



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2279

DATE FILMED 2/24/87 CAMERA NO. 3
CAMERAMAN AS

2701056231

FEDERAL ELECTION COMMISSION

Routing slips, Commissioner comment sheet,

documents pertaining to conciliation,

RAD document pertaining to internal practices.

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

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

Signed

Dorothy B. Kramer

date

2-17-87

FEC 9-21-77

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2279
Paine Webber Fund for)
Better Government and)
Paul B. Guenther, Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 6, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2279.

1. Accept the conciliation agreement for the Paine Webber Fund for Better Government and Paul B. Guenther, as treasurer, as recommended in the General Counsel's Report signed February 3, 1987
2. Close the File.
3. Approve and send the letter ~~letter~~, as recommended in the General Counsel's Report signed February 3, 1987.

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

Attest:

2/9/87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Tues.,	2-3-87,	5:23
Circulated on 48 hour tally basis:	Wed.,	2-4-87,	11:00
Deadline for vote:	Fri.,	2-6-87,	11:00



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

February 10, 1987

Michael S. Berman, Esquire
Kirkpatrick & Lockhart
1900 M Street, N.W.
Washington, D.C. 20036

RE: MUR 2279
Paine Webber Fund for Better
Government and Paul B. Guenther,
as treasurer

Dear Mr. Berman:

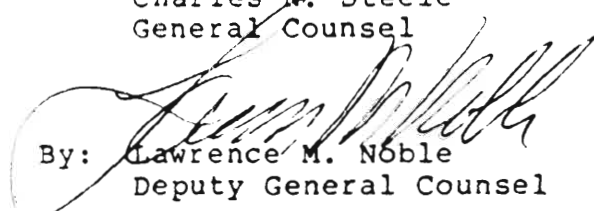
On February 6, 1987, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days.

Please note that 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: 
Deputy General Counsel

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Paine Webber Fund for	)	MUR 2279
Better Government and	)	
Paul B. Guenther,	)	
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 Paine Webber Fund for Better Government and Paul B. Guenther, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(B) by failing to file monthly reports of receipts and disbursements in a timely manner during the 1985-86 election cycle.

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.

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

1. Respondent, Paine Webber Fund for Better Government ("the Committee") is a political committee within the meaning of 2 U.S.C. § 431(4).
2. Respondent, Paul B. Guenther, is the treasurer of the Committee.
3. Section 434(a)(4)(B) of Title 2, United States Code, provides that the treasurer of a political committee is required to file monthly reports of receipts and disbursements no later than the 20th day after the last day of each month. See also, 11 C.F.R. § 104.5(c)(3)(i).
4. Respondents were required to file their 1985 February Monthly report no later than February 20, 1985. Respondents filed their 1985 February Monthly report on February 28, 1985, which was 8 days late.
5. Respondents were required to file their 1985 March Monthly report no later than March 20, 1985. Respondents filed their 1985 March Monthly report on March 27, 1985, which was 7 days late.
6. Respondents were required to file their 1985 April Monthly report no later than April 20, 1985. Respondents filed their 1985 April Monthly report on May 15, 1985, which was 25 days late.
7. Respondents were required to file their 1985 June Monthly report no later than June 20, 1985.

Respondents filed their 1985 June Monthly report on July 11, 1985, which was 21 days late.

8. Respondents were required to file their 1986 May Monthly report no later than May 20, 1986.

Respondents filed their 1986 May Monthly report on May 28, 1986, which was 8 days late.

V. Respondents failed to file five monthly reports of receipts and disbursements in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(B).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Five Hundred dollars (\$500), 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 requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

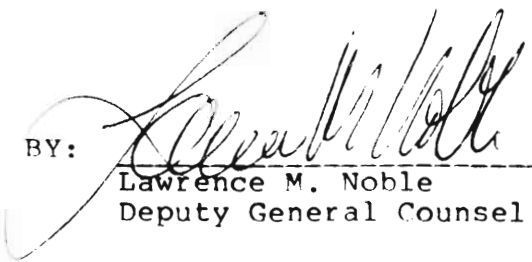
VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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.

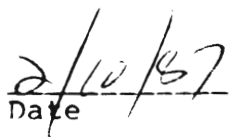
X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

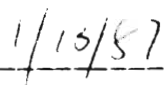
BY: 

Lawrence M. Noble
Deputy General Counsel


Date

FOR THE RESPONDENTS:


Michael S. Berman
Attorney


Date

27040542633

KIRKPATRICK & LOCKHART
GENERAL ACCOUNT
SOUTH LOBBY, 9TH FLOOR
1800 M STREET N.W.
WASHINGTON, D.C. 20036-5891

RIGGS
The Riggs National Bank of Washington, D.C.
18TH & M OFFICE
1800 M STREET, NW

564

January 13 1987

15-3/540

PAY THE SUM 500 DOLS 00 CTS DOLLARS \$ 500.00

TO
THE
ORDER
OF

Federal Election Commission

Amos B. Bales

⑈000564⑈ ⑆⑈054000030⑈ 26⑈08508239⑈

MEMORANDUM

TO: Debra A. Reed

TO: Judy Smith

FROM: Judy Smith

FROM: Debra A. Reed

CHECK NO. 564

(a copy of which is attached) RELATING

TO MUR

2279

AND NAME

Paine Webber Fund

WAS RECEIVED ON

1-20-87

PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

☒ BUDGET CLEARING ACCOUNT (#95F3875.16)

☐ CIVIL PENALTIES ACCOUNT (#95-1099.160)

☐ OTHER

SIGNATURE

Retha L. Wilson

DATE

1-21-87

ACC#2510

JAN 20 1987



011513

1. Enter into conciliation with the Paine Webber Fund for Better Government and Paul B. Guenther, as treasurer, prior to a finding of probable cause to believe.

3. The Government and the people of the United States are committed to the principle of self-determination for all peoples. The Government of the United States is committed to the principle of self-determination for all peoples.

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

Abstract

12-17-86

Date _____

Marcelle V. Emmons

Marjorie W. Emmons
Secretary of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/CHERYL A. FLEMING *CAF*

DATE: DECEMBER 5, 1986

SUBJECT: OBJECTION TO MUR 2279 - GENERAL COUNSEL'S REPORT
SIGNED DECEMBER 2, 1986

The above-captioned document was circulated to the Commission on Wednesday, December 3, 1986 at 11:00 A.M.

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

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	_____ X (comment)

This matter will be placed on the Executive Session agenda for Tuesday, December 16, 1986.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Red*
DATE: December 2, 1986
SUBJECT: MUR 2279 - 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 ☒ ☒
 Sensitive ☒
 Non-Sensitive ☐

24 Hour No Objection ☐
 Sensitive ☐
 Non-Sensitive ☐

Information ☐
 Sensitive ☐
 Non-Sensitive ☐

Other ☐

DISTRIBUTION

Compliance ☒
Audit Matters ☐

Litigation ☐
Closed MUR Letters ☐

Status Sheets ☐
Advisory Opinions ☐

Other (see distribution
 below) ☐

BEFORE THE FEDERAL ELECTION COMMISSION

CONFIDENTIAL

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARY
SENSITIVE

In the Matter of)
Paine Webber Fund for)
Better Government and)
Paul B. Guenther, Treasurer)

MUR 2279

DEC 2 1986 P 4: 21

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On October 27, 1986, the Commission found reason to believe that the Paine Webber Fund for Better Government and Paul B. Guenther, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(B) by failing to file six monthly reports in a timely manner. On November 14, 1986, Respondents submitted a reply to notice of the Commission's actions taken in this matter (Attachment 1).

The response essentially admits that Respondents failed to file six monthly reports in a timely fashion during the 1985-86 election cycle but requests that the Commission take no further action in view of mitigating circumstances. In the alternative, the response requests that the Commission enter into conciliation with Respondents prior to a finding of probable cause to believe.

As basis for taking no further action, Respondents call the Commission's attention to the fact that subsequent to receiving a chronic late filer notice in June of 1985, seven consecutive reports covering the period June through December 1985 were filed in a timely fashion. Respondents assert that the timely filings resulted from efforts by the Committee to tighten its procedures.

The response acknowledges that two monthly reports for 1986 were subsequently filed late, but calls the Commission's attention to the circumstances surrounding these late filings. With regard to their 1986 February Monthly report, Respondents present documented evidence that the report was sent by Federal Express two days prior to its required due date. The response notes that despite the fact that Federal Express guarantees next day delivery, the report was not delivered until ten days later. As to the late filing of their 1986 May Monthly report, the only explanation provided is that the person administratively responsible for filing the report was preoccupied with other duties performed for the company.

After considering the circumstances presented, the Office of General Counsel recommends that the Commission take no further action against the Respondents concerning the late filing of their 1986 February Monthly report and enter into pre-probable cause conciliation regarding their failure to file the remaining five reports in a timely fashion.

KIRKPATRICK & LOCKHART

1900 M STREET, N.W.
WASHINGTON, D.C. 20036
TELEPHONE (202) 452-7000
TELEX 440209 KIPM UI
TELECOMETER (202) 452-7052

MICHAEL S. BERMAN
(202) 452-8387

RECEIVED AT THE FEC
OCC 2003
26 NOV 14 P 1:44
ONE BOSTON PLACE
BOSTON, MA 02108
(617) 973-5400
1428 BRICKELL AVENUE
MIAMI, FL 33131
(305) 374-8112
1900 OLIVER BUILDING
PITTSBURGH, PA 15222
(412) 355-6500

November 13, 1986

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

Attention: Ms. Beverly Kramer

Re: MUR 2279

Dear Mr. Steele:

This letter is submitted on behalf of the Paine Webber Fund for Better Government and Paul B. Guenther, as Treasurer, in response to the Commission's finding of "reason to believe" that the Paine Webber Fund for Better Government (Paine Webber Fund) has violated the Federal Election Campaign Act of 1971, as amended, by failing to file certain reports in a timely fashion.

The Paine Webber Fund has always taken seriously its responsibilities under the Federal Election Campaign Act. Upon receipt of the letter of July 12, 1985, from the Commission's staff, procedures to assure timely filing were tightened. Commission records will indicate that the seven reports filed after receipt of that letter, covering the period June through December 1985, were filed in a timely fashion.

Every effort was made to file the February 1986 monthly report in a timely fashion. Records in our file, show that this report was picked up at the Paine Webber Fund's office by Federal Express on February 18, 1986. A photocopy of the Federal Express receipt is enclosed. As you know, Federal Express guarantee's next day delivery.

Unfortunately, the person administratively responsible for filing these reports, who also has other responsibilities in the company, was preoccupied with other duties at the time of the filing of the May monthly report resulting in its receipt by the Commission eight days late.

Attachment 1

/

RECEIVED NOV 26 1986
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

KIRKPATRICK & LOCKHART

- 2 -

November 13, 1986

Since receipt of the "reason to believe" determination by the Commission, the General Counsel of Paine Webber has taken further steps to assure that the Paine Webber Fund's reports will be filed in a timely fashion. That office has now undertaken supervision of the preparation and filing of all future reports. The Paine Webber Fund would certainly be willing to consider any specific recommendations which the Commission may have to assure timely compliance in the future.

The Paine Webber Fund has acted in good faith and has made best efforts to comply with all provisions of the Federal Election Campaign Act. It intends to assure that its future filing record will be perfect. For this reason, it requests that the Commission take no further action in this matter. However, if the Commission is not inclined to close this matter, respondents request pre-probable cause conciliation.

I am available to discuss this matter with you further at your convenience.

Thank you for your consideration.

Sincerely,


Michael S. Berman

Enclosure

MB:jmt

FEDERAL EXPRESS

SENDER'S FEDERAL EXPRESS ACCOUNT NUMBER

DATE

91908

1194-2215

From (Your Name)		To (Recipient Name)	
1205 6TH AVENUE		[Illegible]	
NEW YORK		[Illegible]	
FED. NO. 78073114		[Illegible]	

SERVICES CHECK ONLY ONE BOX		PRIORITY AND SPECIAL SERVICES	
☐ PRIORITY 1 Overnight Delivery Using the Priority Mail	☐ PRIORITY LETTER Overnight Delivery Using the Priority Mail	☐ 1 INSURED MAIL Delivery of insured mail by Federal Express	☐ 2 REGISTERED MAIL Delivery of registered mail by Federal Express
☐ OVERNIGHT DELIVERY Overnight Delivery Using the Priority Mail	☐ OVERNIGHT DELIVERY Overnight Delivery Using the Priority Mail	☐ 3 REGISTERED MAIL Delivery of registered mail by Federal Express	☐ 4 REGISTERED MAIL Delivery of registered mail by Federal Express
☐ STANDARD AIR Delivery not later than second business day	☐ STANDARD AIR Delivery not later than second business day	☐ 5 REGISTERED MAIL Delivery of registered mail by Federal Express	☐ 6 REGISTERED MAIL Delivery of registered mail by Federal Express
SERVICE COMMITMENT Priority 1 - Delivery is guaranteed by next business morning except Saturdays. If any later time or more business days it will be made to meet the primary service time. Priority 2 - Delivery is guaranteed next business day or not later than second business day if any time later than second business day it will be made to meet the primary service time.		SHIPPER'S COPY	

SHIPPER'S COPY

W

KIRKPATRICK & LOCKHART

1900 M STREET, N.W.
WASHINGTON, D.C. 20036
TELEPHONE (202) 452-7000
TELEX 440209 HIPH UI
TELECOPIER (202) 452-7052

MICHAEL S. BERMAN
(202) 452-8387

RECEIVED AT THE FEC
0002003
86 NOV 14 P 1: 44
ONE BOSTON PLACE
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November 13, 1986

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Federal Election Commission
999 E Street, N. W.
Washington, D. C. 20463

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Re: MUR 2279

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Unfortunately, the person administratively responsible for filing these reports, who also has other responsibilities in the company, was preoccupied with other duties at the time of the filing of the May monthly report resulting in its receipt by the Commission eight days late.

ED:G - 11 ADD 9

RECEIVED
FEB 19 1986
FEDERAL ELECTION COMMISSION

November 13, 1986

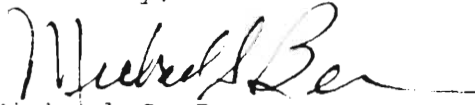
Since receipt of the "reason to believe" determination by the Commission, the General Counsel of Paine Webber has taken further steps to assure that the Paine Webber Fund's reports will be filed in a timely fashion. That office has now undertaken supervision of the preparation and filing of all future reports. The Paine Webber Fund would certainly be willing to consider any specific recommendations which the Commission may have to assure timely compliance in the future.

The Paine Webber Fund has acted in good faith and has made best efforts to comply with all provisions of the Federal Election Campaign Act. It intends to assure that its future filing record will be perfect. For this reason, it requests that the Commission take no further action in this matter. However, if the Commission is not inclined to close this matter, respondents request pre-probable cause conciliation.

I am available to discuss this matter with you further at your convenience.

Thank you for your consideration.

Sincerely,


Michael S. Berman

Enclosure

MB:jmt



SEE BACK OF FORM SET FOR COMPLETE PREPARATION INSTRUCTIONS

SENDER'S FEDERAL EXPRESS ACCOUNT NUMBER

DATE

51908

1184-2216-3

From (Your Name)		Your Phone Number (Very Important)	
Company		Department/Floor No.	
PAINE WEBBER/GENERAL ACCOUNT			
Street Address			
1285 6TH AVENUE			
City		State	
NEW YORK		NY	
AIRBILL NO. 780731114		ZIP * Zip Code Required For Correct Invoicing 10019	

To (Recipient's Name)		Recipient's Phone Number (Very Important)	
Company		Department/Floor No.	
Exact Street Address (Use of P.O. Boxes or R.R. * Zip Codes Will Result in Extra Charge.)			
City		State	
ZIP Street Address Zip Required (Use P.O. Box * Zip Code)			

YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE.)

PAYMENT	☒ Bill Shipper	☐ Bill Recipient's FedEx Acct. No. Fill in line below	☐ Bill 3rd Party FedEx Acct. No. Fill in line below	☐ Bill Credit Card Fill in line below
☐ Cash FedEx Acct. No. or Major Credit Card No.				

SERVICES CHECK ONLY ONE BOX		DELIVERY AND SPECIAL HANDLING CHECK SERVICES REQUIRED	
1 ☐ PRIORITY 1 (Next business day delivery, 9:00 a.m. to 5:00 p.m. delivery) 2 ☐ OVERNIGHT DELIVERY (Next business day delivery, 12:00 a.m. to 5:00 a.m. delivery) 3 ☐ OVERNIGHT DELIVERY (Next business day delivery, 12:00 a.m. to 5:00 a.m. delivery) 4 ☐ OVERNIGHT DELIVERY (Next business day delivery, 12:00 a.m. to 5:00 a.m. delivery) 5 ☐ STANDARD AIR (Delivery not later than second business day) SERVICE COMMITMENT Priority 1: Delivery is scheduled early next business morning. Overnight: Delivery is scheduled next business day or not later than second business day, if the destination is outside our primary service area. Standard Air: Delivery is generally next business day or not later than second business day, if the destination is outside our primary service area.		1 ☐ HOLD FOR PICK-UP Give the Federal Express address where you want package held in Section 4 at right. 2 ☒ DELIVER WEEKDAY 3 ☐ DELIVER SATURDAY (Extra charge applies) 4 ☐ RESTRICTED ARTICLES SERVICE (1 and Standard Air Packages only. Extra charge applies) 5 ☐ CONSTANT SURVEILLANCE SERVICE (CSS) (Extra charge applies) 6 ☐ DRY ICE Lbs 7 ☐ OTHER SPECIAL SERVICE 8 ☐ 9 ☐ SATURDAY PICK-UP OR SATURDAY DROP-OFF (Extra charge applies)	

PACKAGES	WEIGHT	YOUR DECLARED VALUE (See right)	OVER SIZE
Total 1 Total 1 Total 1			
Received At: 0000021786			
On-Call Stop			
FedEx Loc			
Federal Express Corp Employee No.			
Date/Time For Federal Express Use			

HOLD FOR PICK-UP AT THIS FEDERAL EXPRESS STATION. Street Address (See Service Guide or Call 800-836-5365)

City State ZIP * Zip Code of Street Address Required

ZIP * Zip Code of Street Address Required

ZIP * Zip Code of Street Address Required

ZIP * Zip Code of Street Address Required

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ZIP * Zip Code of Street Address Required

ZIP * Zip Code of Street Address Required

ZIP * Zip Code of Street Address Required

ZIP * Zip Code of Street Address Required

Federal Express Use

Base Charges

Declared Value Charge

Origin Agent Charge

Origin Agent Charge

Origin Agent Charge

Origin Agent Charge

Origin Agent Charge

Origin Agent Charge

Origin Agent Charge

Origin Agent Charge

Origin Agent Charge

Origin Agent Charge

Origin Agent Charge

Origin Agent Charge

SHIPPER'S COPY

YOUR DECLARED VALUE

DAMAGE ON LOSS

We are liable for no more than \$100 per package in the event of physical loss or damage, unless you file in a signed Declaration of Value to the left and document higher actual loss in the event of a claim. We charge \$2.00 for each additional \$100 of declared value up to the maximum shown in our Service Guide. Declared value endorsements are shown on the back of the Shipper's Copy of this form. We accept no expense or implied warranties.

DELAY

There is always a risk of late delivery or non-delivery. In the event of a late delivery Federal Express will, at your request, refund all transportation charges paid. See back of Shipper's Copy of this form for further information.

CONSEQUENTIAL DAMAGES

We will not be responsible or liable for any loss or damage resulting from delay, non-delivery or damage to a package except as noted above. This includes loss of sales, income, interest, profits, attorney's fees and other costs, but is not limited to these items. Such damages are called "consequential damages."

PART
#2041738901
FEC S-751-1000
REVISION DATE
2/85
PRINTED U.S.A. SR

Q00H1985

KIRKPATRICK & LOCKHART

1900 M STREET, N.W.
WASHINGTON, D.C. 20036
TELEPHONE (202) 452-7000
TELEX 440209 HIPH UI
TELECOPIER (202) 452-7052

ONE BOSTON PLACE
BOSTON, MA 02108
(617) 973-5400
1428 BRICKELL AVENUE
MIAMI, FL 33131
(305) 374-8112
1500 OLIVER BUILDING
PITTSBURGH, PA 15222
(412) 355-6500

MICHAEL S. BERMAN
(202) 452-8387

November 11, 1986

Ms. Beverly Kramer
Office of the General Counsel
Federal Election Commission
999 E Street, N. W.
Washington, D. C. 20463

Re: MUR 2279

Dear Ms. Kramer:

Per our conversation, enclosed please find a statement of designation of counsel to Paine Webber Fund for Better Government and Paul B. Guenther in the above-referenced matter. I will file a response to the Commission's finding of reason to believe in the above matter by November 14, 1986.

Thank you.

Sincerely,

Mike
Michael S. Berman

Enclosure

MSB:jmt

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
FEDERAL ELECTION COMMISSION
16 NOV 12 P12:44

202-376-5690

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2279

NAME OF COUNSEL: Michael S. Berman

ADDRESS: Kirkpatrick & Lockhart

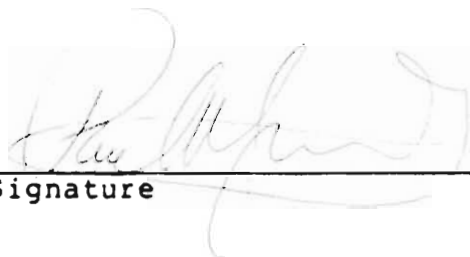
1900 M Street, N.W.

Washington, D.C. 20036

TELEPHONE: (202) 452-8387

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

11/3/86
Date


Signature

RESPONDENT'S NAME: Paul B. Guenther & Paine Webber Fund for Better
Government

ADDRESS: 1285 Avenue of the Americas

New York, NY 10019

HOME PHONE: _____

BUSINESS PHONE: (212) 713-2655

Received in Office of Commission Secretary: Thurs., 10-23-86, 10:01
Circulated on 48 hour tally basis: Thurs., 10-23-86, 4:00
Deadline for vote: Mon., 10-27-86, 4:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 29, 1986

Paul B. Guenther, Treasurer
Paine Webber Fund for Better
Government
1285 Avenue of the Americas
New York, NY 10019

RE: MUR 2279
Paine Webber Fund For
Better Government
Paul B. Guenther,
Treasurer

Dear Mr. Guenther:

On October 27, 1986, the Federal Election Commission determined there is reason to believe the Paine Webber Fund For Better Government and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

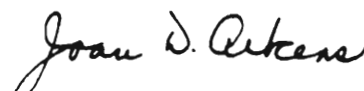
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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 Beverly Kramer, the staff member assigned to this matter at (202) 376-5690.

Sincerely,



Joan D. Aikens
Chairman

Enclosures

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

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

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

**MUR No. 2279
STAFF MEMBER
Beverly Kramer**

RESPONDENTS: Paine Webber Fund for Better Government
Paul B. Guenther, as treasurer

GENERATION OF MATTER

The Reports Analysis Division referred this matter to the Office of the General Counsel on September 26, 1986.

SUMMARY OF ALLEGATIONS

It is alleged that the Paine Webber Fund for Better Government and Paul B. Guenther, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) by failing to file six monthly reports of receipts and disbursements in a timely manner during the 1985-86 election cycle.

FACTUAL BASIS AND LEGAL ANALYSIS

1. The Law

Section 434(a)(4)(B) of Title 2, United States Code, requires that the treasurer of a political committee must file monthly reports of receipts and disbursements no later than the

20th day after the last day of each month. See also, 11 C.F.R. § 104.5(c)(3)(i).

2. The Facts

The Paine Webber Fund for Better Government ("the Fund") is a political committee within the meaning of 2 U.S.C. § 431(4) and Paul B. Guenther is its treasurer.

The Fund failed to file six reports in a timely manner during the 1985-86 election cycle. The reports were filed between 7 and 25 days late. Listed below are the reports filed late, the date each was due, and the date each report was filed:

<u>Report</u>	<u>Due Date</u>	<u>Date Filed</u>
1985 February Monthly (1/1/85 - 1/31/85)	2/20/85	2/28/85
1985 March Monthly (2/1/85 - 2/28/85)	3/20/85	3/27/85
1985 April Monthly (3/1/85 - 3/31/85)	4/20/85	5/15/85
1985 June Monthly (5/1/85 - 5/31/85)	6/20/85	7/11/85
1986 February Monthly (1/1/86 - 1/31/86)	2/20/86	2/28/86
1986 May Monthly (4/1/86 - 4/30/86)	5/20/86	5/28/86

Before the due date of each of the above reports, the Commission sent a general notice to the Fund, advising them of the filing requirements of these reports. In addition, by letter of July 12, 1985, the Reports Analysis Division notified the Fund that its 1985 February, March, April and June monthly reports were filed late and expressed the Commission's view that untimely filing of reports is a serious violation of the Act. The letter

also advised the Fund that any additional report not filed in a timely manner may result in legal enforcement action. Subsequent to this warning notice, the Fund failed to file its 1986 February and May Monthly reports in a timely manner.

3. Application of the Law to the Facts

The record in this case reveals that the Fund failed to file six monthly reports within the time frame required by 2 U.S.C. § 434(a)(4)(B). Failure to file reports within the time frame required is a violation of this section of the Act. Accordingly, the General Counsel's Office recommends that the Commission open a matter under review and find reason to believe that the Fund and Paul B. Guenther, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *pld*
DATE: October 22, 1986
SUBJECT: RAD Ref. 86NF-21 - 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 ☒
Sensitive ☒
Non-Sensitive ☐
24 Hour No Objection ☐
Sensitive ☐
Non-Sensitive ☐
Information ☐
Sensitive ☐
Non-Sensitive ☐
Other ☐

DISTRIBUTION

Compliance ☒
Audit Matters ☐
Litigation ☐
Closed MUR Letters ☐
Status Sheets ☐
Advisory Opinions ☐
Other (see distribution below) ☐

SENSITIVE

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

05 OCT 23
A10:01

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION _____

RAD #86NF-21
STAFF MEMBER
Beverly Kramer

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

RESPONDENTS: Paine Webber Fund for Better Government
Paul B. Guenther, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(B)
11 C.F.R. § 104.5(c)(3)(i)

INTERNAL REPORTS
CHECKED: Public Record

FEDERAL AGENCIES
CHECKED: None

GENERATION OF MATTER

The Reports Analysis Division referred this matter to the Office of the General Counsel on September 26, 1986. See Attachment 1.

SUMMARY OF ALLEGATIONS

It is alleged that the Paine Webber Fund for Better Government and Paul B. Guenther, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) by failing to file six monthly reports of receipts and disbursements in a timely manner during the 1985-86 election cycle.

FACTUAL AND LEGAL ANALYSIS

1. The Law

Section 434(a)(4)(B) of Title 2, United States Code, requires that the treasurer of a political committee must file monthly reports of receipts and disbursements no later than the

20th day after the last day of each month. See also, 11 C.F.R. § 104.5(c)(3)(i).

2. The Facts

The Paine Webber Fund for Better Government ("the Fund") is a political committee within the meaning of 2 U.S.C. § 431(4) and Paul B. Guenther is its treasurer.

The Fund failed to file six reports in a timely manner during the 1985-86 election cycle. The reports were filed between 7 and 25 days late. Listed below are the reports filed late, the date each was due, and the date each report was filed:

<u>Report</u>	<u>Due Date</u>	<u>Date Filed</u>
1985 February Monthly (1/1/85 - 1/31/85)	2/20/85	2/28/85
1985 March Monthly (2/1/85 - 2/28/85)	3/20/85	3/27/85
1985 April Monthly (3/1/85 - 3/31/85)	4/20/85	5/15/85
1985 June Monthly (5/1/85 - 5/31/85)	6/20/85	7/11/85
1986 February Monthly (1/1/86 - 1/31/86)	2/20/86	2/28/86
1986 May Monthly (4/1/86 - 4/30/86)	5/20/86	5/28/86

Before the due date of each of the above reports, the Commission sent a general notice to the Fund, advising them of the filing requirements of these reports. In addition, by letter of July 12, 1985, the Reports Analysis Division notified the Fund that its 1985 February, March, April and June monthly reports were filed late and expressed the Commission's view that untimely filing of reports is a serious violation of the Act. The letter

also advised the Fund that any additional report not filed in a timely manner may result in legal enforcement action. Subsequent to this warning notice, the Fund failed to file its 1986 February and May Monthly reports in a timely manner.

3. Application of the Law to the Facts

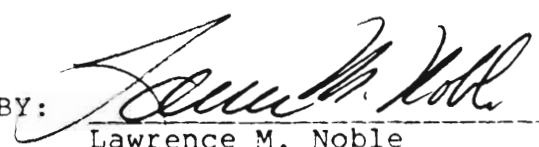
The record in this case reveals that the Fund failed to file six monthly reports within the time frame required by 2 U.S.C. § 434(a)(4)(B). Failure to file reports within the time frame required is a violation of this section of the Act. Accordingly, the General Counsel's Office recommends that the Commission open a matter under review and find reason to believe that the Fund and Paul B. Guenther, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).

RECOMMENDATIONS

1. Open a matter under review.
2. Find reason to believe that the Paine Webber Fund for Better Government and Paul B. Guenther, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).
3. Approve and send the attached letter and General Counsel's Factual and Legal Analysis.

Charles N. Steele
General Counsel

10/22/86
Date

BY: 

Lawrence M. Noble
Deputy General Counsel

Attachments

1. RAD Referral
2. Letter and General Counsel's Factual and Legal Analysis

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 26 September 1986

ANALYST: Edward Ryan

- I. COMMITTEE: Paine Webber Fund for Better Government (C00012245)
Paul B. Guenther, Treasurer
1285 Avenue of the Americas¹/
New York, NY 10019
- II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(B)
11 CFR 104.5(c)(3)(i)
- III. BACKGROUND:

Failure to Timely File Reports

The Paine Webber Fund for Better Government ("the Fund") failed to file six (6) Reports of Receipts and Disbursements in a timely manner for the 1985-1986 election cycle (see attached chart). The reports were filed between seven (7) and twenty-five (25) calendar days late.

On July 12, 1985, a Chronic Late Filing Notice was sent to the Fund for failing to file the 1985 February, March, April, and June Monthly Reports in a timely manner (Attachment 8). The Notice advised the Fund that any additional late filing of reports may result in legal enforcement action. Subsequent to the sending of the Chronic Late Filing Notice, the Fund filed the 1986 February Monthly and 1986 May Monthly Reports late (Attachments 10 and 12).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

¹/ The Fund changed its street address from 140 Broadway to the above on a report received May 15, 1985.

LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1985 February Monthly (1/1/85-1/31/85)	2/11/85 (Attachment 2)	2/20/85	N/A	2/28/85 (Attachment 3)
1985 March Monthly (2/1/85-2/28/85)	2/11/85 (Attachment 2)	3/20/85	N/A	3/27/85 (Attachment 4)
1985 April Monthly (3/1/85-3/31/85)	2/11/85 (Attachment 2)	4/20/85	5/15/85 (Attachment 5)	5/15/85 (Attachment 6)
1985 June Monthly (5/1/85-5/31/85)	2/11/85 (Attachment 2)	6/20/85	N/A	7/11/85 (Attachment 7)
1986 February Monthly (1/1/86-1/31/86)	12/20/85 (Attachment 9)	2/20/86	N/A	2/28/86 (Attachment 10)
1986 May Monthly (4/1/86-4/30/86)	3/21/86 (Attachment 11)	5/20/86	N/A	5/28/86 (Attachment 12)

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

DATE 17SEP86
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
PAINE WEBBER FUND FOR BETTER GOVERNMENT CONNECTED ORGANIZATION: PAINE WEBBER GROUP INC				NON-PARTY QUALIFIED		ID #C00012245
1985	MISCELLANEOUS NOTICE FROM FEC			12JUL85	1	85FEC/378/3175
	STATEMENT OF ORGANIZATION - AMENDMENT			23SEP85	2	85FEC/388/1350
	STATEMENT OF ORGANIZATION - AMENDMENT			23SEP85	3	85FEC/388/1347
	FEBRUARY MONTHLY	758	4,000	1JAN85--31JAN85	5	85FEC/367/1116
	FEBRUARY MONTHLY - AMENDMENT	758	4,000	1JAN85--31JAN85	5	85FEC/403/1116
	REQUEST FOR ADDITIONAL INFORMATION			1JAN85--31JAN85	2	85FEC/401/5296
	MARCH MONTHLY	237	1,800	1FEB85--28FEB85	4	85FEC/369/0740
	MARCH MONTHLY - AMENDMENT	237	1,800	1FEB85--28FEB85	4	85FEC/373/2169
	APRIL MONTHLY	98	2,000	1MAR85--31MAR85	4	85FEC/373/2165
	NOTICE OF FAILURE TO FILE			1MAR85--31MAR85	1	85FEC/373/2646
	MAY MONTHLY	1,066	1,000	1APR85--30APR85	5	85FEC/373/2173
	MAY MONTHLY - AMENDMENT	1,066	1,000	1APR85--30APR85	3	85FEC/403/3891
	REQUEST FOR ADDITIONAL INFORMATION			1APR85--30APR85	1	85FEC/401/5298
	JUNE MONTHLY	9,120	0	1MAY85--31MAY85	5	85FEC/378/0770
	JUNE MONTHLY - AMENDMENT	9,120	0	1MAY85--31MAY85	4	85FEC/403/3895
	REQUEST FOR ADDITIONAL INFORMATION			1MAY85--31MAY85	1	85FEC/401/5299
	JULY MONTHLY	2,613	2,000	1JUN85--30JUN85	4	85FEC/379/5492
	JULY MONTHLY - AMENDMENT	-	-	1JUN85--30JUN85	2	85FEC/381/4400
	JULY MONTHLY - AMENDMENT	2,613	2,000	1JUN85--30JUN85	4	85FEC/403/3900
	REQUEST FOR ADDITIONAL INFORMATION			1JUN85--30JUN85	1	85FEC/401/5300
	AUGUST MONTHLY	195	2,000	1JUL85--31JUL85	4	85FEC/386/1827
	SEPTEMBER MONTHLY	1,636	4,500	1AUG85--31AUG85	7	85FEC/388/1666
	SEPTEMBER MONTHLY - AMENDMENT	1,636	4,500	1AUG85--31AUG85	4	85FEC/403/3905
	REQUEST FOR ADDITIONAL INFORMATION			1AUG85--31AUG85	1	85FEC/401/5301
	OCTOBER MONTHLY	1,691	2,750	1SEP85--30SEP85	7	85FEC/389/5287
	OCTOBER MONTHLY - AMENDMENT	1,691	2,750	1SEP85--30SEP85	6	85FEC/403/3900
	REQUEST FOR ADDITIONAL INFORMATION			1SEP85--30SEP85	1	85FEC/401/5302
	NOVEMBER MONTHLY	7,567	3,250	1OCT85--31OCT85	9	85FEC/391/4115
	NOVEMBER MONTHLY - AMENDMENT	7,567	3,250	1OCT85--31OCT85	4	85FEC/392/0570
	NOVEMBER MONTHLY - AMENDMENT	7,567	3,250	1OCT85--31OCT85	6	85FEC/403/3917
	REQUEST FOR ADDITIONAL INFORMATION			1OCT85--31OCT85	1	85FEC/401/5303
	DECEMBER MONTHLY	22,866	10,020	1NOV85--30NOV85	13	85FEC/393/1473
	DECEMBER MONTHLY - AMENDMENT	22,866	10,020	1NOV85--30NOV85	10	85FEC/403/3924
	REQUEST FOR ADDITIONAL INFORMATION			1NOV85--30NOV85	1	85FEC/401/5304
	YEAR-END	7,449	3,750	1DEC85--31DEC85	10	85FEC/396/2500
	YEAR-END - AMENDMENT	7,449	3,750	1DEC85--31DEC85	11	85FEC/415/4987
	REQUEST FOR ADDITIONAL INFORMATION			1DEC85--31DEC85	1	85FEC/415/0270
1986	STATEMENT OF ORGANIZATION - AMENDMENT			3APR86	2	85FEC/406/5164
	FEBRUARY MONTHLY	6,309	3,500	1JAN86--31JAN86	4	85FEC/404/0094
	MARCH MONTHLY	1,525	2,150	1FEB86--28FEB86	5	85FEC/405/3902
	APRIL MONTHLY	9,156	12,500	1MAR86--31MAR86	5	85FEC/412/1197
	APRIL MONTHLY - AMENDMENT	9,156	8,000	1MAR86--31MAR86	4	85FEC/424/0796
	MAY MONTHLY	10,337	12,958	1APR86--30APR86	6	85FEC/415/3995
	MAY MONTHLY - AMENDMENT	10,337	12,958	1APR86--30APR86	3	85FEC/424/0793

3 7 1 4 0 4 3 3 5

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (05-86)

DATE 17SEP86
PAGE 2

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILE COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	JUNE MONTHLY	2,244	7,847	1MAY86 -31MAY86	7	86FEC/417/5099
	JUNE MONTHLY - AMENDMENT	2,000	7,847	1MAY86 -31MAY86	3	86FEC/424/0790
	JULY MONTHLY	4,506	5,425	1JUN86 -30JUN86	11	86FEC/424/0779
	AUGUST MONTHLY	6,672	10,300	1JUL86 -31JUL86	10	86FEC/426/4008
	TOTAL	95,801	0	87,250	0	217 TOTAL PAGES

5 All reports reviewed through the 1986 July Monthly Report.

Ending Cash-On-Hand as of 7/31/86: \$25,138.29

Outstanding debts and obligations owed to the Committee: -0-

Outstanding debts and obligations owed by the Committee: -0-



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 11, 1985

REPORTING NOTICE FOR MONTHLY FILERS
NON-ELECTION YEAR 1985

The Commission's records indicate that your committee will file monthly reports during 1985. This notice will assist you in complying with the monthly filing requirements.

* * * *

MONTHLY REPORTS

Monthly reports must be filed no later than 20 days after the last day of each month. 11 CFR 104.5(c)(3) Each report must include all financial activity that occurred during the previous month. For example, the first monthly report this year should be filed by February 20, 1985, and should include all financial activity which occurred between January 1 and January 31, 1985. (See the chart below.)

If you send a report by registered or certified mail, it must be postmarked no later than the filing date in order to be timely filed. If you have your report hand-delivered or mailed first class, it must be received by the close of business on the filing date.

You are required to use FEC Form 3X to file all reports. These forms may be duplicated. Two of them have been enclosed for your use. Should you need additional forms call the Office of Public Communications.

MONTHLY REPORTS 1985

Report	Period Covered	Filing Date*
February	1/1 - 1/31	2/20/85
March	2/1 - 2/28	3/20/85
April	3/1 - 3/31	4/20/85
May	4/1 - 4/30	5/20/85
June	5/1 - 5/31	6/20/85
July	6/1 - 6/30	7/20/85
August	7/1 - 7/31	8/20/85
September	8/1 - 8/31	9/20/85
October	9/1 - 9/30	10/20/85
November	10/1 - 10/31	11/20/85
December	11/1 - 11/30	12/20/85
Year-End	12/1 - 12/31	1/31/86

* The reports that are sent by registered or certified mail are considered filed on the date of the U.S. Postmark.

SPECIAL ELECTIONS DURING 1985

Committees that make contributions or expenditures in connection with any special election are not required to file pre-election reports or post-general election reports. Rather, these committees should continue to file reports on a monthly schedule.

CHANGING FILING FREQUENCY

Committees may change from a monthly filing schedule to a semi-annual filing schedule only once during 1985. Should you choose to make this change, you must notify the Commission at the time you file a monthly report.

COMPLIANCE

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

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

ALLEN AREA

85 FEB 28 AM 11:01

1. Name of Committee (in Full)

PaineWebber Fund for
Better Government

Address (Number and Street)

c/o Paul B. Guenther
140 Broadway - 20th Floor

City, State and Zip Code

New York, New York 10005

☐ Check here if a new or different committee than previously reported.

2. FEC Identification Number

C 00012245

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

4. TYPE OF REPORT (Check appropriate box)

☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

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

☒ Monthly Report for February

☐ Twelfth day report preceding _____

election on _____ in the State of _____

☐ Twelfth day report following the General Election

on _____ in the State of _____

☐ Termination Report

5. Is this Report an Amendment?

☐ YES

☒ NO

SUMMARY

6. Covering Period 1/1/85 through 1/31/85

7. (a) Cash on hand January 1, 1985

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

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

7 Total Disbursements (from Line 20)

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

9 Debts and Obligations Owed 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 the Report and to the best of my knowledge and belief
it is true, correct and complete

Dorothy F. Haughey

Type or Print Name of Treasurer

ASSISTANT

SIGNATURE OF TREASURER

2/19/85

Date

For further information contact

Federal Election Commission

Toll Free 800-426-6530

Local 202-423-4888

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing the report to the penalties of 2 U.S.C. § 637b

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

FEC FORM 3X (3/80)

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

(Summary Page)

ATTACHMENT #4

15 MAR 21 1985

ALIGN AREA

1. Name of Committee (In Full)

Paine Webber Fund for Better Government

Address (Number and Street)

**c/o Paul B. Guenther
1221 Avenue of the Americas**

City, State and ZIP Code

New York, NY 10005

☐ Check here if address is different than previously reported

2. FEC Identification Number

C 00012245

3. ☐ This committee qualified as a multicandidate committee during this 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 **February**

☐ Twelfth day report providing _____

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 2/1/85 through 2/28/85

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. Subtract (add Lines 6(b) and 6(c) for Column A and Line 6(a) and 6(c) for Column B)

e. 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

from report on Schedule C or Schedule D

10. Debts and Obligations Owed BY The Committee

from report on Schedule C or Schedule D

11. The filer has read this Report and to the best of his/her knowledge and belief the Report is true and complete

Dorothy F. Haughey

Assistant Treasurer:

Dorothy F. Haughey
SIGNATURE OF TREASURER

3/22/85
Date

For further information contact:

Federal Election Commission

1600 K Street, N.W.

Washington, D.C. 20543

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

FEC FORM 3a 3 80



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RG-7

May 15, 1985

Paul B. Guenther, Treasurer
Paine Webber Fund for Better
Government
140 Broadway
New York, NY 10005

Identification Number: C00012245

Reference: April Monthly Report (3/1/85-3/31/85)

Dear Mr. Guenther:

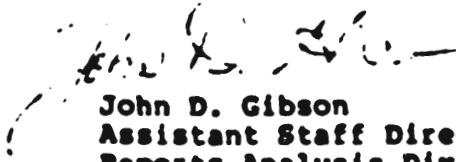
It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

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

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

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

Sincerely,


John D. Gibson
Assistant Staff Director
Reports Analysis Division

85 MAY 15 18:04

ALIGN AREA

ALIGN AREA

FEC FORM 3A (3-70)

11

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

ATTACHMENT #7

FEC

(Summary Page)

85 JUL 17 4 54
ALBUQUERQUE

ALIGN AREA

1 Name of Committee (In Full)

Palme Webber Fund for
Better Government

Address (Number and Street)

c/o Paul B. Guenther
1285 Ave. of Americas

City, State and ZIP Code

New York, New York 10019

☐ Check here if address is different than previously reported

2 FEC Identification Number

C 000 12245

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 MAY
☐ 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 5/1/85 through 5/31/85

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 Total of Lines 6 a and 6 c for Column A and
the entire Line 6 for Column B

e 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 on Schedule C or Schedule D)

10 Debts and Obligations Owed BY The Committee
(itemize on Schedule C or Schedule D)

* If the committee reports a net change in the debt items shown above and be
cause of the change

Paul B. Guenther
Sec. Treasurer

SIGNATURE OF TREASURER

7/3/85
Date

COLUMN A
This Period

COLUMN B
Calendar Year to Date

	\$ 16,579.23
\$ 9,940.31	
\$ 9,120.98	\$ 11,282.06
\$ 19,061.29	\$ 27,861.29
\$	\$ 8,800.00
\$ 19,061.29	\$ 19,061.29
\$	
\$	

For further information contact:

Federal Election Commission
Washington, D.C. 20543
1-800-424-9531
202-453-4366

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

FEC FORM 3a



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MS-L

July 12, 1985

Paul B. Guenther, Treasurer
Paine Webber Fund for Better
Government
1285 Avenue of the Americas
New York, NY 10019

Identification Number: C00012245

Reference: 1985-1986 Election Cycle Reports

Dear Mr. Guenther:

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>
1985 February Monthly (1/1/85-1/31/85)	2/20/85	2/28/85
1985 March Monthly (2/1/85-2/28/85)	3/20/85	3/27/85
1985 April Monthly (3/1/85-3/31/85)	4/20/85	5/15/85
1985 June Monthly (5/1/85-5/31/85)	6/20/85	7/11/85

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 Paul Kolesa on our toll-free number, (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

Michael B. Filler
Chief, Party/Non-Party Branch
Reports Administration Division



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

December 20, 1985

**REPORTING NOTICE FOR MONTHLY FILERS
ELECTION YEAR 1986**

The Commission's records indicate that your committee will file monthly reports during 1986. This notice will assist you in complying with the monthly filing requirements.

* * * *

MONTHLY REPORTS

Monthly reports must be filed no later than 20 days after the last day of each month. 11 CFR 104.5(c)(3). Each report must include all financial activity that occurred during the previous month. For example, the first monthly report this year should be filed by February 20, 1986, and should include all financial activity which occurred between January 1 and January 31, 1986. (See the chart below.)

If you send a report by registered or certified mail, it must be postmarked no later than the filing date in order to be timely filed. If you have your report hand delivered or mailed first class, it must be received by the close of business on the filing date.

You are required to use FEC Form 3X to file all reports. These forms may be duplicated. Two of them have been enclosed for your use. Should you need additional forms call the Information Services Division.

MONTHLY REPORTS 1986

Report	Period Covered	Filing Date*
February	1/1 - 1/31	2/20/86
March	2/1 - 2/28	3/20/86
April	3/1 - 3/31	4/20/86
May	4/1 - 4/30	5/20/86
June	5/1 - 5/31	6/20/86
July	6/1 - 6/30	7/20/86
August	7/1 - 7/31	8/20/86
September	8/1 - 8/31	9/20/86
October	9/1 - 9/30	10/20/86
Pre-election	10/1 - 10/15	10/23/86
Post-election	10/16 - 11/24	12/04/86
Year-End	11/25 - 12/31	1/31/87

* The reports that are sent by registered or certified mail are considered filed on the date of the U.S. Postmark.

14

ATTACHMENT #10

Report of the Treasurer for the Reporting Period

U/o Paul B. Cantor
1225 Avenue of the Americas

City, State and ZIP Code

New York, NY 10019

☐ Check box if balance is different than previously reported

2 FEC Identification Number

0000 12245

3 ☐ This committee qualified as a multicandidate committee during the Reporting Period on _____

4 ☐ Report 15 days after the end of the reporting period

☐ Report 15 days after the end of the reporting period

☐ Report 15 days after the end of the reporting period

☐ Report 15 days after the end of the reporting period

☐ Report 15 days after the end of the reporting period

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☐ Report 15 days after the end of the reporting period

☐ Report 15 days after the end of the reporting period

☐ Report 15 days after the end of the reporting period

GENERAL		Column A This Period	Column B Previous Period
1. Reporting Period	1/1/86 through 12/31/86		
2. Net Cash on Hand January 1, 1986			
3. Net Cash on Hand at Beginning of Reporting Period		34,811.35	
4. Total Receipts (From Line 1B)		6,309.02	6,309.02
5. Subtotal (Add Lines 3(a) and 4(a) for Column A and Lines 3(b) and 4(b) for Column B)		41,120.37	41,120.37
6. Total Disbursements (From Line 2B)		3,500.00	3,500.00
7. Cash on Hand at Close of Reporting Period (Subtract Line 6 from Line 5(a))		37,620.37	37,620.37
8. Debts and Obligations Owed TO The Committee (Include all on Schedule C or Schedule D)		-0-	
9. Debts and Obligations Owed BY The Committee (Include all on Schedule C or Schedule D)		-0-	

Dorothy F. Haughey (Assistant Treasurer)

Type or Print Name of Treasurer

Dorothy F. Haughey

2/17/86

Signature of Treasurer

For further information contact:

Federal Election Commission

Toll Free 800-426-6922

Lower 707-526-6922

NOTE: Submission of this statement or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 4370

All financial statements of FEC FORM 1 and FEC FORM 2 are due on the 15th day of the month following the reporting period

FEC FORM 2A 12-80

QUARTERLY 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

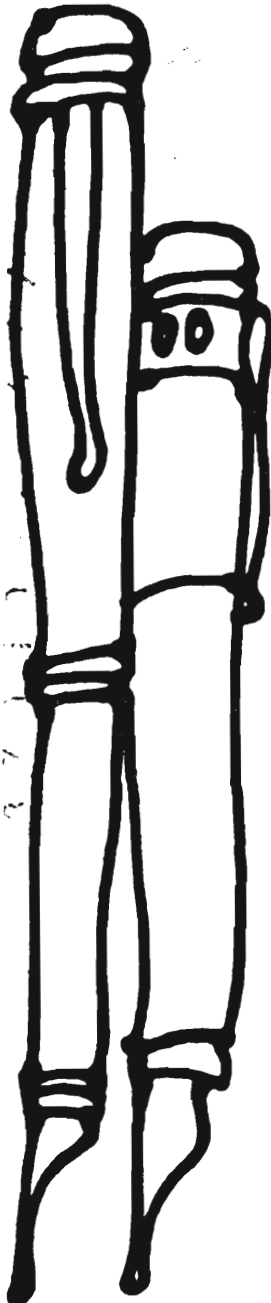
Committees that file on a monthly schedule must file their next report by April 20, 1986, and disclose all financial activity of their committee from March 1 through March 31, 1986. (See the schedule of monthly reports on the reverse side.)

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

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA **ALIGN AREA**

1 Name of Committee (In Full)
Paine Webber Fund for Better Government

Address (Number and Street)
**c/o Paul B. Guenther
1285 Avenue of the Americas**

City, State and ZIP Code
New York, NY 10019

☐ Check here if address is different than previously reported

2 FEC Identification Number
C 000 12245

3 ☐ This committee qualified as a multicandidate committee during this 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 **April**
☐ 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
5 Covering Period 4/1/86 through 4/30/86		
6 a Cash on hand January 1, 19 86		\$ 34,811.35
b Cash on Hand at Beginning of Reporting Period	\$ 33,651.91	
c Receipts (from Line 18)	\$ 10,337.37	\$ 27,327.93
d Total (Lines 6 b and 6 c for Column A and Lines 6 a and 6 c for Column B)	\$ 43,989.28	\$ 62,139.28
e Total Disbursements (from Line 28)	\$ 12,958.00	\$ 32,108.00
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6 d)	\$ 31,031.28	\$ 31,031.28
9 Debts 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, **Paul B. Guenther**, have examined this Report and to the best of my knowledge and belief
it is true, correct and complete.

Paul B. Guenther

Signature of Treasurer

5/20/86

For further information contact:

Federal Election Commission

To: File 800 426 9930

Voice 202 523 4088

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

FEC FORM 3A 3-80



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

Paul B. Guenther, Treasurer
Paine Webber Fund for Better
Government
1285 Avenue of the Americas
New York, NY 10019

RE: MUR
Paine Webber Fund For
Better Government
Paul B. Guenther,
Treasurer

Dear Mr. Guenther:

On , 1986, the Federal Election Commission determined there is reason to believe the Paine Webber Fund For Better Government and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), 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

attachment 2

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.

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 Beverly Kramer, the staff member assigned to this matter at (202) 376-5690.

Sincerely,

Joan D. Aikens
Chairman

Enclosures

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

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

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. _____
STAFF MEMBER
Beverly Kramer

RESPONDENTS: Paine Webber Fund for Better Government
Paul B. Guenther, as treasurer

GENERATION OF MATTER

The Reports Analysis Division referred this matter to the Office of the General Counsel on September 26, 1986.

SUMMARY OF ALLEGATIONS

It is alleged that the Paine Webber Fund for Better Government and Paul B. Guenther, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) by failing to file six monthly reports of receipts and disbursements in a timely manner during the 1985-86 election cycle.

FACTUAL BASIS AND LEGAL ANALYSIS

1. The Law

Section 434(a)(4)(B) of Title 2, United States Code, requires that the treasurer of a political committee must file monthly reports of receipts and disbursements no later than the

20th day after the last day of each month. See also, 11 C.F.R. § 104.5(c)(3)(i).

2. The Facts

The Paine Webber Fund for Better Government ("the Fund") is a political committee within the meaning of 2 U.S.C. § 431(4) and Paul B. Guenther is its treasurer.

The Fund failed to file six reports in a timely manner during the 1985-86 election cycle. The reports were filed between 7 and 25 days late. Listed below are the reports filed late, the date each was due, and the date each report was filed:

<u>Report</u>	<u>Due Date</u>	<u>Date Filed</u>
1985 February Monthly (1/1/85 - 1/31/85)	2/20/85	2/28/85
1985 March Monthly (2/1/85 - 2/28/85)	3/20/85	3/27/85
1985 April Monthly (3/1/85 - 3/31/85)	4/20/85	5/15/85
1985 June Monthly (5/1/85 - 5/31/85)	6/20/85	7/11/85
1986 February Monthly (1/1/86 - 1/31/86)	2/20/86	2/28/86
1986 May Monthly (4/1/86 - 4/30/86)	5/20/86	5/28/86

Before the due date of each of the above reports, the Commission sent a general notice to the Fund, advising them of the filing requirements of these reports. In addition, by letter of July 12, 1985, the Reports Analysis Division notified the Fund that its 1985 February, March, April and June monthly reports were filed late and expressed the Commission's view that untimely filing of reports is a serious violation of the Act. The letter

also advised the Fund that any additional report not filed in a timely manner may result in legal enforcement action. Subsequent to this warning notice, the Fund failed to file its 1986 February and May Monthly reports in a timely manner.

3. Application of the Law to the Facts

The record in this case reveals that the Fund failed to file six monthly reports within the time frame required by 2 U.S.C. § 434(a)(4)(B). Failure to file reports within the time frame required is a violation of this section of the Act. Accordingly, the General Counsel's Office recommends that the Commission open a matter under review and find reason to believe that the Fund and Paul B. Guenther, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 26 September 1986

ANALYST: Edward Ryan

- I. COMMITTEE: Paine Webber Fund for Better Government (C00012245)
Paul B. Guenther, Treasurer
1285 Avenue of the Americas¹/
New York, NY 10019
- II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(B)
11 CFR 104.5(c)(3)(i)
- III. BACKGROUND:

Failure to Timely File Reports

The Paine Webber Fund for Better Government ("the Fund") failed to file six (6) Reports of Receipts and Disbursements in a timely manner for the 1985-1986 election cycle (see attached chart). The reports were filed between seven (7) and twenty-five (25) calendar days late.

On July 12, 1985, a Chronic Late Filing Notice was sent to the Fund for failing to file the 1985 February, March, April, and June Monthly Reports in a timely manner (Attachment 8). The Notice advised the Fund that any additional late filing of reports may result in legal enforcement action. Subsequent to the sending of the Chronic Late Filing Notice, the Fund filed the 1986 February Monthly and 1986 May Monthly Reports late (Attachments 10 and 12).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

¹/ The Fund changed its street address from 140 Broadway to the above on a report received May 15, 1985.

LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1985 February Monthly (1/1/85-1/31/85)	2/11/85 (Attachment 2)	2/20/85	N/A	2/28/85 (Attachment 3)
1985 March Monthly (2/1/85-2/28/85)	2/11/85 (Attachment 2)	3/20/85	N/A	3/27/85 (Attachment 4)
1985 April Monthly (3/1/85-3/31/85)	2/11/85 (Attachment 2)	4/20/85	5/15/85 (Attachment 5)	5/15/85 (Attachment 6)
1985 June Monthly (5/1/85-5/31/85)	2/11/85 (Attachment 2)	6/20/85	N/A	7/11/85 (Attachment 7)
1986 February Monthly (1/1/86-1/31/86)	12/20/85 (Attachment 9)	2/20/86	N/A	2/28/86 (Attachment 10)
1986 May Monthly (4/1/86-4/30/86)	3/21/86 (Attachment 11)	5/20/86	N/A	5/28/86 (Attachment 12)

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

DATE 1/25/86
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
PAINE WEBBER FUND FOR BETTER GOVERNMENT CONNECTED ORGANIZATION: PAINE WEBBER GROUP INC				NON-PARTY QUALIFIED		ID #C00012245
1985	MISCELLANEOUS NOTICE FROM FEC			12JUL85	1	85FEC/378/3175
	STATEMENT OF ORGANIZATION - AMENDMENT			23SEP85	2	85FEC/388/1350
	STATEMENT OF ORGANIZATION - AMENDMENT			23SEP85	3	85FEC/388/1347
	FEBRUARY MONTHLY	758	4.000	1JAN85 - 31JAN85	5	85FEC/267/1146
	FEBRUARY MONTHLY - AMENDMENT	758	4.000	1JAN85 - 31JAN85	5	86FEC/403/3885
	REQUEST FOR ADDITIONAL INFORMATION			1JAN85 - 31JAN85	2	86FEC/401/5296
	MARCH MONTHLY	237	1.800	1FEB85 - 28FEB85	4	85FEC/369/0740
	MARCH MONTHLY - AMENDMENT	237	1.800	1FEB85 - 28FEB85	4	85FEC/373/2169
	APRIL MONTHLY	98	2.000	1MAR85 - 31MAR85	4	85FEC/377/2165
	NOTICE OF FAILURE TO FILE			1MAR85 - 31MAR85	1	85FEC/373/2646
	MAY MONTHLY	1,066	1.000	1APR85 - 30APR85	5	85FEC/373/2173
	MAY MONTHLY - AMENDMENT	1,066	1.000	1APR85 - 30APR85	3	86FEC/403/3891
	REQUEST FOR ADDITIONAL INFORMATION			1APR85 - 30APR85	1	86FEC/401/5298
	JUNE MONTHLY	9,120	0	1MAY85 - 31MAY85	5	85FEC/378/0770
	JUNE MONTHLY - AMENDMENT	9,120	0	1MAY85 - 31MAY85	4	86FEC/403/3895
	REQUEST FOR ADDITIONAL INFORMATION			1MAY85 - 31MAY85	1	86FEC/401/5299
	JULY MONTHLY	2,613	2.000	1JUN85 - 30JUN85	4	85FEC/379/5492
	JULY MONTHLY - AMENDMENT	-	-	1JUN85 - 30JUN85	2	85FEC/391/4400
	JULY MONTHLY - AMENDMENT	2,613	2.000	1JUN85 - 30JUN85	4	86FEC/403/3900
	REQUEST FOR ADDITIONAL INFORMATION			1JUN85 - 30JUN85	1	86FEC/401/5300
	AUGUST MONTHLY	195	2.000	1JUL85 - 31JUL85	4	85FEC/386/1827
	SEPTEMBER MONTHLY	1,636	4.500	1AUG85 - 31AUG85	7	85FEC/388/1666
	SEPTEMBER MONTHLY - AMENDMENT	1,636	4.500	1AUG85 - 31AUG85	4	86FEC/403/3905
	REQUEST FOR ADDITIONAL INFORMATION			1AUG85 - 31AUG85	1	86FEC/401/5301
	OCTOBER MONTHLY	1,691	2,750	1SEP85 - 30SEP85	7	85FEC/389/5287
	OCTOBER MONTHLY - AMENDMENT	1,691	2,750	1SEP85 - 30SEP85	6	86FEC/403/3910
	REQUEST FOR ADDITIONAL INFORMATION			1SEP85 - 30SEP85	1	86FEC/401/5302
	NOVEMBER MONTHLY	7,567	3.250	1OCT85 - 31OCT85	9	85FEC/391/4115
	NOVEMBER MONTHLY - AMENDMENT	7,567	3.250	1OCT85 - 31OCT85	4	85FEC/392/0570
	NOVEMBER MONTHLY - AMENDMENT	7,567	3.250	1OCT85 - 31OCT85	6	86FEC/403/3917
	REQUEST FOR ADDITIONAL INFORMATION			1OCT85 - 31OCT85	1	86FEC/401/5303
	DECEMBER MONTHLY	22,866	10.020	1NOV85 - 30NOV85	13	85FEC/393/1473
	DECEMBER MONTHLY - AMENDMENT	22,866	10.020	1NOV85 - 30NOV85	10	86FEC/403/3924
	REQUEST FOR ADDITIONAL INFORMATION			1NOV85 - 30NOV85	1	86FEC/401/5304
	YEAR-END	7,449	3,750	1DEC85 - 31DEC85	10	85FEC/396/2500
	YEAR-END - AMENDMENT	7,449	3,750	1DEC85 - 31DEC85	11	86FEC/415/4987
	REQUEST FOR ADDITIONAL INFORMATION			1DEC85 - 31DEC85	1	86FEC/415/0270
1986	STATEMENT OF ORGANIZATION - AMENDMENT			3APR86	2	86FEC/406/5164
	FEBRUARY MONTHLY	6,309	3.500	1JAN86 - 31JAN86	4	86FEC/404/6094
	MARCH MONTHLY	1,525	2.150	1FEB86 - 28FEB86	5	86FEC/405/3902
	APRIL MONTHLY	9,156	12.500	1MAR86 - 31MAR86	5	86FEC/412/1197
	APRIL MONTHLY - AMENDMENT	9,156	8.000	1MAR86 - 31MAR86	4	86FEC/424/0796
	MAY MONTHLY	10,337	12.950	1APR86 - 30APR86	6	86FEC/413/3995
	MAY MONTHLY - AMENDMENT	10,337	12.950	1APR86 - 30APR86	3	86FEC/424/0793

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

DATE 17SEP86
PAGE 2

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	JUNE MONTHLY	2,244	7,847	1MAY86 -31MAY86	7	86FEC/417/5099
	JUNE MONTHLY - AMENDMENT	2,000	7,847	1MAY86 -31MAY86	3	86FEC/424/0790
	JULY MONTHLY	4,506	5,425	1JUN86 -30JUN86	11	86FEC/424/0779
	AUGUST MONTHLY	6,672	10,300	1JUL86 -31JUL86	10	86FEC/426/4008
	TOTAL	95,801	0	87,250	0	217 TOTAL PAGES

All reports reviewed through the 1986 July Monthly Report.

Ending Cash-On-Hand as of 7/31/86: \$25,138.29

Outstanding debts and obligations owed to the Committee: -0-

Outstanding debts and obligations owed by the Committee: -0-



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 11, 1985

REPORTING NOTICE FOR MONTHLY FILERS
NON-ELECTION YEAR 1985

The Commission's records indicate that your committee will file monthly reports during 1985. This notice will assist you in complying with the monthly filing requirements.

* * * *

MONTHLY REPORTS

Monthly reports must be filed no later than 20 days after the last day of each month. 11 CFR 104.5(c)(3) Each report must include all financial activity that occurred during the previous month. For example, the first monthly report this year should be filed by February 20, 1985, and should include all financial activity which occurred between January 1 and January 31, 1985. (See the chart below.)

If you send a report by registered or certified mail, it must be postmarked no later than the filing date in order to be timely filed. If you have your report hand-delivered or mailed first class, it must be received by the close of business on the filing date.

You are required to use FEC Form 3X to file all reports. These forms may be duplicated. Two of them have been enclosed for your use. Should you need additional forms call the Office of Public Communications.

MONTHLY REPORTS 1985

Report	Period Covered	Filing Date*
February	1/1 - 1/31	2/20/85
March	2/1 - 2/28	3/20/85
April	3/1 - 3/31	4/20/85
May	4/1 - 4/30	5/20/85
June	5/1 - 5/31	6/20/85
July	6/1 - 6/30	7/20/85
August	7/1 - 7/31	8/20/85
September	8/1 - 8/31	9/20/85
October	9/1 - 9/30	10/20/85
November	10/1 - 10/31	11/20/85
December	11/1 - 11/30	12/20/85
Year-End	12/1 - 12/31	1/31/86

* The reports that are sent by registered or certified mail are considered filed on the date of the U.S. Postmark.

SPECIAL ELECTIONS DURING 1985

Committees that make contributions or expenditures in connection with any special election are not required to file pre-election reports or post-general election reports. Rather, these committees should continue to file reports on a monthly schedule.

CHANGING FILING FREQUENCY

Committees may change from a monthly filing schedule to a semi-annual filing schedule only once during 1985. Should you choose to make this change, you must notify the Commission at the time you file a monthly report.

COMPLIANCE

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

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

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

(Summary Page)

FEC
ATTACHMENT #4
85 MAR 27 10 28 AM '85

ALIGN AREA

1 Name of Committee (In Full)

Paine Webber Fund for Better Government

Address (Number and Street)

**c/o Paul B. Guenther
1221 Avenue of the Americas**

City, State and ZIP Code

New York, NY 10005

☐ Check here if address is different than previously reported

2 FEC Identification Number

C 00012245

3 ☐ This committee qualified as a multicandidate committee during this 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 Elec. Year Only)
☒ Monthly Report for **February**
☐ 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 **2/1/85** through **2/28/85**

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. Subtract: Add Lines 6(b) and 6(c) for Column A and
Line 6(a) and 6(c) for Column B

e. Total Disbursements (from Line 28)

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

g. Debts and Obligations Owed TO The Committee
Itemize on Schedule C or Schedule D

h. Debts and Obligations Owed BY the Committee
Itemize on Schedule C or Schedule D

i. The filer has examined this Report and to the best of his/her knowledge and belief, it is true and complete

**COLUMN A
This Period**

**COLUMN B
Calendar Year to Date**

\$16,579.23

\$ 13,337.56

\$ 237.96 \$ 996.29

\$ 13,575.52 \$17,575.52

\$ 1,800.00 \$ 5,800.00

\$ 11,775.52 \$11,775.52

Dorothy F. Haughey

Assistant Treasurer

SIGNATURE OF TREASURER

3/22/85
Date

For further information contact:

Federal Election Commission

1115 First Street, N.E.

Washington, D.C. 20543

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

FEC FORM 3a 3 80

**FEDERAL ELECTION COMMISSION**

WASHINGTON, DC 20463

80-7

May 15, 1985

Paul B. Guenther, Treasurer
Paine Webber Fund for Better
Government
140 Broadway
New York, NY 10005

Identification Number: C00012245

Reference: April Monthly Report (3/1/85-3/31/85)

Dear Mr. Guenther:

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

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

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

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

Sincerely,

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

37043342646

ATTACHMENT #6
REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

RECEIVED BY THE FEC

65 MAY 15 4 8: 04

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (to Full)

Paine Webber Fund for Better Government

Address (Number and Street)

c/o Paul B. Guenther
1285 Avenue of the Americas

City, State and ZIP Code

New York, NY 10019

☒ Check here if address is different than previously reported

2. FEC Identification Number

C 00012245

3. ☐ The committee qualified as a multicandidate 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 March

☐ Twelfth day report preceding _____ (Type of Standard)

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

6. Covering Period 3/1/85 through 3/31/85

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) Subtract: 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)

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

\$ 16,579.23

\$ 11,775.52

\$ 98.36 \$ 1,094.65

\$ 11,873.88 \$ 17,673.88

\$ 2,000.00 \$ 7,800.00

\$ 9,873.88 \$ 9,873.88

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

Paul B. Guenther

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

5/7/85

Date

NOTE: Submission of false, fraudulent, or incomplete information may subject the person signing this report to the penalties of 2 USC § 4370.

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

FEC FORM 3X (3/80)

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

ATTACHMENT #7 FEC

(Summary Page)

85 JUL 11 4 54
ALBANY, N.Y.

ALIGN AREA

1 Name of Committee (In Full)
Paine Webber Fund for
Better Government

Address (Number and Street)
c/o Paul B. Guenther
1285 Ave. of Americas

City, State and ZIP Code
New York, New York 10019

☐ Check here if address is different than previously reported

2 FEC Identification Number
C 000 12245

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 MAY
☐ 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>3/1/85</u> through <u>5/31/85</u>			
6 a. Cash on hand January 1, 19 <u>85</u>			\$ 16,579.23
b. Cash on hand at Beginning of Reporting Period		\$ 9,940.31	
c. Total Receipts from Line 18		\$ 9,120.98	\$ 11,282.06
d. Total disbursements from Lines 6c and 6d for Column A and the entire year for Column B		\$ 19,061.29	\$ 27,861.29
e. Total Receipts from Line 28		\$ -	\$ 8,310.00
f. Cash on hand at Close of Reporting Period (subtract Line 7 from Line 6 c)		\$ 19,061.29	\$ 19,061.29
9 Debts and Disbursements Owed TO The Committee (itemize on Schedule C or Schedule D)	\$		
10 Debts and Disbursements Owed BY the Committee (itemize 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 and complete.

Paul B. Guenther
Director

SIGNATURE OF TREASURER

7/3/85
Date

For further information contact
Federal Election Commission
Telephone: 202/418-9131
Telex: 211 523 4366



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

MS-L

July 12, 1985

Paul B. Guenther, Treasurer
Paine Webber Fund for Better
Government
1285 Avenue of the Americas
New York, NY 10019

Identification Number: C00012245

Reference: 1985-1986 Election Cycle Reports

Dear Mr. Guenther:

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>
1985 February Monthly (1/1/85-1/31/85)	2/20/85	2/28/85
1985 March Monthly (2/1/85-2/28/85)	3/20/85	3/27/85
1985 April Monthly (3/1/85-3/31/85)	4/20/85	5/15/85
1985 June Monthly (5/1/85-5/31/85)	6/20/85	7/11/85

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 Paul Kolesa on our toll-free number, (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

Michael B. Miller
Chief, Partisan/Non-Party Branch
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

December 20, 1985

**REPORTING NOTICE FOR MONTHLY FILERS
ELECTION YEAR 1986**

The Commission's records indicate that your committee will file monthly reports during 1986. This notice will assist you in complying with the monthly filing requirements.

* * * *

MONTHLY REPORTS

Monthly reports must be filed no later than 20 days after the last day of each month. 11 CFR 104.5(c)(3). Each report must include all financial activity that occurred during the previous month. For example, the first monthly report this year should be filed by February 20, 1986, and should include all financial activity which occurred between January 1 and January 31, 1986. (See the chart below.)

If you send a report by registered or certified mail, it must be postmarked no later than the filing date in order to be timely filed. If you have your report hand delivered or mailed first class, it must be received by the close of business on the filing date.

You are required to use FEC Form 3X to file all reports. These forms may be duplicated. Two of them have been enclosed for your use. Should you need additional forms call the Information Services Division.

MONTHLY REPORTS 1986

Report	Period Covered	Filing Date*
February	1/1 - 1/31	2/20/86
March	2/1 - 2/28	3/20/86
April	3/1 - 3/31	4/20/86
May	4/1 - 4/30	5/20/86
June	5/1 - 5/31	6/20/86
July	6/1 - 6/30	7/20/86
August	7/1 - 7/31	8/20/86
September	8/1 - 8/31	9/20/86
October	9/1 - 9/30	10/20/86
Pre-election	10/1 - 10/15	10/23/86
Post-election	10/16 - 11/24	12/04/86
Year-End	11/25 - 12/31	1/31/87

* The reports that are sent by registered or certified mail are considered filed on the date of the U.S. Postmark.

QUARTERLY 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

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA

ALIGN AREA

1 Name of Committee (In Full)

Paine Webber Fund for Better
Government

Address (Number and Street)

c/o Paul B. Guenther
1285 Avenue of the Americas

City, State and ZIP Code

New York, NY 10019

☐ Check here if address is different than previously reported

2 FEC Identification Number

C 000 12245

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

4 TYPE OF REPORT (Check appropriate below)

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

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (New Election Year Only)

☒ Monthly Report for April

☐ Twelfth day report preceding _____ (Type of Session)

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 4/1/86 through 4/30/866 a. Cash on hand January 1, 19 86

b. Cash on Hand at Beginning of Reporting Period

c. Receipts from Line 18

d. Total Receipts from Lines 6 a and 6 b for Column A and
Lines 6 a and 6 b for Column B

e. 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)

11 I, the undersigned, have examined this Report and to the best of my knowledge and belief
it is true, correct and complete

Paul B. Guenther
Committee Chairman

SIGNATURE OF TREASURER

5/20/86

Date

For further information contact:

Federal Election Commission

Tel. File 800 424 9530

Wire 202 523 4068

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

FEC FORM 3X 3-86



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2229

DATE FILMED 2/24/87 CAMERA NO. 3

CAMERAMAN AS

37117542702