



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20543

THIS IS THE END OF MUR # 2199

Date Filmed 12/12/86 Camera No. --- 2

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Mar 21 1977

~~Confidential~~ Correlation material, routing slips
Internal Communications

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):

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- | | |
|--|---|
| ☒ (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 Charles Evans
date November 21, 1976 10/3/8
T. J. [unclear]
10/5/8

REC 9-21-77



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 14, 1986

L. Geoffrey Webb, Treasurer
Friends of the Earth Political
Action Committee
530 7th Street, S.E.
Washington, D.C. 20007

RE: MUR 2199
Friends of the Earth Political
Action Committee and L.
Geoffrey Webb, as treasurer

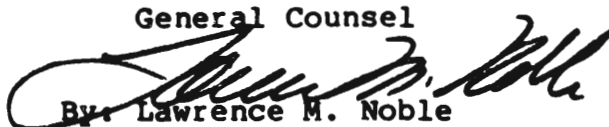
Dear Mr. Webb:

On October 9, 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)(4)(A)(i) and (iv), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel


By: Lawrence M. Noble
Deputy General Counsel

Enclosure
Conciliation Agreement

8504052118



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

L. Geoffrey Webb, Treasurer
Friends of the Earth Political
Action Committee
530 7th Street, S.E.
Washington, D.C. 20007

RE: MUR 2199
Friends of the Earth Political
Action Committee and L.
Geoffrey Webb, as treasurer

Dear Mr. Webb:

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

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

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosure
Conciliation Agreement

CMJ 10/10

TGW
10/10/86

8504052119

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Friends of the Earth) MUR 2199
Political Action Committee)
L. Geoffrey Webb, Treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Friends of the Earth Political Action Committee (hereinafter "the Committee") and L. Geoffrey Webb, as treasurer, ("Respondents"), violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv) by failing to file its 1985 Mid-Year Report, 1985 Year End Report and 1986 April Quarterly Report in a timely manner.

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation, prior to a finding a 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 enter voluntarily into this agreement with the Commission.

86 SEP 17 5:18

RECEIVED
GENERAL COUNSEL

86040621120

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

1. Respondent Committee is a political committee within the meaning of 2 U.S.C. § 431(4).
2. Respondent L. Geoffrey Webb is the treasurer of the Committee.
3. In 1985, as quarterly filers in a non-election year, the respondents were obligated to file a 1985 Mid-Year Report by July 31, 1985. They filed the report on August 13, 1985. They were obligated to file a 1985 Year End Report by January 31, 1986. The report was filed on March 27, 1986. The respondents contend that they originally mailed the report prior to January 31, 1986. The respondents' required filing date for the April Quarterly was April 15, 1986. They filed this report on May 5, 1986.

V. In violation of 2 U.S.C. § 434(a)(4)(A)(i) and (iv), the respondents failed to file the 1985 Mid-Year Report, 1985 Year End Report and 1986 April Quarterly Report in a timely manner.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Dollars (\$1000) pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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

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requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

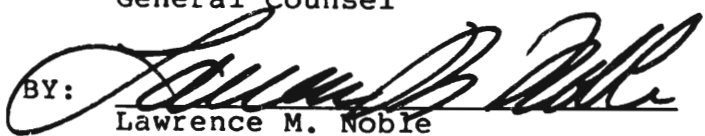
IX. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. 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:


Lawrence M. Noble
Deputy General Counsel

Date

10/14/86

FOR THE RESPONDENTS:


David K. Baker, Director for
L. Geoffrey Webb, Treasurer

9/17/86

95040521122

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Friends of the Earth Political)
Action Committee and L. Geoffrey)
Wedd, as treasurer)

MUR 2199

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 9, 1986, the Commission decided by a vote of 5-0 to take the following actions in MUR 2199:

1. Approve the agreement, as recommended in the General Counsel's Report signed October 7, 1986.
2. Approve and send the letter, as recommended in the General Counsel's Report signed October 7, 1986.
3. Close the file.

Commissioners Aikens, Elliott, Josefiak, McDonald and Thomas voted affirmatively for this decision; Commissioner McGarry did not cast a vote.

Attest:

10-10-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Tues., 10-7-86,	10:04
Circulated on 48 hour tally basis:	Tues., 10-7-86,	4:00
Deadline for vote:	Thurs., 10-9-86,	4:00

35040621123

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Friends of the Earth Political)
Action Committee and L. Geoffrey)
Webb, as treasurer)

MUR 2199

GENERAL COUNSEL'S REPORT

Background

Attached is a conciliation agreement which has been signed by David K. Baker on behalf of the Friends of the Earth Political Action Committee ("FOEPAC") and its treasurer.

66 JET 7 AIO: DM

66 JET 7 AIO: DM

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treasurer.

Recommendations

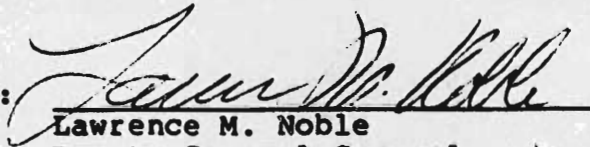
1. Approve the attached agreement.
2. Approve and send the attached letter.
3. Close the file.

Charles N. Steele
General Counsel

Date

10/7/86

BY:


Lawrence M. Noble
Deputy General Counsel

Attachments

1. Conciliation Agreement and Civil Penalty Check
2. Proposed letter to respondents

86040521125

Attachment 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Friends of the Earth) MUR 2199
Political Action Committee)
L. Geoffrey Webb, Treasurer)

SEP 17 5:18 PM

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Friends of the Earth Political Action Committee (hereinafter "the Committee") and L. Geoffrey Webb, as treasurer, ("Respondents"), violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv) by failing to file its 1985 Mid-Year Report, 1985 Year End Report and 1986 April Quarterly Report in a timely manner.

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation, prior to a finding a 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 enter voluntarily into this agreement with the Commission.

85040621126

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

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

2. Respondent L. Geoffrey Webb is the treasurer of the Committee.

3. In 1985, as quarterly filers in a non-election year, the respondents were obligated to file a 1985 Mid-Year Report by July 31, 1985. They filed the report on August 13, 1985. They were obligated to file a 1985 Year End Report by January 31, 1986. The report was filed on March 27, 1986. The respondents contend that they originally mailed the report prior to January 31, 1986. The respondents' required filing date for the April Quarterly was April 15, 1986. They filed this report on May 5, 1986.

V. In violation of 2 U.S.C. § 434(a)(4)(A)(i) and (iv), the respondents failed to file the 1985 Mid-Year Report, 1985 Year End Report and 1986 April Quarterly Report in a timely manner.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Dollars (\$1000) pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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

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requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

IX. 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.

X. 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:

Lawrence M. Noble
Deputy General Counsel

Date

FOR THE RESPONDENTS:

David K. Baker for L. Geoffrey Webb
David K. Baker, Director for
L. Geoffrey Webb, Treasurer

9/17/86

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2
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2
6
0
4
0
5
9

Snyder

16 SEP 26 P 2: 38

**FRIENDS OF THE EARTH, INC.
POLITICAL ACTION COMMITTEE**

1045 SANSOME ST. 415-433-7373
SAN FRANCISCO, CA 94111

742

SEPTEMBER 19 1986

11-8
1210

Pay to the order of

FEDERAL ELECTION COMMISSION

\$1000.00

ONE THOUSAND



CROCKER NATIONAL BANK

LEWIS PLAZA OFFICE
1228 BATTERY STREET, SAN FRANCISCO, CALIFORNIA 94111

David R. Conrad

~~FOR~~ PAYMENT OF FINE

⑈000742⑈ ⑆121000086⑆ 203063598⑈ 33

MEMORANDUM

TO: Debra A. Reed

TO: Judy Smith

GCC#1618

FROM: Judy Smith

FROM: Debra A. Reed

CHECK NO. 742 (a copy of which is attached) RELATING

TO MUR 2199 AND NAME Friends of the Earth, Inc.
Political Action Committee

WAS RECEIVED ON 9/26/86. PLEASE INDICATE THE ACCOUNT INTO
WHICH IT SHOULD BE DEPOSITED:

/ ✓ / BUDGET CLEARING ACCOUNT (#95F3875.16)

/ / CIVIL PENALTIES ACCOUNT (#95-1099.160)

/ / OTHER

SIGNATURE Debra A. Reed

DATE 9/26/86



Attachment 2

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

L. Geoffrey Webb, Treasurer
Friends of the Earth Political
Action Committee
530 7th Street, S.E.
Washington, D.C. 20007

RE: MUR 2199
Friends of the Earth Political
Action Committee and L.
Geoffrey Webb, as treasurer

Dear Mr. Webb:

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

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

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosure
Conciliation Agreement

86040521130



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *ld*
DATE: October 7, 1986
SUBJECT: MUR 2199 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [X]
Sensitive [X]
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance kx]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

85040521131



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 4, 1986

Joanne Cowan
530 7th Street, SE
Washington, DC 20003

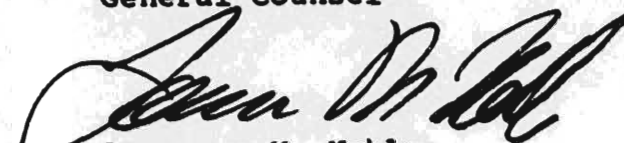
RE: MUR 2199
Friends of the Earth Political
Action Committee; Geoffrey Webb,
Treasurer

Dear Ms. Cowan:

On July 28, 1986, you requested that this Office forward to you a copy of a letter sent by Geoffrey Webb of your committee to the Commission on August 12, 1985. Enclosed is a copy of that letter. Should you have any further questions, contact John Drury at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel


By: Lawrence M. Noble
Deputy General Counsel

Enclosure
Letter of August 12, 1985

86040621132

16 SEP 26 P 24 38

GET

**FRIENDS OF THE EARTH, INC.
POLITICAL ACTION COMMITTEE**

1045 SANSOME ST. 415-433-7373
SAN FRANCISCO, CA 94111

742

11-8
1210

SEPTEMBER 19 86

Pay to the order of

FEDERAL ELECTION COMMISSION

\$1000.00

ONE THOUSAND

~~THOUSAND~~



CROCKER NATIONAL BANK

LEWIS PLAZA OFFICE
1295 BATTERY STREET, SAN FRANCISCO, CALIFORNIA 94111

David R. Conrad

~~FOR~~ PAYMENT OF FINE

⑈000742⑈ ⑆121000086⑆ 203063598⑈ 33

MEMORANDUM

TO:

Debra A. Reed

TO:

Judy Smith

FROM:

Judy Smith

FROM:

Debra A. Reed

CHECK NO. 742

(a copy of which is attached) RELATING

TO MUR

2199 (Snyder)

AND NAME

Friends of the Earth, Inc.

Political Action Committee

WAS RECEIVED ON

9/26/86

PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

/ ✓ /

BUDGET CLEARING ACCOUNT

(#95F3875.16)

/ /

CIVIL PENALTIES ACCOUNT

(#95-1099.160)

/ /

OTHER

SIGNATURE

Debra A. Reed

DATE

9/26/86

GCC#1618

FOE
PAC

Friends of the Earth Political Action Committee
530 Seventh St., S.E., Washington, D.C. 20003 (202) 543-4312

GCC#1618
RECEIVED AT THE FEC

86 SEP 24 P 2: 01

John-

Here is the check

- Dave

16 SEP 26 P 2: 38

RECEIVED
GENERAL COUNSEL

35040521134



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 15, 1986

L. Geoffrey Webb
530 7th Street, S.E.
Washington, D.C. 20003

RE: MUR 2199
Friends of the Earth Political
Action Committee
L. Geoffrey Webb, Treasurer

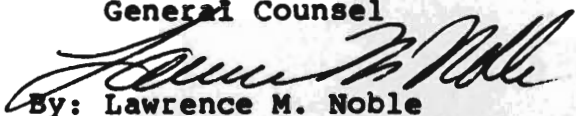
Dear Mr. Webb:

On July 9, 1986, the Commission found reason to believe that Friends of the Earth Political Action Committee and you as treasurer violated 2 U.S.C. § 434(a)(4)(A). At your request, the Commission determined on August 13, 1986, 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 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. 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 John Drury, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel


By: Lawrence M. Noble
Deputy General Counsel

Enclosures
Conciliation Agreement

85040521135



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

L. Geoffrey Webb
530 7th Street, S.E.
Washington, D.C. 20003

RE: MUR 2199
Friends of the Earth Political
Action Committee
L. Geoffrey Webb, Treasurer

Dear Mr. Webb:

On July 9, 1986, the Commission found reason to believe that Friends of the Earth Political Action Committee and you as treasurer violated 2 U.S.C. § 434(a)(4)(A). At your request, the Commission determined on , 1986, 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 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. 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 John Drury, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosures
Conciliation Agreement

JD 8/14/86
TAN 8/14/86

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Friends of the Earth) MUR 2199
Political Action Committee)
L. Geoffrey Webb, Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 13, 1986, the Commission decided by a vote of 6-0 to take the following actions in MUR 2199:

1. Enter into conciliaiton with the Friends of the Earth Political Action Committee and L. Geoffrey Webb, treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement, as recommended in the General Counsel's Report signed August 8, 1986,
3. Approve and send the letter, as recommended in the General Counsel's Report signed August 8, 1986,

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

Attest:

8-13-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Mon.,	8-11-86,	10:31
Circulated on 48 hour tally basis:	Mon.,	8-11-86,	4:00
Deadline for vote:	Wed.,	8-13-86,	4:00

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE SEC
COMMISSION SECRETARY

In the Matter of)
)
Friends of the Earth) MUR 2199
Political Action Committee)
L. Geoffrey Webb, Treasurer)

86 AUG 11 AIO: 31

SENSITIVE

GENERAL COUNSEL REPORT

I. BACKGROUND

On July 9, 1986, the Commission found reason to believe that the Friends of the Earth Political Action Committee ("FOEPAC"), and L. Geoffrey Webb, treasurer, ("the respondents") violated 2 U.S.C. § 434(a)(4)(A) by failing to file its 1985 Mid-Year Report, 1985 Year End Report, and 1986 April Quarterly Report in a timely fashion. The respondents were notified of this determination by letter dated July 16, 1986. On July 30, 1986, this Office received a letter from the respondents in which they requested that this matter be processed through pre-probable cause conciliation.

II. LEGAL ANALYSIS

Under 2 U.S.C. § 434(a)(4)(A)(iv), if a political committee which is not an authorized committee of a candidate elects to file on a quarterly basis, for those years in which no general election is held, such a committee shall file 1) a Mid-Year Report covering the period January 1 - June 30, and 2) a Year-End Report, detailing activity from July 1 - December 31. The Mid-Year Report shall be filed by July 31, the Year End by January 31 of the following calendar year. The respondent had elected to

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file on a quarterly basis. Thus, its 1985 Mid-Year Report was due on July 31, 1985. The Committee filed the report on August 13, 1985. Its 1985 Year-End Report was due on January 31, 1986. The Committee filed the report on March 27, 1986.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), the Committee was obligated to file its 1986 April Quarterly Report by April 15, 1986. The report was filed on May 5, 1986.

The failure to file the 1985 Mid-Year and Year-End Reports and 1986 April Quarterly Report in a timely fashion are violations of 2 U.S.C. § 434(a)(4)(A). Therefore, there is reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A).

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

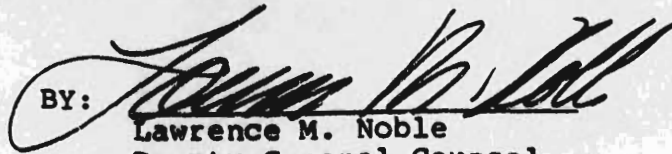
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IV. RECOMMENDATION

1. Enter into conciliation with the Friends of the Earth Political Action Committee and L. Geoffrey Webb, 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

8/2/86
Date

BY: 
Lawrence M. Noble
Deputy General Counsel

Attachments

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

85040521140

FRIENDS OF THE EARTH

530 7TH STREET, S.E., WASHINGTON, D.C. 20003
(202) 543-4312

1 JUL 30 11:25
QCC# 1080
Drury

July 28, 1986

Mr. John Drury
Federal Election Commission
Washington DC 20463

Dear Mr. Drury:

Friends of the Earth Political Action Committee seeks to pursue pre-probable cause conciliation regarding the violations cited in Ms. Aikens' letter to Mr. Webb of 16 July 1986.

Thank you.

Sincerely,

Joanne N. Cowan

Joanne N. Cowan
Director of Administration and Finance

36 JUL 30 13:31

RECEIVED
GENERAL COUNSEL

Attachment I

Committed to the preservation, restoration, and rational use of the ecosphere

100% recycled paper

86040521141



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

L. Geoffrey Webb
530 7th Street, S.E.
Washington, D.C. 20003

RE: MUR 2199
Friends of the Earth Political
Action Committee
L. Geoffrey Webb, Treasurer

Dear Mr. Webb:

On July 9, 1986, the Commission found reason to believe that Friends of the Earth Political Action Committee and you as treasurer violated 2 U.S.C. § 434(a)(4)(A). At your request, the Commission determined on , 1986, 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 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. 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 John Drury, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosures
Conciliation Agreement

Attachment III

86040521142



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Red*
DATE: August 11, 1986
SUBJECT: MUR 2199 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [X]
Sensitive [X]
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]
Audit Matters []

Litigation []
Closed MUR Letters []

Status Sheets []
Advisory Opinions []

Other (see distribution below) []

3 5 0 4 0 5 2 1 1 4 3



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Joanne Cowan
530 7th Street, SE
Washington, DC 20003

RE: MUR 2199
Friends of the Earth Political
Action Committee; Geoffrey Webb,
Treasurer

Dear Ms. Cowan:

On July 28, 1986, you requested that this Office forward to you a copy of a letter sent by Geoffrey Webb of your committee to the Commission on August 12, 1985. Enclosed is a copy of that letter. Should you have any further questions, contact John Drury at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosure
Letter of August 12, 1985

86040521144

FOE PAC

85 AUG 13 49:34

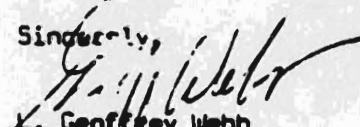
Friends of the Earth Political Action Committee
540 Seventh St., SE, Washington, D.C. 20003 (202) 513-4312

August 12, 1985

To whom it may concern:

My apologies for the late filing of this report, which was completed in San Francisco in time and which I inadvertently did not send in promptly. Please let me know if there is any problem.

Sincerely,


Geoffrey Webb
Treasurer

18; 51 0; 4 9 5 2 21 31 34 5

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

(Summary Page)

USIA 0013-19-84

1 Name of Committee (in Full)
**FRIENDS OF THE EARTH
NATIONAL ACTION COMMITTEE**

Address (Number and Street)
1245 SANSOME ST

City, State and ZIP Code
SAN FRANCISCO CA 94111

☐ If address different than previously reported.

2 FEC Form Number
C 00141044

3 ☐ This committee qualified as a multi-candidate committee during the Reporting Period on _____ Date _____

4 TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report
☐ July 15 Quarterly Report ☐ January 31 Year End Report
☒ July 31 Mid Year Report (Non Election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ (Type of Election) _____
 election on _____ in the State of _____
☐ Thirtieth day report following the General Election
 on _____ in the State of _____
☐ Termination Report

(b) Is this report an Amendment?
☐ YES ☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5 Covering Period <u>1-1-85</u> through <u>6-30-85</u>			
6 (a) Cash on Hand January 1, 19 <u>85</u>			\$ 5,328.18
(b) Cash on Hand at Beginning of Reporting Period		\$ 5,328.18	
(c) Total Receipts (from Line 1B)		\$ 4,772.06	\$ 4,772.06
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 10,100.24	\$ 10,100.24
7 Disbursements (from Line 2B)		\$ 5,050.87	\$ 5,050.87
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 5,049.37	\$ 5,049.37
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)		\$ 0	

Signature of Treasurer: [Signature] Date: 6-25-85

For further information contact:
 Federal Election Commission
 1100 Pennsylvania Ave., N.E.
 Washington, D.C. 20542

FEC FORM 3 and FEC FORM 3e are separate and should not be combined

1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100

FRIENDS OF THE EARTH

530 7TH STREET, S.E., WASHINGTON, D.C. 20003
(202) 543-4312

July 28, 1986

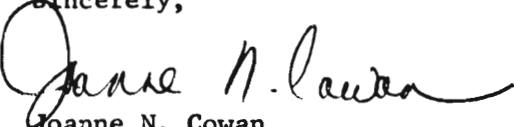
Mr. John Drury
Federal Election Commission
Washington DC 20463

Dear Mr. Drury:

Friends of the Earth Political Action Committee seeks to pursue pre-probable cause conciliation regarding the violations cited in Ms. Aikens' letter to Mr. Webb of 16 July 1986.

Thank you.

Sincerely,


Joanne N. Cowan
Director of Administration and Finance

86 JUL 30 P1:23
QCC# 1080

MJR 2198

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
36 JUL 30 P3:31

86040621147

FRIENDS OF THE EARTH

530 7TH STREET, S.E., WASHINGTON, D.C. 20003
(202) 543-4312

CC# 1006

M2199

Summary

JUL 22 P3:16

July 18, 1986

Ms. Joan D. Aikens, Chairman
Federal Election Commission
Washington DC 20463

Dear Ms. Aikens:

Mr. Webb has forwarded your letter dated 16 July, 1986 to me for response, as I am the preparer of Friends of the Earth Political Action Committee filings.

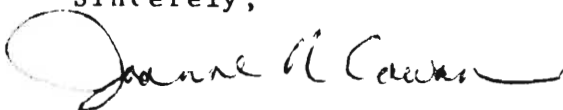
In response to the Council's factual analysis, according to our records only one of the three filings in question was not filed on time. Prior to our national relocation (see attached letter of 30 April 1986), the filings were prepared in San Francisco, mailed to Mr. Webb for signing and mailing to the commission. Mr. Webb mailed the returns on the date he signed them, specifically July 31, 1985 (first half of 1985) and January 27, 1986 (last half of 1985).

If the received date, not the postmark, is what determines the "date of filing," I would expect a day or two at most between our mailing and your receiving the filings. I do not understand the two filings for the periods mentioned above being received on August 13, 1985 and March 27, 1986, respectively, and can only respond that they were filed in a timely fashion relative to their due dates.

The filing for the third period in question, the first quarter of 1986, was mailed fifteen days late. As I explained in the cover memo I submitted with the report (attached), our cross-country relocation prevented my accessing the records sooner.

I look forward to clarifying these discrepancies. Please contact me if I can be of further assistance.

Sincerely,



Joanne N. Cowan
Director of Administration and Finance

Encl. (1)

Committed to the preservation, restoration, and rational use of the ecosphere

100% recycled paper

FRIENDS OF THE EARTH

530 7TH STREET, S.E., WASHINGTON, D.C. 20003
(202) 543-4312

April 30, 1986

Ms. Alva E. Smith, Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington DC 20463

RE: Identification Number: C00141011
ENCLOSED: Amended YE Report (7/1/85-12/32/85)
First Quarter Report, 1986

Dear Ms. Smith:

Enclosed please find the two reports referenced above. I believe the amended report responds to all your inquiries. Please feel free to call me at the number above if you have any outstanding questions.

It has come to my attention that the first quarter report is due on April 15. Friends of the Earth relocated in March, 1986 from our national headquarters in San Francisco to the address above in Washington DC. (This is indicated on the FEC report wherein I indicated the difference address box.) I was unable to access the information required to prepare the first quarter report until today. I trust you will understand our predicament (and given that our reports are usually timely) and not hold the report in tardiness.

Thank you.

Sincerely,



Joanne N. Cowan
Director of Administration and Finance

PS. I have enclosed a copy of a "Political Initiative Card" for your review, and highlighted the portions that I feel indicate our exercising "best efforts" to obtain the information I have been unable to supply on both of the enclosed reports.

Encl. (3)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1986

L. Geoffrey Webb
530 7th Street, S.E.
Washington, D.C. 20003

RE: MUR 2199
Friends of the Earth
Political Action
Committee; and
L. Geoffrey Webb,
treasurer

Dear Mr. Webb:

On July 9, 1986, the Federal Election Commission determined that there is reason to believe Friends of the Earth Political Action Committee ("the Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further,

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permanen/-

Letter to L. Geoffrey Webb
Page 2

requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

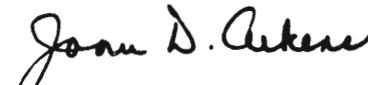
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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 John Drury, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Joan D. Aikens
Chairman

Enclosures

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

86040521151



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

**L. Geoffrey Webb
530 7th Street, S.E.
Washington, D.C. 20003**

**RE: MUR
Friends of the Earth
Political Action
Committee; and
L. Geoffrey Webb,
treasurer**

Dear Mr. Webb:

On , 1986, the Federal Election Commission determined that there is reason to believe Friends of the Earth Political Action Committee ("the Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further,

96040521152

Letter to L. Geoffrey Webb
Page 2

requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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 John Drury, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens
Chairman

Enclosures

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

JD 7/11
7/15

86040521153

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No.

RESPONDENTS: Friends of the Earth Political Action Committee,
and Geoffrey Webb, Treasurer

SUMMARY OF ALLEGATIONS

The Committee failed to file its 1985 Mid-Year and Year End Reports and 1986 April Quarterly Report in a timely manner.

FACTUAL BASIS AND LEGAL ANALYSIS

Under 2 U.S.C. § 434(a)(4)(A)(iv), if a political committee which is not an authorized committee of a candidate elects to file on a quarterly basis, for those years in which no general election is held, such a committee shall file a Mid-Year Report covering the period January 1 - June 30, and a Year End Report, detailing activity from July 1 - December 31. The Mid-Year Report shall be filed by July 31, the Year End by January 31 of the following calendar year. The respondent had elected to file in a quarterly basis. Thus, its 1985 Mid-Year Report was due on July 31, 1985. The Committee filed the report on August 13, 1985. Its 1985 Year End Report was due on January 31, 1986. The Committee filed the report on March 27, 1986.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), the Committee was obligated to file its 1986 April Quarterly Report by April 15, 1986. The report was filed on May 5, 1986.

The failure to file the 1985 Mid-Year and Year End Reports and 1986 April Quarterly Report in a timely fashion are violations of 2 U.S.C. § 434(a)(4)(A). Therefore, there is reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A).

86040521154

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Friends of the Earth Political
Action Committee
L. Geoffrey Webb, Treasurer

)
)
)
)
)

RAD 86NF-7 (M2199)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of July 9, 1986, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

1. Open a MUR.
2. Find reason to believe that the Friends of the Earth Political Action Committee and L. Geoffrey Webb, treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv) of the Federal Election Campaign Act of 1971, as amended.
3. Approve the Factual and Legal Analysis attached to the General Counsel's report dated June 19, 1986.
4. Approve the letter attached to the General Counsel's report dated June 19, 1986.

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

Attest:

7-11-86
Date

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

86040521155



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE SEC
COMMISSION SECRETARY

SENSITIVE

86 JUL 3 P2:16

July 3, 1986

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

By: Lawrence M. Noble *[Signature]*
Deputy General Counsel

SUBJECT: First General Counsel's Report in RAD Referral
86NF-7, circulated June 20, 1986 -- Erratum

Since submission of the above-mentioned report, it has come to the attention of this Office that page three of the report does not include a recommendation to approve the proposed Factual and Legal Analysis (Attachment III). That page should contain the following recommendation:

4. Approve the attached Factual and Legal Analysis.

EXECUTIVE SESSION

7-9-86

86040521156



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/ CHERYL A. FLEMING *CAF*
DATE: JUNE 24, 1986
SUBJECT: OBJECTION TO RAD 86NF-7: FIRST GENERAL COUNSEL'S
SIGNED JUNE 19, 1986

The above-named document was circulated to the
Commission on Friday, June 20, 1986 at 2:00 P.M.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____ X _____
Commissioner Harris	_____
Commissioner Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____

This matter will be placed on the Executive Session
agenda for Wednesday, July 9, 1986.

86040621157

RECEIVED
FEDERAL ELECTION COMMISSION
999 E STREET, N.W.
WASHINGTON, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT 19 P4:19

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION:

RAD # 86NF-7
STAFF MEMBER:
John Drury

SENSITIVE

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME: Friends of the Earth Political Action
Committee
L. Geoffrey Webb, Treasurer

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

INTERNAL REPORTS

CHECKED: C Index

FEDERAL AGENCIES

CHECKED: None

GENERATION OF MATTER

The Friends of the Earth Political Action Committee, and L. Geoffrey Webb, treasurer, (hereinafter "respondent" or the "Committee") failed to file its 1985 Mid-Year and Year End Reports in a timely manner. On March 21, 1986, the Reports Analysis Division sent to the respondent a Chronic Late Filer Notice, which informed the Committee that if it were delinquent in filing any future reports, it might face enforcement proceedings. Shortly thereafter, the respondent failed to file its 1986 April Quarterly Report on time. On June 4, 1986 the Reports Analysis Division referred the matter to this Office. (See Attachment I, RAD Referral).

SUMMARY OF ALLEGATIONS

The Committee failed to file its 1985 Mid-Year and Year End Reports and 1986 April Quarterly Report in a timely manner.

86040621158

FACTUAL AND LEGAL ANALYSIS

Under 2 U.S.C. § 434(a)(4)(A)(iv), if a political committee which is not an authorized committee of a candidate elects to file on a quarterly basis, for those years in which no general election is held, such a committee shall file a Mid-Year Report covering the period January 1 - June 30, and a Year End Report, detailing activity from July 1 - December 31. The Mid-Year Report shall be filed by July 31, the Year End by January 31 of the following calendar year. The respondent had elected to file on a quarterly basis. Thus, its 1985 Mid-Year Report was due on July 31, 1985. The Committee filed the report on August 13, 1985. Its 1985 Year End Report was due on January 31, 1986. The Committee filed the report on March 27, 1986.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), the Committee was obligated to file its 1986 April Quarterly Report by April 15, 1986. The report was filed on May 5, 1986.

The failure to file the 1985 Mid-Year and Year End Reports and 1986 April Quarterly Report in a timely fashion are violations of 2 U.S.C. § 434(a)(4)(A). Therefore, there is reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A).

RECOMMENDATION

1. Open a MUR.
2. Find reason to believe that the Friends of the Earth Political Action Committee and L. Geoffrey Webb, treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv) of the Federal Election Campaign Act of 1971, as amended.

86040521159

3. Approve the attached letter.

Charles N. Steele
General Counsel

June 17, 1986
Date

Lawrence M. Noble
BY: Deputy General Counsel

Attachments:
RAD Referral
Proposed Letter
Legal and Factual Analysis

86040521150



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

4 June 1986

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF THE FRIENDS OF THE EARTH POLITICAL
ACTION COMMITTEE

This is a referral of the Friends of the Earth Political Action Committee ("the Committee"). The Committee failed to file three (3) reports in a timely manner during the 1985-1986 election cycle. According to the RAD Review and Referral Procedures for Unauthorized Committees (Standard 4), further examination is required by your office.

If you have any questions, please contact Alva E. Smith at 376-2480.

Attachment

Attachment I Page 1

86040521161

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 4 June 1986

ANALYST: Alva E. Smith

I. COMMITTEE: Friends of the Earth Political Action
Committee (C00141044)
L. Geoffrey Webb, Treasurer
(February 1, 1985 - Present)
Robert A. Chlopak, Treasurer
(January 1, 1985 - January 31, 1985)
530 7th Street, SE
Washington, DC 20003

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

III. BACKGROUND:

Failure to Timely File Reports

The Friends of the Earth Political Action Committee ("the Committee") failed to file three (3) Reports of Receipts and Disbursements in a timely manner for the 1985-1986 election cycle (See Chart on Page 2). The reports were filed between thirteen (13) and fifty-five (55) calendar days late.

On March 21, 1986, a Chronic Late Filer Notice was sent to the Committee for failing to file the 1985 Mid-Year and the 1985 Year End Reports in a timely manner (Attachment 7). The notice advised the Committee that any additional late filing of reports may result in legal enforcement action. Subsequent to the sending of the Chronic Late Filer Notice, the Committee failed to timely file the 1986 April Quarterly Report.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

8 6 0 4 0 6 2 1 1 6 3

LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1985 Mid-Year (1/1/85-6/30/85)	6/21/85 (Attachment 2)	7/31/85	N/A	8/13/85 (Attachment 3)
1985 Year End (7/1/85-12/31/85)	12/20/85 (Attachment 4)	1/31/86	2/25/86 (Attachment 5)	3/27/86 (Attachment 6)
1986 April Quarterly (1/1/86-3/31/86)	3/21/86 (Attachment 8)	4/15/86	N/A	5/5/86 (Attachment 9)

13

8 6 0 4 0 5 2 1 1 6 4

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)DATE 2JUN86
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
FRIENDS OF THE EARTH POLITICAL ACTION COMMITTEE						
CONNECTED ORGANIZATION: FRIENDS OF THE EARTH INC						
1983 MISCELLANEOUS REPORT						
	FEBRUARY MONTHLY	3,447	2,779	23FEB83 TO FEC	1	83FEC/267/0089
	FEBRUARY MONTHLY - AMENDMENT	3,447	2,779	1JAN83 -31JAN83	8	83FEC/267/0090
	REQUEST FOR ADDITIONAL INFORMATION			1JAN83 -31JAN83	9	84FEC/309/2679
	PRE-SPECIAL	228	3,130	1JAN83 -31JAN83	1	84FEC/306/3352
	MID-YEAR REPORT	1,047	0	1FEB83 - 1JUN83	7	83FEC/273/0316
	PRE-RUN-OFF	52,180	20,360	2JUN83 -30JUN83	5	83FEC/277/4260
	POST-RUN-OFF	2,164	113	1JUL83 -19OCT83	7	83FEC/288/2343
	YEAR-END	4,573	726	20OCT83 -28NOV83	5	83FEC/289/1355
				29NOV83 -31DEC83	7	84FEC/294/1692
1984 MISCELLANEOUS REPORT						
	STATEMENT OF ORGANIZATION - AMENDMENT			21MAY84 TO FEC	1	84FEC/315/1537
	APRIL QUARTERLY	11,613	7,941	18JUL84	1	84FEC/322/4450
	MAY MONTHLY	1,866	2,099	1JAN84 -31MAR84	7	84FEC/309/1936
	1'ST LETTER INFORMATIONAL NOTICE			1APR84 -30APR84	7	84FEC/315/1538
	JUNE MONTHLY	793	3,619	1APR84 -30APR84	1	84FEC/328/4213
	JULY MONTHLY	105	1,878	1MAY84 -31MAY84	6	84FEC/317/1869
	1'ST LETTER INFORMATIONAL NOTICE			1JUN84 -30JUN84	6	84FEC/322/4451
	AUGUST MONTHLY	1,364	7,517	1JUN84 -30JUN84	2	84FEC/328/4210
	SEPTEMBER MONTHLY	29,760	18,931	1JUL84 -31JUL84	6	84FEC/325/4894
	OCTOBER MONTHLY	34,582	18,786	1AUG84 -31AUG84	10	84FEC/329/0122
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP84 -30SEP84	18	84FEC/342/5281
	REQUEST FOR ADDITIONAL INFORMATION			1SEP84 -30SEP84	4	84FEC/356/5493
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1SEP84 -30SEP84	6	84FEC/349/0945
	PRE-GENERAL	15,041	26,003	1SEP84 -30SEP84	7	84FEC/356/4425
	PRE-GENERAL - AMENDMENT	15,041	26,003	1OCT84 -17OCT84	23	84FEC/347/2528
	REQUEST FOR ADDITIONAL INFORMATION			1OCT84 -17OCT84	25	85FEC/259/0986
	POST-GENERAL	6,254	36,859	1OCT84 -17OCT84	1	85FEC/358/0725
	POST-GENERAL - AMENDMENT	-	-	18OCT84 -26NOV84	41	84FEC/356/1402
	POST-GENERAL - AMENDMENT	-	-	18OCT84 -26NOV84	1	85FEC/369/4254
	POST-GENERAL - AMENDMENT	-	-	18OCT84 -26NOV84	1	85FEC/369/4253
	POST-GENERAL - AMENDMENT	-	-	18OCT84 -26NOV84	3	85FEC/370/5159
	REQUEST FOR ADDITIONAL INFORMATION			18OCT84 -26NOV84	1	85FEC/367/4509
	REQUEST FOR ADDITIONAL INFORMATION 2ND			18OCT84 -26NOV84	1	85FEC/369/4275
	YEAR-END	3,705	17,552	27NOV84 -31DEC84	16	85FEC/362/1322
	YEAR-END - AMENDMENT	-	-	27NOV84 -31DEC84	2	85FEC/368/4707
	YEAR-END - AMENDMENT	-	-	27NOV84 -31DEC84	3	85FEC/369/2028
	YEAR-END - AMENDMENT	-	-	27NOV84 -31DEC84	1	85FEC/371/1152
	REQUEST FOR ADDITIONAL INFORMATION			27NOV84 -31DEC84	3	85FEC/367/3933
	REQUEST FOR ADDITIONAL INFORMATION 2ND			27NOV84 -31DEC84	4	85FEC/369/3637
TOTAL		168,722	0 168,493	0	258	TOTAL PAGES

All reports have been reviewed.
Ending cash on hand as of 12/31/84: \$5,328
Debts owed by the committee as of 12/31/84: \$2,878

Attachment #1
1 of 2

8 6 0 4 0 6 2 1 1 6 5

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 2JUN86
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
FRIENDS OF THE EARTH POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: FRIENDS OF THE EARTH INC				NON-PARTY QUALIFIED	ID #C00141044	
1985	MISCELLANEOUS REPORT			11FEB85 FROM FEC	1	85FEC/365/4621
	MID-YEAR REPORT	4,772	5,050	1JAN85 -30JUN85	9	85FEC/305/3245
	YEAR-END	28,153	15,572	1JUL85 -31DEC85	8	86FEC/406/2847
	YEAR-END - AMENDMENT	28,203	15,572	1JUL85 -31DEC85	8	86FEC/413/1766
	YEAR-END - AMENDMENT	-	-	1JUL85 -31DEC85	2	86FEC/415/1044
	NOTICE OF FAILURE TO FILE			1JUL85 -31DEC85	1	86FEC/403/3720
	REQUEST FOR ADDITIONAL INFORMATION			1JUL85 -31DEC85	2	86FEC/407/3098
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL85 -31DEC85	3	86FEC/413/0843
1986	MISCELLANEOUS NOTICE FROM FEC			21MAR86	1	86FEC/405/5154
	APRIL QUARTERLY	7,452	-	1JAN86 -31MAR86	7	86FEC/413/1759
	REQUEST FOR ADDITIONAL INFORMATION			1JAN86 -31MAR86	1	86FEC/415/4545
	TOTAL	40,427	0 20,622	0	43	TOTAL PAGES

IS
All Reports have been reviewed.
Ending cash on hand as of 3/31/86: \$25,132
Debts as of 3/31/86: \$0



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 21, 1985

**SEMIANNUAL REPORT NOTICE
FOR UNAUTHORIZED COMMITTEES**

WHO MUST FILE

ALL POLITICAL COMMITTEES currently registered with the Commission (except committees filing monthly) must file a semiannual report by July 31, 1985.

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through June 30, 1985. Unauthorized political committees that have not previously filed a financial disclosure report should report all financial activity from date of registration, through June 30, 1985.*

WHEN TO FILE

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

WHERE AND HOW TO FILE

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

MONTHLY FILERS

Committees filing on a monthly schedule need not file a semi-annual report. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month. The next monthly report must be filed by July 20, 1985, and should disclose all financial activity of the committee from June 1 through June 30, 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 101.3; 104.3(a) and (b). Activity which occurred prior to 1985 should be reported separately.

- over -

I6

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: Information Services Division
202/523-4068
800/424-9530

86040521167

FOE
PAC

Attachment #3
Page 1 of 2

85 AUG 13 9:34

Friends of the Earth Political Action Committee
531 Seventh St., S.E., Washington, D.C. 20003 (202) 543-4312

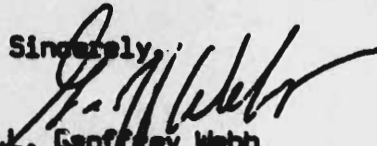
(191)

August 12, 1985

To whom it may concern:

My apologies for the late filing of this report, which was completed in San Francisco in time and which I inadvertently did not send in promptly. Please let me know if there is any problem.

Sincerely,


L. Geoffrey Webb
Treasurer

885500430392513125485

159

18

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

(Summary Page) Attachment #3
Page 2 of 2

ALICIA AREA

1 Name of Committee (in Full)

**FRIENDS OF THE EARTH
POLITICAL ACTION COMMITTEE**

Address (Number and Street)

1045 SANSOME ST

City, State and ZIP Code

SAN FRANCISCO CA 94111

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C 00141044

3. ☐ This committee qualified as a multi-candidate committee during the Reporting Period on _____

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 **1-1-85** through **6-30-85**

6 (a) Cash on hand January 1, 19**85**

(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)

Committee has examined this Report and to the best of its knowledge and belief it is true, correct and complete

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

For further information contact

Federal Election Commission

Toll Free 800 426 9530

Local 202 523 4388

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

FEC FORM 3X 3 85

19

YEAR-END

Attachment #4

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 20, 1985

WHO MUST FILE

ALL PARTY COMMITTEES, NON-CONNECTED COMMITTEES, AND SEPARATE SEGREGATED FUNDS must file a year-end report by January 31, 1986.

WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for the last report through December 31, 1985. Political committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration* through December 31, 1985. For more detailed instructions, consult your campaign guide.

FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1986. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1986.

WHERE TO FILE

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

COMPLIANCE

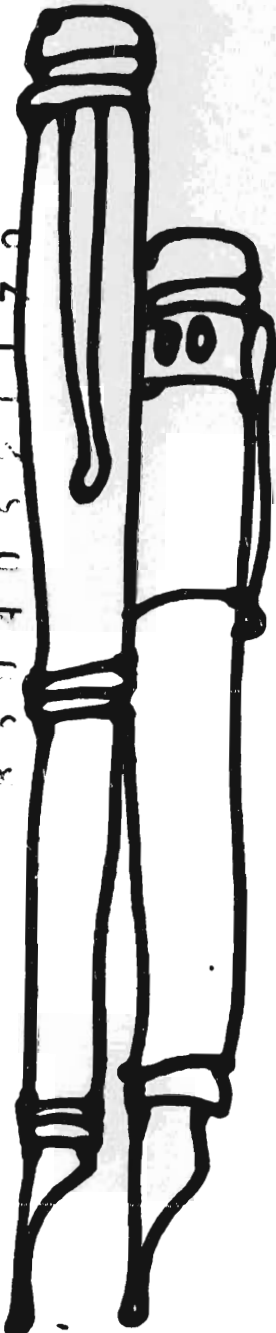
Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible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

1986 FILING REQUIREMENTS

See the January 1986 issue of the FEC Record for filing requirements during 1986. A committee that wishes to change its reporting schedule (e.g. from semiannually in 1985 to monthly—rather than quarterly in 1986) must notify the Commission by submitting a letter with the next report due under its current reporting schedule.

*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: ¹¹⁰ Information Services Division
202/523-4068 or 800/424-9530





FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

BQ-7

February 25, 1986

Robert A. Chlopak, Treasurer
Friends of The Earth Political
Action Committee
1045 Sansome Street
San Francisco, CA 94111

Identification Number: C00141044

Reference: Year-End Report (7/1/85-12/31/85)

Dear Mr. Chlopak:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E 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 the relevant portions should also be filed with the Secretary of State or equivalent state officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Alva Smith on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

A handwritten signature in cursive script, reading "John D. Gibson".
John D. Gibson
Assistant Staff Director
Reports Analysis Division

111

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

FEC

(Summary Page) Attachment #6

5 MAR 27 AM 19

ALIGN AREA 1. Name of Committee (In Full) FRIENDS OF THE EARTH NATIONAL ACTION COMMITTEE Address (Number and Street) 1095 SANSOME ST. City, State and ZIP Code SAN FRANCISCO, CA 94111 ☐ Check here if address is different than previously reported. 2. FEC Identification Number C-00141044 3. ☐ This committee qualified as a multicandidate committee during the Reporting Period on _____	ALIGN AREA 4. TYPE OF REPORT (Check appropriate boxes) (a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report ☐ July 15 Quarterly Report ☒ January 31 Year End Report ☐ July 31 Mid Year Report (Non-Station 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	COLUMN A This Period	COLUMN B Calendar Year to Date
6. Covering Period <u>July 1, 1985</u> through <u>DECEMBER 31, 1985</u>		
6 (a) Cash on hand January 1, 19 <u>85</u>		\$ 5328.18
(b) Cash on hand at Beginning of Reporting Period	\$ 5649.37	
(c) Total Receipts (from Line 18)	\$ 26,153.26	\$ 32,925.32
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 33,262.63	\$ 38,453.50
7. Total Disbursements (from Line 28)	\$ 15,572.90	\$ 20,623.77
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 17,629.73	\$ 17,629.73
9. Credits and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	\$ 0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ 0	

I, Geoffrey Webb, have examined this Report and to the best of my knowledge and belief it is true and complete.

Geoffrey Webb
Signature of Treasurer

For further information contact
Federal Election Commission
Te: Free 877 424 9530
Local 202 523 4088

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

FEC FORM 3X (3 80)

I12



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20540

MB-2

MAY 21 1985

Robert A. Chlopak, Treasurer
Friends of the Earth Political
Action Committee
1045 Sansome Street
San Francisco, CA 94111

Identification Number: C00141044

Reference: 1983-1986 Election Cycle Reports

Dear Mr. Chlopak:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. §434(a), by failing to timely file Reports of Receipts and Disbursements. The following is a list of the reports in question.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year Report (1/1/85-6/30/85)	7/31/85	8/13/85
Year End Report (7/1/85-12/31/85)	1/31/86	not filed

Timely filing is a specific requirement of the Federal Election Campaign Act ("the Act") and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views the untimely filing of reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending before the Commission, any additional report which is not submitted in a timely manner by your committee may result in the Commission initiating legal enforcement or audit action.

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Alva Smith on our toll-free number, (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

Lisa J. Stolaruk
Chief, Party/Non-Party Branch
Reports Analysis Division

I13

8 6 3 374055213173

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 21, 1986

WHO MUST FILE

ALL Party Committees, Non-connected Committees and Separate Segregated Funds, except those filing monthly (see below), must file a quarterly report by April 15, 1986.

WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for last report filed through March 31, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through March 31, 1986.* For more detailed instructions, consult your campaign guide.

WHERE TO FILE

Reports sent by registered or certified mail must be postmarked no later than midnight April 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business April 15, 1986.

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 April 20, 1986, and disclose all financial activity of their committee from March 1 through March 31, 1986. (See the schedule of monthly reports on the reverse side.)

COMPLIANCE

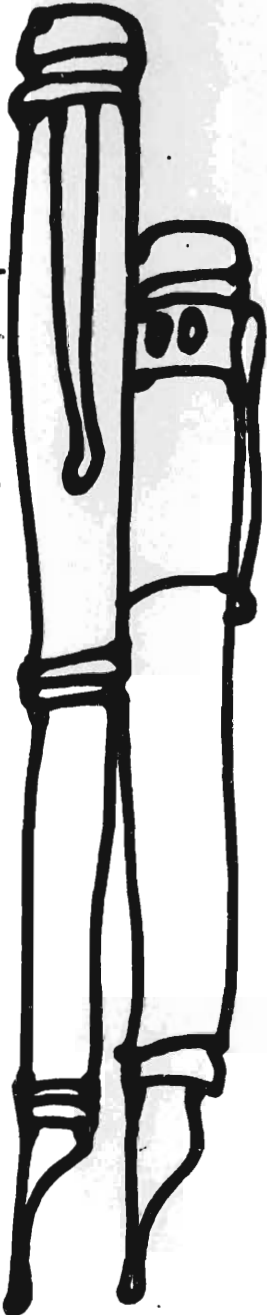
Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible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

*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 or disbursed during the current reporting period. See 11 CFR 104.3(a) and (b).

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I/4

36040321174



REMINERS

QUARTERLY FILERS

Committees that make contributions or expenditures (including independent expenditures) in connection with an election, must file a pre-election report if this activity has not been previously disclosed. See the January 1986 issue of the Federal Election Commission Record for primary election filing requirements.

MONTHLY FILERS

Committees that file monthly must follow the schedule below. Pre-general election reports sent by registered or certified mail must be postmarked no later than midnight October 20, 1986. All other reports sent by registered or certified mail must be postmarked no later than midnight on the filing date in order to be timely. Reports hand delivered or mailed first class must be received by close of business on the filing date.

REPORT	PERIOD COVERED		FILING DATE
February	01/01	- 01/31	02/20/86
March	02/01	- 02/28	03/20/86
April	03/01	- 03/31	04/20/86
May	04/01	- 04/30	05/20/86
June	05/01	- 05/31	06/20/86
July	06/01	- 06/30	07/20/86
August	07/01	- 07/31	08/20/86
September	08/01	- 08/31	09/20/86
October	09/01	- 09/30	10/20/86
Pre-election	10/01	- 10/15	10/23/86
Post-election	10/16	- 11/24	12/04/86
Year-End	11/25	- 12/31	01/31/87

INDEPENDENT EXPENDITURES

Any independent expenditure aggregating \$1,000 or more and made between 2 and 20 days before an election must be reported within 24 hours after the expenditure is made. See 11 CFR 104.4(c)(2) and (3) for information concerning where to file.

FOR INFORMATION CALL: Information Services Division
800/424-9530 or 202/376-3120

#15

96040521175

FRIENDS OF THE EARTH

110 7TH STREET, S.E., WASHINGTON, D.C. 20003
(202) 543-4312

EGMAY 5 AS: 33

April 30, 1986

Ms. Alva E. Smith, Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington DC 20463

RE: Identification Number: C00141011
ENCLOSED: Amended YE Report (7/1/85-12/32/85)
First Quarter Report, 1986

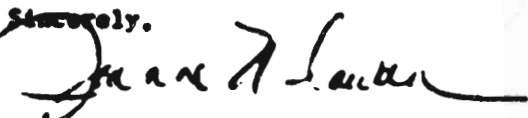
Dear Ms. Smith:

Enclosed please find the two reports referenced above. I believe the amended report responds to all your inquiries. Please feel free to call me at the number above if you have any outstanding questions.

It has come to my attention that the first quarter report is due on April 15. Friends of the Earth relocated in March, 1986 from our national headquarters in San Francisco to the address above in Washington DC. (This is indicated on the FEC report wherein I indicated the difference address box.) I was unable to access the information required to prepare the first quarter report until today. I trust you will understand our predicament (and given that our reports are usually timely) and not hold the report in tardiness. ML

Thank you.

Sincerely,



Joanne N. Cowan
Director of Administration and Finance

PS. I have enclosed a copy of a "Political Initiative Card" for your review, and highlighted the portions that I feel indicate our exercising "best efforts" to obtain the information I have been unable to supply on both of the enclosed reports.

Enc. (1)

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REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee **88 MAY 5 4:32**
 (Summary Page) Attachment #9, Page 2 of 2

FRIENDS OF THE EARTH
POLITICAL ACTION COMMITTEE

530 7th St. SE

WASHINGTON D.C. 20003

C-00141044

 NO SMOKING

FEC FORM 3X (3/80)

I/7



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

L. Geoffrey Webb
530 7th Street, S.E.
Washington, D.C. 20003

RE: MUR
Friends of the Earth
Political Action
Committee; and
L. Geoffrey Webb,
treasurer

Dear Mr. Webb:

On , 1986, the Federal Election Commission determined that there is reason to believe Friends of the Earth Political Action Committee ("the Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further,

Attachment II Page 1

86040521178

Letter to L. Geoffrey Webb
Page 2

requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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 John Drury, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens
Chairman

Enclosures

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

86040521179

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No.

RESPONDENTS: Friends of the Earth Political Action Committee,
and Geoffrey Webb, Treasurer

SUMMARY OF ALLEGATIONS

The Committee failed to file its 1985 Mid-Year and Year End Reports and 1986 April Quarterly Report in a timely manner.

FACTUAL BASIS AND LEGAL ANALYSIS

Under 2 U.S.C. § 434(a)(4)(A)(iv), if a political committee which is not an authorized committee of a candidate elects to file on a quarterly basis, for those years in which no general election is held, such a committee shall file a Mid-Year Report covering the period January 1 - June 30, and a Year End Report, detailing activity from July 1 - December 31. The Mid-Year Report shall be filed by July 31, the Year End by January 31 of the following calendar year. The respondent had elected to file in a quarterly basis. Thus, its 1985 Mid-Year Report was due on July 31, 1985. The Committee filed the report on August 13, 1985. Its 1985 Year End Report was due on January 31, 1986. The Committee filed the report on March 27, 1986.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), the Committee was obligated to file its 1986 April Quarterly Report by April 15, 1986. The report was filed on May 5, 1986.

The failure to file the 1985 Mid-Year and Year End Reports and 1986 April Quarterly Report in a timely fashion are violations of 2 U.S.C. § 434(a)(4)(A). Therefore, there is reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A).

Attachment III

86040521180



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *rk*
DATE: July 3, 1986
SUBJECT: RAD Referral 86NF-7, First General Counsel's Report
Erratum

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information [x]
Sensitive [x]
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [x]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

86040521191



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *red*
DATE: June 19, 1986
SUBJECT: RAD 86NF-7 - First General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [X]
Sensitive [X]
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

8504062182



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

4 June 1986

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 THE FRIENDS OF THE EARTH POLITICAL
ACTION COMMITTEE

This is a referral of the Friends of the Earth Political Action Committee ("the Committee"). The Committee failed to file three (3) reports in a timely manner during the 1985-1986 election cycle. According to the RAD Review and Referral Procedures for Unauthorized Committees (Standard 4), further examination is required by your office.

If you have any questions, please contact Alva E. Smith at 376-2480.

Attachment

96040521183

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 4 June 1986

ANALYST: Alva E. Smith

I. COMMITTEE: Friends of the Earth Political Action
Committee (C00141044)
L. Geoffrey Webb, Treasurer
(February 1, 1985 - Present)
Robert A. Chlopak, Treasurer
(January 1, 1985 - January 31, 1985)
530 7th Street, SE
Washington, DC 20003

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

III. BACKGROUND:

Failure to Timely File Reports

The Friends of the Earth Political Action Committee ("the Committee") failed to file three (3) Reports of Receipts and Disbursements in a timely manner for the 1985-1986 election cycle (See Chart on Page 2). The reports were filed between thirteen (13) and fifty-five (55) calendar days late.

On March 21, 1986, a Chronic Late Filer Notice was sent to the Committee for failing to file the 1985 Mid-Year and the 1985 Year End Reports in a timely manner (Attachment 7). The notice advised the Committee that any additional late filing of reports may result in legal enforcement action. Subsequent to the sending of the Chronic Late Filer Notice, the Committee failed to timely file the 1986 April Quarterly Report.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

86040521184

8 6 0 4 0 6 2 1 1 8 5

LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1985 Mid-Year (1/1/85-6/30/85)	6/21/85 (Attachment 2)	7/31/85	N/A	8/13/85 (Attachment 3)
1985 Year End (7/1/85-12/31/85)	12/20/85 (Attachment 4)	1/31/86	2/25/86 (Attachment 5)	3/27/86 (Attachment 6)
1986 April Quarterly (1/1/86-3/31/86)	3/21/86 (Attachment 8)	4/15/86	N/A	5/5/86 (Attachment 9)

8 6 0 4 0 5 2 1 1 8 6

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 2JUN86
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
FRIENDS OF THE EARTH POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: FRIENDS OF THE EARTH INC				NON-PARTY QUALIFIED		ID #C00141044
1983	MISCELLANEOUS REPORT			23FEB83 TO FEC	1	83FEC/267/0089
	FEBRUARY MONTHLY	3,447	2,779	1JAN83 -31JAN83	8	83FEC/267/0090
	FEBRUARY MONTHLY - AMENDMENT	3,447	2,779	1JAN83 -31JAN83	9	84FEC/309/2679
	REQUEST FOR ADDITIONAL INFORMATION			1JAN83 -31JAN83	1	84FEC/306/3352
	PRE-SPECIAL	228	3,130	1FEB83 - 1JUN83	7	83FEC/273/0316
	MID-YEAR REPORT	1,047	0	2JUN83 -30JUN83	5	83FEC/277/4260
	PRE-RUN-OFF	52,180	20,360	1JUL83 -19OCT83	7	83FEC/288/2343
	POST-RUN-OFF	2,164	113	20OCT83 -28NOV83	5	83FEC/289/1355
	YEAR-END	4,573	726	29NOV83 -31DEC83	7	84FEC/294/1692
1984	MISCELLANEOUS REPORT			21MAY84 TO FEC	1	84FEC/315/1537
	STATEMENT OF ORGANIZATION - AMENDMENT			18JUL84	1	84FEC/322/4450
	APRIL QUARTERLY	11,613	7,941	1JAN84 -31MAR84	7	84FEC/309/1936
	MAY MONTHLY	1,866	2,099	1APR84 -30APR84	7	84FEC/315/1538
	1'ST LETTER INFORMATIONAL NOTICE			1APR84 -30APR84	1	84FEC/328/4213
	JUNE MONTHLY	793	3,819	1MAY84 -31MAY84	6	84FEC/317/1860
	JULY MONTHLY	105	1,878	1JUN84 -30JUN84	6	84FEC/322/4451
	1'ST LETTER INFORMATIONAL NOTICE			1JUN84 -30JUN84	2	84FEC/328/4210
	AUGUST MONTHLY	1,364	7,517	1JUL84 -31JUL84	6	84FEC/325/4894
	SEPTEMBER MONTHLY	29,760	18,931	1AUG84 -31AUG84	10	84FEC/329/0122
	OCTOBER MONTHLY	34,582	18,786	1SEP84 -30SEP84	18	84FEC/342/5281
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP84 -30SEP84	4	84FEC/356/5493
	REQUEST FOR ADDITIONAL INFORMATION			1SEP84 -30SEP84	6	84FEC/349/0945
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1SEP84 -30SEP84	7	84FEC/356/4425
	PRE-GENERAL	15,041	26,003	1OCT84 -17OCT84	23	84FEC/347/2528
	PRE-GENERAL - AMENDMENT	15,041	26,003	1OCT84 -17OCT84	25	85FEC/359/0986
	REQUEST FOR ADDITIONAL INFORMATION			1OCT84 -17OCT84	1	85FEC/358/0725
	POST-GENERAL	6,254	36,859	18OCT84 -26NOV84	41	84FEC/356/1402
	POST-GENERAL - AMENDMENT	-	-	18OCT84 -26NOV84	1	85FEC/369/4254
	POST-GENERAL - AMENDMENT	-	-	18OCT84 -26NOV84	1	85FEC/369/4253
	POST-GENERAL - AMENDMENT	-	-	18OCT84 -26NOV84	3	85FEC/370/5159
	REQUEST FOR ADDITIONAL INFORMATION			18OCT84 -26NOV84	1	85FEC/367/4589
	REQUEST FOR ADDITIONAL INFORMATION 2ND			18OCT84 -26NOV84	1	85FEC/369/4275
	YEAR-END	3,705	17,552	27NOV84 -31DEC84	16	85FEC/362/1322
	YEAR-END - AMENDMENT	-	-	27NOV84 -31DEC84	2	85FEC/368/4707
	YEAR-END - AMENDMENT	-	-	27NOV84 -31DEC84	3	85FEC/369/2028
	YEAR-END - AMENDMENT	-	-	27NOV84 -31DEC84	1	85FEC/371/1152
	REQUEST FOR ADDITIONAL INFORMATION			27NOV84 -31DEC84	3	85FEC/367/3933
	REQUEST FOR ADDITIONAL INFORMATION 2ND			27NOV84 -31DEC84	4	85FEC/369/3637
TOTAL		168,722	0 168,493	0	258	TOTAL PAGES

All reports have been reviewed.
Ending cash on hand as of 12/31/84: \$5,328
Debts owed by the committee as of 12/31/84: \$2,878

Attachment #1
p 1 of 2

8 6 0 4 0 6 2 1 1 8 7

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 2JUN86
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
FRIENDS OF THE EARTH POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: FRIENDS OF THE EARTH INC				NON-PARTY QUALIFIED	ID #C00141044	
1985	MISCELLANEOUS REPORT			11FEB85 FROM FEC	1	85FEC/365/4621
	MID-YEAR REPORT	4,772	5,050	1JAN85 -30JUN85	9	85FEC/305/3245
	YEAR-END	28,153	15,572	1JUL85 -31DEC85	8	86FEC/406/2847
	YEAR-END - AMENDMENT	28,203	15,572	1JUL85 -31DEC85	8	86FEC/413/1766
	YEAR-END - AMENDMENT	-	-	1JUL85 -31DEC85	2	86FEC/415/1044
	NOTICE OF FAILURE TO FILE			1JUL85 -31DEC85	1	86FEC/403/3720
	REQUEST FOR ADDITIONAL INFORMATION			1JUL85 -31DEC85	2	86FEC/407/3098
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL85 -31DEC85	3	86FEC/413/0845
1986	MISCELLANEOUS NOTICE FROM FEC			21MAR86	1	86FEC/405/5154
	APRIL QUARTERLY	7,452	-	1JAN86 -31MAR86	7	86FEC/413/1759
	REQUEST FOR ADDITIONAL INFORMATION			1JAN86 -31MAR86	1	86FEC/415/4545
	TOTAL	40,427	0 20,622	0	43	TOTAL PAGES

All Reports have been reviewed.
Ending cash on hand as of 3/31/86: \$25,132
Debts as of 3/31/86: \$0



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 21, 1985

**SEMIANNUAL REPORT NOTICE
FOR UNAUTHORIZED COMMITTEES**

WHO MUST FILE

ALL POLITICAL COMMITTEES currently registered with the Commission (except committees filing monthly) must file a semiannual report by July 31, 1985.

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through June 30, 1985. Unauthorized political committees that have not previously filed a financial disclosure report should report all financial activity from date of registration, through June 30, 1985.*

WHEN TO FILE

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

WHERE AND HOW TO FILE

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

MONTHLY FILERS

Committees filing on a monthly schedule need not file a semi-annual report. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month. The next monthly report must be filed by July 20, 1985, and should disclose all financial activity of the committee from June 1 through June 30, 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 101.3; 104.3(a) and (b). Activity which occurred prior to 1985 should be reported separately.

- over -

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: Information Services Division
202/523-4068
800/424-9530

86040321189



Attachment #3
Page 1 of 2

85 AUG 13 9:34

Friends of the Earth Political Action Committee
530 Seventh St., S.E., Washington, D.C. 20003 (202) 543-4312

191

August 12, 1985

To whom it may concern:

My apologies for the late filing of this report, which was completed in San Francisco in time and which I inadvertently did not send in promptly. Please let me know if there is any problem.

Sincerely,

L. Geoffrey Webb
Treasurer

8 8 5 0 0 4 3 0 3 4 2 5 3 2 4 5

159

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

(Summary Page) Attachment #3
Page 2 of 2

851AUG 82 HIGHWAY 34

ALIGN AREA ☐

1 Name of Committee (In Full)

**FRIENDS OF THE EARTH
POLITICAL ACTION COMMITTEE**

Address (Number and Street)

1045 SANSOME ST

City, State and ZIP Code

SAN FRANCISCO CA 94111

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C 00141044

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

4. TYPE OF REPORT (Check appropriate boxes)

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

☐ July 15 Quarterly Report ☐ January 31 Year End Report

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

☐ Monthly Report for _____

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election

on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☐ NO

SUMMARY

5. Covering Period **1-1-85** through **6-30-85**

6 (a) Cash on hand January 1, 19 **85**

(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.

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

Date

For further information contact

Federal Election Commission

Toll Free 800 424 9530

Local 202 523 4368

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

FEC FORM 3X 380

YEAR-END

Attachment #4

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PAGE

December 20, 1985

WHO MUST FILE

ALL PARTY COMMITTEES, NON-CONNECTED COMMITTEES, AND SEPARATE SEGREGATED FUNDS must file a year-end report by January 31, 1986.

WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for the last report through December 31, 1985. Political committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration* through December 31, 1985. For more detailed instructions, consult your campaign guide.

FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1986. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1986.

WHERE TO FILE

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

COMPLIANCE

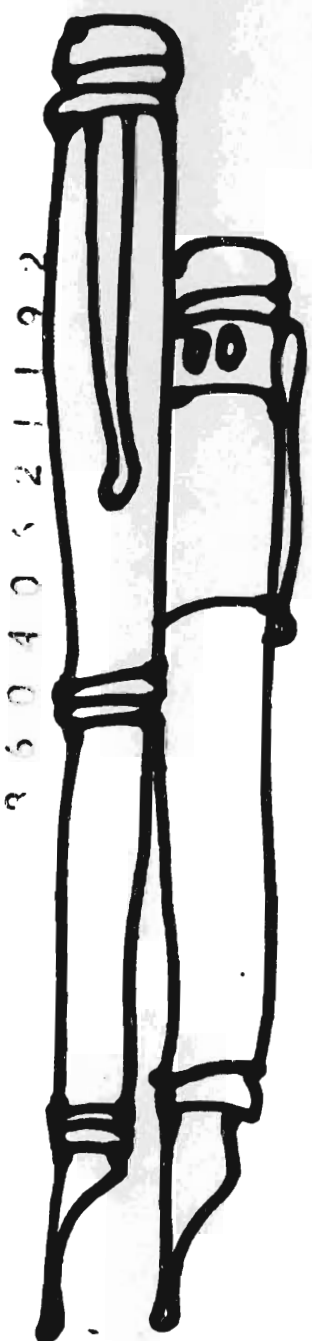
Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible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

1986 FILING REQUIREMENTS

See the January 1986 issue of the FEC Record for filing requirements during 1986. A committee that wishes to change its reporting schedule (e.g. from semiannually in 1985 to monthly—rather than quarterly in 1986) must notify the Commission by submitting a letter with the next report due under its current reporting schedule.

*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: Information Services Division
202/523-4068 or 800/424-9530





FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

RG-7

February 25, 1986

Robert A. Chlopak, Treasurer
Friends of The Earth Political
Action Committee
1045 Sansome Street
San Francisco, CA 94111

Identification Number: C00141044

Reference: Year-End Report (7/1/85-12/31/85)

Dear Mr. Chlopak:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E 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 the relevant portions should also be filed with the Secretary of State or equivalent state officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Alva Smith on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

A handwritten signature in cursive script, reading "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

... **FEC**

16 MAR 27 AM: 18

Abstract

FRINDS OF THE EARTH
PACIFIC ACTION COMMITTEE

1045 SAWYER ST.

SAN FRANCISCO, CA 94111

C-0014 10 44

☐ July 15 Quarterly Report ☒ January 31 Year End Report:☐ July 31 Mid Year Report (Non-Election Year Only)☐ Monthly Report for

Twelfth day report presented

Two of (Number)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election

ON _____ in the State of _____

Termination Report

(d) Is this Report an Amendment?

☐ YES☒ NO

5. Covering Period July 1, 1965 through December 31, 1965

6 (a) Cash on hand January 1, 1955

(b) Cash on hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Select (add Lines 8(b) and 8(c) for Column A and Lines 8(a) and 8(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))

COLUMN A
Total Period

COLUMN B
Calendar Year to Date

• 52818

• 5649.37

• 26,153.26 • 32,925.32

• 33.26.63 • 34.25.50

* 15,572.90 * 20,623.77

17,629.73 17,629.73

9 Credits 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, _____, have examined this Report and to the best of my knowledge and belief it is true and correct and true etc.

For further information contact

Federal Election Commission

Tr 5-82 424 9530

LOG# 207 523-4058

SHORTAGE OF MANPOWER

518

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. 20543

MB-1

MAY 21 1985

Robert A. Chlopak, Treasurer
Friends of the Earth Political
Action Committee
1045 Sansome Street
San Francisco, CA 94111

Identification Number: C00141044

Reference: 1985-1986 Election Cycle Reports

Dear Mr. Chlopak:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. §434(a), by failing to timely file Reports of Receipts and Disbursements. The following is a list of the reports in question.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year Report (1/1/85-6/30/85)	7/31/85	8/13/85
Year End Report (7/1/85-12/31/85)	1/31/86	not filed

Timely filing is a specific requirement of the Federal Election Campaign Act ("the Act") and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views the untimely filing of reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending before the Commission, any additional report which is not submitted in a timely manner by your committee may result in the Commission initiating legal enforcement or audit action.

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Alva Smith on our toll-free number, (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

Lisa J. Stolaruk
Chief, Party/Non-Party Branch
Reports Analysis Division

889340552151495

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 21, 1986

WHO MUST FILE

ALL Party Committees, Non-connected Committees and Separate Segregated Funds, except those filing monthly (see below), must file a quarterly report by April 15, 1986.

WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for last report filed through March 31, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through March 31, 1986.* For more detailed instructions, consult your campaign guide.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than midnight April 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business April 15, 1986.

WHERE AND HOW TO FILE

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

MONTHLY FILERS

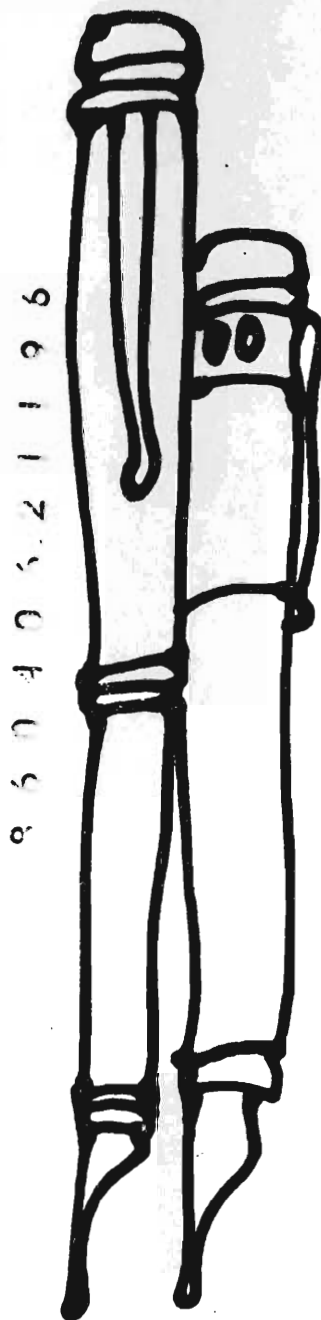
Committees that file on a monthly schedule must file their next report by April 20, 1986, and disclose all financial activity of their committee from March 1 through March 31, 1986. (See the schedule of monthly reports on the reverse side.)

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are 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.

*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 or disbursed during the current reporting period. See 11 CFR 104.3(a) and (b).

-over-



REMINDERS

QUARTERLY FILERS

Committees that make contributions or expenditures (including independent expenditures) in connection with an election, must file a pre-election report if this activity has not been previously disclosed. See the January 1986 issue of the Federal Election Commission Record for primary election filing requirements.

MONTHLY FILERS

Committees that file monthly must follow the schedule below. Pre-general election reports sent by registered or certified mail must be postmarked no later than midnight October 20, 1986. All other reports sent by registered or certified mail must be postmarked no later than midnight on the filing date in order to be timely. Reports hand delivered or mailed first class must be received by close of business on the filing date.

REPORT	PERIOD COVERED			FILING DATE
February	01/01	-	01/31	02/20/86
March	02/01	-	02/28	03/20/86
April	03/01	-	03/31	04/20/86
May	04/01	-	04/30	05/20/86
June	05/01	-	05/31	06/20/86
July	06/01	-	06/30	07/20/86
August	07/01	-	07/31	08/20/86
September	08/01	-	08/31	09/20/86
October	09/01	-	09/30	10/20/86
Pre-election	10/01	-	10/15	10/23/86
Post-election	10/16	-	11/24	12/04/86
Year-End	11/25	-	12/31	01/31/87

INDEPENDENT EXPENDITURES

Any independent expenditure aggregating \$1,000 or more and made between 2 and 20 days before an election must be reported within 24 hours after the expenditure is made. See 11 CFR 104.4(c)(2) and (3) for information concerning where to file.

FOR INFORMATION CALL: Information Services Division
800/424-9530 or 202/376-3120

86040621197

FRIENDS OF THE EARTH

130 7TH STREET, S.E., WASHINGTON, D.C. 20003
(202) 943-4312

26 MAY 85 AS: 33

April 30, 1986

Ms. Alva E. Smith, Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington DC 20463

RE: Identification Number: C00141011
ENCLOSED: Amended YE Report (7/1/85-12/32/85)
First Quarter Report, 1986

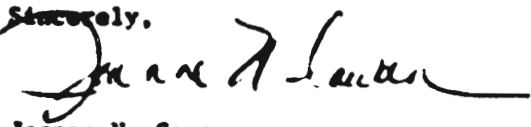
Dear Ms. Smith:

Enclosed please find the two reports referenced above. I believe the amended report responds to all your inquiries. Please feel free to call me at the number above if you have any outstanding questions.

It has come to my attention that the first quarter report is due on April 15. Friends of the Earth relocated in March, 1986 from our national headquarters in San Francisco to the address above in Washington DC. (This is indicated on the FEC report wherein I indicated the difference address box.) I was unable to access the information required to prepare the first quarter report until today. I trust you will understand our predicament (and given that our reports are usually timely) and not hold the report in tardiness. MK

Thank you.

Sincerely,


Joanne N. Cowan
Director of Administration and Finance

PS. I have enclosed a copy of a "Political Initiative Card" for your review, and highlighted the portions that I feel indicate our exercising "best efforts" to obtain the information I have been unable to supply on both of the enclosed reports.

85040521200



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 2199

Date Filmed 12/12/86 Camera No. --- 2

Cameraman AS