



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2005

Date Filmed 3/26/86 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

Routing slips, internal
documents discussion of
civil penalty, RFD Ref. Standards

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- | | |
|--|---|
| ☐ (1) Classified Information | ☐ (6) Personal privacy |
| ☒ (2) Internal rules and practices | ☐ (7) Investigatory files |
| ☐ (3) Exempted by other statute | ☐ (8) Banking Information |
| ☐ (4) Trade secrets and commercial or financial information | ☐ (9) Well Information (geographic or geophysical) |
| ☒ (5) Internal Documents | |

Signed

Mary Lybarger

date

3-6-86

FEC 9-21-77

36040572662



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 2, 1985

Leo Geffner, Esquire
3055 Wilshire Boulevard
Suite 900
Los Angeles, California 90010

Re: MUR 2005
Political Action Council of
Educators (United Teachers -
Los Angeles)
Betty Karnette, Treasurer

Dear Mr. Geffner:

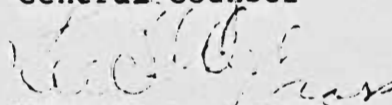
On September 25, 1985, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(i) and (ii), provisions of the Federal Election Campaign Act of 1971, as amended.

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

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Political Action Council of Education) MUR 2005
(United Teachers - Los Angeles)
Gerald A. Reedy, as treasurer)
)

CONCILIATION AGREEMENT

3 5 0 4 0 5 7 2 6 5 5
This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Political Action Council of Educators (United Teachers-Los Angeles) and Gerald Reedy, as treasurer, ("PACE" or "Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii) by failing to file the October Quarterly and 1984 12 Day Pre-General Report in a timely manner.

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

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

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

III. Respondents entered voluntarily into this agreement with the Commission.

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

1. Respondent PACE is a political committee within the meaning of 2 U.S.C. § 431(4)(A).

2. Gerald Reedy is the treasurer of PACE.

3. Section 434(a)(4)(A)(i) of Title 2, United States Code, requires quarterly reports to be filed in an election year, no later than 15 days after last day of each calender quarter.

4. Respondents' Quarterly Report was required to be filed by October 15, 1984. Their 12 day Pre-General Report was due on October 25, 1984. The Quarterly Report was received February 11, 1985, revealing activity during the pre-general reporting period. The October Quarterly Report was filed 120 days late, and the 12 Day Pre-General Report 103 days late.

V. Respondents violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii) by failing to file the October Quarterly and 1984 12 Day Pre-General Report in a timely manner.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Three Hundred and Fifty Dollars (\$350), pursuant to 2 U.S.C. §437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 4431, et seq.

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

05040572665

IX. This agreement shall become effective as of the date all parties hereto have executed the same and the Commission has approved the entire agreement.

X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. 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
Kenneth A. Gross
Associate General Counsel

Sept. 1, 1985
Date

FOR THE RESPONDENTS:

Betty Karnette
Gerald Reedy
Treasurer, PACE

Sept. 9, 1985
Date

850403/2667



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Leo Geffner, Esquire
3055 Wilshire Boulevard
Suite 900
Los Angeles, California 90010

Re: MUR 2005
Political Action Council of
Educators (United Teachers -
Los Angeles)
Betty Karnette, Treasurer

Dear Mr. Geffner:

On September 25, 1985, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(i) and (ii), provisions 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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2005
Political Action Council)
of Educators (United)
Teachers - Los Angeles))
Betty Karnette, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 25, 1985, the Commission decided by a vote of 4-0 to take the following actions in MUR 2005:

1. Accept the conciliation agreement submitted with the General Counsel's Report signed September 19, 1985.
2. Close the file.
3. Approve the letter to the respondents attached to the General Counsel's Report Signed September 19, 1985.

Commissioners Elliott, Josefiak, McDonald and McGarry voted affirmatively in this matter; Commissioners Aikens and Harris did not cast a vote.

Attest:

9-25-85

Date

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

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

Fri., 9-20-85, 4:43
Mon., 9-23-85, 11:00
Wed., 9-25-85, 11:00

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Political Action Council)
of Educators (United Teachers -)
Los Angeles))
Betty Karnette, as treasurer)

05 SEP 20 P 4: 43
MUR 2005

GENERAL COUNSEL'S REPORT

SENSITIVE

BACKGROUND

Attached is a conciliation agreement which has been signed by Betty Karnette, as treasurer of the Political Action Council of Education (or United Teachers - Los Angeles) (hereinafter referred to as "PACE").

The attached agreement contains no changes from the agreement originally proposed by the Commission. A check for the civil penalty of Three Hundred and Fifty Dollars (\$350.00) has been received.

RECOMMENDATIONS

The Office of General Counsel recommends the acceptance of this agreement and the closing of the file.

The Office of General Counsel recommends the approval of the attached letter to the Respondents.

Charles N. Steele
General Counsel

Date

Sept 19, 1985

BY:

Kenneth A. Gross
Associate General Counsel

Attachments
Conciliation Agreement
Check for Civil Penalty
Letter to Respondents

05040174670

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Political Action Council of Education) MUR 2005
(United Teachers - Los Angeles)
Gerald A. Reedy, as treasurer)
)

CONCILIATION AGREEMENT

360403 / 2671
This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Political Action Council of Educators (United Teachers-Los Angeles) and Gerald Reedy, as treasurer, ("PACE" or "Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii) by failing to file the October Quarterly and 1984 12 Day Pre-General Report in a timely manner.

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

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

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

III. Respondents entered voluntarily into this agreement with the Commission.

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

1. Respondent PACE is a political committee within the meaning of 2 U.S.C. § 431(4)(A).

2. Gerald Reedy is the treasurer of PACE.

3. Section 434(a)(4)(A)(i) of Title 2, United States Code, requires quarterly reports to be filed in an election year, no later than 15 days after last day of each calendar quarter.

4. Respondents' Quarterly Report was required to be filed by October 15, 1984. Their 12 day Pre-General Report was due on October 25, 1984. The Quarterly Report was received February 11, 1985, revealing activity during the pre-general reporting period. The October Quarterly Report was filed 120 days late, and the 12 Day Pre-General Report 103 days late.

V. Respondents violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii) by failing to file the October Quarterly and 1984 12 Day Pre-General Report in a timely manner.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Three Hundred and Fifty Dollars (\$350), pursuant to 2 U.S.C. §437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 4431, et seq.

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

IX. This agreement shall become effective as of the date all parties hereto have executed the same and the Commission has approved the entire agreement.

X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. 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

FOR THE RESPONDENTS:

Betty Farnette
~~Gerald Reedy~~
Treasurer, PACE

Sept. 9, 1985
Date

ATTACHMENT 2 of 3

UNITED TEACHERS - LOS ANGELES
2511 W. 3RD STREET
LOS ANGELES, CA 90057

56804

Let's Make Education Number One

Sept. 3, 1985

10-144
1222

UNITED TEACHERS - LOS ANGELES 350 DOLS 00 CTS

DOLLARS \$ 350.00

UNITED TEACHERS - LOS ANGELES

Treasurer of United State

Francis J. Aguirre
Francis J. Aguirre

LOS ANGELES REGIONAL OFFICE
IMPERIAL BANK
665 S. FIGUEROA ST.
LOS ANGELES, CA 90017

056804 1222201441

070041985



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

Leo Geffner, Esquire
3055 Wilshire Boulevard
Suite 900
Los Angeles, California 90010

Re: MUR 2005
Political Action Council of
Educators (United Teachers -
Los Angeles)
Betty Karnette, Treasurer

Dear Mr. Geffner:

On 1985, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(i) and (ii), provisions 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

ATTACHMENT 3 of 3

05 SEP 16 12:33
OF COUNSEL
Michael Smolen
Patricia A. Duncan

Geffner & Satzman

A Professional Corporation

3055 Wilshire Boulevard, Suite 900
Los Angeles, California 90010
(213) 487-1520 • (213) 531-9724

Attorneys at Law

Leo Geffner

Barry Satzman

Irwin L. Goldstein

Jeffrey Paule

Helena Sunny Wise

Leland Rosner

Judge (Ret.) William S. Hassen

Louis Rimbach

Bruce A. Sackett

Michael J. McNeil

Roberta S. Kallan

September 12, 1985

Mr. Craig Engle
Federal Election Commission
Washington, D.C. 20463

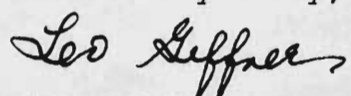
RE: United Teachers-Los Angeles
Political Action Council of Educators
MUR 2005

Dear Mr. Engle:

I am enclosing a Conciliation Agreement signed by Betty Karnette, Treasurer, PACE/UTLA and a check from United Teachers-Los Angeles dated September 3, 1985 and Check No. 56804 in the amount of \$350.00 payable to the Treasurer of United States.

Please send a signed copy of the Concilation Agreement to this office.

Yours very truly,



LEO GEFFNER

LG/emp

Enclosures

cc: Wayne Johnson, President, UTLA
Betty Karnette, Treasurer, UTLA

05043572676



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

13 August 1985

Mr. Leo Geffner, Esquire
Geffner & Satzman
3055 Wilshire Boulevard, Suite 980
Los Angeles, CA 90010

RE: MUR 2005

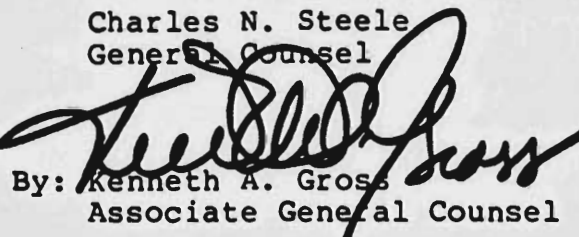
Dear Mr. Geffner:

On May 15, 1985, the Commission found reason to believe that Political Action Council of Educators (United Teachers-Los Angeles) and Gerald Reedy, as treasurer, violated 2 U.S.C. §434(a)(4)(A)(i) and (ii). At your request, the Commission determined on August 1, 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. Please note 30 day time period in this matter expires on , 1985. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Andrea Quinn, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosures

96040572677

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Political Action Council of Education)
(United Teachers - Los Angeles)
Gerald A. Reedy, as treasurer)

MUR 2005

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Political Action Council of Educators (United Teachers-Los Angeles) and Gerald Reedy, as treasurer, ("PACE" or "Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii) by failing to file the October Quarterly and 1984 12 Day Pre-General Report in a timely manner.

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

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

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

III. Respondents entered voluntarily into this agreement with the Commission.

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

1. Respondent PACE is a political committee within the meaning of 2 U.S.C. § 431(4)(A).

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2. Gerald Reedy is the treasurer of PACE.

3. Section 434(a)(4)(A)(i) of Title 2, United States Code, requires quarterly reports to be filed in an election year, no later than 15 days after last day of each calender quarter.

4. Respondents' Quarterly Report was required to be filed by October 15, 1984. Their 12 day Pre-General Report was due on October 25, 1984. The Quarterly Report was received February 11, 1985, revealing activity during the pre-general reporting period. The October Quarterly Report was filed 120 days late, and the 12 Day Pre-General Report 103 days late.

V. Respondents violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii) by failing to file the October Quarterly and 1984 12 Day Pre-General Report in a timely manner.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Three Hundred and Fifty Dollars (\$350), pursuant to 2 U.S.C. §437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 4431, et seq.

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

150405 / 2579

IX. This agreement shall become effective as of the date all parties hereto have executed the same and the Commission has approved the entire agreement.

X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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FOR THE COMMISSION:

Charles N. Steele
General Counsel

By:

Kenneth A. Gross
Associate General Counsel

Date

FOR THE RESPONDENTS:

Gerald Reedy
Treasurer, PACE

Date

85040572530



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Leo Geffner, Esquire
Geffner & Satzman
3055 Wilshire Boulevard, Suite 980
Los Angeles, CA 90010

RE: MUR 2005

Dear Mr. Geffner:

On May 15, 1985, the Commission found reason to believe that Political Action Council of Educators (United Teachers-Los Angeles) and Gerald Reedy, as treasurer, violated 2 U.S.C. §434(a)(4)(A)(i) and (ii). At your request, the Commission determined on , 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Leo Geffner, Esquire
Geffner & Satzman
3055 Wilshire Boulevard, Suite 980
Los Angeles, CA 90010

RE: MUR 2005

Dear Mr. Geffner:

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Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. Please note 30 day time period in this matter expires on , 1985. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Andrea Quinn, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2005
Political Action Council)
of Educators (United)
Teachers - Los Angeles)
Gerald A. Reedy, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 1, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 2005:

1. Enter into conciliation with Political Action Council of Educators (United Teachers-Los Angeles) and Gerald Reedy, 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 July 25, 1985.
3. Approve and send the letter attached to the General Counsel's Report signed July 25, 1985.

Commissioners Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter; Commissioner Aikens did not cast a vote.

Attest:

8-1-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

In the Matter of)

Political Action Council)
of Educators (United)
Teachers - Los Angeles)

Gerald A. Reedy, as treasurer)

05 JUL 29 P 4: 53

MUR 2005

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On May 15, 1985, the Commission found reason to believe the Political Action Council of Education (United Teachers-Los Angeles ("PACE") and Gerald Reedy, as treasurer, violated 2 U.S.C. § 434 (a)(4)(A)(i) and (ii) by failing to file the October Quarterly and the 12 Day Pre-General Reports in a timely manner. Notification of the Commission's finding was mailed to the respondents on May 22, 1985. By letter dated June 26, 1985, the Committee's treasurer requested to settle the matter prior to a finding of probable cause to believe (Attachment 1).

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

III. RECOMMENDATION

1. Enter into conciliation with Political Action

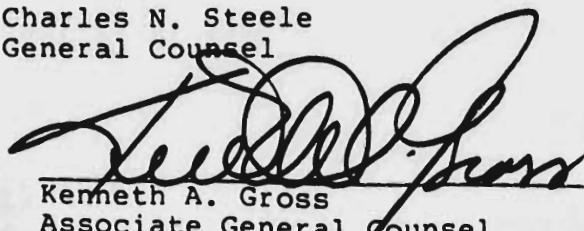
Council of Educators (United Teachers-Los Angeles) and Gerald Reedy, as treasurer, prior to a finding of probable cause to believe.

2. Approve the attached proposed conciliation agreement.
3. Approve and send the attached letter.

Charles N. Steele
General Counsel

360405 / 26835
Date July 25, 1985

By:


Kenneth A. Gross
Associate General Counsel

Attachments:

1. Respondents' Letter Requesting Conciliation
2. Proposed Conciliation Agreement
3. Letter to Respondent

1/Since the pre-election coverage dates (10/1-10/17) were included in the coverage dates of the 1984 Year End Report, we have used the 1984 Year End Report filing date to compute the late filing date of the 12 day Pre-General Report.

GCC #787210
95 JUN 28

Geffner & Satzman

A Professional Corporation

3055 Wilshire Boulevard, Suite 900
Los Angeles, California 90010
(213) 487-1520 • (213) 531-9724

OF COUNSEL
Michael Smolen
Patricia A. Duncan

Attorneys at Law

Leo Geffner
Barry Satzman
Irwin L. Goldstein
Jeffrey Paule

Helena Sunny Wise

Leland Rosner

Judge (Ret.) William S. Hassen

Louis Rimbach

Bruce A. Sackett

Michael J. McNeil

Roberta S. Kallan

15 JUN 28 P 2: 20

RECEIVED
GENERAL COUNSEL

June 26, 1985

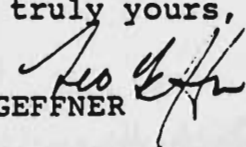
Deborah Curry, Esq.
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2005
Political Action Council of
Educators (United Teachers- Los
Angeles) and Gerald A. Reedy as
Treasurer

Dear Ms. Curry:

United Teachers-Los Angeles and Gerald A. Reedy, Treasurer,
request that the above matter proceed through conciliation.
Please advise us as to the statement of settlement on the
part of the Commission.

Very truly yours,


LEO GEFFNER

LG:bo

cc: Wayne Johnson, President
UTLA

6892 / : C 6 0 5 6

35040:12537

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)
)
)
)
)

MUR 2005

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

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

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

1. Respondent PACE is a political committee within the meaning of 2 U.S.C. § 431(4)(A).

2. Gerald Reedy is the treasurer of PACE.

3. Section 434(a)(4)(A)(i) of Title 2, United States Code, requires quarterly reports to be filed in an election year, no later than 15 days after last day of each calendar quarter.

4. Respondents' Quarterly Report was required to be filed by October 15, 1984. Their 12 day Pre-General Report was due on October 25, 1984. The Quarterly Report was received February 11, 1985, revealing activity during the pre-general reporting period. The October Quarterly Report was filed 120 days late, and the 12 Day Pre-General Report 103 days late.

V. Respondents violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii) by failing to file the October Quarterly and 1984 12 Day Pre-General Report in a timely manner.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Three Hundred and Fifty Dollars (\$350), pursuant to 2 U.S.C. §437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 4431, et seq.

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

IX. This agreement shall become effective as of the date all parties hereto have executed the same and the Commission has approved the entire agreement.

X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. 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

FOR THE RESPONDENTS:

Gerald Reedy
Treasurer, PACE

Date

95040-1-16889

7-15-1971 P3



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Leo Geffner, Esquire
Geffner & Satzman
3055 Wilshire Boulevard, Suite 980
Los Angeles, CA 90010

RE: MUR 2005

Dear Mr. Geffner:

On May 15, 1985, the Commission found reason to believe that Political Action Council of Educators (United Teachers-Los Angeles) and Gerald Reedy, as treasurer, violated 2 U.S.C. §434(a)(4)(A)(i) and (ii). At your request, the Commission determined on , 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. Please note 30 day time period in this matter expires on , 1985. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Andrea Quinn, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

760
GCC #7872.18
05 JUN 28

Geffner & Satzman

A Professional Corporation

3055 Wilshire Boulevard, Suite 900
Los Angeles, California 90010
(213) 487-1520 • (213) 531-9724

OF COUNSEL
Michael Smolen
Patricia A. Duncan

Attorneys at Law

Leo Geffner
Barry Satzman
Irwin L. Goldstein
Jeffrey Paule

Helena Sunny Wise

Leland Rosner

Judge (Ret.) William S. Hassen

Louis Rimbach

Bruce A. Sackett

Michael J. McNeil

Roberta S. Kallan

5 JUN 28 P 2: 20

RECEIVED
COMM-FED-REG

June 26, 1985

Deborah Curry, Esq.
Federal Election Commission
Washington, D. C. 20463

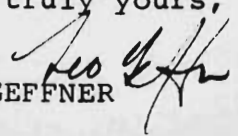
RE: MUR 2005
Political Action Council of
Educators (United Teachers- Los
Angeles) and Gerald A. Reedy as
Treasurer

Dear Ms. Curry:

United Teachers-Los Angeles and Gerald A. Reedy, Treasurer,
request that the above matter proceed through conciliation.
Please advise us as to the statement of settlement on the
part of the Commission.

Very truly yours,

LEO GEFNER



LG:bo

cc: Wayne Johnson, President
UTLA

1667 / 10606

Geffner & Satzman

PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

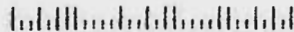
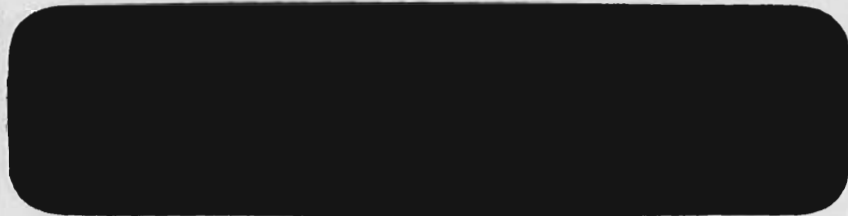
SUITE 900
WILSHIRE BOULEVARD
ANGELES, CALIFORNIA 90010

GENERAL COUNSEL

15 JUN 28 P 2: 20



0572





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 22, 1985

Gerald A. Reedy, Treasurer
Political Action Council of Educators
(United Teachers-Los Angeles)
2511 West 3rd Street
Los Angeles, CA 90057

Re: MUR 2005
Political Action Council of
Educators (United Teachers-Los
Angeles) and Gerald A. Reedy as
treasurer

Dear Mr. Reedy:

On May 15, 1985, the Federal Election Commission determined that there is reason to believe that Political Action Council of Educators (United Teachers-Los Angeles) and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii), provisions 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 the committee and you. 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 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 the 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).

36040372693

Gerald A. Reedy, Treasurer
Page 2

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.

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 Deborah Curry, the attorney 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

35040572604

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Political Action Council of
Educators (United Teachers-
Los Angeles) and Gerald Reedy,
as Treasurer

MUR No. 2005

SUMMARY OF ALLEGATIONS

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The Political Action Council of Educators (United Teachers-
Los Angeles) ("PACE") failed to file the 1984 October Quarterly
and 12 Day Pre-General Reports as of Election Day, November 6,
1984. PACE was notified on September 21, 1984 that the October
Quarterly Report was due on October 15, 1984. PACE was further
notified on October 1, 1984 that the 12 Day Pre-General Report
was due on October 25, 1984 if contributions or expenditures in
connection with the general election were made during the period
ending October 17, 1984.

A Non-Filer Notice was sent on January 29, 1985 to PACE for
failure to file the 1984 October Quarterly and 30 Day Post-
General Reports. The 1984 Year-End Report was received on
February 4, 1985, which covered the period from October 1 through
December 31, 1984. This report disclosed activity during the
pre-general reporting period.* / The 1984 October Quarterly
Report was received on February 11, 1985.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 434(a)(4)(A)(i) and (ii) requires an unauthorized
committee to file, in an election year both a quarterly report
and a pre-general election report. 2 U.S.C. § 434(a)(4)(A)(i)
requires that a quarterly report be filed no later than the 15th

* / Two \$250 contributions were made to the Dymally Dinner
Committee on October 5, 1984.

day after the last day of each calendar quarter. 2 U.S.C. § 434(a)(4)(A)(ii) requires that a pre-election report be filed no later than the 12th day before any election in which the committee makes a contribution or expenditures on behalf of a candidate in such election.

PACE did not file its October Quarterly Report on the due date of October 15, 1984. Additionally, PACE did not file its 12 Day Pre-General Report on the due date of October 25, 1984. Instead, PACE filed a 1984 Year-End Report on February 4, 1985, which covered its activity from October 1 through December 31, 1984. This report disclosed activity during the pre-general reporting period. Subsequently, on February 11, 1985, the 1984 October Quarterly Report was filed by the Committee.

Since the pre-election report coverage date (10/1-10/17) was included in the coverage dates of the 1984 Year End Report and activity was disclosed, it is recommended that the 1984 Year End Report filing date be the date used to compute the late filing of PACE's 12 Day Pre-General Election Report.

Therefore, the disclosure of activity for the pre-election time period, as contained in the 1984 Year End Report, was filed 103 days late by PACE. The activity attributable to the pre-election period is hard to discern since the 1984 Year End Report covered the period 10/1-12/31. However, the receipts for that period were \$6,541 and expenditures for that period were \$3,685.

The October Quarterly Report was filed on February 11, 1985. Therefore, the disclosure of activity for that period was filed 120 days late. The activity attributable to the quarterly period was \$5,249 in receipts and \$6,514 in expenditures.

65040572696

DESCRIPTION OF PRELIMINARY PROCEDURES
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE
FEDERAL ELECTION COMMISSION

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of General Counsel where they are assigned a MUR (Matter Under Review) number, and assigned to a staff member.

Following review of the information which generated the MUR, a recommendation on how to proceed on the matter, which shall include preliminary legal and factual analysis, and any information compiled from materials available to the Commission shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act (FECA) may have occurred or is about to occur and that the Commission conduct an investigation of the matter; or (b) that the Commission find no reason to believe that a possible violation of the FECA has occurred and that the Commission close the file on the matter.

Thereafter, if the Commission decides by an affirmative vote of four (4) Commissioners that there is reason to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed, the Office of the General Counsel shall open an investigation into the matter. Upon notification of the Commission's finding(s), within 15 days a respondent(s) may submit any factual or legal materials relevant to the allegations. During the investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order answers to interrogatories. The respondent(s) may be contacted more than once by the Commission in its investigation.

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: _____

ADDRESS: _____

TELEPHONE: _____

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.

Date

Signature

RESPONDENT'S NAME: _____

ADDRESS: _____

HOME PHONE: _____

BUSINESS PHONE: _____

96040:72698



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Gerald A. Reedy, Treasurer
Political Action Council of Educators
(United Teachers-Los Angeles)
2511 West 3rd Street
Los Angeles, CA 90057

Re: MUR
Political Action Council of
Educators (United Teachers-Los
Angeles) and Gerald A. Reedy as
treasurer

Dear Mr. Reedy:

On , 1985, the Federal Election Commission determined that there is reason to believe that Political Action Council of Educators (United Teachers-Los Angeles) and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii), provisions 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 the committee and you. 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 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 the 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).

Gerald A. Reedy, Treasurer
Page 2

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.

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 Deborah Curry, the attorney 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

05040112700

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Political Action Council of
Educators (United Teachers-
Los Angeles) and Gerald Reedy,
as Treasurer

MUR No. _____

SUMMARY OF ALLEGATIONS

The Political Action Council of Educators (United Teachers-Los Angeles) ("PACE") failed to file the 1984 October Quarterly and 12 Day Pre-General Reports as of Election Day, November 6, 1984. PACE was notified on September 21, 1984 that the October Quarterly Report was due on October 15, 1984. PACE was further notified on October 1, 1984 that the 12 Day Pre-General Report was due on October 25, 1984 if contributions or expenditures in connection with the general election were made during the period ending October 17, 1984.

A Non-Filer Notice was sent on January 29, 1985 to PACE for failure to file the 1984 October Quarterly and 30 Day Post-General Reports. The 1984 Year-End Report was received on February 4, 1985, which covered the period from October 1 through December 31, 1984. This report disclosed activity during the pre-general reporting period.^{*/} The 1984 October Quarterly Report was received on February 11, 1985.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 434(a)(4)(A)(i) and (ii) requires an unauthorized committee to file, in an election year both a quarterly report and a pre-general election report. 2 U.S.C. § 434(a)(4)(A)(i) requires that a quarterly report be filed no later than the 15th

^{*/} Two \$250 contributions were made to the Dymally Dinner Committee on October 5, 1984.

day after the last day of each calendar quarter. 2 U.S.C. § 434(a)(4)(A)(ii) requires that a pre-election report be filed no later than the 12th day before any election in which the committee makes a contribution or expenditures on behalf of a candidate in such election.

PACE did not file its October Quarterly Report on the due date of October 15, 1984. Additionally, PACE did not file its 12 Day Pre-General Report on the due date of October 25, 1984. Instead, PACE filed a 1984 Year-End Report on February 4, 1985, which covered its activity from October 1 through December 31, 1984. This report disclosed activity during the pre-general reporting period. Subsequently, on February 11, 1985, the 1984 October Quarterly Report was filed by the Committee.

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Therefore, the disclosure of activity for the pre-election time period, as contained in the 1984 Year End Report, was filed 103 days late by PACE. The activity attributable to the pre-election period is hard to discern since the 1984 Year End Report covered the period 10/1-12/31. However, the receipts for that period were \$6,541 and expenditures for that period were \$3,685.

The October Quarterly Report was filed on February 11, 1985. Therefore, the disclosure of activity for that period was filed 120 days late. The activity attributable to the quarterly period was \$5,249 in receipts and \$6,514 in expenditures.

350401/2702



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Gerald A. Reedy, Treasurer
Political Action Council of Educators
(United Teachers-Los Angeles)
2511 West 3rd Street
Los Angeles, CA 90057

Re: MUR
Political Action Council of
Educators (United Teachers-Los
Angeles) and Gerald A. Reedy as
treasurer

Dear Mr. Reedy:

On , 1985, the Federal Election Commission determined that there is reason to believe that Political Action Council of Educators (United Teachers-Los Angeles) and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii), provisions 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 the committee and you. 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 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 the 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).

Gerald A. Reedy, Treasurer
Page 2

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.

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 Deborah Curry, the attorney 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

3 5 0 4 0 5 1 2 7 0 4

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Political Action Council of Educators
(United Teachers-Los Angeles)
Gerald A. Reedy, as treasurer

)
) RAD Referral 85NF-75
)
)
)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 15, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-75:

1. Open a MUR.
2. Find reason to believe Political Action Council of Educators (United Teachers-Los Angeles) and Gerald A. Reedy, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii).
3. Approve and send the letter and legal and factual analysis attached to the First General Counsel's Report signed May 10, 1985.

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

Attest:

5-17-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

5-13-85, 9:10
5-13-85, 4:00

SENSITIVE

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION 5/13/85 - 9:10 RAD REFERRAL: 85NF-75
STAFF MEMBER:
Curry

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

RESPONDENT'S NAMES: Political Action Council of Educators
(United Teachers-Los Angeles) and
Gerald A. Reedy, as treasurer

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

INTERNAL REPORTS CHECKED: Political Action Council of Educators
(United Teachers-Los Angeles) by RAD.

FEDERAL AGENCIES CHECKED: None.

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Reports Analysis Division on March 20, 1985.

SUMMARY OF ALLEGATIONS

The Political Action Council of Educators (United Teachers-Los Angeles) ("PACE") failed to file the 1984 October Quarterly and 12 Day Pre-General Reports as of Election Day, November 6, 1984. PACE was notified on September 21, 1984 that the October Quarterly Report was due on October 15, 1984. PACE was further notified on October 1, 1984 that the 12 Day Pre-General Report was due on October 25, 1984 if contributions or expenditures in connection with the general election were made during the period ending October 17, 1984.

A Non-Filer Notice was sent on January 29, 1985 to PACE for failure to file the 1984 October Quarterly and 30 Day Post-General Reports. The 1984 Year-End Report was received on February 4, 1985, which covered the period from October 1 through December 31, 1984. This report disclosed activity during the pre-general reporting period.^{*/} The 1984 October Quarterly Report was received on February 11, 1985.

LEGAL AND FACTUAL ANALYSIS

2 U.S.C. § 434(a)(4)(A)(i) and (ii) requires an unauthorized committee to file, in an election year both a quarterly report and a pre-general election report. 2 U.S.C. § 434(a)(4)(A)(i) requires that a quarterly report be filed no later than the 15th day after the last day of each calendar quarter. 2 U.S.C. § 434(a)(4)(A)(ii) requires that a pre-election report be filed no later than the 12th day before any election in which the committee makes a contribution or expenditures on behalf of a candidate in such election.

PACE did not file its October Quarterly Report on the due date of October 15, 1984. Additionally, PACE did not file its 12 Day Pre-General Report on the due date of October 25, 1984. Instead, PACE filed a 1984 Year-End Report on February 4, 1985, which covered its activity from October 1 through December 31, 1984. This report disclosed activity during the pre-general reporting period. Subsequently, on February 11, 1985, the 1984 October Quarterly Report was filed by the Committee.

^{*/} Two \$250 contributions were made to the Dymally Dinner Committee on October 5, 1984.

Since the pre-election report coverage date (10/1-10/17) was included in the coverage dates of the 1984 Year End Report and activity was disclosed, it is recommended that the 1984 Year End Report filing date be the date used to compute the late filing of PACE's 12 Day Pre-General Election Report.

Therefore, the disclosure of activity for the pre-election time period, as contained in the 1984 Year End Report, was filed 103 days late by PACE. The activity attributable to the pre-election period is hard to discern since the 1984 Year End Report covered the period 10/1-12/31. However, the receipts for that period were \$6,541 and expenditures for that period were \$3,685.

The October Quarterly Report was filed on February 11, 1985. Therefore, the disclosure of activity for that period was filed 120 days late. The activity attributable to the quarterly period was \$5,249 in receipts and \$6,514 in expenditures.

RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. Open a MUR;
2. Find reason to believe Political Action Council of Educators (United Teachers-Los Angeles) and Gerald A. Reedy, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii);

3. Approve and send the attached letter and legal and factual analysis.

Charles N. Steele
General Counsel

May 10, 1985
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. Referral
2. Letter
3. Factual and Legal Analysis

36040372709

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 20 March 1985

ANALYST: Brian Hancock

I. COMMITTEE: Political Action Council of Educators
(United Teachers-Los Angeles)
(C00023754)
Gerald A. Reedy, Treasurer
(October 3, 1983 - present)
Dorothy Moser, Treasurer
(Prior to January 1, 1983 - October 3, 1983)

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

III. BACKGROUND:

Failure to File Required Reports as of Election Day

The Political Action Council of Educators (United Teachers-Los Angeles) ("PACE") failed to file the 1984 October Quarterly and 12 Day Pre-General Reports as of Election Day, November 6, 1984. PACE was notified on September 21, 1984 that the October Quarterly Report was due on October 15, 1984 (Attachment 2). PACE was further notified on October 1, 1984 that the 12 Day Pre-General Report was due on October 25, 1984 if contributions or expenditures in connection with the general election were made during the period ending October 17, 1984. (Attachment 3).

A Non-Filer Notice was sent on January 29, 1985 to PACE for failure to file the 1984 October Quarterly and 30 Day Post-General Reports (Attachment 4). The 1984 Year-End Report was received on February 4, 1985, which covered the period from October 1 through December 31, 1984. This report disclosed activity during the pre-general reporting period (Attachment 5).^{*} The 1984 October Quarterly Report was received on February 11, 1985 (Attachment 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

^{*}/Two \$250 Contributions were made to the Dymally Dinner Committee on October 5, 1984.

NON PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPT	DISBURSEMENTS	TYPE OF FILE COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
POLITICAL ACTION COUNCIL OF EDUCATORS(UNITED TEACHERS-LOS ANGELES)				NON-PARTY QUALIFIED		10 000023754
CONNECTED ORGANIZATION:	TEACHERS-LOS ANGELES; UNITED					
1983	STATEMENT OF ORGANIZATION - AMENDMENT			30OCT83	1	83FEC/284/0641
	STATEMENT OF ORGANIZATION - AMENDMENT			28OCT83	2	83FEC/286/2130
	REQUEST FOR ADDITIONAL INFORMATION 2ND				1	83FEC/284/4299
	APRIL QUARTERLY	8,570	4,720	1JAN83 -31MAR83	4	83FEC/270/4354
	JULY QUARTERLY	11,535	13,537	1APR83 -30JUN83	4	83FEC/279/3077
	JULY QUARTERLY - AMENDMENT	11,641	13,532	1APR83 -30JUN83	4	83FEC/286/2132
	JULY QUARTERLY - AMENDMENT	11,641	13,189	1APR83 -30JUN83	6	84FEC/348/5104
	REQUEST FOR ADDITIONAL INFORMATION			1APR83 -30JUN83	1	84FEC/340/4230
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR83 -30JUN83	4	84FEC/348/3404
	OCTOBER QUARTERLY	45	566	1JUL83 -30SEP83	4	83FEC/287/0572
	OCTOBER QUARTERLY - AMENDMENT	45	566	1JUL83 -30SEP83	5	84FEC/348/5110
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -30SEP83	1	84FEC/340/4236
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL83 -30SEP83	1	84FEC/348/3878
	YEAR-END	8,794	1,910	1OCT83 -31DEC83	4	84FEC/295/4200
	YEAR-END CV - AMENDMENT	8,794	1,910	1OCT83 -31DEC83	5	84FEC/348/5099
	REQUEST FOR ADDITIONAL INFORMATION			1OCT83 -31DEC83	1	84FEC/340/4232
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT83 -31DEC83	1	84FEC/348/3677
1984	APRIL QUARTERLY	9,261	6,610	1JAN84 -31MAR84	4	84FEC/309/0733
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN84 -31MAR84	5	84FEC/346/5458
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31MAR84	1	84FEC/340/4234
	JULY QUARTERLY	5,221	7,824	1APR84 -30JUN84	4	84FEC/322/2102
	JULY QUARTERLY - AMENDMENT	5,221	7,824	1APR84 -30JUN84	5	84FEC/341/5301
	JULY QUARTERLY - AMENDMENT	5,221	7,824	1APR84 -30JUN84	5	84FEC/347/4146
	1ST LETTER INFORMATIONAL NOTICE			1APR84 -30JUN84	1	84FEC/338/1418
	OCTOBER QUARTERLY	5,249	6,514	1JUL84 -30SEP84	5	85FEC/365/4702
	NOTICE OF FAILURE TO FILE			1JUL84 -30SEP84	1	85FEC/362/2063
	NOTICE OF FAILURE TO FILE			1OCT84 -26NOV84	1	85FEC/362/0488
	YEAR-END	6,541	3,685	1OCT84 -31DEC84	4	85FEC/363/4802
	YEAR-END - AMENDMENT	6,541	3,685	1OCT84 -31DEC84	4	85FEC/365/4707
	TOTAL	55,322	0	44,018	0	29 TOTAL PAGES

All reports have been reviewed.

Ending Cash 12/31/84: \$10,340

Debts 12/31/84: -0-

**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

September 21, 1984

OCTOBER REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES**WHO MUST FILE**

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

WHAT MUST BE REPORTED

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

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than October 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business October 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 October 20, 1984, and disclose all financial activity of their committee from September 1 through September 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).

-over-

A R E M I N D E R

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.

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

36040372713



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20541

Attachment 3

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).

-over-

WHERE AND HOW TO FILE

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

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

*Or from date of registration, or the close of books of the last report filed, whichever is later.

**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, D.C. 20463

JAN 29 1985

RQ-7

Gerald A. Reedy, Treasurer
 Political Action Council of
 Educators (United Teachers-
 Los Angeles)
 2511 West 3rd Street
 Los Angeles, CA 90057

Identification Number: C00023754

Reference: October Quarterly (7/1/84-9/30/84) and 30 Day Post-
 General (10/1/84-11/26/84) Reports

Dear Mr. Reedy:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Reports of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due dates for these reports.

It is important that you file these reports immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). Copies of the reports or the relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file these reports may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Pamela C. Brown on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson
 Assistant Staff Director
 Reports Analysis Division

060403/2710

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

FEC

(Summary Page)

85 FEB 4 AM: 36

1. Name of Committee (in Full)
Political Action Council of Educators
United Teachers-Los Angeles

Address (Number and Street)
2511 West 3rd., Street

City, State and ZIP Code
Los Angeles, CA 90057

☐ Check if address is different than previously reported.

2. FEC Identification Number
C00023754

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
☐ July 15 Quarterly Report
☐ October 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

5. Covering Period 10-1-84 Through 12-31-84

6. (a) Cash on Hand January 1, 1984

(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 20)

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 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)

Column A This Period	Column B Calendar Year-to-Date
	\$ 8,701.86
\$ 7,484.94	
\$ 6,541.00	\$ 26,272.98
\$ 14,025.94	\$ 34,974.84
\$ 3,685.00	\$ 25,633.90
\$ 10,340.94	\$ 10,340.94
\$	
\$	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-673-4000

Betty Karnette
Type or Print Name of Treasurer

Betty Karnette
SIGNATURE OF TREASURER

1/30/85
Date

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

All previous versions of FEC FORM 3 and FEC FORM 2s are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

270,974,343



1. TRANSFERS FROM AFFILIATED PARTY COMMITTEES	1,501.00	25,272.25
2. ALL OTHERS		
3. CONTRIBUTIONS TO FEDERAL GOVERNMENT AND OTHER POLITICAL COMMITTEES		
4. CONTRIBUTIONS TO STATE GOVERNMENT AND OTHER POLITICAL COMMITTEES		
5. CONTRIBUTIONS TO LOCAL GOVERNMENT AND OTHER POLITICAL COMMITTEES		
6. CONTRIBUTIONS TO OTHERS		
7. TOTAL CONTRIBUTIONS (Lines 1 through 6)	1,501.00	25,272.25
8. OPERATING EXPENDITURES - 00000000	155.00	1,485.60
9. TRANSFERS TO AFFILIATED PARTY COMMITTEES		
10. CONTRIBUTIONS TO FEDERAL GOVERNMENT AND OTHER POLITICAL COMMITTEES	1,120.00	21,775.00
11. CONTRIBUTIONS TO STATE GOVERNMENT AND OTHER POLITICAL COMMITTEES		
12. CONTRIBUTIONS TO LOCAL GOVERNMENT AND OTHER POLITICAL COMMITTEES		
13. CONTRIBUTIONS TO OTHERS		
14. TOTAL EXPENDITURES (Lines 8 through 13)	1,275.00	23,260.60
15. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
16. TOTAL CONTRIBUTIONS (Line 7)	1,501.00	25,272.25
17. TOTAL EXPENDITURES (Line 14)	1,275.00	23,260.60
18. NET CONTRIBUTIONS (Line 16 minus Line 17)	226.00	2,011.65
19. NET OPERATING EXPENDITURES (Line 14 minus Line 16)	(774.00)	(8,588.35)
20. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES (Line 18 plus Line 19)	149.00	1,123.30

85 FEB 11 10 05

95033454793

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

Value of Work Hours of Teachers

10-14-84

100

Line 202-52-0000

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

All previous versions of PNC FORMS 3 and PNC FORMS 3a are obsolete and should no longer be used.

FEC FORM 3X (2004)

(1)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 20, 1985

Attachment

1

MEMORANDUM

TO : CHARLES N. STEELE
GENERAL COUNSEL

THROUGH : JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT : REFERRAL OF POLITICAL ACTION COUNCIL OF EDUCATORS
(UNITED TEACHERS-LOS ANGELES)

This is a referral of the Political Action Council of Educators (United Teachers-Los Angeles) ("PACE") for failing to file the 1984 October Quarterly and 12 Day Pre-General Reports as of Election Day, November 6, 1984. According to the Review and Referral Procedures (Standard 3), further examination is required by your office.

If you have any questions, please contact Pam Brown or Brian Hancock at 523-4048.

Attachment

8504001/2721

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 20 March 1985

ANALYST: Brian Hancock

I. COMMITTEE: Political Action Council of Educators
(United Teachers-Los Angeles)
(C00023754)
Gerald A. Reedy, Treasurer
(October 3, 1983 - present)
Dorothy Moser, Treasurer
(Prior to January 1, 1983 - October 3, 1983) -

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

III. BACKGROUND:

Failure to File Required Reports as of Election Day

The Political Action Council of Educators (United Teachers-Los Angeles) ("PACE") failed to file the 1984 October Quarterly and 12 Day Pre-General Reports as of Election Day, November 6, 1984. PACE was notified on September 21, 1984 that the October Quarterly Report was due on October 15, 1984 (Attachment 2). PACE was further notified on October 1, 1984 that the 12 Day Pre-General Report was due on October 25, 1984 if contributions or expenditures in connection with the general election were made during the period ending October 17, 1984. (Attachment 3).

A Non-Filer Notice was sent on January 29, 1985 to PACE for failure to file the 1984 October Quarterly and 30 Day Post-General Reports (Attachment 4). The 1984 Year-End Report was received on February 4, 1985, which covered the period from October 1 through December 31, 1984. This report disclosed activity during the pre-general reporting period (Attachment 5).*/ The 1984 October Quarterly Report was received on February 11, 1985 (Attachment 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

*/Two \$250 Contributions were made to the Dymally Dinner Committee on October 5, 1984.

NON PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
POLITICAL ACTION COUNCIL OF EDUCATORS(UNITED TEACHERS-LOS ANGELES)				NON-PARTY QUALIFIED		ID 000023754
CONNECTED ORGANIZATION	TEACHERS-LOS ANGELES; UNITED					
1983	STATEMENT OF ORGANIZATION - AMENDMENT			30CT83	1	83FEC/284/0641
	STATEMENT OF ORGANIZATION - AMENDMENT			29OCT83	2	83FEC/286/2130
	REQUEST FOR ADDITIONAL INFORMATION 2ND				1	83FEC/284/4299
	APRIL QUARTERLY	8,570	4,720	1JAN83 -31MAR83	4	83FEC/270/4354
	JULY QUARTERLY	11,535	13,527	1APR83 -30JUN83	4	83FEC/279/3077
	JULY QUARTERLY - AMENDMENT	11,641	13,532	1APR83 -30JUN83	4	83FEC/286/2132
	JULY QUARTERLY - AMENDMENT	11,641	12,189	1APR83 -30JUN83	6	84FEC/340/5104
	REQUEST FOR ADDITIONAL INFORMATION			1APR83 -30JUN83	1	84FEC/340/4230
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR83 -30JUN83	4	84FEC/340/3404
	OCTOBER QUARTERLY	45	566	1JUL83 -30SEP83	4	83FEC/287/0573
	OCTOBER QUARTERLY - AMENDMENT	45	566	1JUL83 -30SEP83	5	84FEC/340/5110
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -30SEP83	1	84FEC/340/4236
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL83 -30SEP83	1	84FEC/340/3678
	YEAR-END	8,794	1,910	1OCT83 -31DEC83	4	84FEC/295/4200
	YEAR-END C.V.	8,794	1,910	1OCT83 -31DEC83	5	84FEC/340/5099
	REQUEST FOR ADDITIONAL INFORMATION			1OCT83 -31DEC83	1	84FEC/340/4232
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT83 -31DEC83	1	84FEC/340/3677
1984	APRIL QUARTERLY	9,261	6,610	1JAN84 -31MAR84	4	84FEC/309/0723
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN84 -31MAR84	5	84FEC/346/5458
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31MAR84	1	84FEC/340/4234
	JULY QUARTERLY	5,221	7,824	1APR84 -30JUN84	4	84FEC/322/2102
	JULY QUARTERLY - AMENDMENT	5,221	7,824	1APR84 -30JUN84	5	84FEC/341/5301
	JULY QUARTERLY - AMENDMENT	5,221	7,824	1APR84 -30JUN84	5	84FEC/347/4146
	1ST LETTER INFORMATIONAL NOTICE			1APR84 -30JUN84	1	84FEC/338/1410
	OCTOBER QUARTERLY	5,249	6,514	1JUL84 -30SEP84	5	85FEC/365/4702
	NOTICE OF FAILURE TO FILE			1JUL84 -30SEP84	1	85FEC/362/2063
	NOTICE OF FAILURE TO FILE			1OCT84 -26NOV84	1	85FEC/362/0481
	YEAR-END	6,541	3,605	1OCT84 -31DEC84	4	85FEC/363/4002
	YEAR-END - AMENDMENT	6,541	3,605	1OCT84 -31DEC84	4	85FEC/365/4707
	TOTAL	55,322	0	44,018	0	89 TOTAL PAGES

All reports have been reviewed.

Ending Cash 12/31/84: \$10,340

Debts 12/31/84: -0-

**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

September 21, 1984**OCTOBER REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES****WHO MUST FILE**

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

WHAT MUST BE REPORTED

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

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than October 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business October 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 October 20, 1984, and disclose all financial activity of their committee from September 1 through September 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).

-over-

3604057224

5

A R E M I N D E R

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.

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

36040372725



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20541

Attachment 3

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).

-over-

7

WHERE AND HOW TO FILE

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

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

*Or from date of registration, or the close of books of the last report filed, whichever is later.

**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

86040312727

8



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JAN 29 1985

RQ-7

Gerald A. Reedy, Treasurer
Political Action Council of
Educators (United Teachers-
Los Angeles)
2511 West 3rd Street
Los Angeles, CA 90057

Identification Number: C00023754

Reference: October Quarterly (7/1/84-9/30/84) and 30 Day Post-
General (10/1/84-11/26/84) Reports

Dear Mr. Reedy:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Reports of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due dates for these reports.

It is important that you file these reports immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). Copies of the reports or the relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file these reports may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Pamela C. Brown on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

350405723

9

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

(Summary Page)

85 FEB 4 10:36

1. Name of Committee (in Full) Political Action Council of Educators United Teachers-Los Angeles Address (Number and Street) 2511 West 3rd., Street City, State and ZIP Code Los Angeles, CA 90057 ☐ Check if address is different than previously reported. 2. FEC Identification Number C00023754 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 ☐ July 15 Quarterly Report ☐ October 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>10-1-84</u> Through <u>12-31-84</u>		
6. (a) Cash on Hand January 1, 19 <u>84</u>			\$ 8,701.86
(b) Cash on Hand at Beginning of Reporting Period		\$ 7,484.94	
(c) Total Receipts (from Line 12)		\$ 6,541.00	\$ 26,272.98
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)		\$ 14,025.94	\$ 34,974.84
7. Total Disbursements (from Line 28)		\$ 3,685.00	\$ 25,633.90
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))		\$ 10,340.94	\$ 10,340.94
9. Debts and Obligations Owed TO the Committee (Provide all on Schedule C or Schedule D)		\$	
10. Debts and Obligations Owed BY the Committee (Provide 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.

For further information, contact:

Federal Election Commission
 Toll Free 800-424-9530
 Local 202-673-4088

Betty Karnette
 Type or Print Name of Treasurer

Betty Karnette
 SIGNATURE OF TREASURER

1/30/85
 Date

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

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

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FEC FORM 3X (1/80)

10

1. [REDACTED]	
2. [REDACTED]	25,772.95
3. [REDACTED]	
4. [REDACTED]	
5. [REDACTED]	
6. [REDACTED]	
7. [REDACTED]	
8. [REDACTED]	
9. [REDACTED]	
10. [REDACTED]	
11. [REDACTED]	
12. [REDACTED]	25,772.95
13. [REDACTED]	
14. [REDACTED]	1,421.39
15. [REDACTED]	
16. [REDACTED]	21,775.00
17. [REDACTED]	
18. [REDACTED]	
19. [REDACTED]	
20. [REDACTED]	
21. [REDACTED]	
22. [REDACTED]	
23. [REDACTED]	
24. [REDACTED]	
25. [REDACTED]	
26. [REDACTED]	
27. [REDACTED]	
28. [REDACTED]	
29. [REDACTED]	
30. [REDACTED]	
31. [REDACTED]	
32. [REDACTED]	
33. [REDACTED]	
34. [REDACTED]	
35. [REDACTED]	
36. [REDACTED]	
37. [REDACTED]	
38. [REDACTED]	
39. [REDACTED]	
40. [REDACTED]	
41. [REDACTED]	
42. [REDACTED]	
43. [REDACTED]	
44. [REDACTED]	
45. [REDACTED]	
46. [REDACTED]	
47. [REDACTED]	
48. [REDACTED]	
49. [REDACTED]	
50. [REDACTED]	
51. [REDACTED]	
52. [REDACTED]	
53. [REDACTED]	
54. [REDACTED]	
55. [REDACTED]	
56. [REDACTED]	
57. [REDACTED]	
58. [REDACTED]	
59. [REDACTED]	
60. [REDACTED]	
61. [REDACTED]	
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64. [REDACTED]	
65. [REDACTED]	
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69. [REDACTED]	
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74. [REDACTED]	
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76. [REDACTED]	
77. [REDACTED]	
78. [REDACTED]	
79. [REDACTED]	
80. [REDACTED]	
81. [REDACTED]	
82. [REDACTED]	
83. [REDACTED]	
84. [REDACTED]	
85. [REDACTED]	
86. [REDACTED]	
87. [REDACTED]	
88. [REDACTED]	
89. [REDACTED]	
90. [REDACTED]	
91. [REDACTED]	
92. [REDACTED]	
93. [REDACTED]	
94. [REDACTED]	
95. [REDACTED]	
96. [REDACTED]	
97. [REDACTED]	
98. [REDACTED]	
99. [REDACTED]	
100. [REDACTED]	

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 11 of 11 for
 LINE NUMBER 11
 (Use separate schedule for each
 category of the Detailed
 Summary Page)

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)

**Political Action Council of Educators
 United Teachers-Los Angeles**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Gymally Dinner Committee 322 W. Compton Blvd., #103 Compton, CA 90220	dinner Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	10-5-84	\$250.00
G. Full Name, Mailing Address and ZIP Code Gymally Dinner Committee 322 West Compton Blvd., #103 Compton, CA 90220	dinner Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	10-5-84	250.00
C. Full Name, Mailing Address and ZIP Code 1984 Democratic Victory Gala	Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	10-5-84	\$1,200.00
D. Full Name, Mailing Address and ZIP Code Democratic Victory Fund 9465 Wilshire Blvd., #530 Beverly Hills, CA 90212	Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	10-12-84	350.00
E. Full Name, Mailing Address and ZIP Code California Democratic Fund 9911 West Pico Blvd., #301 Los Angeles, CA 90035	Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	10-8-84	870.00
F. Full Name, Mailing Address and ZIP Code Committee to elect Judge R. Shumsky 1633 Purdue Los Angeles, CA 90025	Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	10-31-84	\$200.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

950333/273
 350403/273

For a Political Committee Other Than an Authorized Committee

(Summary Page)

85 FEB 11 10:25 AM ALBA

ALBA AREA

1. Name of Committee (in Full)
 Political Action Council of Educators
 United Teachers-Los Angeles

Address (Number and Street)

2511 West 3rd., Street

City, State and ZIP Code

Los Angeles, CA 90057

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C80023754

3. ☐ This committee qualified as an independent committee during this reporting period on _____
 Date

4. TYPE OF REPORT (Check appropriate boxes)

☐ April 15 Quarterly Report ☐ October 15 Quarterly Report☐ July 15 Quarterly Report ☐ January 31 Year End Report☐ July 31 Mid Year Report (Non-Quarter Year Only)☐ Monthly Report for _____☐ Twelfth day report preceding _____
Election

election on _____ in the State of _____

☐ Twelfth day report following the General Election

on _____ in the State of _____

☐ Termination Report

Is this Report an Amendment?

☐ YES☐ NO

SUMMARY

5. Covering Period 7-1-84 through 9-30-84

6. (a) Cash on hand January 1, 1984

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (From Line 10)

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

7. Total Disbursements (From Line 20)

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

9. Debts and Obligations Owed TO The Committee

(Provide all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee

(Provide 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.

Betty Karnette

Type or Print Name of Treasurer

Betty Karnette

10-14-84

Date

For further information contact:

Federal Election Commission

Toll Free 800-426-6530

Local 202-433-4000

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

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

FEC FORM 3X (3/80)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Attachment 2

Gerald A. Reedy, Treasurer
Political Action Council of Educators
(United Teachers-Los Angeles)
2511 West 3rd Street
Los Angeles, CA 90057

Re: MUR
Political Action Council of
Educators (United Teachers-Los
Angeles) and Gerald A. Reedy as
treasurer

Dear Mr. Reedy:

On , 1985, the Federal Election Commission determined that there is reason to believe that Political Action Council of Educators (United Teachers-Los Angeles) and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii), provisions 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 the committee and you. 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 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 the 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).

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Gerald A. Reedy, Treasurer
Page 2

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.

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 Deborah Curry, the attorney 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

36040372734

Attachment 3

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GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Political Action Council of
Educators (United Teachers-
Los Angeles) and Gerald Reedy,
as Treasurer

MUR No. _____

SUMMARY OF ALLEGATIONS

The Political Action Council of Educators (United Teachers-Los Angeles) ("PACE") failed to file the 1984 October Quarterly and 12 Day Pre-General Reports as of Election Day, November 6, 1984. PACE was notified on September 21, 1984 that the October Quarterly Report was due on October 15, 1984. PACE was further notified on October 1, 1984 that the 12 Day Pre-General Report was due on October 25, 1984 if contributions or expenditures in connection with the general election were made during the period ending October 17, 1984.

A Non-Filer Notice was sent on January 29, 1985 to PACE for failure to file the 1984 October Quarterly and 30 Day Post-General Reports. The 1984 Year-End Report was received on February 4, 1985, which covered the period from October 1 through December 31, 1984. This report disclosed activity during the pre-general reporting period.^{*/} The 1984 October Quarterly Report was received on February 11, 1985.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 434(a)(4)(A)(i) and (ii) requires an unauthorized committee to file, in an election year both a quarterly report and a pre-general election report. 2 U.S.C. § 434(a)(4)(A)(i) requires that a quarterly report be filed no later than the 15th

^{*/} Two \$250 contributions were made to the Dymally Dinner Committee on October 5, 1984.

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day after the last day of each calendar quarter. 2 U.S.C. § 434(a)(4)(A)(ii) requires that a pre-election report be filed no later than the 12th day before any election in which the committee makes a contribution or expenditures on behalf of a candidate in such election.

PACE did not file its October Quarterly Report on the due date of October 15, 1984. Additionally, PACE did not file its 12 Day Pre-General Report on the due date of October 25, 1984. Instead, PACE filed a 1984 Year-End Report on February 4, 1985, which covered its activity from October 1 through December 31, 1984. This report disclosed activity during the pre-general reporting period. Subsequently, on February 11, 1985, the 1984 October Quarterly Report was filed by the Committee.

Since the pre-election report coverage date (10/1-10/17) was included in the coverage dates of the 1984 Year End Report and activity was disclosed, it is recommended that the 1984 Year End Report filing date be the date used to compute the late filing of PACE's 12 Day Pre-General Election Report.

Therefore, the disclosure of activity for the pre-election time period, as contained in the 1984 Year End Report, was filed 103 days late by PACE. The activity attributable to the pre-election period is hard to discern since the 1984 Year End Report covered the period 10/1-12/31. However, the receipts for that period were \$6,541 and expenditures for that period were \$3,685.

The October Quarterly Report was filed on February 11, 1985. Therefore, the disclosure of activity for that period was filed 120 days late. The activity attributable to the quarterly period was \$5,249 in receipts and \$6,514 in expenditures.

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 2005

Date Filmed 3/26/86 Camera No. --- 2

Cameraman AS

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