



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

3 Sept. 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 MINNESOTA FREEZE VOTER '84

This is a referral of the Minnesota Freeze Voter '84 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 Robyn Jameson at 376-2480.

Attachment

8804058430Z

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 3 Sept. 1986

ANALYST: Robyn Jimeson

I. COMMITTEE:

Minnesota Freeze Voter '84
(C00178855)
John F. Noble III, Treasurer
2401 University Avenue
St. Paul, MN 55114

II. RELEVANT STATUTE:

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

III. BACKGROUND:

Chronic Late Filing of Reports

The Minnesota Freeze Voter '84 committee ("the Committee") failed to file three (3) reports in a timely manner for the 1985-1986 election cycle (See attached chart). The reports were filed between seven (7) and fifty (50) calendar days late.

On May 29, 1986, Mr. Ross C. Williams contacted the Reports Analysis Division ("RAD") analyst concerning the May 7, 1986 Non-Filer Notice (Attachment 5). He explained that the Committee's treasurer had been injured and was unable to file the 1986 April Quarterly Report. The RAD analyst told Mr. Williams that it was important that reports be filed in a timely manner, and that the April Quarterly Report should be filed immediately (Attachment 6).

On June 2, 1986 a letter was received from Mr. Williams again explaining that the Committee's treasurer had been injured (Attachment 7).

On June 13, 1986 a Chronic Late Filer Notice was sent to the Committee for failing to file the 1985 Year End and 1986 April Quarterly Reports in a timely manner (Attachment 9). The Notice advised the Committee that any additional late filing of reports may result in legal enforcement action. Subsequent to the mailing of this notice, the Committee failed to file the 1986 July Quarterly Report in a timely manner (Attachment 11).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

88040684308

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LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1985 Year End (7/1/85-12/31/85)	12/20/85 (Attachment 2)	1/31/86	N/A	2/7/86 (Attachment 3)
1986 April Quarterly (1/1/86-3/31/86)	3/21/86 (Attachment 4)	4/15/86	5/7/86 (Attachment 5)	6/4/86 (Attachment 8)
1986 July Quarterly (4/1/86-6/30/86)	6/20/86 (Attachment 10)	7/15/86	N/A	7/23/86 (Attachment 11)

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
MINNESOTA FREEZE VOTER '84				NON-PARTY QUALIFIED		ID 0C00178855
CONNECTED ORGANIZATION:	FREEZE VOTER '84					
1984	STATEMENT OF ORGANIZATION			12MAR84	2	84FEC/299/0763
	STATEMENT OF ORGANIZATION - AMENDMENT			12JUN84	2	84FEC/316/3946
	STATEMENT OF ORGANIZATION - AMENDMENT			24AUG84	1	84FEC/327/2713
	APRIL QUARTERLY	5,040	3,531	1JAN84 -31MAR84	8	84FEC/310/2237
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN84 -31MAR84	2	84FEC/349/0213
	1'ST LETTER INFORMATIONAL NOTICE			1JAN84 -31MAR84	2	84FEC/348/0222
	JULY QUARTERLY	36,931	22,004	1APR84 -30JUN84	15	84FEC/321/3977
	JULY QUARTERLY - AMENDMENT	-	-	1APR84 -30JUN84	3	84FEC/348/1566
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30JUN84	2	84FEC/345/1903
	PRE-PRIMARY	14,809	23,492	1JUL84 -22AUG84	12	84FEC/327/2714
	PRE-PRIMARY - AMENDMENT	14,809	23,492	1JUL84 -22AUG84	4	84FEC/348/3153
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 -22AUG84	1	84FEC/345/1981
	OCTOBER QUARTERLY	30,006	33,098	23AUG84 -30SEP84	13	84FEC/340/4173
	PRE-GENERAL	16,926	19,227	1OCT84 -17OCT84	14	84FEC/345/4109
	POST-GENERAL	20,323	19,840	18OCT84 -26NOV84	19	84FEC/353/4905
	1'ST LETTER INFORMATIONAL NOTICE			18OCT84 -26NOV84	1	85FEC/365/3040
	YEAR-END	1,699	3,538	27NOV84 -31DEC84	9	85FEC/363/0196
	TOTAL	125,734	0 124,730	0	110	TOTAL PAGES

All reports have been reviewed

Ending Cash-on-hand figure as of 12/31/84: \$1003.55

Debts owed to the Committee as of 12/31/84: \$0

Debts owed by the Committee as of 12/31/84: \$113.83

8 8 0 4 0 5 8 4 3 1 1
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 7AUG86
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
MINNESOTA FREEZE VOTER '84 CONNECTED ORGANIZATION: FREEZE VOTER '84				NON-PARTY QUALIFIED		ID #C00178855
1985	MID-YEAR REPORT	1,636	1,024	1JAN85 -30JUN85	5	85FEC/384/2449
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN85 -30JUN85	3	86FEC/397/1395
	REQUEST FOR ADDITIONAL INFORMATION			1JAN85 -30JUN85	2	85FEC/392/2279
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN85 -30JUN85	2	86FEC/394/0366
	YEAR-END	-	13	1JUL85 -30DEC85	4	86FEC/401/5310
	YEAR-END - AMENDMENT	-	13	1JUL85 -30DEC85	6	86FEC/412/4975
	REQUEST FOR ADDITIONAL INFORMATION			1JUL85 -30DEC85	1	86FEC/404/4869
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL85 -30DEC85	2	86FEC/410/3574
1986	MISCELLANEOUS REPORT			2JUN86 TO FEC	2	86FEC/416/0052
	MISCELLANEOUS NOTICE FROM FEC			13JUN86	1	86FEC/416/4166
	APRIL QUARTERLY	-	6	1JAN86 -31MAR86	6	86FEC/416/0640
	NOTICE OF FAILURE TO FILE			1JAN86 -31MAR86	1	86FEC/413/3036
	JULY QUARTERLY	-	7	1APR86 -30JUN86	5	86FEC/424/2833
TOTAL		1,636	0 1,050	0	41	TOTAL PAGES

All reports have been reviewed

Ending Cash-on-hand figure as of 6/30/86: \$1,587.29

Debts owed to the Committee as of 6/30/86: \$0

Debts owed by the Committee as of 6/30/86: \$113.83

YEAR-END 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

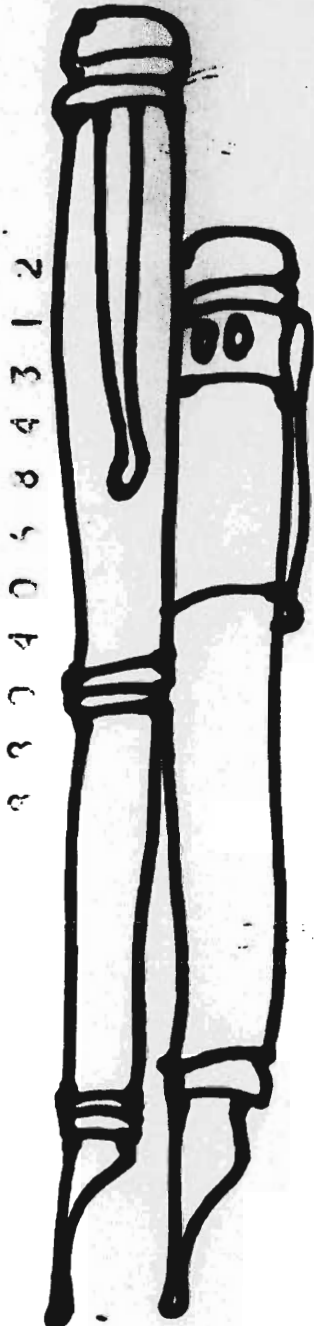
Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible 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: Information Services Division
202/523-4068 or 800/424-9530



QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PAGE

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).

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REQUIREMENTS

QUARTERLY FILINGS

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 FILINGS

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

88040584315



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

EQ-7

May 7, 1986

John F. Noble III, Treasurer
Minnesota Freeze Voter '86
2401 University Avenue
St. Paul, MN 55114

Identification Number: C00178835

Reference: April Quarterly Report (1/1/86-3/31/86)

Dear Mr. Noble:

It has come to the attention of the Federal Election Commission ("the Commission") that you 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, N.W., 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 Robyn Jameson on toll-free number (800) 424-9530. Our local number is (202) 7490.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

88040584316

ANALYST: Jimeson

CONVERSATION WITH: Ross C. Williams

COMMITTEE: Minnesota, Freeze Voter '84 (C00178855)

DATE: 5/29/86

SUBJECT(S): Non Filing of Report

Mr. Ross C. Williams telephoned to explain that the 1986 April Quarterly Report had not been filed because the treasurer had been injured in a fall.

I told Mr. Williams that it was important that all reports be filed timely and the April Quarterly Report should be filed immediately.

88040584317

ATTACHMENT 7

6 JUN 2

All: 4

MINNESOTA FREEZE VOTER '84

2401 University Avenue, St. Paul, MN 55104 (612) 644-4646

Robyn Jameson
Federal Elections Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Mr. Jameson:

As I explained to you on the phone, our Treasurer Fritz Noble fell and hit his head, suffering a fractured skull during the time the April Quarterly Report (1/1/86 - 3/31/86) should have been filed. We are now trying to prepare this report and will forward it as soon as possible.

We have been unable to locate our April Quarterly report notification and report form. Could you forward us a new form for this report. During the period of this report there were no expenditures made by Minnesota Freeze Voter '84.

Thank you for your assistance.

Sincerely,

Ross C. Williams
Ross C. Williams

THE
FREEZE
Because Nobody Wants A Nuclear War

ALABAMA

1. Name of Committee (in full)
Miss. For. & Vets. 1974

Address (Number and Street)
2401 University Blvd

City, State and ZIP Code
St. Paul, Mo. 65114

☐ Check here if address is different than previously reported.

2. FEC Identification Number
000178855

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

4. Type of Report (Check one)

☒ Initial Report (Required for all committees)

☐ Annual Report (Required for all committees)

☐ Quarterly Report (Required for all committees)

☐ Monthly Report (Required for all committees)

☐ Termination Report (Required for all committees)

☐ Other (Specify): _____

5. ☐ This report is an amendment to the report on _____

6. ☐ YES ☒ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
7. Covering Period	<u>1/1/86</u> through <u>3/31/86</u>		
8. (a) Cash on hand January 1, 19 <u>86</u>		<u>1601.60</u>	<u>1601.60</u>
(b) Cash on hand at Beginning of Reporting Period		<u>1601.60</u>	
(c) Total Receipts (from Line 12)			
(d) Subtotal (add Lines 8(a) and 8(c) for Column A and Lines 8(a) and 8(c) for Column B)		<u>1601.60</u>	<u>1601.60</u>
(e) Total Disbursements (from Line 28)		<u>6.96</u>	<u>6.96</u>
9. Cash on hand at Close of Reporting Period (subtract Line 9 from Line 8(d))		<u>1594.64</u>	<u>1594.64</u>
10. Debt and Obligations Owed TO The Committee (reported on Schedule C or Schedule D)			
11. Debt and Obligations Owed BY the Committee (reported on Schedule C or Schedule D)		<u>113.83</u>	

12. Signature of Treasurer (Print Name)
Joan E. Nij - E

13. Signature of Chairman (Print Name)
5/29/86

For further information contact:
 Federal Election Commission
 Toll Free 877-474-6630
 Local 202-453-6024

98373476864319



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

JAN 19 1986

John F. Noble III, Treasurer
Minnesota Freeze Voter '84
2401 University Avenue
St. Paul, MN 55114

Identification Number: C00170035

Reference: 1983-1986 Election Cycle Reports

Dear Mr. Noble:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. 3434(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>
Year End Report (7/1/85-12/31/85)	1/31/86	2/7/86
April Quarterly Report (1/1/86-3/31/86)	4/15/86	6/4/86

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 Robyn Jinson on our toll-free number, (800) 424-9330. Our local number is (202) 376-2400.

Sincerely,

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

006034166

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PAGE

June 20, 1986

WHO MUST FILE

All Party Committees, Nonconnected Committees and Separate Segregated Funds, except those that file monthly (see below), must file a quarterly report by July 15, 1986.

WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for the last report filed through June 30, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through June 30, 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 July 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business July 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 July 20, 1986, and disclose all financial activity of their committee from June 1 through June 30, 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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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 reports must follow the schedule below. Pre-general election reports sent by registered or certified mail must be postmarked no later than mid-night 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**

SENSITIVE

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

86 SEP 26 49:30

**DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION:**

86NF-14
STAFF MEMBER:
Garr

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME: Minnesota Freeze Voter '84
John F. Noble, III, Treasurer

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

**INTERNAL REPORTS
CHECKED:** FEC Disclosure Documents

**FEDERAL AGENCIES
CHECKED:** NA

GENERATION OF MATTER

The Minnesota Freeze Voter '84 committee ("Committee") and John F. Noble, III, as Treasurer, were referred to the Office of General Counsel by the Reports Analysis Division for failing to file in a timely manner 3 reports required for the 1985-1986 election cycle. The reports were filed between 7 and 50 days late.

SUMMARY OF ALLEGATIONS

The Committee was notified on December 20, 1985, that its 1985 Year End Report was due on January 31, 1986. The report was filed on February 7, 1986, 7 days late.

On March 21, 1986, the Committee was notified that its 1986 April Quarterly Report was due of April 15, 1986. A Non-Filer

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Notice was sent on May 7, 1986.^{1/} The report was filed on June 4, 1986, 50 days late.

On June 13, 1986, a Chronic Late Filer Notice was sent to the Committee for failing to file the 1985 Year End Report and 1986 April Quarterly Report in a timely manner. The Notice advised the Committee that any additional late filing of reports may result in legal enforcement action.

On June 20, 1986, the Committee was notified that its 1986 July Quarterly Report was due on July 15, 1986. The report was filed on July 23, 1986, 8 days late.

LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), all political committees other than authorized committees of a candidate may elect to file in a calendar year in which a regularly scheduled election is held, quarterly reports which shall be filed no later than the 15th day after the last day of each calendar quarter, except that the report for the quarter ending on December 31 of such calendar year, which shall be filed no later than January 31 of the following calendar year.

Additionally, pursuant to 2 U.S.C. § 434(a)(4)(A)(iv) those committees are required to file, in any other calendar year, a

^{1/} On May 29, 1986, a representative of the Committee contacted a RAD analyst to advise that the 1986 April Quarterly Report had not been filed because the Committee's treasurer had been injured in a fall. The conversation was followed with a written response received by the Commission on June 2, 1986.

88040684325

report covering the period January 1 and ending June 30 which shall be filed no later than July 31 and a report covering the period July 1 and ending December 31 which shall be filed no later than January 31 of the following calendar year.

By failing to file its 1985 Year End Report and 1986 April and July Quarterly Reports in a timely manner, the Committee appears to be in violation of 2 U.S.C. § 434(a)(4)(A)(i) and (iv).

RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

- 1) Open a MUR;
- 2) Find reason to believe that the Minnesota Freeze Voter '84 committee and John F. Noble, III, as Treasurer violated 2 U.S.C. § 434(a)(4)(A)(i);
- 3) Find reason to believe that the Minnesota Freeze Voter '84 committee and John F. Noble, III, as Treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv);
- 4) Approve and send the attached letter and legal and factual analysis.

Charles N. Steele
General Counsel

Date 9/25/86

BY: Lawrence M. Noble (LPN)
Lawrence M. Noble
Deputy General Counsel

Attachments

1. Referral
2. Proposed letter and legal and factual analysis

88040684326

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Minnesota Freeze Voter '84
John F. Noble, III, Treasurer

RAD Ref. 86NF-14

(CMUR2257)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 30, 1986, the Commission decided by a vote of 4-0 to take the following actions in RAD Ref. 86NF-14:

1. Open a MUR.
2. Find reason to believe that the Minnesota Freeze Voter '84 Committee and John F. Noble, III, as treasurer, violated 2 U.S.C. § 434(a) (4) (A) (i).
3. Find reason to believe that the Minnesota Freeze Voter '84 Committee and John F. Noble, III, as treasurer, violated 2 U.S.C. § 434(a) (4) (A) (iv).
4. Approve and send the letter and legal and factual analysis, as recommended in the First General Counsel's Report signed September 25, 1986.

Commissioners Elliott, Josefiak, McDonald and McGarry voted affirmatively for this decision; Commissioners Aikens and Harris did not vote.

Attest:

9-30-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Fri., 9-26-86,	9:30
Circulated on 48 hour tally basis:	Fri., 9-26-86,	2:00
Deadline for vote:	Tues., 9-30-86,	4:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 3, 1986

Minnesota Freeze Voter '84
John F. Noble, III, Treasurer
2401 University Avenue
St. Paul, Minnesota 55114

RE: MUR 2257
Minnesota Freeze Voter '84
John F. Noble, III,
Treasurer

Dear Mr. Noble:

On September 30, 1986, the Federal Election Commission determined that there is reason to believe that the Minnesota Freeze Voter '84 committee and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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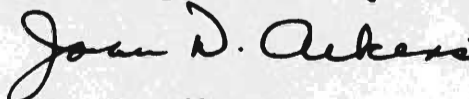
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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 Shelley Garr, the staff member 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

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SENSITIVE



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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COMMUNICATIONS SECTION

MEMORANDUM

March 5, 1987

TO: The Commission
FROM: Charles N. Steele
General Counsel
SUBJECT: MUR # 2257

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on March 5, 1987. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Briefs
2. Letters to Respondents

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

**John F. Noble, III, Treasurer
Minnesota Freeze Voter '84
2401 University Avenue
St. Paul, MN 55114**

March 5, 1987

**RE: MUR 2257
Minnesota Freeze Voter '84
John F. Noble, III, Treasurer**

Dear Mr. Noble:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on September 30, 1986, found reason to believe that The Minnesota Freeze Voter '84 committee and you, as treasurer, had violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv) and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days. All requests for extension of time must be submitted 5 days prior to the due date and must be in writing. Further, good cause must be shown.

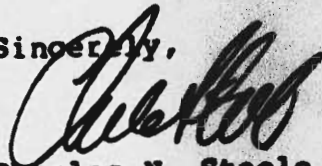
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John F. Noble, III, Treasurer
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Shelley Garr, the staff member assigned to handle this matter, at (202) 376-8200.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Minnesota Freeze Voter '84)

John P. Noble, III, Treasurer)

MUR 2257)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF CASE

On September 30, 1986, the Commission found reason to believe that the Minnesota Freeze Voter '84 committee and John P. Noble, III, as Treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv) by failing to file in a timely manner three reports required for the 1985-1986 election cycle. The reports are:

<u>REPORT</u>	<u>DATE DUE</u>	<u>DATE FILED</u>	<u>DAYS LATE</u>	<u>RECEIPTS</u>	<u>EXPENDITURES</u>
1985 Year End	1/31/86	2/7/86	7	\$1,636	\$1,024
1986 April ^{1/} Quarterly	4/15/86	6/4/86	50		\$ 6
1986 July Quarterly	7/15/86	7/23/86	8		\$ 7 ^{2/}

On December 31, 1986, this Office contacted Mr. Noble to determine the status of the Committee's response. Mr. Noble stated that he had referred the Commission's notification to another staff member, but he would check on it and call this Office back. As of this date, this Office has received no response.

^{1/} On June 13, 1986, a Chronic Late Filer Notice was sent to the Committee for failing to file the 1985 Year End Report and 1986 April Quarterly Report in a timely manner.

^{2/} In their last report filed with the Commission, the 1986 Post General Report, the Committee listed \$652 cash-on-hand.

II. LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), all political committees other than authorized committees of a candidate may elect to file in a calendar year in which a regularly scheduled election is held, quarterly reports which shall be filed no later than the 15th day after the last day of each calendar quarter, except that the report for the quarter ending on December 31 of such calendar year, which shall be filed no later than January 31 of the following calendar year.

Additionally, pursuant to 2 U.S.C. § 434(a)(4)(A)(iv) those committees are required to file, in any other calendar year, a report covering the period January 1 and ending June 30 which shall be filed no later than July 31, and a report covering the period July 1 and ending December 31 which shall be filed no later than January 31 of the following calendar year.

By failing to file its 1985 Year End Report and 1986 April and July Quarterly Reports in a timely manner, the Committee is in violation of 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv).

III. RECOMMENDATION

The Office of General Counsel recommends that the Commission find probable cause to believe that the Minnesota Freeze Voter '84 committee and John F. Noble, III, violated 2 U.S.C. §§ 433(a)(4)(A)(i) and (iv).

4 March 1987
Date


Charles N. Steele
General Counsel

87 MAR 30 P 1:00

March 22, 1987

Charles N. Steele
General Counsel
Federal Election Commission
999 E Street NW
Washington, D.C. 20463

Dear Mr. Steele:

In response to your letter dated March 5, 1987 regarding possible violation of 2 U.S.C. SS 434 (a) (4) (A) (i) and (iv) I submit this brief.

The legal and factual issues stated in the brief by General Counsel regarding late filing are correct.

Subsequent to notification last Fall by the FEC that Minnesota Freeze Voter '84 may be in violation of 2 U.S.C. SS 434 (a) (4) (A) (i) and (iv) I made procedural and staffing changes to prevent future delays in filing. Please note that all subsequent filing has been "on-time".

This matter is embarrassing to me. I apologize for the past delays and for the inconvenience caused to those at the FEC.

I respectfully request of the Commission that we enter into pre-probable cause conciliation.

If you have any questions I can be reached through the office at 612-339-5144. Please note the change in the address of MFV '84, below.

Sincerely,



John F. Noble, III
Treasurer
Minnesota Freeze Voter '84
#411
2000 South 5th Street
Minneapolis, Minnesota 55454-1337

cc: Shelly Garr

87 MAR 30 P 2:53

GENERAL COUNSEL

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Minnesota Freeze Voter '84)
John F. Noble, III, Treasurer)

MUR 2257

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On September 30, 1986, the Commission found reason to believe that the Minnesota Freeze Voter '84 committee ("Committee") and John F. Noble, III, as Treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv) by failing to file in a timely manner its 1985 Year End, 1986 April Quarterly, and 1986 July Quarterly Reports. The reports were filed 7, 50, and 8 days late, respectively.

On December 31, 1986, this Office contacted Mr. Noble to determine the status of the Committee's response. Mr. Noble stated that he had referred the Commission's notification to another staff member, but he would check on it and call this Office back. Mr. Noble failed to respond.

On March 5, 1987, the Office of General Counsel sent the Committee its Brief recommending that the Commission find probable cause to believe. In his response received by the Commission on March 30, 1987, Mr. Noble acknowledged the violations and advised that procedural and staffing changes had been made to prevent future filing delays. Mr. Noble also requested that the Committee enter into pre-probable cause conciliation with the Commission (Attachment I). In as much as this request was made after the Brief was sent to the Committee, in keeping with Commission policy, this Office recommends that

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the Commission not approve Mr. Noble's request for pre-probable cause conciliation.

II. LEGAL ANALYSIS

The factual and legal analysis remains the same as that outlined in the General Counsel's Brief dated March 5, 1987.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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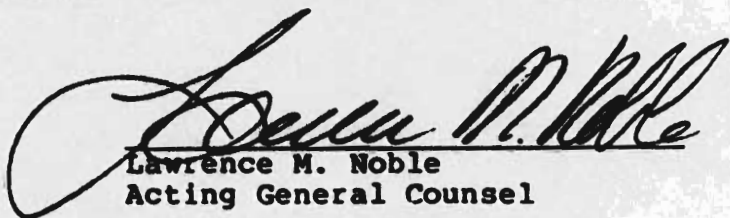
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IV. RECOMMENDATIONS

1. Do not enter into pre-probable cause conciliation.
2. Find probable cause to believe that Minnesota Freeze Voter '84 and John F. Noble, III, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv).
2. Approve and send the attached conciliation agreement and letter.

Date

5/12/87


Lawrence M. Noble
Acting General Counsel

Attachments:

1. Response to Brief
2. Proposed Conciliation Agreement (1)
3. Letter (1)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Minnesota Freeze Voter '84) MUR 2257
John F. Noble, III, Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of May 19,
1987, decided by a vote of 6-0 to take the following
actions in MUR 2257:

1. Do not enter into pre-probable cause
conciliation.
2. Find probable cause to believe that
Minnesota Freeze Voter '84 and John F.
Noble, III, as treasurer, violated 2
U.S.C. §§ 434(a)(4)(A)(i) and (iv).
3. Approve and send the conciliation agree-
ment and letter attached to the General
Counsel's report dated May 12, 1987.

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

Attest:

5-20-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 26, 1987

John F. Noble, III, Treasurer
Minnesota Freeze Voter '84
2000 S. 5th Street
Minneapolis, MN 55454-1337

RE: MUR 2257
Minnesota Freeze Voter '84
John F. Noble, III, Treasurer

Dear Mr. Noble:

On May 19, 1978, the Federal Election Commission found that there is probable cause to believe Minnesota Freeze Voter '84 and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv), provisions of the Federal Election Campaign Act of 1971, as amended, in connection with your committee's 1985 Year End Report and its 1986 April and July Quarterly Reports.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

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 within 10 days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation

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agreement, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

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In the Matter of)
Minnesota Freeze Voter '84) MUR 2257
John F. Noble, III, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by John F. Noble, III, treasurer of the Minnesota Freeze Voter '84 committee ("Committee") (Attachment I).

II. RECOMMENDATION

1. Accept the conciliation agreement with Minnesota Freeze Voter '84 and John F. Noble, III, as treasurer;
2. Close the file; and

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3. Approve the attached letter.

Date

11/24/87


Lawrence M. Noble
General Counsel

Attachments:

1. Response and conciliation agreement
2. Proposed Letter

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Minnesota Freeze Voter '84
John F. Noble, III, as treasurer

)
)
)
)
MUR 2257

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 30, 1987, the Commission decided by a vote of 5-0 to take the following actions in MUR 2257:

1. Accept the conciliation agreement with Minnesota Freeze Voter '84 and John F. Noble, III, as treasurer, as recommended in the General Counsel's report signed November 24, 1987.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report signed November 24, 1987.

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

Attest:

11-30-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Tues., 11-24-87, 4:09
Circulated on 48 hour tally basis: Wed., 11-25-87, 11:00
Deadline for vote: Mon., 11-30-87, 11:00



FEDERAL ELECTION COMMISSION

03 December 1987

**John F. Noble, III, Treasurer
Minnesota Freeze Voter '84
5621 Mtka. Blvd. #110
St. Louis Park, MN 55416**

RE: MUR 2257
Minnesota Freeze Voter '84
John F. Noble, III as
treasurer

Dear Mr. Noble:

On November 30, 1987, the Federal Election Commission accepted the signed conciliation agreement submitted on behalf of your clients, the Minnesota Freeze Voter '84 committee and you as treasurer, in settlement of violations of 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Shelley Garr, the staff member assigned to this matter at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

**Enclosure
Conciliation Agreement**

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Minnesota Freeze Voter '84) MUR 2257
John F. Noble, III, Treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that Minnesota Freeze Voter '84 and John F. Noble, III, as treasurer ("Respondents") violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv).

NOW, THEREFORE, the Commission and the Respondents, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:

- I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding.
- 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.
- IV. The pertinent facts in this matter are as follows:
 1. Respondent, Minnesota Freeze Voter '84, is a political committee within the meaning of 2 U.S.C. § 431(4).
 2. Respondent, John F. Noble, III, is the treasurer of Minnesota Freeze Voter '84.

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3. Respondents were required to file a 1985 Year End Report on January 31, 1986. The report was filed on February 7, 1986, 7 days late.

4. Respondents were required to file a 1986 April Quarterly Report on April 15, 1986. The report was filed on June 4, 1986, 50 days late.

5. Respondents were required to file a 1986 July Quarterly Report on July 15, 1986. The report was filed on July 23, 1986, 8 days late.

V. Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), all political committees other than authorized committees of a candidate, may elect to file, in a calendar year in which a regularly scheduled election is held, quarterly reports which shall be filed no later than the 15th day after the last day of each calendar quarter, except that the report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year. Further, pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), in any other calendar year, those committees are required to file a report covering the period beginning January 1, and ending June 30, which shall be filed no later than July 31 and a report covering the period July 1 and ending December 31 which shall be filed no later than January 31 of the following calendar year.

VI. Respondents failure to file the 1986 April and July Quarterly Reports and the 1985 Year End Report in a timely

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manner is in violation of 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv), respectively.

VII. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Seven Hundred Dollars (\$700), pursuant to 2 U.S.C. § 437g(a)(5)(A), such penalty is to be paid as follows:

- 1) One initial payment of \$200 due on January 1, 1988;
- 2) Thereafter, beginning on February 1, 1988, consecutive monthly installment payments of \$100 each;
- 3) Each such installment shall be paid on the first day of the month in which it becomes due;
- 4) In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the respondent. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

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

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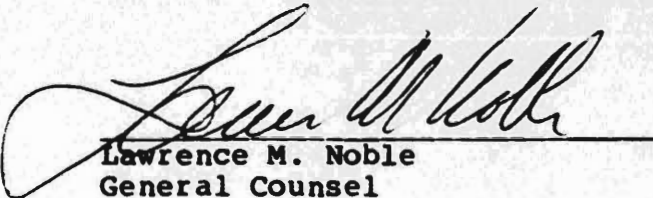
action for relief in the United States District Court for the District of Columbia.

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

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

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:


Lawrence M. Noble
General Counsel

12/3/87
Date

FOR THE RESPONDENTS:


(Name) _____, Treasurer
(Position)

10/30/87
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2257

DATE FILMED 3/25/88 CAMERA NO. 4

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