$4,057	\$250
1734	C00399113	TAN NGUYEN FOR CONGRESS	NGUYEN, TAN D	TAN NGUYEN	\$1,095,210	0		Not Filed	\$121,690 (est)	\$4,500
1735	C00415760	TERRY STULCE FOR CONGRESS	STULCE, TERRY F	BLAIR CANNON	\$116,369	0		Not Filed	\$23,274 (est)	\$500

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation - 2006)
Year End Report for the Administrative)
Fine Program:)
KING FOR CONGRESS, and BRUCE) AF# 1717
MALOTT as treasurer;)
COMMITTEE TO ELECT SEKHON FOR) AF# 1706
CONGRESS, and DALJIT KAUR)
SEKHON as treasurer;)
KANNO FOR CONGRESS, and Neves,) AF# 1716
Lee as treasurer;)
TAN NGUYEN FOR CONGRESS, and) AF# 1734
Tello, Emilee as treasurer;)
HOMER HARTAGE, and Black, Erica C.) AF# 1712
as treasurer;)
ANDY MICHAUD FOR CONGRESS, and) AF# 1698
ANDY MICHAUD as treasurer;)
MIKE MCGRAW FOR CONGRESS, and) AF# 1720
A ROBERT MUZIO as treasurer;)
DONZELLA JAMES FOR US) AF# 1710
CONGRESS CAMPAIGN 2006, and)
ELMO JAMES as treasurer;)

BEATTY FOR CONGRESS) AF# 1701
COMMITTEE, and JUDITH)
GRANDINETTI as treasurer;)

SCHWARZ FOR CONGRESS, and) AF# 1731
ROBERT HANS SCHULER as treasurer;)

OSTROW FOR CONGRESS, and SUSAN) AF# 1725
H HANNA as treasurer;)

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BYRNE FOR CONGRESS COMMITTEE;) AF# 1702
THE, and JILL K HUEY as treasurer;)
GREEN FOR CHANGE, and) AF# 1711
CORAMINITA MAHR as treasurer;)
RIGGER FOR CONGRESS, and) AF# 1729
JENNIFER I BUTLER as treasurer;)
JACOBS FOR CONGRESS, and) AF# 1714
WILLARD STEPHEN HAYNES as)
treasurer;)

TERRY STULCE FOR CONGRESS, and) AF# 1735
Cannon, Blair Ms as treasurer;)
COMMITTEE TO ELECT MARVELL) AF# 1705
MITCHELL FOR CONGRESS, and)
RICHARD B CAMPBELL as treasurer;)
COMMITTEE TO ELECT BRAD) AF# 1704
BLANTON, and Burchard, Justin as)
treasurer;)
PAUL R. NELSON FOR CONGRESS) AF# 1726
COMMITTEE, and Anderson, Jeff as)
treasurer;)
CONTRA COSTA UNITED) AF# 1709
DEMOCRATIC CAMPAIGN AKA)
CCUDC, and GREGORY E SANBORN as)
treasurer;)
NEXT POLITICAL ACTION) AF# 1722
COMMITTEE, and Linehan, Patrick as)
treasurer;)
PENNSYLVANIA PAC FOR PROGRESS,) AF# 1727
and JONATHAN ROBERT KING as)
treasurer;)
AMERICAN FINANCIAL SERVICES) AF# 1697
ASSOCIATION PAC, and Himpler, Bill)
Mr. as treasurer;)

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Federal Election Commission
Certification for Administrative Fines
May 15, 2007

COMPRESSED AIR FREE AIR) AF# 1707
FOUNDATION TUNNEL CAISSON)
SUBWAY WORKERS POLITICAL)
ACTION FUND, and RICHARD E)
FITZSIMMONS as treasurer;)
INTERGRAPH CORPORATION) AF# 1713
POLITICAL ACTION COMMITTEE, and)
KERRY M FEHRENBACH as treasurer;)
STOP HILARY PAC, and JOHN) AF# 1732
LEBOUTELLIER as treasurer;)
ARCH LEADERSHIP PAC, and JOHN) AF# 1699
ROSS TRUMAN as treasurer;)
SUFF CO DETECTIVES ASSN INC) AF# 1733
POLITICAL ACTION COMMITTEE, and)
RAYMOND L GRIFFIN JR as treasurer;)
CONSERVATIVE VICTORY) AF# 1708
COMMITTEE, and LEIF E NOREN as)
treasurer;)
MZM INC. PAC, and O'Neil, Jeanne Ms. as) AF# 1721
treasurer;)
OHIO ASSOCIATION OF MORTGAGE) AF# 1724
BROKERS PAC (OAMB PAC), and JIM)
STEINBERG as treasurer;)
PHILLIPS INTERNATIONAL INC) AF# 1728
POLITICAL ACTION COMMITTEE, and)
Estey, William Mr. as treasurer;)
SAN MATEO COUNTY DEMOCRATIC) AF# 1730
CENTRAL COMMITTEE, and JUDITH A)
CHRISTENSEN as treasurer;)

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CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby certify that on May 15, 2007 the Commission took the following actions on the Reason To Believe Recommendation - 2006 Year End Report for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated May 09, 2007, on the following committees:

AF#1717 Decided by a vote of 4-0 to: (1) find reason to believe that KING FOR CONGRESS, and BRUCE MALOTT 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#1706 Decided by a vote of 4-0 to: (1) find reason to believe that COMMITTEE TO ELECT SEKHON FOR CONGRESS, and DALJIT KAUR SEKHON 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#1716 Decided by a vote of 4-0 to: (1) find reason to believe that KANNO FOR CONGRESS, and Neves, Lee 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#1734 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#1712 Decided by a vote of 4-0 to: (1) find reason to believe that HOMER HARTAGE, and Black, Erica C. 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

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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#1698 Decided by a vote of 4-0 to: (1) find reason to believe that ANDY MICHAUD FOR CONGRESS, and ANDY MICHAUD 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#1720 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#1710 Decided by a vote of 4-0 to: (1) find reason to believe that DONZELLA JAMES FOR US CONGRESS CAMPAIGN 2006, and ELMO JAMES 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#1701 Decided by a vote of 4-0 to: (1) find reason to believe that BEATTY FOR CONGRESS COMMITTEE, and JUDITH GRANDINETTI 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#1731 Decided by a vote of 4-0 to: (1) find reason to believe that SCHWARZ FOR CONGRESS, and ROBERT HANS SCHULER 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#1725 Decided by a vote of 4-0 to: (1) find reason to believe that OSTROW FOR CONGRESS, and SUSAN H HANNA 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#1702 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#1711 Decided by a vote of 4-0 to: (1) find reason to believe that GREEN FOR CHANGE, and CORAMINITA MAHR 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#1729 Decided by a vote of 4-0 to: (1) find reason to believe that RIGGER FOR CONGRESS, and JENNIFER I BUTLER 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#1714 Decided by a vote of 4-0 to: (1) find reason to believe that JACOBS FOR CONGRESS, and WILLARD STEPHEN HAYNES 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#1735 Decided by a vote of 4-0 to: (1) find reason to believe that TERRY STULCE FOR CONGRESS, and Cannon, Blair 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#1705 Decided by a vote of 4-0 to: (1) find reason to believe that COMMITTEE TO ELECT MARVELL MITCHELL FOR CONGRESS, and RICHARD B CAMPBELL 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#1704 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,

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

AF#1726 Decided by a vote of 4-0 to: (1) find reason to believe that PAUL R. NELSON FOR CONGRESS COMMITTEE, and Anderson, Jeff 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#1709 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.

AF#1722 Decided by a vote of 4-0 to: (1) find reason to believe that NEXT POLITICAL ACTION COMMITTEE, and Linehan, Patrick 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#1727 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#1697 Decided by a vote of 4-0 to: (1) find reason to believe that AMERICAN FINANCIAL SERVICES ASSOCIATION PAC, and Himpler, Bill 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.

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AF#1707 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#1713 Decided by a vote of 4-0 to: (1) find reason to believe that INTERGRAPH CORPORATION POLITICAL ACTION COMMITTEE, and KERRY M FEHRENBACH 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#1732 Decided by a vote of 4-0 to: (1) find reason to believe that STOP HILARY PAC, and JOHN LEBOUTELLIER 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#1699 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#1733 Decided by a vote of 4-0 to: (1) find reason to believe that SUFF CO DETECTIVES ASSN INC POLITICAL ACTION COMMITTEE, and RAYMOND L GRIFFIN 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#1708 Decided by a vote of 4-0 to: (1) find reason to believe that CONSERVATIVE VICTORY COMMITTEE, and LEIF E NOREN 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#1721 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

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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#1724 Decided by a vote of 4-0 to: (1) find reason to believe that OHIO ASSOCIATION OF MORTGAGE BROKERS PAC (OAMB PAC), and JIM STEINBERG 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#1728 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#1730 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:

May 16 2007
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 17, 2007

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

C00369884
AF#: 1721

Dear Ms. Jeanne O'Neil:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a Year End Report of Receipts and Disbursements every calendar year. This report, covering the period through December 31st, shall be filed no later than January 31st. 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 this 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 5/15/2007, 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 January 31st. 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 6/24/2007 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 6/24/2007. 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

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your control and prevented you 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 Year-End 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 6/24/2007. 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#: 1721

PAYMENT DUE DATE: 6/24/2007

PAYMENT AMOUNT DUE: \$900

27092615859

MAR-20-2007 09:32

OAR

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: () _____

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RECEIVED
FEC MAIL CENTER

2007 JUN 25 AM 11:02

WILMERHALE

Ronald C. Machen

+1 202 663 6881 (t)

+1 202 663 6363 (f)

ronald.machen@wilmerhale.com

June 20, 2007

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

RE: AF# 1721

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 May 17, 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 Year End Report of Receipts and Disbursements.

On March 9, 2007, and May 15, 2007, I submitted responses to the FEC's prior findings that MZM Inc. PAC and Ms. O'Neil, as treasurer, violated the same statutory provisions by failing to file timely an October Quarterly Report of Receipts and Disbursements and a 30 Day Post-General Report of Receipts and Disbursements, respectively. Because the same factual predicate applies to all three RTB letters received to date, I request consolidation of AF# 1563, AF# 1673, and AF# 1721.

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

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

2007 JUN 25 P 2: 22

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ADMIN REVIEW

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FEC Office of Administrative Review
June 20, 2007
Page 2

donating all its remaining funds to the Intrepid Fallen Heroes Fund. (See donation form, MZM 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 Year End 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 May 17, 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
Rj

Ronald C. Machen

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A

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](#)

27092613865

B

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.

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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 *RF*

Ronald C. Machen

cc: Matt Herrington, Esq.

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C

INTREPID FALLEN HEROES FUND

DONATION FORM

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

Name: MJ WOOD
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.

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MZM, INC., PAC 1057
1523 NEW HAMPSHIRE AVE
WASHINGTON, DC 20036
DATE 7/16/06 65-070590

PAID BY Intrepid Fallen Heroes Fund \$ 70892.11
Seventy Thousand Eight Hundred Ninety Two and 11/100ths

SUNTRUST
SunTrust Bank

Donation

SUNTRUST BANK
 P O BOX 622227
 ORLANDO FL 32862-2227

Page 1 of 2
 66/E00/0175/0 /72

01/31/2006

Account
 Statement



HZM INC PAC
 PAC ACCOUNT
 1523 NEW HAMPSHIRE AVE NW
 WASHINGTON DC 20036-1203

Questions? Please call
 1-800-786-8787

THANK YOU FOR BANKING WITH SUNTRUST. TO LEARN MORE ABOUT HOW SUNTRUST CAN MEET YOUR FINANCIAL SERVICES NEEDS, PLEASE VISIT OUR WEB SITE AT WWW.SUNTRUST.COM

Account Summary	Account Type	Account Number	Statement Period	Taxpayer ID
	BUSINESS CHECKING	[REDACTED]	01/01/2006 - 01/31/2006	[REDACTED]

Description	Amount	Description	Amount
Beginning Balance	\$70,892.71	Average Balance	\$70,892.71
Deposits/Credits	\$.00	Average Collected Balance	\$70,892.71
Checks	\$.00	Number of Days in Statement Period	31
Withdrawals/Debits	\$.00		
Ending Balance	\$70,892.71		

Balance Activity History	Date	Balance	Collected Balance	Date	Balance	Collected Balance
	01/31	70,892.71	70,892.71			

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D

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/Var#: FECfile / Var# 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

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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:

621d37a7c62b72e32d4bd850c1db3b20

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**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. 02/2013)

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**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	Y	Y
2	0	0	6

 To:

M	M
0	2

D	D
1	3

Y	Y	Y	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></tr><tr><td>2</td><td>0</td></tr></table>	Y	Y	2	0		70892.71
Y	Y					
2	0					
(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

27092613875

**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	0.00	0.00
(i) Itemized (use Schedule A)		
(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

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**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

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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

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**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 6/8

<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

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

Transaction ID: SB29,4493
Date of Disbursement

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

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

27092613879

2007 JUN 29 A 9:30

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

June 20, 2007

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

Re: AF 1721

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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The Notice

The Notice asserts reason to believe that a penalty should be imposed for failure to file an MZM PAC report in January 2007. To be clear, in January 2007 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 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 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.

27092613881

27092613882



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 17, 2007

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

C00369884
AF#: 1721

Dear Ms. Jeanne O'Neil:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a Year End Report of Receipts and Disbursements every calendar year. This report, covering the period through December 31st, shall be filed no later than January 31st. 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 this 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 5/15/2007, 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 January 31st. 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 6/24/2007 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 6/24/2007. 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

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your control and prevented you 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

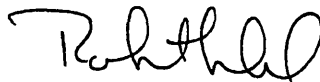
If you do not pay the calculated civil money penalty or submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Mzm Inc. PAC and you, as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty.

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 Year-End 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 6/24/2007. 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#: 1721

PAYMENT DUE DATE: 6/24/2007

PAYMENT AMOUNT DUE: \$900

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27092613886

WILMERHALE

Ronald C. Machen

+1 202 663 6881 (t)

+1 202 663 6363 (f)

ronald.machen@wilmerhale.com

June 20, 2007

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

RE: AF# 1721

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 May 17, 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 Year End Report of Receipts and Disbursements.

On March 9, 2007, and May 15, 2007, I submitted responses to the FEC's prior findings that MZM Inc. PAC and Ms. O'Neil, as treasurer, violated the same statutory provisions by failing to file timely an October Quarterly Report of Receipts and Disbursements and a 30 Day Post-General Report of Receipts and Disbursements, respectively. Because the same factual predicate applies to all three RTB letters received to date, I request consolidation of AF# 1563, AF# 1673, and AF# 1721.

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

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FEC Office of Administrative Review

June 20, 2007

Page 2

donating all its remaining funds to the Intrepid Fallen Heroes Fund. (See donation form, MZM 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 Year End 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 May 17, 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
Rj

Ronald C. Machen

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TAB A

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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](#)

TAB B

27092613891

WILMERHALE

Ronald C. Machen

+1 202 663 6881 (f)
+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.

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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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.

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TAB C

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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 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 10038

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 20-0388717.

MZM, INC., PAC
1523 NEW HAMPSHIRE AVE
WASHINGTON, DC 20006

1057

7/10/06 DATE

63-7707800

PAID BY Intrepid Fallen Heroes Fund \$ 70892.11

Seventy Thousand Eight Hundred Ninety Two and 11/100

SUNTRUST
SunTrust Bank

Donation

27092613895

SUNTRUST BANK
 P O BOX 622227
 ORLANDO FL 32862-2227

Page 1 of 2
 66/E00/0175/0 /72

01/31/2006



Account Statement



MZH INC PAC
 PAC ACCOUNT
 1523 NEW HAMPSHIRE AVE NW
 WASHINGTON DC 20036-1203

Questions? Please call
 1-800-786-8787.

THANK YOU FOR BANKING WITH SUNTRUST. TO LEARN MORE ABOUT HOW SUNTRUST CAN MEET YOUR FINANCIAL SERVICES NEEDS, PLEASE VISIT OUR WEB SITE AT WWW.SUNTRUST.COM

Account Summary	Account Type	Account Number	Statement Period	Taxpayer ID
	BUSINESS CHECKING	[REDACTED]	01/01/2006 - 01/31/2006	[REDACTED]

Description	Amount	Description	Amount
Beginning Balance	\$70,892.71	Average Balance	\$70,892.71
Deposits/Credits	\$0.00	Average Collected Balance	\$70,892.71
Checks	\$0.00	Number of Days in Statement Period	31
Withdrawals/Debits	\$0.00		
Ending Balance	\$70,892.71		

Balance Activity History	Date	Balance	Collected Balance	Date	Balance	Collected Balance
	01/31	70,892.71	70,892.71			

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TAB D

27092613897

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, and 8 with corresponding numerical values.

27092613898

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

27092613899

**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 CITY STATE ZIP CODE

C00389884

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 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. 02/2013)

27092613900

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name
M2M INC. PAC

Report Covering the Period: From:

M	M
0	1

D	D
0	1

Y	Y	Y	Y
2	0	0	8

 To:

M	M
0	2

D	D
1	3

Y	Y	Y	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></tr><tr><td>2</td><td>0</td></tr></table>	Y	Y	2	0		70892.71
Y	Y					
2	0					
(b) Cash on Hand at Beginning of Reporting Period	70892.71					
(c) Total Receipts (from Line 10)	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
899 E street, NW
Washington, DC 20463

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

27092613901

**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(i)(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

27092613902

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

27092613903

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 6

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

27092613904

**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

21b 22 23 24 25 26
 27 28a 28b 28c 29 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		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

27092613905

FEDERAL ELECTION COMMISSION
ADMINISTRATIVE REVIEW

2007 JUL -5 A 11:07

Date: July 5, 2007

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

AF#: 1721

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 May 9, 2007 and RTB Certification, dated May 15, 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 Year End Report Prior Notice, dated December 27, 2006.

-Non-Filer Letter, dated February 20, 2007.

-RTB Letter, dated May 17, 2007.

Attachment #: 3

Other RAD Information: (Y/N): N

Attachment#: N/A

27092613906

27092613907

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 <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Marian Moore</i></p> <p>C. Date of Delivery <i>6/25/07</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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p> <p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number (Transfer from service label)</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p> <p>7005 1820 0002 3465 8999</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 December 27, 2006, referencing the 2006 Year End Report;
 - B) Non-Filer Letter, dated February 20, 2007, referencing the 2006 Year End Report;
 - C) Reason-to-Believe Letter, dated May 17, 2007, referencing the 2006 Year End 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 Year End 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 5th day of July, 2007.



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

27092613908

YEAR-END
REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 27, 2006

QUARTERLY AND MONTHLY FILERS

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

WHO MUST FILE

All Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) filing on a quarterly basis must file a Year-End Report on January 31, 2007. 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

Monthly, Quarterly and Year-End 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. Monthly, Quarterly and Year-End 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.

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. Committees may change their filing frequency no more than once per calendar year.

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.

(over)

27092613909

2007 FILING SCHEDULE

I. SEMIANNUAL FILERS

REPORT	REPORTING PERIOD ¹	REG./CERT. & OVERNIGHT MAILING DATE ²	FILING DATE
Mid-Year	01/01/07 - 06/30/07	07/31/07	07/31/07
Year-End	07/01/07 - 12/31/07	01/31/08	01/31/08

II. MONTHLY FILERS

REPORT	REPORTING PERIOD ¹	REG./CERT. & OVERNIGHT MAILING DATE	FILING DATE
February	01/01/07 - 01/31/07	02/20/07	02/20/07
March	02/01/07 - 02/28/07	03/20/07	03/20/07
April	03/01/07 - 03/31/07	04/20/07	04/20/07
May	04/01/07 - 04/30/07	05/20/07	05/20/07 ²
June	05/01/07 - 05/31/07	06/20/07	06/20/07
July	06/01/07 - 06/30/07	07/20/07	07/20/07
August	07/01/07 - 07/31/07	08/20/07	08/20/07
September	08/01/07 - 08/31/07	09/20/07	09/20/07
October	09/01/07 - 09/30/07	10/20/07	10/20/07 ²
November	10/01/07 - 10/31/07	11/20/07	11/20/07
December	11/01/07 - 11/30/07	12/20/07	12/20/07
Year-End	12/01/07 - 12/31/07	01/31/08	01/31/08

48- AND 24-HOUR REPORTS OF INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in connection with a special 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 1st and the 20th day before the election. The 24-hour reporting requirement will be triggered each time the committee makes independent expenditures in connection with a federal election aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election. See 11 CFR 104.4. These reports are *not* required when a Party Committee or PAC makes a contribution directly to a candidate.

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).

¹See footnote #1, on reverse side.

²Notice that the filing date falls on a weekend. Filing deadlines are not extended when they fall on nonworking days.

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

February 20, 2007

Jeanne O'Neil, Treasurer
Mzm Inc. Pac
1523 New Hampshire Avenue NW
Washington, DC 20036

IDENTIFICATION NUMBER: C00369884

Reference: Year-End Report 11/28/2006 - 12/31/2006

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and expenditures as required by the Federal Election Campaign Act, as amended. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, N.W., Washington, D.C., 20463. A copy of the report or relevant portions must also be filed with the Secretary of the State or equivalent State Officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

The failure to timely file this report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Navarro Moore at our toll free number (800)424-9530. Our direct local number is (202)694-1130.

Sincerely,

A handwritten signature in cursive script, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division (RAD)

270393927892613911



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2007 SEP -4 P 2:45

August 31, 2007

MEMORANDUM

To: The Commission

Through: Patrina M. Clark *Patrina Clark*
Staff Director

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

Shawn Woodhead *Shawn Woodhead*
Reviewing Officer
Office of Administrative Review

Jill I. Sugarman *Jill I. Sugarman*
Reviewing Analyst

Subject: AF# 1721 - MZM Inc. PAC and Jeanne O'Neil, as Treasurer
(C00369884)

SENSITIVE

The respondents' challenge for this case and its challenge for AF# 1673 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# 1673, 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

27092613912



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 31, 2007

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

AF# 1721 – MZM Inc. PAC and Jeanne O'Neil, as Treasurer (C00369884)

On May 15, 2007, the Commission found reason to believe ("RTB") that the respondents violated 2 U.S.C. § 434(a) for failing to file the 2006 Year-End 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 May 17, 2007, of the Commission's RTB finding and civil money penalty.

Respondents' Response

On June 29, 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 at Tab B is a June 20, 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 June 25, 2007, the Commission received from Mr. Machen his June 20 letter and four Exhibits.

27092613913

Analysis of Challenge

The Federal Election Campaign Act ("Act") states that the treasurer of a political committee shall file a report for the quarter ending December 31 no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i). 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 January 2007, 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 January 31, 2007. Thus, she was the Treasurer of record at the time of the filing deadline and was required to file the Year-End 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 Year-End Report. Therefore, the Treasurer was aware four days before leaving Athena that the Committee still had an obligation to file reports, including the Year-End 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 eleven 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 Year-End 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 Year-End reporting period to be \$35,741, resulting in a \$900 civil money penalty. 11 C.F.R. § 111.43(a)(2).

27092613914

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 Year-End 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# 1721 involving MZM Inc. PAC and Jeanne O'Neil, as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 1721 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 Year-End 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
ATTORNEYS AT LAW

Attachment # 2
14 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

August 10, 2007

Via Hand

Jill Sugerman
Federal Elections Commission
999 E Street NW
Washington, DC 20463

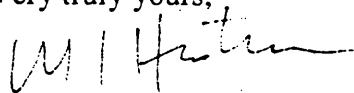
Re: **MZM Inc. PAC**

Dear Ms. Sugerman,

As you know we represent Jeanne O'Neill, who served as Treasurer of the MZM Inc. PAC. Our position, as you know is that the PAC has terminated and Ms. O'Neill is no longer Treasurer. We understand the Commissions' position to be that during the pendency of a MUR related to this PAC and Ms. O'Neill, the putative terminations and resignations were ineffective. Further to our discussions, and without prejudice to either side's legal position on the matter, we have agreed to submit the enclosed FEC Form 3X reports. I attach at Tab 2 a communication we received from counsel to Mitchell Wade which sets out the factual basis for the representations in the reports. I attach at Tab 2 FEC Form 3X reports for the periods 7/1/06 - 9/30/06, 10/1/06 - 11/27/06, 11/28/06 - 12/31/06, and 1/1/07 - 6/30/07. Finally, I attach at Tab 3 A communications recently received from the Commission which reflects that the MUR related to the MZM Inc. PAC and Ms. O'Neill in her role as Treasurer thereof has been closed.

Thank you for your consideration and practicality in wrestling with these issues. Please contact me should you have any questions.

Very truly yours,



Matthew J. Herrington

27092613916

2007 AUG 10 P 11:12



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JUL 26 2007

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

RE: MUR 5666
MZM, Inc. PAC
and Jeanne O'Neil, in her official
capacity as treasurer

Dear Mr. Herrington:

On June 19, 2006, you were notified that the Federal Election Commission found reason to believe that your clients, MZM, Inc. PAC and Jeanne O'Neil, in her official capacity as treasurer, knowingly and willfully violated 2 U.S.C. §§ 441b and 441c. After considering the circumstances of the matter, the Commission determined on July 24, 2007, to take no further action as to MZM, Inc. PAC and Jeanne O'Neil, in her official capacity as treasurer, and closed the file as it pertains to them.

You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect, and that this matter is still open with respect to other respondents. The Commission will notify you when the entire file has been closed.

If you have any questions, please contact me at (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn Tran", with a long horizontal flourish extending to the right.

Lynn Tran
Attorney

27092613917

WILMERHALE

Ronald C. Machen

+1 202 663 6881 (t)
+1 202 663 6363 (f)
ronald.machen@wilmerhale.com

July 30, 2007

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

RE: FEC AF Nos. 1563, 1673, and 1721

Dear Mr. Herrington:

I am writing on behalf of my client, Mitchell Wade, to provide factual background in connection with Ms. Jeanne O'Neil's challenges to the FEC's findings in the above-referenced matters. As you know, the FEC found reason to believe that MZM Inc. PAC violated 2 U.S.C. § 434(a) by failing to file timely PAC reports.

I am attaching an Intrepid Fallen Heroes Fund donation form, MZM Inc. PAC check no. 1057, and MZM Inc. PAC's SunTrust account statements dated January 31, 2006, and February 28, 2006. These documents reflect that, on February 13, 2006, MZM Inc. PAC donated all of its remaining funds to the Intrepid Fallen Heroes Fund. The attached statement of February 28, 2006 shows that the account had a zero balance after this charitable donation. At the time of the donation, MZM Inc. PAC had no outstanding debts or obligations. No other MZM Inc. PAC accounts have been opened for political activity. In fact, MZM Inc. PAC was effectively dissolved on February 13, 2006, after ceasing political fundraising and disbursement activity.

Sincerely yours,



Ronald C. Machen

Enclosures

27092613918

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 Year-End Report is due January 31, 2007. If electronically filed, it must be received and validated by the Commission at or before 11:59 p.m., Eastern Standard/Daylight Time on January 31 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. It is the practice of the Commission's Information Division to send prior notification of a report's due date to committees and treasurers at their address of record approximately 3 weeks before the due date.
5. 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 November 28 through December 31, 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.
6. 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

27092613919

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

2. FEC IDENTIFICATION NUMBER C00069864 3. IS THIS REPORT NEW (N) OR AMENDED (A)

Table with 4 columns: (a) Type of Report (Choose One), (b) Monthly Report Due On, (c) 12-Day Pre-Election Report for the, (d) 30-Day Post-Election Report for the. Includes options like Quarterly Reports, Primary, General, Runoff, and Special.

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 437p.

27092613920



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

VIA FIRST CLASS MAIL

FEB 22 2006

Brian M. Heberlig, Esq.
Steptoe & Johnson, LLP
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036

RE: MUR 5666
MZM Inc. PAC

Dear Mr. Heberling:

On February 13, 2006, MZM Inc. PAC ("the Committee") and the Jeanne O'Neil, as treasurer, requested that the Federal Election Commission ("the Commission") permit the Committee to terminate pursuant to 2 U.S.C. § 433(d) and 11 C.F.R. § 102.3. Because of the above-referenced ongoing enforcement matter involving the Committee, this request has been denied. Therefore, you are reminded that the Committee must continue to file all the required reports with the Commission until such time as the enforcement matter has been closed as to the Committee.

If you have any questions, please contact me at (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn Y. Tran".

Lynn Y. Tran
Attorney

cc: Reports Analysis Division

27092613921

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

C000369884

3. IS THIS REPORT NEW OR AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- X 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:

Table with columns for report types: Feb 20 (M2), May 20 (M5), Aug 20 (M8), Nov 20 (M11), Mar 20 (M3), Jun 20 (M6), Sep 20 (M9), Dec 20 (M12), Apr 20 (M4), Jul 20 (M7), Oct 20 (M10), Jan 31 (YE)

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

Table with columns for election types: Primary (12P), General (12G), Runoff (12R), Convention (12C), Special (12G)

Election on in the State of

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

Table with columns for election types: 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 2008

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 table with 7 empty columns

27092613922

**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

C00369664

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 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.

Office Use Only							
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FEC FORM 3X
(Rev. 02/2003)

27092613923

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)

27092613924

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

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.

27092613925

**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

WZM Inc. PAC

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

Check if different than previously reported. (ACC) 1330 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:
- 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 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 Jeanne M. O'Neil

Signature of Treasurer Jeanne 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. 5437g.

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

270395101092613926

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

ANZM INC PAC

Report Covering the Period:

From:

11 28 2006

To:

12 31 2006

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



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

2703951011092613927

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.

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt <i>8/10/07</i>
<input type="checkbox"/> USPS First Class Mail	Postmarked
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
	Next Business Day Delivery <input type="checkbox"/>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked


 PREPARER
 (3/2005)

8/14/07
 DATE PREPARED

2703951011292613928



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

27092613929



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2007 SEP 18 A 9:09

September 17, 2007

MEMORANDUM

SENSITIVE

To: The Commission

Through: Patrina M. Clark *PK*
Staff Director *pk*

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

Shawn Woodhead Wert *SW*
Reviewing Officer
Office of Administrative Review

By: Jill I. Sugarman *JIS*
Reviewing Analyst

Subject: Final Determination Recommendation in AF# 1721 – MZM Inc. PAC and
Jeanne O’Neil, as Treasurer (C00369884)

On May 15, 2007, the Commission found reason to believe that the respondents violated 2 U.S.C. § 434(a) for failing to file the 2006 Year-End 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 June 29, 2007, the Commission received the respondents’ written response (“challenge”). On August 10, 2007, the respondents submitted a paper copy of the report covering the Year-End 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 Year-End 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

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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# 1721 involving MZM Inc. PAC and Jeanne O'Neil, as Treasurer, in making a final determination;
- (2) Make a final determination in AF# 1721 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 Year-End 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.

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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 1721 – 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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Final Determination Recommendation:) AF 1721
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 1721:

1. Adopt the Reviewing Officer recommendation for AF 1721 involving MZM Inc. PAC and Jeanne O'Neil, as Treasurer, in making a final determination.
2. Make a final determination in AF 1721 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 Year-End 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

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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# 1721

Dear Mr. Herrington:

On May 15, 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 Year-End Report. By letter dated May 17, 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 June 29, 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.

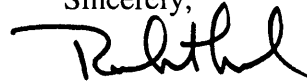
The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 C.F.R. § 111.42(b). Although the file must be placed on the public record within 30

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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

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FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 1721

DATE SCANNED 11-29-07

SCANNER NO. 2

SCAN OPERATOR JmW

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