



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2337
DATE FILMED 10/2/87 CAMERA NO. 4
CAMERAMAN GPC

87040655040

PUBLIC RECORD INDEX - MUR 2337

1. Memo, dtd 10 Dec 86, John D. Gibson (Report Analysis Division) to Charles N. Steele (General Counsel), Subj: Referral of the American Electronics Association (Electro PAC), w/atch (RAD Referral Package).
2. First General Counsel's Report, 21 Jan 87.
3. Certification of Commission action, 2 Feb 87.
4. Ltr, 13 Feb, Scott E. Thomas (Chairman, FEC) to William H. Phillips, Jr., (Treas, Electro PAC).
5. Ltr, 17 Feb 87, Barbara S. Sarpa (Accounting Manager, Electro PAC) to FEC.
6. General Counsel's Report, 20 Mar 87.
7. Certification of Commission action, 25 Mar 87.
8. Ltr, dtd 1 Apr 87, FEC to W.H. Phillips.
9. Ltr, dtd 20 May 87, Jan W. Baran to FEC, w/atch (Statement of Designation of Counsel - J.W. Baran for Electro PAC).
10. General Counsel's Report, 27 May 87.
11. General Counsel's Report, 10 July 87.
12. Certification of Commission action, 15 July 87.
13. Clsg. Ltr, dtd 17 July 87, L.M. Noble to Jan Baran, w/atch (Executed Conciliation Agreement).

-END-

NOTE: In preparing its file for the public record, O.G.C. routinely removes those documents in which it perceives little or no public interest, and those documents, or portions thereof, which are exempt from disclosure under the Freedom of Information Act.

8704055041



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

10 December 1986

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF THE AMERICAN ELECTRONICS ASSOCIATION
ELECTRO PAC

This is a referral of the American Electronics Association Electro PAC ("Electro PAC"). Electro PAC failed to file the 1986 October Quarterly Report and the 1986 12 Day Pre-Election Report of Receipts and Disbursements by Election Day, November 4, 1986. According to the RAD Review and Referral Procedures for Unauthorized Committees (Standard 3), further examination is required by your office.

In addition, please note that a Chronic Late Filer Notice was sent to Electro PAC on December 1, 1986 for failing to file the 1986 October Quarterly Report and the 1986 12 Day Pre-Election Report in a timely manner. Should Electro PAC file one (1) additional report in an untimely manner during the election cycle, Electro PAC will be referred to your office as a Chronic Late Filer.

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

Attachment

8704055042

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 10 December 1986

ANALYST: Alva E. Smith

I. COMMITTEE: American Electronics Association
Electro PAC (C00088609)
William H. Phillips Jr., Treasurer
2670 Hanover Street^{1/}
Palo Alto, CA 94304

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

III. BACKGROUND:

Failure to File the 1986 October Quarterly and 12 Day Pre-Election Reports by Election Day

The American Electronics Association Electro PAC ("Electro PAC") failed to file the 1986 October Quarterly Report and the 1986 12 Day Pre-Election Report of Receipts and Disbursements by Election Day, November 4, 1986. Electro PAC was notified on September 19, 1986 that the October Quarterly Report was due on October 15, 1986 (Attachment 2). On September 29, 1986, Electro PAC was notified that the 1986 12 Day Pre-General Report was due on October 23, 1986 if contributions and expenditures, which had not previously been reported, were made in connection with the general election (Attachment 3).

On November 4, 1986, a Non-Filer Notice was sent to Electro PAC for its failure to file the 1986 October Quarterly Report (Attachment 4).

^{1/} Electro PAC's 1981 Year End Report changed its address from Electro PAC's Government Operations Office at 1612 K Street, NW, Room 1101, Washington, DC 20006 to the above address; however, all correspondence from the Commission has continued to be sent to the Washington, DC address and has apparently been forwarded to the California address.

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**AMERICAN ELECTRONICS ASSOCIATION ELECTRO PAC
REPORTS ANALYSIS OGC REFERRAL
PAGE 2**

Electro PAC filed the 1986 October Quarterly Report and the 1986 12 Day Pre-Election Report on November 10, 1986 (Attachments 5 and 6). The 1986 12 Day Pre-General Report disclosed a total of \$2,100 in contributions to seven (7) federal candidates on October 13, 1986, indicating that a report should have been filed by October 23, 1986 (see page 3 of Attachment 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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8 7 0 4 0 5 5 0 4 5
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 3DEC86
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
AMERICAN ELECTRONICS ASSOCIATION ELECTRO PAC CONNECTED ORGANIZATION: ELECTRONICS ASSOCIATION, AMERICAN				NON-PARTY QUALIFIED		ID #C00088609
1983	MID-YEAR REPORT	378	500	1JAN83 -30JUN83	4	83FEC/280/5037
	YEAR-END	13,008	4,250	1JUL83 -31DEC83	7	84FEC/294/3517
	YEAR-END - AMENDMENT	13,008	4,250	1JUL83 -31DEC83	8	85FEC/370/0322
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31DEC83	1	85FEC/369/1037
1984	APRIL QUARTERLY	11,725	2,000	1JAN84 -31MAR84	6	84FEC/312/5382
	JULY QUARTERLY	6,513	15,000	1APR84 -30JUN84	8	84FEC/321/3286
	OCTOBER QUARTERLY	13,861	23,750	1JUL84 -30SEP84	12	84FEC/341/0435
	PRE-GENERAL	1,905	2,000	1NOV84 -17NOV84	5	84FEC/347/4068
	PRE-GENERAL - AMENDMENT	1,905	2,000	1OCT84 -17OCT84	5	84FEC/354/2241
	POST-GENERAL	0	0	18OCT84 -26NOV84	3	84FEC/354/2238
	YEAR-END	110	0	27NOV84 -31DEC84	2	85FEC/363/3089
	TOTAL	47,500	0	47,500	0	61 TOTAL PAGES

All reports have been reviewed.

Ending cash balance as of 12/31/84: \$946

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

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

8 7 0 4 0 5 5 0 4 6
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 30DEC86
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
AMERICAN ELECTRONICS ASSOCIATION ELECTRO PAC CONNECTED ORGANIZATION: ELECTRONICS ASSOCIATION; AMERICAN				NON-PARTY QUALIFIED	ID #C00088609	
1985	MID-YEAR REPORT	6,602	600	1JAN85 -30JUN85	6	85FEC/381/4739
	YEAR-END	7,344	4,022	1JUL85 -31DEC85	5	86FEC/398/0339
1986	APRIL QUARTERLY	9,693	2,750	1JAN86 -31MAR86	6	86FEC/408/1865
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN86 -31MAR86	3	86FEC/413/3830
	JULY QUARTERLY	13,779	27,950	1APR86 -30JUN86	11	86FEC/422/3072
	JULY QUARTERLY - AMENDMENT	13,779	27,950	1APR86 -30JUN86	9	86FEC/430/4203
	JULY QUARTERLY - AMENDMENT	13,779	27,950	1APR86 -30JUN86	2	86FEC/443/4071
	REQUEST FOR ADDITIONAL INFORMATION			1APR86 -30JUN86	2	86FEC/429/4354
	REQUEST FOR ADDITIONAL INFORMATION			1APR86 -30JUN86	1	86FEC/433/3598
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR86 -30JUN86	2	86FEC/443/2554
	OCTOBER QUARTERLY	3,777	4,500	1JUL86 -30SEP86	5	86FEC/443/5378
	NOTICE OF FAILURE TO FILE			30SEP86	1	86FEC/443/3989
	PRE-GENERAL	430	2,100	1OCT86 -15OCT86	4	86FEC/443/5383
	POST-GENERAL	791	1,000	16OCT86 -24NOV86	4	86FEC/445/1610
TOTAL		42,416	0 42,922	0	61	TOTAL PAGES

All reports have been reviewed.
Ending cash balance as of 11/24/86: \$441
Debts owed to the committee as of 11/24/86: \$0
Debts owed by the committee as of 11/24/86: \$0

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PAGE

September 15, 1986

WHO MUST FILE

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

WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for the last report filed through September 30, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through September 30, 1986.* For more detailed instructions, consult your campaign guide.

WHEN TO FILE

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

WHERE AND HOW TO FILE

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

MONTHLY FILERS

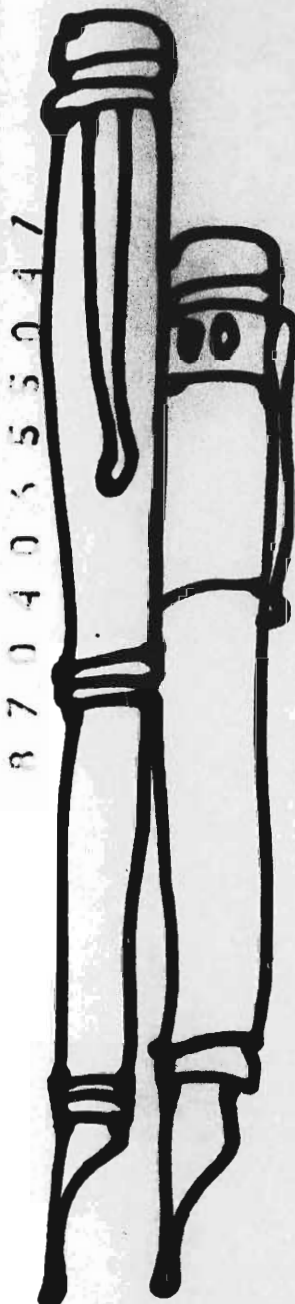
Committees that file on a monthly schedule must file their next report by October 20, 1986, and disclose all financial activity from September 1 through September 30, 1986. (See Monthly Filers on the reverse side.)

COMPLIANCE

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

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

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REMINDERS

QUARTERLY FILERS

Committees that make contributions or expenditures (including independent expenditures) in connection with an election, and coordinated party expenditures in connection with a general 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 and general election filing requirements.

MONTHLY FILERS

Committees that are filing monthly must file a pre-general election report due on October 23, a post-general election report due on December 24, and a year-end report due January 31, 1987, instead of monthly reports on November 20, December 20 and January 20, 1987. See the schedule below.

<u>REPORT</u>	<u>PERIOD COVERED</u>	<u>REG./CENT. MAILING DATE</u>	<u>FILING DATE</u>
Pre-general	10/01 - 10/15	10/20/86	10/23/86
Post-general	10/16 - 11/24	12/24/86	12/24/86
Year-end	11/25 - 12/31	01/31/87	01/31/87

*See General
Election Notice*

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.

A notice explaining general election filing requirements will be sent to you before the general election.

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

GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 29, 1986

WHO MUST FILE THE PRE-GENERAL ELECTION REPORT

ALL COMMITTEES that file monthly reports must file the pre-general election report due October 23, 1986.

All COMMITTEES that file quarterly that have made contributions or expenditures (including independent expenditures and coordinated party expenditures) in connection with the general election must file a pre-election report, if such activity has not previously been reported. See below for post-general filing information.

WHAT MUST BE REPORTED

Quarterly filers must disclose all financial activity from the close of books of the last report, or from the date of registration* (whichever is later), through October 15, 1986. (Monthly filers must disclose all financial activity from October 1 or from the date of registration* (whichever is later), through October 15, 1986.) For more detailed instructions, consult your campaign guide.

WHEN TO FILE

Pre-general election reports sent registered or certified mail must be postmarked no later than midnight October 20, 1986. Reports hand delivered or mailed first class must be received no later than close of business October 23, 1986.

WHO MUST FILE THE POST-GENERAL ELECTION REPORT

ALL COMMITTEES must file the post-general election report due December 4, 1986, regardless of election activity.

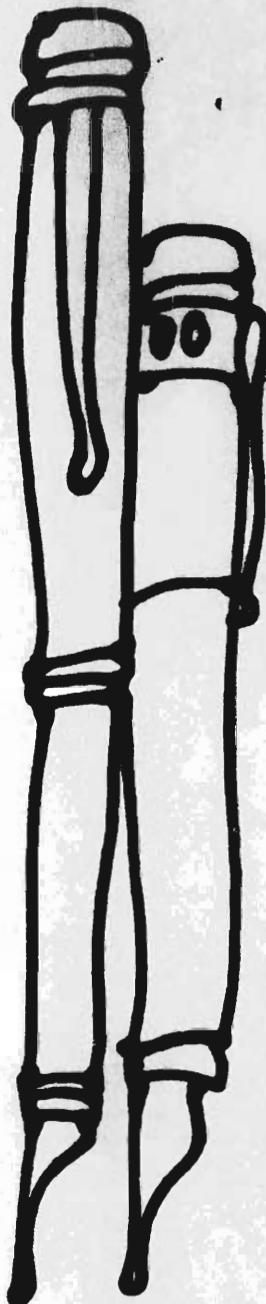
WHAT MUST BE REPORTED

The report must disclose all financial activity from the close of books of the last report, or the date of registration* (whichever is later), through November 24, 1986.

WHEN TO FILE

Post-general election reports sent by registered or certified mail must be postmarked no later than midnight December 4, 1986. Reports hand delivered or mailed first class must be received no later than close of business December 4, 1986.

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



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QUARTERLY FILERS

<u>Name of Report</u>	<u>Period Covered</u>	<u>Reg./Cert. Mailing Date</u>	<u>Filing Date</u>
Oct. Quarterly	07/01 ^{1/} - 09/30	10/15/86	10/15/86
Pre-General	10/01 - 10/15	10/20/86	10/23/86
Post-General ^{2/}	10/16 - 11/24	12/04/86*	12/04/86*
Year-End	11/25 - 12/31	01/31/87	01/31/87

MONTHLY FILERS

<u>Name of Report</u>	<u>Period Covered</u>	<u>Reg./Cert. Mailing Date</u>	<u>Filing Date</u>
Oct. Monthly	09/01 ^{1/} - 09/30	10/20/86	10/20/86
Pre-General	10/01 - 10/15	10/20/86	10/23/86
Post-General	10/16 - 11/24	12/04/86*	12/04/86*
Year-End	11/25 - 12/31	01/31/87	01/31/87

*Follow these dates for mailing and filing the post-general report. Disregard dates shown on the October Quarterly Report Notice dated September 19, 1986.

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.

WHERE AND HOW TO FILE

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

COMPLIANCE

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

^{1/}Or from date of registration, or the close of books of the last report filed, whichever is later.

^{2/}Reports filed by committees that did not file the pre-general election report should cover all financial activity from the closing date of the last report or from the date of registration (whichever is later), through November 24, 1986. See the footnote on the reverse side.

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

8704055050



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

EQ-7

November 4, 1986

William M. Phillips Jr., Treasurer
American Electronics Association
Electro PAC
1612 K Street, NW, Room 1101
Washington, DC 20006

Identification Number: C00088609

Reference: October Quarterly Report (through 9/30/86)

Dear Mr. Phillips:

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

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

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

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

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

15504058

ATTACHMENT 6

FEC

(Page 3 of 3)

Inventory List

26 NOV 10 09:51

1. Name of Committee (No Full) American Electronics Association ELECTROPAC Address (Number and Street) 2670 Manover Street P.O. Box 10045 City, State and ZIP Code Palo Alto, CA 94303 ☐ Check here if address is different than previously reported.	4. TYPE OF REPORT (Check appropriate boxes) to ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report ☐ July 15 Quarterly Report ☐ January 31 Year End Report ☐ July 31 End Year Report (Non-Station Year Only) ☐ Monthly Report for _____ ☒ Twelfth day report preceding <u>GENERAL</u> station on <u>NOV. 4</u> in the State of <u>CALIF</u> ☐ Twelfth day report following the General Station on _____ in the State of _____ ☐ Termination Report
2. FCC Identification Number C00088609 3. ☐ This committee qualified as a noncandidate committee during this Reporting Period on _____	to this Report an Amendment? ☐ YES ☒ NO

THE

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period: <u>October 1, 1986</u> through <u>October 15, 1986</u>			
6. (a) Cash on hand January 1, 19 <u>86</u>			\$ 10,271
(b) Cash on Hand at Beginning of Reporting Period		\$ 2320	
(c) Total Receipts (from Line 10)		\$ 430	\$ 27679
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(b) and 6(c) for Column B)		\$ 2750	\$ 37950
7. Total Disbursements (from Line 20)		\$ 2,100	\$ 37,300
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 650	\$ 650
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$	

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

For further information contact:

William H. Phillips, Jr.

Types of Firms (Number of Firms)

References

NOTE: Submission of false, erroneous, or incomplete information may subject the person making the report to the penalties of 18 USC 1007a.

Federal Election Commission
500 E Street, N.W.
Washington, D.C. 20543
Toll Free 800-424-9549
Local 202-557-0800

All pending versions of POC POCNA 2 and POC POCNA 3a are obsolete and should no longer be used.

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PRC FORM 3X (2/00)

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**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 281)**

ATTACHMENT 6

(Page 2 of 8)

America Electronic Services, Inc.

From: 10-1-86 To: 10-11-86

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	430	23,640	11(a)
(Memo Entry Unavailable: \$ <u>430</u> -)			
(b) Political Party Committees	0	3,000	11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	430	26,640	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Returns, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	0	1039	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	430	27,679	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES			19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22. INDEPENDENT EXPENDITURES (See Schedule B)	2100	39,300	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 641 (d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees		2000	26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))		2000	26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (Add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	2100	37,300	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	430	26,640	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	0	0	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	430	26,640	31
32. TOTAL OPERATING EXPENDITURES from Line 19	0		32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	0		33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	0		34

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 111
OF 111
FOR LINE NUMBER 7

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

AMERICAN ELECTRONICS ASSOCIATION

A. Full Name, Mailing Address and ZIP Code MATTHEW LY FOR SENATE P.O. Box 1986 ATLANTA, GA 30301	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/13/86	Amount of Each Disbursement This Period 500 ⁰⁰
B. Full Name, Mailing Address and ZIP Code RHODES TO CONGRESS COMMITTEE 1230 28th ST. N.W. WASHINGTON, DC. 20007	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 11/13/86	Amount of Each Disbursement This Period 250 ⁰⁰
C. Full Name, Mailing Address and ZIP Code TOM SHIMIZU FOR CONGRESS P.O. Box 21084 SALT LAKE CITY UT 84121	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/13/86	Amount of Each Disbursement This Period 250 ⁰⁰
D. Full Name, Mailing Address and ZIP Code COMMITTEE FOR STEWART B. MCKENNEY PO Box 338 FAIRFIELD CT 06430	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/13/86	Amount of Each Disbursement This Period 100 ⁰⁰
E. Full Name, Mailing Address and ZIP Code NEAL FOR CONGRESS COMMITTEE P.O. Box 1044 SEVERNA PARK, MD 21146	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/13/86	Amount of Each Disbursement This Period 250 ⁰⁰
F. Full Name, Mailing Address and ZIP Code SLABY FOR CONGRESS COMMITTEE 1236 WEATHER VANE SUITE-209 AKRON OHIO 44313	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/13/86	Amount of Each Disbursement This Period 250 ⁰⁰
G. Full Name, Mailing Address and ZIP Code KIT BOND FOR U.S. SENATE 8600 WARD PARKWAY SUITE 205 KANSAAS CITY MO 64114	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/13/86	Amount of Each Disbursement This Period 500 ⁰⁰
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (opt. only)

TOTAL This Period (at page this line number only)

2100 -

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

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

**MUR 86NF-32
STAFF MEMBER
Garr**

SOURCE OF MUR: INTERNALLY GENERATED

**RESPONDENT'S NAME: American Electronics Association
Electro PAC
William H. Phillips, Jr., Treasurer**

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

**INTERNAL REPORTS
CHECKED: FEC Disclosure Documents**

**FEDERAL AGENCIES
CHECKED: N/A**

GENERATION OF MATTER

The American Electronics Association's Electro PAC and its treasurer, William H. Phillips, Jr., were referred to the Office of General Counsel for failing to file the 1986 October Quarterly and 12 Day Pre-Election Reports by Election Day, November 4, 1986.

SUMMARY OF ALLEGATIONS

Electro PAC was notified on September 19, 1986, that its October Quarterly Report was due on October 15, 1986; and on September 29, 1986, that its 12 Day Pre-General Report was due on October 23, 1986, if contributions and expenditures, which had not previously been reported, were made in connection with the general election.

A Non-Filer Notice was sent to Electro PAC on November 4, 1986, for failing to file its October Quarterly Report. Electro

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PAC responded on November 10, 1986, by filing both its October Quarterly and 12 Day Pre-General Reports, 26 days late and 18 days late, respectively.

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), all political committees other than authorized committees of a candidate, may elect to file, in a calendar year in which a regularly scheduled election is held, a quarterly report which shall be filed no later than the 15th day after the last day of each calendar quarter. Further, pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), those committees are required to file a pre-election report, which shall be filed no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election and shall be complete as of the 20th day before the election.

The Committee's failure to file its 1986 October Quarterly Report and 12 Day Pre-General Report in a timely manner are, in the General Counsel's view, violations of 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii).

RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. Open a MUR;
2. Find reason to believe that the American Electronics Association Electro PAC and William H. Phillips, Jr., as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii);

3. Approve and send the attached letter and Legal and Factual Analysis.

Charles N. Steele
General Counsel

Date

1/21/87

By:

Lawrence M. Noble
Deputy General Counsel

Attachments

1. Referral
2. Proposed letter and Legal and Factual Analysis

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Attachment(s) 1, 2
to FIRST GENERAL COUNSEL'S REPORT
have been removed from this
position in Public Record File.
See Index Item(s) 1, 4

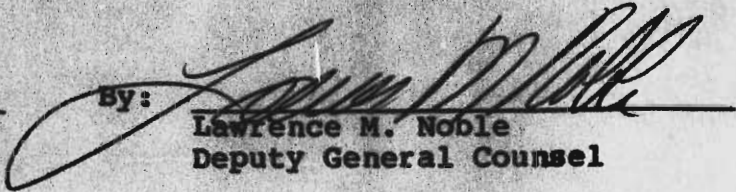
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3. Approve and send the attached letter and Legal and Factual Analysis.

Charles N. Steele
General Counsel

Date 1/24/87

By:


Lawrence M. Noble
Deputy General Counsel

Attachments

1. Referral
2. Proposed letter and
Legal and Factual Analysis

87040655059

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

American Electronics Association)
Electro PAC)
William H. Phillips, Jr., Treasurer)

RAD Ref. 86NF-32

(MUR 2337)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 30, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 86NF-32.

1. Open a MUR.
2. Find reason to believe that the American Electronics Association Electro PAC and William H. Phillips, Jr., as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii).
3. Approve and send the letter and Legal and Factual Analysis, as recommended in the First General Counsel's Report signed January 21, 1987.

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

Attest:

2-2-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Wed., 1-28-87, 11:19
Circulated on 48 hour tally basis: Wed., 1-28-87, 4:00
Deadline for vote: Fri., 1-30-87, 4:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 13, 1987

William H. Phillips, Jr., Treasurer
American Electronics Association
Electro PAC
2670 Hanover Street
Palo Alto, California 94304

RE: MUR 2337
American Electronics
Association Electro PAC
William H. Phillips, Jr.,
Treasurer

Dear Mr. Phillips:

On January 30, 1987, the Federal Election Commission determined that there is reason to believe the American Electronics Association Electro PAC and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against 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.

This matter will remain 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 matter to be made public. If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

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

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American Electronics Association

2670 Hanover Street, P.O. Box 10045, Palo Alto, California 94303 Telephone: (415) 857-9300
1612 K Street, NW, Suite 1100, Washington, D.C. 20006 Telephone: (202) 331-8050

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87 FEB 20 49: 04

February 17, 1987

Ms. Shelley Garr
Federal Election Commission
Washington, DC 20463

Re: MUR2337
American Electronics Association
ELECTROPAC

Dear Shelley:

Thank you for the information you provided in our telephone call on February 17, 1987. Certainly the letter received from your office, with all the attachments, causes much stress for those of us who are trying to maintain an Accounting Department.

As Accounting Manager, I maintain records and prepare reports for the AEA Electropac. I make this request on behalf of Electropac and at the request of William H. Phillips, Treasurer.

I am requesting a pre-probable cause conciliation to avoid any judgement against Electropac as a result of the late filing of the two reports in question. The reports were filed in good faith, with full intention of meeting the deadlines established by the Commission.

Historically, AEA Electropac has followed the guidelines of the Federal Election Commission since its inception in 1978. We will endeavor to ensure continued compliance, and request your assistance in resolving this matter promptly.

Again, Shelley, thank you for your assistance in this matter.

Sincerely,

Barbara S. Sarpa
Barbara S. Sarpa
Accounting Manager

BSS/mkv

William H. Phillips
William H. Phillips
Vice President & Treasurer

2/17/87
Date

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

87 FEB 20 AM: 22

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

American Electronics Association-ELECTROPAC
William H. Phillips, Treasurer

)
)
) MUR 2337
)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On January 30, 1987, the Commission determined that there is reason to believe the American Electronics Association-ELECTROPAC ("the Committee") and William H. Phillips, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii) by failing to file the 1986 October Quarterly and 12 Day Pre-General Reports in a timely manner. By letter dated February 17, 1987, Mr. Phillips requested that this matter be settled prior to a finding of probable cause to believe (Attachment 1).

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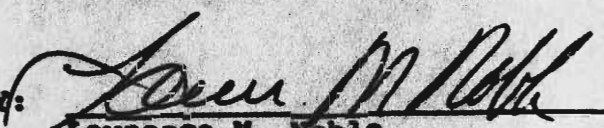
III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Enter into conciliation with the American Electronics Association-ELECTROPAC, and William H. Phillips, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Date

3/20/87

BY:


Lawrence M. Noble
Acting General Counsel

Attachments

1. Response
2. Proposed agreement and letter

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

American Electronics Association-ELECTROPAC
William H. Phillips, Treasurer

)
)
) MUR 2337
)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 24, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2337:

1. Enter into conciliation with the American Electronics Association-ELECTROPAC, and William H. Phillips, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter, as recommended in the General Counsel's Report signed March 20, 1987.

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

Attest:



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

Received in the Office of Commission Secretary:	Fri., 3-20-87,	9:58
Circulated on 48 hour tally basis:	Fri., 3-20-87,	2:00
Deadline for vote:	Tues., 3-24-87,	4:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 1, 1987

William H. Phillips
Vice President and Treasurer
American Electronics Association-ELECTROPAC
1612 K Street, N.W.
Suite 1100
Washington, D.C. 20006

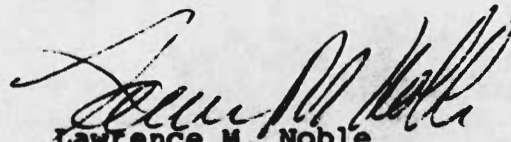
RE: MUR 2337
American Electronics
Association-ELECTROPAC
William H. Phillips,
Treasurer

Dear Mr. Phillips:

On January 30, 1987, the Commission found reason to believe that the American Electronics Association-ELECTROPAC, and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii). At your request, the Commission determined on March 24, 1987, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosures

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May 20, 1987

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

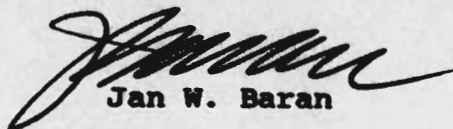
Re: MUR 2337

Dear Ms. Garr:

Enclosed please find the Statement of Designation of Counsel in connection with MUR 2337 involving our clients, the American Electronics Association Electro PAC and William H. Phillips, Jr. as treasurer.

I will contact you to discuss this matter at greater length.

Sincerely,



Jan W. Baran

JWB/njl
Enclosure

cc: William H. Phillips, Jr.
Anthony Ekonomou II

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Office of the
GENERAL COUNSEL

87 MAY 21 12:15

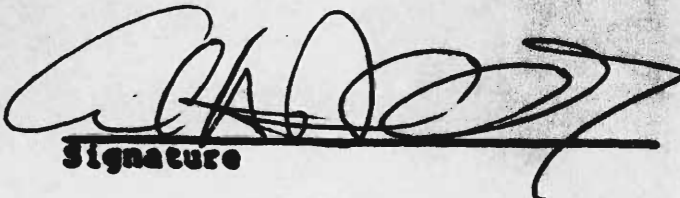
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STATEMENT OF DESIGNATION BY COUNSEL

NR 2377
NAME OF COUNSEL: Jan W. Baran
ADDRESS: Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006
TELEPHONE: 429-7330

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.

5/15/87
Date


Signature

RESPONDENT'S NAME: American Electronics Association Electro PAC
William H. Phillips, Jr., Treasurer
ADDRESS: 2670 Hanover Street
Palo Alto, California 94304
HOME PHONE: _____
BUSINESS PHONE: _____

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

American Electronics Association-ELECTROPAC
William H. Phillips, Treasurer

MUR 2337

GENERAL COUNSEL'S REPORT

BACKGROUND

On March 24, 1987, the Commission decided to enter into pre-probable cause conciliation with the American Electronics Association-ELECTROPAC and William H. Phillips, as treasurers. The Commission mailed the notification letter and proposed conciliation agreement to Respondents on April 1, 1987.

The response, received by the Office of General Counsel on April 27, 1987, included Respondents' counteroffer. This Office was preparing its reply when it received Respondents designation of counsel. Therefore, this Office believes it is worthwhile to continue these pre-probable cause conciliation negotiations for an additional thirty (30) days to determine if an agreement can be reached.

Lawrence M. Noble
Acting General Counsel

5/27/87
Date

BY:

George F. Kishel
George F. Kishel
Acting Associate General Counsel

Attachments

1. Response
2. Designation of Counsel

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

American Electronic Association--ELECTROPAC)
William H. Phillips, Jr., Treasurer)

MUR 23375

GENERAL COUNSEL'S REPORT

I. BACKGROUND

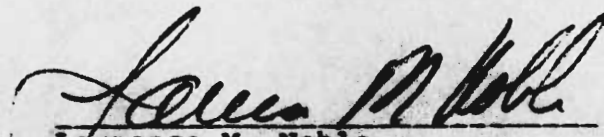
Attached is a conciliation agreement which has been signed by counsel for the American Electronics Association-ELECTROPAC ("the Committee") and William H. Phillips, as Treasurer (Attachment I).

II. RECOMMENDATION

The Office of the General Counsel recommends that the Commission accept the agreement in settlement of this matter and close the file.

Date

2/10/87


Lawrence M. Noble
Acting General Counsel

Attachments:

- 1) Conciliation agreement
- 2) Proposed letter

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Attachment(s) 1, 2
to GENERAL COUNSEL'S REPORT
have been removed from this
position in Public Record File.
See Index Item(s) 13

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

American Electronic Association--ELECTROPAC
William H. Phillips, Jr., Treasurer

MUR 2337

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 15, 1987, the Commission decided by a vote of 6-0 to accept the agreement in settlement of this matter and close the file, as recommended in the General Counsel's Report signed July 10, 1987.

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

Attest:

7-15-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Fri., 7-10-87, 3:39
Circulated on 48 hour tally basis: Mon., 7-13-87, 11:00
Deadline for vote: Wed., 7-15-87, 11:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 17, 1987

Jan W. Baran
Wiley, Rein and Fielding
1776 K Street, N.W.
Washington, DC 20006

RE: MUR 2337
American Electronics
Association-ELECTROPAC
William H. Phillips, Jr.,
Treasurer

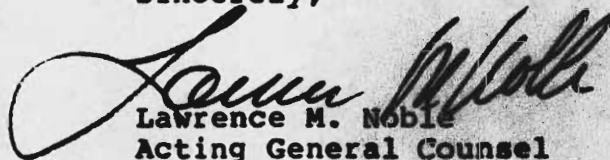
Dear Mr. Baran:

On July 15, 1987, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of violations of 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to the American Electronics Association-ELECTROPAC and William H. Phillips, Jr., as treasurer. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

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

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

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

American Electronics Association-ELECTROPAC)
William H. Phillips, Treasurer)

MUR 2337

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 American Electronics Association-ELECTROPAC and William H. Phillips, as treasurer, (hereinafter "the Respondents") violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii).

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

I. The Commission has jurisdiction over 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 American Electronics Association-ELECTROPAC is a political committee registered with the Commission.

2. William H. Phillips is the treasurer of the American Electronics Association-ELECTROPAC.

3. Respondents were required to file the 1986 October Quarterly Report by October 15, 1986. The report was filed on November 10, 1986, 26 days late.

4. Respondents were required to file the 1986 12 Day Pre General Election Report by October 23, 1986. The report was filed on November 10, 1986, 18 days late.

V. Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), all political committees other than authorized committees of a candidate, are required to file, in a calendar year in which a regularly scheduled election is held, a quarterly report which shall be filed no later than the 15th day after the last day of each calendar quarter. Further, pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), those committees are required to file a pre-election report, which shall be filed no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election and shall be complete as of the 20th day before the election.

VI. Respondents' failure to timely file the 1986 October Quarterly Report and the 1986 12 Day Pre-General Report is in violation of 2 U.S.C. § 434(a)(4)(A)(i) and 2 U.S.C. § 434(a)(4)(A)(ii), respectively.

VII. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Seven Hundred Fifty Dollars (\$ 750.00) pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

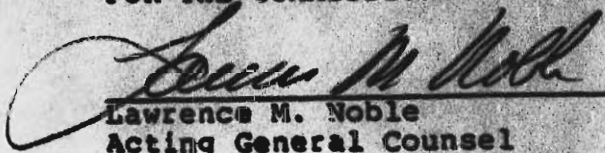
X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or

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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:


Lawrence M. Noble
Acting General Counsel

7/16/87
Date

FOR THE RESPONDENT:


Jan W. Baran
1776 K Street, N.W.
Washington, D.C. 20006
Counsel to the American
Electronics Association--
ElectroPAC, and William
H. Phillips, Treasurer

6/26/87
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

THIS IS THE END OF MUR # 2337

DATE FILMED 10/2/87 CAMERA NO. 4

CAMERAMAN GPC

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