



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1961

Date Filmed 7/26/85 Camera No. --- 2

Cameraman J.A.D.

85040532295

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1961
Pensioners Action Fund)
Pietro Mazzai, treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 6, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1961:

1. Accept the conciliation agreement submitted with the General Counsel's Report signed May 29, 1985.
2. Close the file.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

6/6/85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:
Objection withdrawn:

5-30-85, 9:29
5-30-85, 4:00
6- 6-85, 10:13

85040532296



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 17, 1985

John Thomas Shaw, Esquire
715 Ingleside Avenue
Baltimore, Maryland 21228

RE: MUR 1961
Pensioners Action Fund
Peittro Mazzai, Treasurer

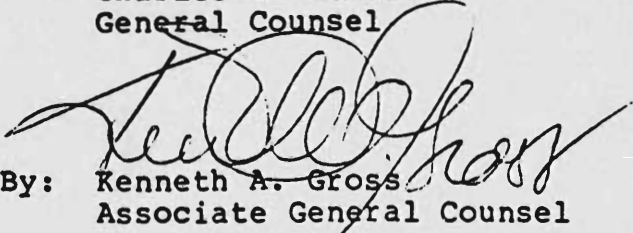
Dear Mr. Shaw:

On June 6, 1985, the Commission accepted the conciliation agreement you signed and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

85040532297

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Pensioners Action Fund) MUR 1961
 Pietro Mazzai, Treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Pensioners Action Fund and Pietro Mazzai, as treasurer, ("Respondent") violated 2 U.S.C. § 434(a)(4)(A) by failing to file timely reports .

NOW, THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of proceeding, and this agreement has the effect of an agreement entered into pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent, Pensioners Action Fund, is a political committee registered with the Commission.
2. Pietro Mazzai is treasurer of Respondent committee.

3. Respondent failed to file four reports of receipts and expenditures on time for the 1983-84 election cycle.

4. The reports were filed between 19 and 53 days late as follows:

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>	<u>Days Late</u>
1983 Mid Year (1/1/83-6/30/83)	7/1/83	9/22/83	53
1984 July Quarterly (4/1/84-6/30/84)	7/15/84	8/24/84	40
1984 30 Day Post General (11/27/84-12/31/84)	12/6/84	1/28/85	53
1984 Year End (11/27/84-12/31/84)	1/31/85	2/19/85	19

V. 2 U.S.C. § 434(a)(4)(A) sets forth, in pertinent part, that all political committees other than authorized committees of a candidate shall file 1) quarterly reports in an election year no later than the 15th day after the last day of the calendar quarter except at year end, when the report is due no later than January 31 of the following year; 2) a post-general election report, which shall be filed no later than the 30th day after the general election and complete as of the 20th day after the general election; and 3) in other than election years, semi-annual reports due no later than July 31 and January 31 of the following year. (See also 11 C.F.R. § 104.5(c)(1) and (2)).

VI. Respondent failed to file timely reports in violation of 2 U.S.C. § 434(a)(4)(A).

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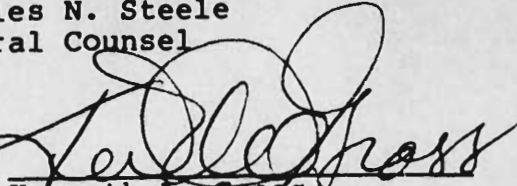
XII. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or

oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

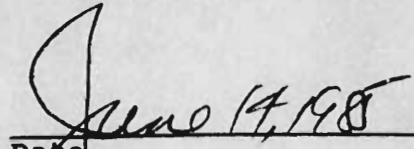
FOR THE COMMISSION:

Charles N. Steele
General Counsel

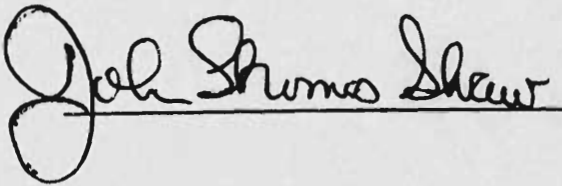
BY:


Kenneth A. Gross
Associate General Counsel

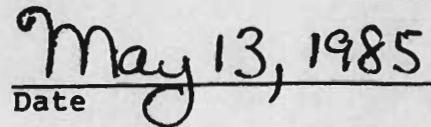
Date


June 14, 1985

FOR THE RESPONDENT:


John Thomas Shaw

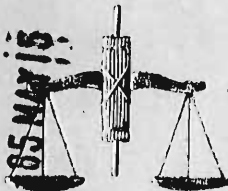
Date


May 13, 1985

85040532301

RECEIVED AT THE F

185 MAY 15 P 1:00



GCC #7475
McRobie and Shaw
Attorneys at Law

715 Ingleside Avenue • Baltimore, Maryland 21228
744-8400

May 14, 1985

Federal Election Commission
Washington, D.C. 20463

Attn: Mr. Kenneth A. Gross, Esquire
Associate General Counsel

Re: MUR 1961
Pensioners Action Fund

Dear Mr. Gross:

I enclose herein the Conciliation Agreement along with the civil penalty in this matter.

Sincerely,

John Thomas Shaw

JTS:lw

Enclosure

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
MAY 15 P 2:30

8 5 0 4 0 5 3 2 3 0 2

5 MAY 17 9:45

RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Sent 5/16/85

GCC #7475

MEMORANDUM

TO: CHERYL THOMAS TO: JOAN HARRIS
FROM: JOAN HARRIS FROM: CHERYL THOMAS

CHECK NO. 498 (a copy of which is attached) RELATING
TO MUR 1961 AND NAME Pensioners Action Fund
Pietro Muzgai, Pres.
WAS RECEIVED ON May 17, 1985. PLEASE INDICATE THE ACCOUNT INTO
WHICH IT SHOULD BE DEPOSITED:

/ / BUDGET CLEARING ACCOUNT (#95F3875.16)
/ ☒ CIVIL PENALTIES ACCOUNT (#95-1099.160)

SIGNATURE Cheryl R. Thomas DATE 5/20/85
OTHER _____

85040532303

CHECK IS IN PAYMENT OF FOLLOWING ITEMS			
DATE	AMOUNT		
5/13/85	MUR	1961	

CORRECT ENDORSEMENT IS RECEIPT

MAIN OFFICE
UNION TRUST
COMPANY OF MARYLAND
BALTIMORE, MARYLAND 21202

PENSIONERS ACTIONS FUND
ADMINISTRATIVE ACCOUNT
P. O. BOX 6120
BALTIMORE, MARYLAND 21231

498

MAY 13 1985 7-1 520

PAY TO THE ORDER OF Treasurer of United States 250.00

Two Hundred Fifty Dollars DOLLARS

John E. Felt

0000498 0520000161 201 55693

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Pensioners Action Fund

)
)
)

MUR 1961

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 2, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1961:

1. Enter into conciliation with the Pensioners Action Fund and Pietro Mazzai, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement submitted with the General Counsel's Report signed April 26, 1985.
3. Approve and send the letter attached to the General Counsel's Report signed April 26, 1985.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

5-2-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

4-29-85, 5:05
4-30-85, 11:00

85040532304

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Pensioners Action Fund)

MUR 1961

APR 29 5:05

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On March 27, 1985, the Commission found reason to believe that the Pensioners Action Fund ("Pensioners Fund") and Pietro Mazzai, as treasurer, violated 2 U.S.C. § 434(a)(4)(A) by failing to file reports in a timely manner.

The Pensioners Fund failed to timely file four reports for the 1983-84 election cycle. The reports were filed between 19 and 53 calendar days late:

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>	<u>Days Late</u>
1983 Mid Year <u>1</u> / (1/1/83-6/30/83)	7/1/83	9/22/83	53
1984 July Quarterly <u>2</u> / (4/1/84-6/30/84)	7/15/84	8/24/84	40
1984 30 Day Post General <u>3</u> / (11/27/84-12/31/84)	12/6/84	1/28/85	53
1984 Year End (11/27/84-12/31/84)	1/31/85	2/19/85	19

On September 18, 1984, RAD sent the Pensioners Fund a notice of chronic late filings, specifically noting the late 1983 Mid Year and 1984 July Quarterly Reports. Subsequently, the

1/ The Fund's 1983 Mid-Year Report disclosed coverage dates of 1/1/83-7/31/83.

2/ The Fund's 1984 July Quarterly Report disclosed coverage dates of 4/30/84-7/15/84.

3/ The Fund's 1984 30 Day Post-General Report disclosed coverage dates of 10/16/84-11/26/84.

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Pensioners Fund was tardy in submitting its 1984 30 Day Post General and Year End Reports. The RAD analyst contacted the Pensioners Fund counsel who stated that a heavy case load was responsible for the delay in producing reports.

On April 12, 1985, the Pensioners Fund requested initiation of pre-probable cause conciliation.

II. LEGAL ANALYSIS

2 U.S.C. § 434(a)(4)(A) sets forth, in pertinent part, that all political committees of a candidate shall file 1) quarterly reports in an election year no later than the 15th day after the last day of the calendar quarter except at year end, when the report is due no later than January 31 of the following year; 2) a post-general election report, which shall be filed no later than the 30th day after the general election and complete as of the 20th day after the general election; and 3) in other than election years, semi-annual reports due no later than July 31 and January 31 of the following year. (See also 1 C.F.R. § 104.5(c)(1) and (2)).

The Pensioners Fund has repeatedly filed late reports as evidenced by the four reports listed above. Therefore, the Fund is in violation of 2 U.S.C. § 434(a)(4)(A).

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

IV. RECOMMENDATON

1. Enter into conciliation with the Pensioners Action Fund and Pietro Mazzai, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement.
3. Approve and send the attached letter.

Charles N. Steele
General Counsel

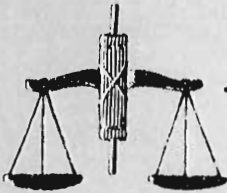
April 26, 1985
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments:
Proposed Conciliation Agreement
Letter to Respondent

85040532307



McRobie and Shaw
Attorneys at Law

715 Ingleaside Avenue • Baltimore, Maryland 21228
744-8400

April 10, 1985

Federal Election Commission
Washington, D.C. 20463

Attn: Ms. Frances B. Hagan

Re: MUR 1961
Pensioners Action Fund
Pietro Mazzai, Treasurer

Dear Ms. Hagan:

Pursuant to our recent telephone conversation, please be advised I represent the Pensioners Action Fund and Pietro Mazzai, Treasurer with respect to the MUR 1961. I enclose herein an executed Designation of Counsel form.

Please be advised that I wish to negotiate a possible settlement through a conciliation agreement as outline in 11 C.F.R. §111.18(d).

I will await your contact with regards to settlement negotiations of this matter.

Sincerely,

John Thomas Shaw
John Thomas Shaw

JTS:lw

Enclosure

85040532308

RECEIVED
GENERAL COUNSEL
APR 12 P 7: 24



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 3, 1985

Piетро Mazzai, Treasurer
Pensioners Action Fund
P.O. Box 6120
Baltimore, Maryland 21231

RE: MUR 1961
Pensioners Action Fund
Piетро Mazzai, Treasurer

Dear Mr. Mazzai:

On March 27, 1985, the Federal Election Commission determined that there is reason to believe the Pensioners Action Fund and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, along with your answers to the enclosed questions, within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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

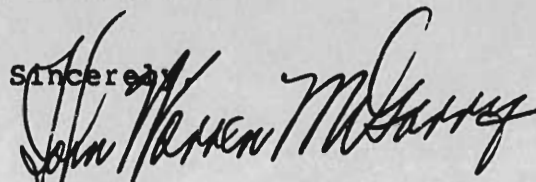
The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

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Piетро Mazzai, Treasurer
Page 2

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



John Warren McGarry
Chairman

Enclosures
General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

85040532310

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Pensioners Action Fund
Piетро Mazzai, Treasurer

MUR NO. 1961

SUMMARY OF ALLEGATIONS

The Pensioners Action Fund ("Pensioners Fund") violated 2 U.S.C. § 434(a)(4)(A) by failing to timely file reports of receipts and expenditures.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 434(a)(4)(A) sets forth, in pertinent part, that all political committees other than authorized committees of a candidate shall file 1) quarterly reports in an election year no later than the 15th day after the last day of the calendar quarter except at year end, when the report is due no later than January 31 of the following year; 2) a post-general election report, which shall be filed no later than the 30th day after the general election and complete as of the 20th day after the general election; and 3) in other than election years, semi-annual reports due no later than July 31 and January 31 of the following year. (See also 11 C.F.R. § 104.5(c)(1) and (2)).

According to the Reports Analysis Division, the Pensioners Fund failed to timely file four reports for the 1983-84 election

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cycle. The reports were filed between 19 and 53 calendar days late:

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>	<u>Days Late</u>
1983 Mid Year ^{1/} (1/1/83-6/30/83)	7/31/83	9/22/83	53
1984 July Quarterly ^{2/} (4/1/84-6/30/84)	7/15/84	8/24/84	40
1984 30 Day Post General ^{3/} (11/27/84-12/31/84)	12/6/84	1/28/85	53
1984 Year End (11/27/84-12/31/84)	1/31/85	2/19/85	19

On September 18, 1984, RAD sent the Pensioners Fund a notice of chronic late filings, specifically noting the late 1983 Mid Year and 1984 July Quarterly Reports. Subsequently, the Pensioners Fund was tardy in submitting its 1984 30 Day Post General and Year End Reports. The RAD analyst contacted the Pensioners Fund counsel who stated that a heavy case load was responsible for the delay in producing reports. Because the Pensioners Fund has been chronically late in filing its reports, the Office of General Counsel recommended that the Commission open a Matter Under Review and find reason to believe in this matter.

- ^{1/} The Fund's 1983 Mid-Year Report disclosed coverage dates of 1/1/83-7/31/83.
^{2/} The Fund's 1984 July Quarterly Report disclosed coverage dates of 4/30/84-7/15/84.
^{3/} The Fund's 1984 30 Day Post-General Report disclosed coverage dates of 10/16/84-11/26/84.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

John Thomas Shaw, Esquire
715 Ingleside Avenue
Baltimore, Maryland 21228

RE: MUR 1961
Pensioners Action Fund
Peittro Mazzai, Treasurer

Dear Mr. Shaw:

On , the Commission accepted the conciliation agreement you signed and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

A handwritten signature, possibly "fu", is written in the bottom right corner of the page.

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85040532314

RAD Referral 85NF-68

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 27, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-68:

1. Open a MUR.
2. Find reason to believe that the Pensioners Action Fund and as treasurer, Pietro Mazzai, violated 2 U.S.C. § 434(a)(4)(A).
3. Approve the letter and General Counsel's Factual and Legal Analysis attached to the First General Counsel's Report signed March 21, 1985.

Commissioners Aikens, Elliott, Harris, McDonald,
McGarry and Reiche voted affirmatively in this matter.

Attest:

3-27-85

Date _____

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 3-22-85, 1:32
Circulated on 48 hour tally basis: 3-25-85, 11:00

SENSITIVE

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT 85 MAR 22 P 1:32

DATE AND TIME OF TRANSMITTAL BY OGC
TO THE COMMISSION _____

RAD REFERRAL NO. 85NF-68
STAFF MEMBER:
Frances B. Hagan

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

RESPONDENT'S NAME: Pensioners Action Fund

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(A)(i)(iii) and (iv)
11 C.F.R. § 104.5(c)(1) and (2)

INTERNAL REPORTS
CHECKED: Committee Reports

FEDERAL AGENCIES
CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Reports Analysis Division.

SUMMARY OF ALLEGATIONS

The Pensioners Action Fund ("Pensioners Fund") violated 2 U.S.C. § 434(a)(4)(A) by failing to timely file reports of receipts and expenditures.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 434(a)(4)(A) sets forth, in pertinent part, that all political committees other than authorized committees of a candidate shall file 1) quarterly reports in an election year no later than the 15th day after the last day of the calendar quarter except at year end, when the report is due no later than January 31 of the following year; 2) a post-general election report, which shall be filed no later than the 30th day after the general election and complete as of the 20th day after the

85040532315

general election; and 3) in other than election years, semi-annual reports due no later than July 31 and January 31 of the following year. (See also 11 C.F.R. § 104.5(c)(1) and (2)).

According to the Reports Analysis Division, the Pensioners Fund failed to timely file four reports for the 1983-84 election cycle. The reports were filed between 19 and 53 calendar days late:

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>	<u>Days Late</u>
1983 Mid Year ^{1/} (1/1/83-6/30/83)	7/1/83	9/22/83	53
1984 July Quarterly ^{2/} (4/1/84-6/30/84)	7/15/84	8/24/84	40
1984 30 Day Post General ^{3/} (11/27/84-12/31/84)	12/6/84	1/28/85	53
1984 Year End (11/27/84-12/31/84)	1/31/85	2/19/85	19

On September 18, 1984, RAD sent the Pensioners Fund a notice of chronic late filings, specifically, noting the late 1983 Mid Year and 1984 July Quarterly Reports. Subsequently, the Pensioners Fund was tardy in submitting its 1984 30 Day Post General and Year End Reports. The RAD analyst contacted the

^{1/} The Fund's 1983 Mid-Year Report disclosed coverage dates of 1/1/83-7/31/83.

^{2/} The Fund's 1984 July Quarterly Report disclosed coverage dates of 4/30/84-7/15/84.

^{3/} The Fund's 1984 30 Day Post-General Report disclosed coverage dates of 10/16/84-11/26/84.

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Pensioners Fund counsel who stated that a heavy case load was responsible for the delay in producing reports. Because the Pensioners Fund has been chronically late in filing its reports, the Office of General Counsel recommends that the Commission open a Matter Under Review and find reason to believe in this matter.

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Pensioners Action Fund and as treasurer, Pietro Mazzai, violated 2 U.S.C. § 434(a)(4)(A).
3. Approve attached letter and General Counsel's Factual and Legal Analysis.

March 21, 1985
Date

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

Proposed letter and General Counsel's
Factual and Legal Analysis
Referral from RAD

85040532317



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Piетро Mazzai, Treasurer
Pensioners Action Fund
P.O. Box 6120
Baltimore, Maryland 21231

RE: MUR _____
Pensioners Action Fund
Piетро Mazzai, Treasurer

Dear Mr. Mazzai:

On _____, 1985, the Federal Election Commission determined that there is reason to believe the Pensioners Action Fund and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, along with your answers to the enclosed questions, within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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

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

Attachment A (1)

85040532318

Piетро Mazzai, Treasurer
Page 2

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures
General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

85040532319

A (2)

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Pensioners Action Fund
Piettro Mazzai, Treasurer

MUR NO.

SUMMARY OF ALLEGATIONS

The Pensioners Action Fund ("Pensioners Fund") violated 2 U.S.C. § 434(a)(4)(A) by failing to timely file reports of receipts and expenditures.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 434(a)(4)(A) sets forth, in pertinent part, that all political committees other than authorized committees of a candidate shall file 1) quarterly reports in an election year no later than the 15th day after the last day of the calendar quarter except at year end, when the report is due no later than January 31 of the following year; 2) a post-general election report, which shall be filed no later than the 30th day after the general election and complete as of the 20th day after the general election; and 3) in other than election years, semi-annual reports due no later than July 31 and January 31 of the following year. (See also 11 C.F.R. § 104.5(c)(1) and (2)).

According to the Reports Analysis Division, the Pensioners Fund failed to timely file four reports for the 1983-84 election

cycle. The reports were filed between 19 and 53 calendar days late:

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>	<u>Days Late</u>
1983 Mid Year ^{1/} (1/1/83-6/30/83)	7/31/83	9/22/83	53
1984 July Quarterly ^{2/} (4/1/84-6/30/84)	7/15/84	8/24/84	40
1984 30 Day Post General ^{3/} (11/27/84-12/31/84)	12/6/84	1/28/85	53
1984 Year End (11/27/84-12/31/84)	1/31/85	2/19/85	19

On September 18, 1984, RAD sent the Pensioners Fund a notice of chronic late filings, specifically noting the late 1983 Mid Year and 1984 July Quarterly Reports. Subsequently, the Pensioners Fund was tardy in submitting its 1984 30 Day Post General and Year End Reports. The RAD analyst contacted the Pensioners Fund counsel who stated that a heavy case load was responsible for the delay in producing reports. Because the Pensioners Fund has been chronically late in filing its reports, the Office of General Counsel recommended that the Commission open a Matter Under Review and find reason to believe in this matter.

^{1/} The Fund's 1983 Mid-Year Report disclosed coverage dates of 1/1/83-7/31/83.

^{2/} The Fund's 1984 July Quarterly Report disclosed coverage dates of 4/30/84-7/15/84.

^{3/} The Fund's 1984 30 Day Post-General Report disclosed coverage dates of 10/16/84-11/26/84.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

4 March 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA 15/
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF PENSIONERS ACTION FUND

This is a referral of the Pensioners Action Fund ("Pensioners Fund"). The Pensioners Fund has failed to file four (4) reports in a timely manner during the 1983-84 election cycle. In addition, the Pensioners Fund failed to file the 1984 30 Day Post-General Report within of the Non-Filer Notice.

For your information, the Pensioners Fund was referred for a possible 2 U.S.C. §438(b) audit on August 23, 1983. The Commission approved the final-audit report on March 16, 1984 (see A83-77).

Additionally, based on previous Commission action, the Reports Analysis Division has changed the Pensioners Fund's name from Masters, Mates and Pilots Pensioners' Action Fund to Pensioners Action Fund (see MUR 1652).

If you have any questions, please contact Pamela Brown at 523-4048.

Attachment

Attachment B (1)

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 4 March 1985

ANALYST: Pamela Brown

I. COMMITTEE: Pensioners Action Fund
(C00012013)
Piettro Mazzai, Treasurer^{1/}
P.O. Box 6120
Baltimore, MD 21231

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

III. BACKGROUND:

Failure to Timely File Reports

The Pensioners Action Fund ("Pensioners Fund") failed to file four (4) reports of Receipts and Disbursements in a timely manner for the 1983-84 election cycle (see chart on Page 2). The reports were filed between nineteen (19) and fifty-three (53) calendar days late.

On September 18, 1984, a Chronic Late Filing Notice was sent to the Pensioners Fund for failing to file the 1983 Mid-Year and 1984 July Quarterly Reports in a timely manner (Attachment 7). The notice advised the Pensioners Fund that any additional late-filing of reports may result in legal enforcement action. Subsequent to the sending of the warning notice, the Pensioners Fund failed to timely file the 1984 30 Day Post-General and Year End Reports.

A Non-Filer Notice was sent on December 28, 1984 for failure to file the 30 Day Post-General Report (Attachment 9). The analyst in the Reports Analysis Division ("RAD") contacted the Pensioners Fund's counsel by phone on January 23, 1985 to advise him that the Commission had not yet received the 30 Day Post-General Report (Attachment 10). The counsel informed the RAD analyst that a heavy case load had prevented him from timely filing the report. The report was received on January 28, 1985 (Attachment 11).✓

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

B(2)

^{1/} Although Mr. Mazzai is the treasurer of record, John E. Fields, Chairman of the Pensioners Fund, has signed all original reports as treasurer during the 1983-84 election cycle.

85040532323

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LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1983 Mid-Year ^{2/} (1/1/83-6/30/83)	7/7/83 (Attachment 2)	7/31/83	N/A	9/22/83 (Attachment 3)
1984 July Quarterly ^{3/} (4/1/84-6/30/84)	6/21/84 (Attachment 4)	7/15/84	8/8/84 (Attachment 5)	8/24/84 (Attachment 6)
1984 30 Day Post-General ^{4/} (10/1/84-11/26/84)	10/1/84 (Attachment 8)	12/6/84	12/28/84 (Attachment 9)	1/28/85 (Attachment 11)
1984 Year End (11/27/84-12/31/84)	1/7/85 (Attachment 12)	1/31/85	N/A	2/19/85 (Attachment 13)

^{2/} The 1983 Mid-Year Report disclosed actual coverage dates of 1/1/83-7/31/83.

^{3/} The 1984 July Quarterly Report disclosed actual coverage dates of 4/30/84-7/15/84.

^{4/} The 1984 30 Day Post-General Report disclosed actual coverage dates of 10/16/84-11/26/84.

B(3)

8 5 0 4 0 5 3 2 3 2 5

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)DATE 28FEB85
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
PENSIONERS ACTION FUND				NON-PARTY QUALIFIED		ID #C00012013
CONNECTED ORGANIZATION: MASTERS MATES & PILOTS; INT'L						
1983	MISCELLANEOUS REPORT			20MAY83 TO FEC	1	83FEC/272/1830
	APRIL QUARTERLY	-	-	31MAR83	1	83FEC/272/1831
	MID-YEAR REPORT	2,433	2,319	1JAN83 -31JUL83	6	83FEC/283/3793
	MID-YEAR REPORT - AMENDMENT	2,433	2,319	1JAN83 -31JUL83	5	84FEC/311/1545
	YEAR-END	2,053	14,441	1JUL83 -31DEC83	12	84FEC/292/3693
	YEAR-END - AMENDMENT	2,053	14,441	31JUL83 -31DEC83	7	84FEC/311/1550
1984	MISCELLANEOUS NOTICE FROM FEC			18SEP84	1	84FEC/328/3166
	APRIL QUARTERLY	798	1,718	1JAN84 -30APR84	6	84FEC/311/1539
	JULY QUARTERLY	904	3,939	30APR84 -15JUL84	5	84FEC/327/0679
	JULY QUARTERLY - AMENDMENT	904	3,939	30APR84 -15JUL84	3	84FEC/336/4530
	NOTICE OF FAILURE TO FILE			1APR84 -30JUN84	1	84FEC/325/0611
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30JUN84	1	84FEC/327/3647
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR84 -30JUN84	2	84FEC/329/5031
	OCTOBER QUARTERLY	654	4,428	15JUL84 -15OCT84	6	84FEC/341/1671
	POST-GENERAL	390	1,096	16OCT84 -26NOV84	6	85FEC/361/4393
	NOTICE OF FAILURE TO FILE			16OCT84 -26NOV84	1	84FEC/357/4800
	YEAR-END	168	1,965	26NOV84 -31DEC84	6	85FEC/366/2342
TOTAL		7,400	0 29,906	0	70	TOTAL PAGES

All reports have been reviewed.

Cash on hand as of 12/31/84: \$293,661.20.
 Debts owed to committee as of 12/31/84: \$0
 Debts owed by committee as of 12/31/84: \$0

(B)(7)

8 5 0 4 0 5 3 2 3 2 6

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 28FEB85
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
PENSIONERS ACTION FUND				NON-PARTY QUALIFIED	ID #C00012013	
CONNECTED ORGANIZATION: MASTERS MATES & PILOTS; INT'L						
1981	APRIL QUARTERLY	18,450	16,274	1JAN81 -31MAR81	6	81FEC/196/2855
	JULY QUARTERLY	3,504	38,920	1APR81 -30JUN81	6	81FEC/203/0755
	OCTOBER QUARTERLY	16,696	7,450	1JUL81 -30SEP81	9	81FEC/209/0213
	YEAR-END	5,566	4,165	1OCT81 -31DEC81	7	82FEC/224/348*
1982	MISCELLANEOUS REPORT			23APR82 TO FEC	6	82FEC/230/35
	APRIL QUARTERLY	14,731	2,794	1JAN82 -31MAR82	6	82FEC/230/354.
	JULY QUARTERLY	15,538	24,626	1APR82 -30JUN82	7	82FEC/239/4053
	OCTOBER QUARTERLY	7,828	252,534	1JUL82 -30SEP82	9	82FEC/256/0875
	OCTOBER QUARTERLY - AMENDMENT	7,828	10,748	1JUL82 -30SEP82	9	83FEC/269/0746
	REQUEST FOR ADDITIONAL INFORMATION			1JUL82 -30SEP82	1	83FEC/267/2146
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL82 -30SEP82	2	83FEC/268/4063
	YEAR-END	2,414	3,471	1OCT82 -31DEC82	7	83FEC/268/3897
	YEAR-END - AMENDMENT	2,414	3,471	1OCT82 -31DEC82	2	83FEC/283/3799
	REQUEST FOR ADDITIONAL INFORMATION			1OCT82 -31DEC82	1	83FEC/274/0364
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT82 -31DEC82	2	83FEC/275/4353
1983	MISCELLANEOUS REPORT			9MAR83 FROM FEC	1	83FEC/267/4001
TOTAL		84,727	0 108,448	0	81	TOTAL PAGES

All reports have been reviewed.

Cash on hand as of 12/31/82: \$316,165.80
Debts owed to committee as of 12/31/82: \$0
Debts owed by committee as of 12/31/82: \$0

B(5)



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

July 7, 1983

SEMIANNUAL REPORT FILING REQUIREMENTS

WHO MUST FILE

ALL POLITICAL COMMITTEES currently registered with the Commission (except committees filing monthly) must file a semiannual report by July 31, 1983..

WHAT MUST BE REPORTED

Committees must disclose all financial activity of the committee from the later of, the last report filed or the date of registration,* through June 30, 1983.

FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight July 31, 1983. Reports hand delivered or mailed first class must be received no later than close of business July 31, 1983.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed form for details.

FAILURE TO FILE

According to Commission policy, political committees will not necessarily receive notification of their failure to file reports. However, they remain fully liable for failure to file any report required under the Act. In addition, failure to file required reports may result in compliance proceedings. Committees must submit legible reports which can be reproduced clearly. Illegible documents will not be accepted as reports, and committees filing such documents will be required to refile.

MONTHLY FILERS

Committees filing on a monthly schedule need not file a semiannual report. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month. The next monthly report must be filed by July 20, 1983, and disclose all financial activity of the committee from June 1 through June 30, 1983.

* The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

FOR INFORMATION CALL: Office of Public Communications
202/523-4068
800/424-9530

B(6)

85040532327

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Candidate

(Summary Page) Attachment 3

83 SEP 22 19:24

ALIGN AREA 1. Name of Committee (In Full) Pensioners Action Fund Address (Number and Street) P.O. Box 6120 City, State and ZIP Code Baltimore, Maryland 21231 ☐ Check here if address is different than previously reported. 2. FEC Identification Number 00012013 3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____	ALIGN AREA 4. TYPE OF REPORT (Check appropriate boxes) (a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report ☐ July 15 Quarterly Report ☐ January 31 Year End Report ☒ July 31 Mid Year Report (Non-Election Year Only) ☐ Monthly Report for _____ ☐ Twelfth day report preceding _____ Type of Election _____ election on _____ in the State of _____ ☐ Thirtieth day report following the General Election on _____ in the State of _____ ☐ Termination Report (b) Is this Report an Amendment? ☐ YES ☐ NO
---	---

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>1/1/83</u> through <u>7/31/83</u>		
6 (a) Cash on hand January 1, 19 <u>83</u>			\$ 316165.80
(b) Cash on Hand at Beginning of Reporting Period		\$ 316165.80	
(c) Total Receipts (from Line 18)		\$ 2433.57	\$ 2433.57
(d) Subtotal (add Lines 6(a) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 313732.23	\$ 313732.23
7 Total Disbursements (from Line 28)		\$ 2319.35	\$ 2319.35
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 311412.88	\$ 311412.88
9 Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$	
10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$	

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

John Fields

Type or Print Name of Treasurer

SIGNATURE OF TREASURER _____ Date July 31, 1983

For further information contact
Federal Election Commission
Toll Free 800-424-9630
Local 202-523-4068

NOTE: Submission of false, fraudulent or incomplete information may subject the person signing this report to the penalties of 18 U.S.C. § 437.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

	FEC FORM 3X (3-80)
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B(7)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 21, 1984

JULY REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES

WHO MUST FILE

ALL unauthorized political committees, except those that file monthly, must file a quarterly report by July 15, 1984. (See below.)

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through June 30, 1984. Political committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration,* through June 30, 1984.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than midnight July 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business July 15, 1984.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

MONTHLY FILERS

Committees that file on a monthly schedule must file their next report by July 20, 1984, and disclose all financial activity of their committee from June 1 through June 30, 1984. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month.

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

B (8)

A R E M I N D E R F O R Q U A R T E R L F I L E R S

All committees that have made contributions or expenditures (including independent expenditures) in connection with a primary election which have not previously been reported must file a pre-election report.

85040532330

B(9)



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

BQ-7

ALB 81884

Pietro Mazzai, Treasurer
Masters Mates & Pilots
Pensioners' Action Fund
P.O. Box 6120
Baltimore, MD 21231

Identification Number: C00012013

Reference: July Quarterly Report (4/1/84-6/30/84)

Dear Mr. Mazzai:

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 Disbursements as required by the Federal Election Campaign Act. 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, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Lisa Baruk on our toll-free number (800) 424-9530. Our local number is (202) 522-4048.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

B(10)

RECEIVED AT THE FCC

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I have reviewed this Report and to the best of my knowledge and belief the information is true and correct.

By E. F. Field
SIGNATURE OF TREASURER

Date _____

SECTION 38, B(1)

$$3(11)$$



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEP 18 1984

MS-L

Pietro Mazzai, Treasurer
Masters Mates and Pilots
Pensioners' Action Fund
P.O. Box 6120
Baltimore, MD 21231

Identification Number: C00012013

Reference: 1983-1984 Election Cycle Reports

Dear Mr. Mazzai:

This letter is prompted by the Commission's review of the reports required to be filed by your committee. The following is a list of reports your committee apparently has failed to file in a timely manner.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
1983 Mid-Year (1/1/83-6/30/83)	7/31/83	9/22/83
1984 July Quarterly (4/1/84-6/30/84)	7/15/84	8/24/84

Timely filing is a specific requirement of the Federal Election Campaign Act and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views failure to timely file reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending with the Commission, any additional failure to timely file a required report by your committee may result in the Commission initiating legal enforcement or audit action.

If you need assistance or have any questions regarding this matter, please feel free to contact me on our toll-free number. (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Michael B. Filler
Chief
Party/Non-Party Branch

B (12)

85040532333
3173329165



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20540

October 1, 1984

GENERAL ELECTION FILING NOTICE
FOR UNAUTHORIZED COMMITTEES

WHO MUST FILE THE PRE-GENERAL ELECTION REPORT
All committees that file monthly reports must file the pre-general election report due October 25, 1984.

In addition all quarterly filing committees that have made contributions or expenditures (including independent expenditures) in connection with the general election must file a pre-election report, if such activity has not previously been reported. See below for post-general filing information.

WHAT MUST BE REPORTED

The report must disclose all financial activity of the committee from the later of, the last report filed or the date of registration* through October 17, 1984. (Monthly filers must disclose all financial activity from the later of October 1 or the date of registration* through October 17, 1984.)

WHEN TO FILE

Pre-general election reports sent registered or certified mail must be postmarked no later than October 22, 1984. Reports hand delivered or mailed first class must be received no later than close of business October 25, 1984.

* * * * *

WHO MUST FILE THE POST-GENERAL ELECTION REPORT
All committees must file the post-general election report due December 6, 1984, regardless of election activity.

WHAT MUST BE REPORTED

The post-general election report must cover all financial activity of the committee from either the date of the last report filed or the date of registration, whichever is later* through November 26, 1984.

WHEN TO FILE

Post-general election reports sent by registered or certified mail must be postmarked no later than December 6, 1984. Reports hand delivered or mailed first class must be received no later than close of business December 6, 1984.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

B (13)

QUARTERLY FILERS

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
3rd Q-Report	07/01* - 09/30	10/15/84	10/15/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General**	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

****Reports filed by committees that did not file the pre-General report should cover all financial activity from the last report filed through November 26, 1984.**

MONTHLY FILERS

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
Oct. Monthly	09/01 - 09/30	10/20/84	10/20/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

COMPLIANCE
Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

FOR INFORMATION CALL: Office Of Public Communications
800/424-9530 or 202/523-4068



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RQ-7

December 28, 1984

Pietro Massai, Treasurer
Masters Mates & Pilots Pensioners'
Action Fund
P.O. Box 6120
Baltimore, MD 21231

Identification Number: C00012013

Reference: 30 Day Post-General Report (10/16/84-11/26/84)

Dear Mr. Massai:

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 Disbursements as required by the Federal Election Campaign Act. 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, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 101.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Pamela [redacted] on our toll-free number (800) 424-9530. Our local number is (202) 523-4040.

Sincerely,

John D. Gibson
John D. Gibson
Assistant Staff Director
Reports Analysis Division

B(15)

85040532736
R410335/4800

MEMORANDUM TO THE FILES:

COMMITTEE: Masters Mates & Pilots Pensioners Action Fund
CONTACT: John Thomas Shaw, Attorney (301) 744-6400
DATE: 1/23/85
ANALYST: Brown
SUBJECT: Non-Filing of the 30 Day Post General Report

I contacted Mr. Shaw to inquire ~~if~~ he had received the FEC non-filer notification. I also told him that we had not received the report. He told me that a heavy case schedule had precluded timely filing of the report, but that he was working on it. I advised him to get the report in as soon as possible, as the matter would be referred to the Counsel's office. He said that he would do so.

Mr. Shaw called back a short time later to tell me that the coverage dates discussed in the letter (10/16/84-11/26/84) differed from what I had stated in my earlier conversation. I told him that he should pick up where the filings had ended as the letter had stated, and that I had misspoken.

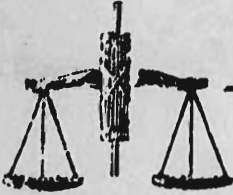
B(16)

85040532337

McRobie and Shaw

35 JAN 29 1985
Attorneys at Law

41

715 Ingleside Avenue • Baltimore, Maryland 21228
744-8400

January 25, 1985

Federal Election Commission
1325 K Street, NW
Washington, D.C. 20463

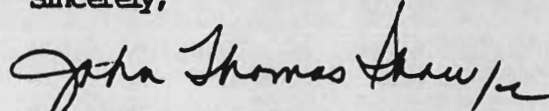
Attn: Ms. Pamela Brown
Reports Analysis Division

Re: Pensioners Action Fund
FEC No.: C00012013
30 Day Post-General Election
Report 10/16/84 - 11/26/84

Dear Ms. Brown:

Kindly find enclosed the above captioned report.

Sincerely,


John Thomas Shaw

JTS:lw

B(17)

8504053338

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

NEW YORK STATE FEC

(Summary Page) Attachment 11
Page 2 of 2

05 JAN 28 09:41

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

Pensioners Action Fund

Address (Number and Street)

P.O. Box 6120

City, State and ZIP Code

Baltimore, Maryland 21231

☐ Check here if address is different than previously reported.

2. FEC Identification Number
C 0012013

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☐ Monthly Report for _____

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☒ Thirtieth day report following the General Election period 10-16-84 - 11-26-84 on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☐ NO

SUMMARY

5. Covering Period 10-16-84 through 11-26-84

6. (a) Cash on hand January 1, 19 84

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

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

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

\$ 303,892.55

\$ 296,163.87

\$ 390 52 \$ 2,747.76

\$ 296,554.39 \$ 306,640.31

\$ 1,096.81 \$ 11,182.73

\$ 295,457.58 \$ 295,457.58

\$

\$

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

John E. Fields

Date

1/24/85

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4068

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

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All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3/80)

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 7, 1985

JANUARY 31 YEAR-END REPORT NOTICE

WHO MUST FILE

ALL POLITICAL COMMITTEES currently registered with the Commission must file a year-end report by January 31, 1985.

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through December 31, 1984. Political committees that have not previously filed a financial report should report all financial activity from the date of registration* through December 31, 1984.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1985. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1985.

WHERE TO FILE

Committees should consult the instructions on the enclosed form for details.

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

1985 FILING REQUIREMENTS

See the January 1985 issue of the FEC Record for filing requirements during 1985.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

FOR INFORMATION CALL: Office of Public Communications
202/523-4068 or 800/424-9530

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FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1961

Date Filmed 7/26/85 Camera No. --- 2

Cameraman J.A.D.

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