



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2007

Date Filmed 4/1/86 Camera No. --- 3

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FEDERAL ELECTION COMMISSION

Loaning slips, Conciliation negotiation information,
Internal documents, Internal procedures,
Duplicative Materials

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):

- | | |
|---|--|
| <u>X</u> (1) Classified Information | _____ (6) Personal privacy |
| <u>X</u> (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) |
| <u>X</u> (5) Internal Documents | |

Signed _____
 date _____

FEC 9-21-77

1973/12/82

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

First National State Bancorporation
Political Action Committee
Bruno A. Mancuso, treasurer

)
) RAD REFERRAL 85NF-87
)
)
)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 16, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-87:

1. Open a MUR.
2. Find reason to believe that the First National State Bancorporation Political Action Committee and Bruno A. Mancuso, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv).
3. Approve the letter and factual and legal analysis attached to the First General Counsel's Report signed May 13, 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, 11:38
5-14-85, 11:00

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MUR 2007

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1. Enter into conciliation with the First Fidelity Bancorporation Political Action Committee and Bruno A. Mancuso, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter attached to the General Counsel's Report signed July 12, 1985.

Attest:

Date _____

Jody C. Hanson
for Marjorie W. Emmons
Secretary of the Commission

7-16-85, 9:58
7-16-85, 4:00

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

First Fidelity Bancorporation
Political Action Committee
Bruno A. Mancuso, as treasurer

)
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)
)

MUR 2007

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 10, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 2007:

2. Approve the proposed conciliation agreement prepared by Office of General Counsel submitted with the General Counsel's Report signed October 3, 1985.
3. Approve and send the letter attached to the General Counsel's Report signed October 3, 1985.

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

Attest:

10-11-85

Date

Jody C. Ransom

for Marjorie W. Emmons
Secretary of the Commission

96040573939

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

First Fidelity Bancorporation)
Political Action Committee)
Bruno A. Mancuso, Treasurer)

MUR 2007

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 28, 1986, the Commission decided by a vote of 6-0 to take the following actions in MUR 2007:

1. Accept the conciliation agreement attached to the General Counsel's Report signed January 23, 1986.
2. Close the file.
3. Approve and send the proposed letter attached to the General Counsel's Report signed January 23, 1986.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald and McGarry voted affirmatively for this decision.

Attest:

1-28-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Thurs.,	1-23-86,	4:46
Circulated on 48 hour tally basis:	Fri.,	1-24-86,	2:00
Deadline for vote:	Tues.,	1-28-86,	4:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 6, 1986

William F. Squadron, Esquire
Morrison & Foerster
Suite 5500
2000 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 2007

Dear Mr. Squadron:

On January 28, 1986, 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), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross (2/6/86)
By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

86040573991

BEFORE THE
FEDERAL ELECTION COMMISSION

In the Matter of

MUR 2007

First Fidelity Bancorporation
Political Action Committee
Bruno A. Mancuso, as Treasurer

CONCILIATION AGREEMENT

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This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the First National State Bancorporation Political Action Committee and Bruno A. Mancuso, as Treasurer ("Respondents"), violated 2 U.S.C.

§ 434(a)(4)(a)(i) and (iv) by filing late its 1983 Year-End Report due by January 31, 1984, its 1984 July Quarterly Report due by July 15, 1984, and its 1984 Year-End Report due by January 31, 1985. On June 14, 1985, Respondents notified the Commission that the Committee's official name had been changed to the First Fidelity Bancorporation Political Action Committee.

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. Respondents enter voluntarily into this agreement with the Commission.

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

1. Respondent committee is a political committee which registered with the Commission.

2. 2 U.S.C. § 434(a)(4)(A)(i) and (iv) and 11 C.F.R. § 104.5(c)(1)(i) and (2)(i)(B) require that committees which elect to file quarterly reports in election years file such reports no later than the fifteenth day following the close of the immediately preceding quarter, except that the report for the final quarter, the Year-End Report, may be filed no later than January 31 of the following calendar year; and that committees filing semi-annually in non-election years file their reports covering the period of July 1 through December 31 no later than January 31 of the following calendar year.

3. Respondents' second 1983 semi-annual, or Year-End report was due on January 31, 1984, but was filed on February 23, 1984.

4. Respondents' 1984 July Quarterly Report was due on July 15, 1984, but was filed on August 1, 1984.

5. Respondents' 1984 Year-End Report was due on January 31, 1985, but was filed on March 28, 1985.

V. By filing the three above-cited reports in untimely fashion, Respondents failed to comply with the requirements of 2 U.S.C. § 434(a)(4)(i) and (iv).

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Three Hundred and Twenty-Five Dollars (\$325), 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. § 431, 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 that all parties hereto have executed 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 agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

2/5/86
Date

FOR THE RESPONDENT:

Jerome D. Greco
(Name) Jerome D. Greco
(Position) Treasurer

12/13/85
Date

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In The Matter Of

First Fidelity Bancorporation
Political Action Committee
Bruno A. Mancuso, Treasurer

MUR 2007 46

GENERAL COUNSEL'S REPORT

Background

Attached is a conciliation agreement which has been signed by counsel for the respondent.

Recommendation

The Office of General Counsel recommends the acceptance of this agreement, the closing of the file and approving and sending the attached proposed letter.

Charles N. Steele
General Counsel

January 23, 1986
Date

BY

Kenneth A. Gross
Associate General Counsel

Attachments

Conciliation agreement
Photocopy of civil penalty check
Proposed letter

86040573996

LAW OFFICES OF
MORRISON & FOERSTER

SAN FRANCISCO
LOS ANGELES
DENVER
LONDON

2000 PENNSYLVANIA AVENUE, N. W.
SUITE 8800
WASHINGTON, D. C. 20006
TELEPHONE (202) 897-1800
TELEX 90-4000

HONG KONG
WOODLAND HILLS
WALNUT CREEK

WRITER'S DIRECT DIAL NUMBER

202/887-1515

November 6, 1985

BY HAND

Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2007 - First Fidelity Bancor-
poration Political Action Committee
and Bruno A. Mancuso, as Treasurer

Dear Mr. Steele:

The purpose of this letter is to set forth the understanding of our clients, First Fidelity Bancorporation Political Action Committee and Bruno A. Mancuso, as Treasurer ("First Fidelity"), with respect to the draft Conciliation Agreement dated November 6, 1985 ("Agreement") in the above-referenced matter. A copy of the Agreement is attached.

Paragraphs VII and VIII of the Agreement, by their express terms, would authorize the Commission to proceed directly to federal court when it believes that any violation of the Federal Election Campaign Act of 1971, as amended ("Act"), has been committed by First Fidelity. It is our understanding that the Commission would only exercise such authority with respect to a perceived recurrence of the untimely filings that are the subject matter of the Agreement, as opposed to other types of violations of the Act. It is our further understanding that the Commission has not previously relied on comparable provisions in other Conciliation Agreements to proceed directly to court with respect to perceived violations of the Act unrelated to the subject matter of a given Conciliation Agreement. Lastly, we would request that a copy of this letter be placed in the public

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P 5:36

MORRISON & FOERSTER

Charles N. Steele
November 6, 1985
Page 2

file concerning this matter, when the Agreement is executed and placed therein.

Assuming that our understanding expressed above is accurate, and that this letter will be placed in the public file as requested, First Fidelity is prepared to execute the Agreement. Please advise us by November 13, 1985 if our understanding on these issues is incorrect in any respect, or if there are any problems in placing this letter in the public file.

Sincerely,


Robert M. Kurucza

Enclosure

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

5 August 1985

Robert M. Kurucza, Esquire
William F. Squadron, Esquire
Morrison and Foerster
2000 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 2007
First Fidelity
Bancorporation
Political Action Committee
Bruno A. Mancuso, as
treasurer

Dear Mr. Kurucza and Mr. Squadron:

On May 16, 1985, the Commission found reason to believe that the First National State Bancorporation Political Action Committee, now the First Fidelity Bancorporation Political Action Committee, and Bruno A. Mancuso, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv). At your request, the Commission, on July 18, 1985, determined to enter into negotiations directed toward 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 your clients agree with the provisions of the enclosed agreement, please sign it 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. If you have any questions, or suggestions for changes in the agreement, or if you wish to arrange a meeting in

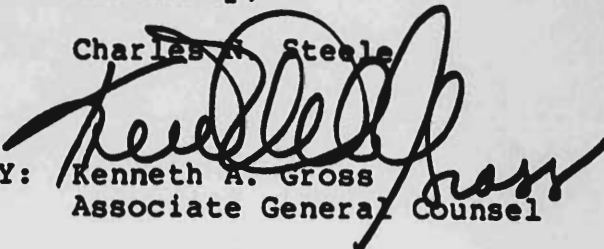
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Page 2
Robert M. Kurucza, Esquire
William F. Squadron, Esquire

connection with a mutually satisfactory conciliation agreement,
please contact Anne A. Weissenborn, the attorney assigned to this
matter, at (202) 523--4000.

Sincerely,

Charles A. Steele


BY: Kenneth A. Gross
Associate General Counsel

Enclosure

86040574000

BEFORE THE FEDERAL ELECTION COMMISSION

July 5, 1985

85 JUL 16 49:59

In the Matter of

MUR 2007

First Fidelity Bancorporation
Political Action Committee
(formerly First National State
Bancorporation Political Action
Committee)
Bruno A. Mancuso, as treasurer

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On May 16, 1985, the Commission found reason to believe that the First National State Bancorporation Political Action Committee and Bruno A. Mancuso, as treasurer, had violated 2 U.S.C. § 434(a)(43)(A)(i) and (iv) by filing the committee's 1983 Year-End Report on February 23, 1984, or twenty-three days late, its 1984 July Quarterly Report on August 1, 1984, or seventeen days late, and its 1984 Year-End Report on March 28, 1985, or fifty-six days late. Respondents were sent a Chronic Late Filing Notice on September 28, 1984, for failure to file the 1983 Year-End Report and the 1984 July Quarterly Report in a timely fashion. Notification of the Commission's determination was sent to the respondents on May 21, 1985.

On June 14, 1985, the respondent committee notified the Commission that its official name has been changed to the First Fidelity Bancorporation Political Action Committee.

On June 11, 1984, a representative of this Office met with counsel for the respondents. Earlier, on June 3, and subsequently, on June 12, 1985, this Office received requests for

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extensions of time in which to respond, the second being until June 26. This response has now been received. In it counsel cites numerous allegedly mitigating factors and requests that the Commission enter into conciliation negotiations prior to a finding of probable cause to believe. (Attachment 1).

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

Attached for the Commission's approval is a proposed conciliation agreement with First Fidelity Bancorporation Political Action Committee and Bruno A. Mancuso, as treasurer.. This agreement provides for an admission of violation and a proposed civil penalty of \$400.

penalty in this matter reflects the following information:

<u>Report</u>	<u>Receipts</u>	<u>Exp's</u>	<u>Report Due</u>	<u>Report Filed</u>	<u>Days Late</u>	
1983 Year-End	\$18,710.00	\$13,335.27	1/31/84	2/23/84	23	—
1984 July Quarterly	\$ 6,535.28	\$ 4,513.87	7/15/84	8/1/84	17	
1984 Year-End	\$ 1,315.00	\$ 2,208.10	1/28/85	3/28/85	56	

* Total activity during periods covered by late reports -\$46,616
Total activity during election cycle - \$119,483

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III. RECOMMENDATIONS

1. Enter into conciliation with the First Fidelity Bancorporation Political Action Committee and Bruno A Mancuso, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Charles N. Steele
General Counsel

July 12, 1985
Date

[Signature]
BY: Kenneth A. Gross
Associate General Counsel

Attachments

1. Response from counsel
2. Proposed conciliation agreement
3. Letter to counsel

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BCC # 7847
Weissenborn

LAW OFFICES OF
MORRISON & FOERSTER

SAN FRANCISCO
LOS ANGELES
DENVER
LONDON

3000 PENNSYLVANIA AVENUE, N. W.
SUITE 5500
WASHINGTON, D. C. 20008
TELEPHONE (202) 887-1500
TELEX 90-4000

HONG KONG
WOODLAND HILLS
WALNUT CREEK

June 26, 1985

WRITER'S DIRECT DIAL NUMBER
(202) 887-1515

BY HAND

Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 2007

Dear Mr. Steele:

The First Fidelity Bancorporation Political Action Committee ("Committee") and Bruno Mancuso, as Treasurer of the Committee, (collectively "Respondents"), are in receipt of the Commission's letter of May 21, 1985 which states that the Commission has found reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act"), has taken place. The Committee and Mr. Mancuso hereby respectfully respond to the Commission's May 21st letter.^{1/}

Respondents request, pursuant to 11 C.F.R. § 111.18(d), that the Commission and the Respondents enter into conciliation negotiations prior to a Commission finding of probable cause. Respondents anticipate and believe that the conciliation process will disclose mitigating factors regarding the matters described in the Commission's May 21st letter. A summary of those factors include the following:

1. The Committee has consistently viewed its responsibilities and obligations under the Federal Election Campaign Act and the Commission's rules with the utmost seriousness, as reflected by the senior level bank executives responsible for ensuring that reports are timely filed.

^{1/} On June 14, 1985 the Committee notified the Commission that its official name has been changed to the First Fidelity Bancorporation Political Action Committee from the First National State Bancorporation Political Action Committee.

15 JUN 26 4:02 PM '85
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

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MORRISON & FOERSTER

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Charles N. Steele
June 26, 1985
Page 2

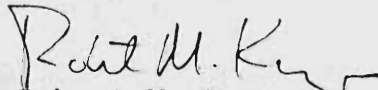
2. The Committee has recently implemented even more stringent procedures intended to ensure further that reports required under the Act are filed in a timely fashion.

3. The 1984 Year-End Report, by far the most untimely of the Reports, was due at a time when both Mr. Mancuso and his assistant were deeply involved and personally responsible for significant aspects of a major bank acquisition by First National State Bancorporation.

In addition to the above factors, Respondents believe that any conciliation agreement should reflect the fact that this matter represents the first time that the Commission has issued a complaint against the Committee, and that the bank has implemented additional procedures to ensure timely filing in the future. Accordingly, particularly in view of the Commission's primary objective of ensuring compliance with the Act, which the Committee has already proceeded to ensure by further revising its procedures, we believe that a civil penalty is not warranted under the circumstances.

We look forward to hearing from you regarding conciliation negotiations prior to a finding of probable cause. Please let us know if we can provide any further information.

Very truly yours,


Robert M. Kurucz

Counsel for First Fidelity
Bancorporation Political
Action Committee and Bruno A.
Mancuso, as Treasurer

RMK/jb

cc: Anne A. Weissenborn, Esq.
Charles Terribile, Esq.
William F. Squadron, Esq.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1985

Bruno A. Mancuso
First National State
Bancorporation Political
Action Committee
550 Broad Street
Newark, New Jersey 07101

RE: MUR 2007

Dear Mr. Mansco:

On May 16, 1985, the Commission determined that there is reason to believe that the First National State Bancorporation Political Action Committee, and you, as treasurer, have violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv), provisions of the Federal Election Campaign Act of 1971, as amended. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials 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).

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 any such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

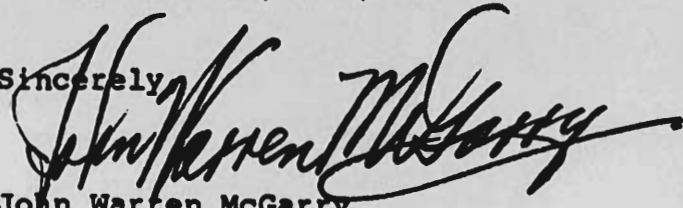
The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

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Bruno A. Mancuso
Page 2

For your information we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Anne A. Weissenborn, 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

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT First National State Bancorporation MUR NO. 2007
Political Action Committee
Bruno A. Mancuso, as Treasurer

SUMMARY OF ALLEGATIONS

8 6 0 4 0 5 7 4 0 0 3
The Committee is an unauthorized committee which has elected to file quarterly and semi-annual reports and which is therefore subject to the provisions of 2 U.S.C. § 434(a)(4)(A)(i) and (iv) and 11 C.F.R. § 104.5(c)(1)(i) and (2)(i)(B) requiring the filing in election years of quarterly reports no later than the 15th day following the close of the immediately preceding quarter, except that the report for the final quarter, the Year-End Report, may be filed no later than January 31 of the following calendar year; and the filing in non-election years of a semi-annual report concerning the period of July 1 through December 31 no later than January 31 of the following calendar year. The Committee did not file its second 1983 semi-annual or Year-End Report until February 23, 1984, or twenty-three (23) days late, its 1984 July Quarterly Report until August 1984, or seventeen (17) days late, and its 1984 Year-End Report until March 28, 1985 or fifty-six (56) days late.

The Committee was sent a Chronic Late Filing Notice on September 18, 1984, but failed to file its 1984 Year-End Report on time. A Non-Filer Notice was sent to the Committee on February 22, 1985, regarding this 1984 Year-End Report; however, this report was not filed until March 28, 1985.

FACTUAL AND LEGAL ANALYSIS

The Committee was required to file its 1983 Year-End Report no later than January 31, 1984, its 1984 July Quarterly Report no later than July 15, 1984 and its 1984 Year-End Report no later than January 31, 1985; however, these reports were not filed until February 23, 1984, August 1, 1984, and March 28, 1985, respectively, or between seventeen and fifty-six days late. The Committee's failure to comply with the reporting requirements in a timely manner are violations of 2 U.S.C. § 434(a)(4)(A)(i) and (iv) and of 11 C.F.R. § 104.5(c)(1)(i) and (2)(i)(B). Hence it was the recommendation of the General Counsel's Office that the Commission open a matter under review and find reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv).

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SENSITIVE

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

FEC
CLERK

FIRST GENERAL COUNSEL'S REPORT

MAY 13 11:38

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION

5/13/85 - 11:40

85NF-87

STAFF MEMBER:

Anne Weissenborn

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

RESPONDENT'S NAME: First National State Bancorporation
Political Action Committee
Bruno A. Mancuso, Treasurer

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

INTERNAL REPORTS

CHECKED: FEC Disclosure Documents

FEDERAL AGENCIES

CHECKED: None

GENERATION OF MATTER

The First National State Bancorporation Political Action Committee ("the Committee") was referred to the Office of the General Counsel by the Reports Analysis Division for failing to file its 1983 Year End Report by January 31, 1983, its 1984 July Quarterly Report by July 15, 1984, and its 1984 Year-End Report by January 31, 1984.

SUMMARY OF ALLEGATIONS

The Committee is an unauthorized committee which has elected to file quarterly and semi-annual reports and which is therefore subject to the provisions of 2 U.S.C. § 434(a)(4)(A)(i) and (iv) and 11 C.F.R. § 104.5(c)(1)(i) and (2)(i)(B) requiring the filing in election years of quarterly reports no later than the 15th day following the close of the immediately preceding quarter except that the report for the final quarter, the Year-End Report,

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may be filed no later than January 31 of the following calendar year; and the filing in non-election years of a semi-annual report concerning the period of July 1 through December 31 no later than January 31 of the following calendar year. The Committee did not file its second 1983 semi-annual or Year-End Report until February 23, 1984, or twenty three (23) days late, its 1984 July Quarterly Report until August 1984, or seventeen (17) days late, and its 1984 Year-End Report until March 28, 1985 or fifty-six (56) days late.

The Committee was sent a Chronic Late Filing Notice on September 18, 1984, but failed to file its 1985 Year-End Report on time. A Non-Filer Notice was sent to the Committee on February 22, 1984, regarding this 1984 Year-End Report; however, this report was not filed until March 28, 1985.

FACTUAL AND LEGAL ANALYSIS

The Committee was required to file its 1983 Year-End Report no later than January 31, 1984, its 1984 July Quarterly Report no later than July 15, 1984 and its 1984 Year-End Report no later than January 31, 1985; however, these reports were not filed until February 23, 1984, August 1, 1984, and March 28, 1985, respectively, or between seventeen and fifty-six days late. The Committee's failure to comply with the reporting requirements in a timely manner are violations of 2 U.S.C. § 434(a)(4)(A)(i) and (iv) and of 11 C.F.R. § 104.5(c)(1)(i) and (2)(i)(B). Hence it is the recommendation of the General Counsel that the Commission

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open a matter under review and find reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv).

RECOMMENDATIONS

1. Open a matter under review.
2. Find reason to believe that the First National State Bancorporation Political Action Committee and Bruno A. Mancuso, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv).
3. Approve the attached letter and factual and legal analysis.

Charles N. Steele
General Counsel

May 13, 1985
Date

BY: Kenneth A. Gross
Associate General Counsel

Attachments
Referral
Letter and Analysis

36040574012



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

9 April 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: *[Signature]* JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE FIRST NATIONAL STATE BANCORPORATION
POLITICAL ACTION COMMITTEE

This is a referral of the First National State Bancorporation Political Action Committee (the "PAC"). The PAC failed to file three (3) reports in a timely manner during the 1983-84 election cycle. In addition, the PAC's 1984 Year End Report was not filed within thirty (30) days of receipt of a Non-Filer Notice.

these matters require further examination by your office.

If you have any questions, please contact Lisa Stolaruk at 523-4048.

Attachment

86040574013

(i)

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 9 April 1985

ANALYST: Lisa J. Stolaruk

I. COMMITTEE: First National State Bancorporation
Political Action Committee (C00104182)
Bruno A. Mancuso, Treasurer
550 Broad Street
Newark, NJ 07101

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

III. BACKGROUND:

Failure to File Reports in a Timely Manner

The First National State Bancorporation Political Action Committee (the "PAC") failed to file three (3) reports in a timely manner during the 1983-84 election cycle (see chart and attachments). The reports were filed between seventeen (17) and fifty-six (56) calendar days late.

On September 18, 1984, a Chronic Late Filing Notice was sent to the PAC for failure to file the 1983 Year End and 1984 July Quarterly Reports in a timely manner (Attachment 6). The notice advised the PAC that any additional late filing of reports may result in legal enforcement action.

Subsequent to the receipt of the Chronic Late Filing Notice, the PAC failed to file the 1984 Year End Report in a timely manner. A Non-Filer Notice was mailed to the PAC on February 22, 1985 for failure to file the 1984 Year End Report (Attachment 8).

The Reports Analysis Division ("RAD") analyst called the PAC on March 15, 1985, and was informed that the treasurer, Mr. Bruno Mancuso, was on vacation. The RAD analyst was referred to Mr. Dolan, who was in charge of handling FEC matters in the treasurer's absence. The RAD analyst informed Mr. Dolan that the PAC's 1984 Year End Report had not been filed. Mr. Dolan assured the RAD analyst that he had intended to file the report, and stated that the report would be mailed by Monday, March 18, 1985 (Attachment 9).

86040574014

REFERRAL OF THE FIRST NATIONAL STATE
BANCORPORATION POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

The RAD analyst called Mr. Dolan again on March 22, 1985, as the report had not been filed. Mr. Dolan stated that the report had been prepared, but that he was waiting for the treasurer to return so that Mr. Mancuso could sign the report. The RAD analyst recommended that he mail the report without the signature and file an amended report with the correct signature upon the treasurer's return (Attachment 10).

The PAC's 1984 Year End Report was filed on March 28, 1985 (Attachment 11).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

86040574015

8 6 0 4 0 5 7 4 0 1 6

LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1983 Year End (7/1/83-12/31/83)	1/7/84 (Attachment 2)	1/31/84	N/A	2/23/84 (Attachment 3)
1984 July Quarterly (4/1/84-6/30/84)	6/21/84 (Attachment 4)	7/15/84	N/A	8/1/84 (Attachment 5)
1984 Year End (11/27/84-12/31/84)	1/7/85 (Attachment 7)	1/31/85	2/22/85 (Attachment 8)	3/28/85 (Attachment 11)

8 6 2 4 0 5 7 4 0 1 7
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (82-P4)

DATE 2APR85
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILED COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
FIRST NATIONAL STATE BANCORPORATION PAC CONNECTED ORGANIZATION: FIRST NATIONAL STATE BANCORPORATION				NON-PARTY QUALIFIED	ID #C00104182	
1983	REQUEST FOR ADDITIONAL INFORMATION					1 83FEC/272/5045
	STATEMENT OF ORGANIZATION - AMENDMENT			22JUN83		2 83FEC/274/0235
	MID-YEAR REPORT	9,910	8,666	1JAN83 -30JUN83		7 83FEC/280/2282
	YEAR-END	18,710	13,335	1JUL83 -31DEC83		10 84FEC/297/2556
	YEAR-END - AMENDMENT	18,710	13,335	1JUL83 -31DEC83		11 84FEC/314/3209
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31DEC83		1 84FEC/310/47
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL83 -31DEC83		2 84FEC/314/017
1984	MISCELLANEOUS NOTICE FROM FEC			18SEP84		1 84FEC/328/3172
	APRIL QUARTERLY	125	4,403	1JAN84 -31MAR84		4 84FEC/311/0700
	APRIL QUARTERLY - AMENDMENT	125	4,403	1JAN84 -31MAR84		5 84FEC/314/3235
	APRIL QUARTERLY - AMENDMENT	125	4,403	1JAN84 -31MAR84		2 84FEC/316/4972
	1ST LETTER INFORMATIONAL NOTICE			1JAN84 -31MAR84		1 84FEC/316/3108
	JULY QUARTERLY	6,535	4,513	1APR84 -30JUN84		7 84FEC/324/4360
	JULY QUARTERLY - AMENDMENT	6,535	4,513	1APR84 -30JUN84		7 84FEC/327/3071
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30JUN84		1 84FEC/326/3211
	OCTOBER QUARTERLY	21,719	9,090	1JUL84 -30SEP84		9 84FEC/341/0459
	OCTOBER QUARTERLY - AMENDMENT	21,719	9,090	1JUL84 -30SEP84		9 84FEC/347/1502
	OCTOBER QUARTERLY - AMENDMENT	21,719	9,090	1JUL84 -30SEP84		10 84FEC/350/0145
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 -30SEP84		1 84FEC/349/2077
	PRE-GENERAL	8,911	1,578	1OCT84 -17OCT84		5 84FEC/347/1520
	POST-GENERAL	1,570	6,893	18OCT84 -26NOV84		5 84FEC/353/4437
	YEAR-END	1,315	2,208	27NOV84 -31DEC84		4 85FEC/369/1319
	NOTICE OF FAILURE TO FILE			7DEC84 -31DEC84		1 85FEC/366/4655
TOTAL		68,795	0	50,686	0	106 TOTAL PAGES

All reports listed above have been reviewed

Ending cash balance as of 12/31/84: \$23,995

Debts and Obligations owed by the committee as of 12/31/84: \$0

ATTACHMENT 1



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

January 7, 1984

JANUARY 31 YEAR-END REPORT NOTICE

WHO MUST FILE

ALL POLITICAL COMMITTEES currently registered with the Commission must file a year-end report by January 31, 1984.

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through December 31, 1983. Registered committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration* through December 31, 1983.

FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1984. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1984.

WHERE TO FILE

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

COMPLIANCE

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

1984 FILING REQUIREMENTS

See the January 1984 issue of the FEC Record for filing requirements during 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).

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

86040574013

6

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

RECEIVED AT THE FEC
ATTACHMENT 3
4 FEB 23 AM: 28

(Summary Page)

ALIAS AREA

ALIAS AREA

1. Name of Committee (in Full)

First National State Bancorporation PAC

Address (Number and Street)

550 Broad Street

City, State and ZIP Code

Newark, New Jersey 07101

☐ Check here if address is different than previously reported.

2. PBC Identification Number

C 0010 4182

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on 2/1/79

4. TYPE OF REPORT (Check appropriate boxes)

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

☐ July 15 Quarterly Report ☒ January 31 Year End Report

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

☐ Monthly Report for _____

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election

on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☐ NO

SUMMARY

5. Covering Period 7/1/83 through 12/31/83

6. (a) Cash on hand January 1, 19 83

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

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

9. Debts and Obligations Owed by the Committee (transfers all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (transfers 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.

Bruno Mancuso

Type or Print Name of Treasurer

Signature of Treasurer

2/14/84
Date

For further information contact:

Federal Election Commission

Toll Free 800-424-6530

Local 202-623-4088

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 PBC FORM 3 and PBC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3/80)

(7)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

ATTACHMENT 4
page 1 of 2)

June 21, 1984

JULY REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES

WHO MUST FILE

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

WHAT MUST BE REPORTED

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

WHEN TO FILE

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

WHERE AND HOW TO FILE

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

MONTHLY FILERS

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

COMPLIANCE

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

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

-over-

8

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

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

86040574021

9

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

Aug 1 10:28

(Summary Page)

ATTACHMENT 5

1. Name of Committee (in Full) First National State Bancorporation PAC Address (Number and Street) 550 Broad Street City, State and ZIP Code Newark, New Jersey 07101 ☐ Check if address is different than previously reported. 2. FEC Identification Number C 0010 4182 3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on <u>2/1/79</u> (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
6. Covering Period <u>4/1/84</u> Through <u>6/30/84</u>			
6. (a) Cash on Hand January 1, 19 <u>84</u>			\$ 12,508.10
(b) Cash on Hand at Beginning of Reporting Period	\$ 8,229.86		
(c) Total Receipts (from Line 1B)	\$ 6,535.28	\$ 6,660.28	
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 14,765.14	\$ 19,168.38	
7. Total Disbursements (from Line 2B)	\$ 4,513.87	\$ 8,917.11	
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ...	\$ 10,251.27	\$ 10,251.27	
9. Debts and Obligations Owed TO the Committee (Provide all on Schedule C or Schedule D)	\$ -0-		
10. Debts and Obligations Owed BY the Committee (Provide all on Schedule C or Schedule D)	\$ -0-		

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 800-424-6530
Local 202-633-4000

Bruno Mancuso



TREASURER

7/25/84

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 3a are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

(10)

**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

SEP 18 1984

ATTACHMENT 6

ME-L

**Bruno Mancuso, Treasurer
First National State
Bankcorporation Political
Action Committee
560 Broad Street
Newark, NJ 07101**

Identification Number: C00104182**Reference: 1983-1984 Election Cycle Reports****Dear Mr. Mancuso:**

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

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Year End (7/1/83-12/31/83)	1/31/84	2/23/84
July Quarterly (4/1/84-6/30/84)	7/15/84	8/1/84

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

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

Sincerely,

**Michael B. Filler
Chief
Party/Non-Party Branch**

34033283172

(11)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 7, 1985

JANUARY 31 YEAR-END REPORT NOTICE

WHO MUST FILE

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

WHAT MUST BE REPORTED

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

WHEN TO FILE

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

WHERE TO FILE

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

COMPLIANCE

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

1985 FILING REQUIREMENTS

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

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

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

86040574024



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

February 22, 1985

Bruno A. Mancuso, Treasurer
First National State
Bankcorporation PAC
550 Broad Street
Newark, NJ 07101

Identification Number: C00104182

Reference: 1984 Year-End Report (12/7/84-12/31/84)

Dear Mr. Mancuso:

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

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

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

If you have any questions regarding this matter, please contact Lisa Stolaruk 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

ANALYST: Lisa Stolaruk

CONVERSATION WITH: Mr. Dolan

COMMITTEE: First National State Bancorporation PAC

DATE: 3/15/85

SUBJECT(S): Non-Filing of the 1984 Year End Report

I called to speak with Mr. Mancuso, the committee treasurer and was informed that he was on vacation. I was referred to Mr. Dolan, who had been assigned all FEC matters during Mr. Mancuso's absence.

I called Mr. Dolan and informed him that we had not received the committee's Year End Report. He stated that he had intended to file it and promised to have it in the mail by Monday. He apologized for any inconvenience that he had caused.

86040574026

ANALYST: Lisa Stolaruk

CONVERSATION WITH: Mr. Dolan

COMMITTEE: First National State Bancorporation PAC

DATE: 3/22/85

SUBJECT(S): Non-Filing of the Year End Report

I called Mr. Dolan again this afternoon to advise him that we had still not received the committee's Year End Report. He said that the report has been prepared but that he is waiting for the treasurer to sign the report. I recommended that he send the report as soon as possible and amend the report when the treasurer returns from his vacation. He said that he would mail the report this afternoon.

86040574027

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee or an Authorized Committee

78 JUL 1 1984 FEC

ATTACHMENT 11

85 MAR 23 1985

(Summary Page)

ALION AREA

1. Name of Committee (In Full)

First National State Bancorporation PAC

Address (Number and Street)

550 Broad Street

City, State and ZIP Code

Newark, New Jersey 07101

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C 0010 4182

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on 2/1/79

4. TYPE OF REPORT (Check appropriate boxes)

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

☐ July 15 Quarterly Report ☒ January 31 Year End Report

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

☐ Monthly Report for _____

☐ Twelfth day report preceding _____
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 11/27/84 through 12/31/84

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

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

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

7. Total Disbursements (from Line 28)

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

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

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

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

Bruno Mancuso

Type or Print Name of Treasurer

Signature of the Treasurer

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 4371.

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

For further information contact

Federal Election Commission

Toll Free 800 424 9530

Local 202 523 4088

FEC FORM 3X (3-80)

(16)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Bruno A. Mancuso
First National State
Bancorporation Political
Action Committee
550 Broad Street
Newark, New Jersey 07101

RE: MUR

Dear Mr. Mansco:

On May , 1985, the Commission determined that there is reason to believe that the First National State Bancorporation Political Action Committee, and you, as treasurer, have violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv), provisions of the Federal Election Campaign Act of 1971, as amended. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials 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).

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 any 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.

86040574029

Bruno A. Mancuso
Page 2

For your information we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Anne A. Weissenborn, 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

86040574030

18

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT First National State Bancorporation
Political Action Committee
Bruno A. Mancuso, as Treasurer

MUR NO.

SUMMARY OF ALLEGATIONS

86040574031

The Committee is an unauthorized committee which has elected to file quarterly and semi-annual reports and which is therefore subject to the provisions of 2 U.S.C. § 434(a)(4)(A)(i) and (iv) and 11 C.F.R. § 104.5(c)(1)(i) and (2)(i)(B) requiring the filing in election years of quarterly reports no later than the 15th day following the close of the immediately preceding quarter except that the report for the final quarter, the Year-End Report, may be filed no later than January 31 of the following calendar year; and the filing in non-election years of a semi-annual report concerning the period of July 1 through December 31 no later than January 31 of the following calendar year. The Committee did not file its second 1983 semi-annual or Year-End Report until February 23, 1984, or twenty three (23) days late, its 1984 July Quarterly Report until August 1984, or seventeen (17) days late, and its 1984 Year-End Report until March 28, 1985 or fifty-six (56) days late.

The Committee was sent a Chronic Late Filing Notice on September 18, 1984, but failed to file its 1985 Year-End Report on time. A Non-Filer Notice was sent to the Committee on February 22, 1984, regarding this 1984 Year-End Report; however, this report was not filed until March 28, 1985.

FACTUAL AND LEGAL ANALYSIS

The Committee was required to file its 1983 Year-End Report no later than January 31, 1984, its 1984 July Quarterly Report no later than July 15, 1984 and its 1984 Year-End Report no later than January 31, 1985; however, these reports were not filed until February 23, 1984, August 1, 1984, and March 28, 1985, respectively, or between seventeen and fifty-six days late. The Committee's failure to comply with the reporting requirements in a timely manner are violations of 2 U.S.C. § 434(a)(4)(A)(i) and (iv) and of 11 C.F.R. § 104.5(c)(1)(i) and (2)(i)(B). Hence it was the recommendation of the General Counsel's Office that the Commission open a matter under review and find reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv).

86040574032

86040574033



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, DC 20463

THIS IS THE BEGINNING OF MUR # 2007

Date Filmed 4/1/86 Camera No. --- 3

Cameraman AS

FEDERAL ELECTION COMMISSION

conciliation documents, duplicates, envelopes

internal memoranda

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

Francis B. Haggen

date

3-21-80

FEC 9-21-77

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