



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

THIS IS THE BEGINNING OF MUR # 2362

DATE FILMED 4/25/82 CAMERA NO. 3

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1. Memo, 19 Feb 87, John D. Gibson (Reports Analysis Division) to Charles N. Steele (General Counsel, subj: Referral of the Hudson Valley Political Action Committee, w/atch (RAD Referral Package)
 2. First General Counsel's Report, 7 Mar 87
 3. Certification of Commission Action, 9 Mar 87
 4. Ltr, 11 Mar 87, Scott E. Thomas (Chairman, FEC) to Jeanne Gray (Treasurer, The Hudson Valley PAC)
 5. Ltr, 20 Mar 87, Mandell I. Ganchrow to FEC, subj: Request for extension of time
 6. Ltr, 30 Mar 87, Carolyn V. Oliphant to Lawrence M. Noble (Acting General Counsel, FEC), subj: Request for pre-probable cause conciliation w/atch Statement of Designation of Counsel
 7. Statement of Designation of Counsel, 6 Apr 87
 8. General Counsel's Report, 6 May 87
 9. Certification of Commission Action, 11 May 87
 10. Ltr, 14 May 87, L.M. Noble to C.V. Oliphant
 11. General Counsel's Report, 15 Jul 87
 12. Certification of Commission Action, 21 Jul 87
 13. Ltr, 22 Jul 87, L.M. Noble to C.V. Oliphant, subj: Rejection of counterproposal
 14. Ltr, 10 Aug 87, C.V. Oliphant to FEC, w/atch
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 17. Ltr, 14 Sep 87, L.M. Noble to C.V. Oliphant, 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.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

19 February 1987

MEMORANDUM

TO: CHARLES N. STEERE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF THE HUDSON VALLEY POLITICAL ACTION
COMMITTEE

This is a combined Non-Filer/Chronic Late Filer referral of the Hudson Valley Political Action Committee ("the Committee"). The Committee failed to file four (4) reports in a timely manner during the 1985-1986 election cycle. One of these reports, the 12 Day Post-General Report was not filed by Election Day, November 4, 1986. Please note that all financial activity occurring within the coverage dates for the 12 Day Pre-General Report (10/1/86-10/15/86) is disclosed on the Committee's 1986 30 Day Post-General Report. According to the RAD Review and Referral Procedures for Unauthorized Committees (Standards 3 and 4), further examination is required by your office.

If you have any questions concerning this matter, please contact Joseph Rawson at 376-2480.

Attachment

87040664112

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REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 19 February 1987

ANALYST: Joseph Rawson

I. COMMITTEE: The Hudson Valley Political Action Committee
(C00158863)
Jeanne Gray, Treasurer
(January 20, 1987 to Present)
(January 1, 1985 to June 5, 1985)
Rita Liebowitz, Treasurer
(June 6, 1985 to January 19, 1987)
100 Red Schoolhouse Road, Suite A7A^{1/}
Spring Valley, NY 10977

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

III. BACKGROUND:

Failure to Timely File Reports and Failure to File The 12
Day Pre-General Report by Election Day

The Hudson Valley Political Action Committee ("the
Committee") failed to file four (4) Reports of Receipts and
Disbursements in a timely manner for the 1985-1986 election
cycle (see chart). The reports were filed between fifteen
(15) and eighty-nine (89) calendar days late. In addition,
one of the filings, the 1986 12 Day Pre-General Report, was
not filed by Election Day, November 4, 1986.

The Committee was notified on September 29, 1986 that
all committees that have made contributions or expenditures
in connection with the general election during the period
10/1/86 through 10/15/86 must file a 12 Day Pre-General
Report by October 23, 1986, if such activity has not been
previously reported. (Attachment 6).

^{1/} The Commission was notified of an address change on October
30, 1986.

**THE HUDSON VALLEY POLITICAL
ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2**

On November 19, 1986, a Chronic Late Filing Notice was sent to the Committee for failing to file the 1986 April Quarterly and the 1986 October Quarterly Reports in a timely manner (Attachment 8). The Notice advised the Committee that any additional late filing of reports may result in legal enforcement action.

Subsequent to the sending of the Chronic Late Filing Notice, the Committee filed the 1986 30 Day Post-General Report late (Attachment 10). In a cover letter the treasurer stated, "Unfortunately on January 20, 1987 the management changed..." The 30 Day Post-General Report disclosed seven (7) contributions to seven (7) federal candidates between 10/1/86 and 10/15/86 indicating that a 12 Day Pre-General Report should have been filed by October 23, 1986 (Attachment 10).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

87040564114

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LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1986 April Quarterly (1/1/86-3/31/86)	3/21/86 (Attachment 2)	4/15/86	5/7/86 (Attachment 3)	5/12/86 (Attachment 4)
1986 October Quarterly (7/1/86-9/30/86)	9/19/86 (Attachment 5)	10/15/86	N/A	10/30/86 (Attachment 7)
1986 12 Day Pre-General (10/1/86-10/15/86)	9/29/86 (Attachment 6)	10/23/86	N/A	1/20/87 (Attachment 10) ^{1/}
1986 30 Day Post-General (10/16/86-11/24/86)	9/29/86 (Attachment 6)	12/4/86	12/23/86 (Attachment 9)	1/20/87 (Attachment 10)

^{1/} The 1986 30 Day Post-General Report filed on 1/20/87 contained the 12 Day Pre-General activity and covered the period 10/1/86 - 11/24/86.

THE HUDSON VALLEY POLITICAL
ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 3

8 7 0 4 0 3 6 4 1 1 6
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 19FEB87
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
HUDSON VALLEY POLITICAL ACTION COMMITTEE				NON-PARTY QUALIFIED		ID 0000150865
	CONNECTED ORGANIZATION: NONE					
1985	MISCELLANEOUS REPORT			15FEB85 FROM FEC	1	85FEC/366/1199
	STATEMENT OF ORGANIZATION - AMENDMENT			10JUN85	2	85FEC/375/2951
	MID-YEAR REPORT	58,782	47,817	1JAN85 -30JUN85	16	85FEC/384/1783
	MID-YEAR REPORT - AMENDMENT	58,877	47,817	1JAN85 -30JUN85	5	85FEC/402/2962
	REQUEST FOR ADDITIONAL INFORMATION			1JAN85 -30JUN85	2	85FEC/397/3403
	YEAR-END	66,559	69,909	1JUL85 -31DEC85	21	85FEC/397/2885
	YEAR-END - AMENDMENT	67,759	69,909	1JUL85 -31DEC85	4	85FEC/402/2967
1986	MISCELLANEOUS NOTICE FROM FEC			19NOV86	1	85FEC/444/3487
	APRIL QUARTERLY	8,264	13,417	1JAN86 -31MAR86	7	85FEC/414/1224
	NOTICE OF FAILURE TO FILE			1JAN86 -31MAR86	1	85FEC/413/3062
	JULY QUARTERLY	34,309	35,552	1APR86 -30JUN86	20	85FEC/423/3860
	JULY QUARTERLY - AMENDMENT	-	-	1APR86 -30JUN86	2	85FEC/429/2975
	REQUEST FOR ADDITIONAL INFORMATION			1APR86 -30JUN86	1	85FEC/426/1032
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR86 -30JUN86	2	85FEC/428/3322
	OCTOBER QUARTERLY	89,227	88,536	1JUL86 -30SEP86	39	85FEC/443/1186
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL86 -30SEP86	2	85FEC/451/8230
	REQUEST FOR ADDITIONAL INFORMATION			1JUL86 -30SEP86	1	85FEC/444/3516
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL86 -30SEP86	2	85FEC/451/8379
	POST-GENERAL	23,881	26,942	1OCT86 -24NOV86	14	87FEC/455/2327
	POST-GENERAL - AMENDMENT	23,881	26,942	1OCT86 -24NOV86	3	87FEC/460/4262
	NOTICE OF FAILURE TO FILE			24NOV86	1	85FEC/452/1630
	REQUEST FOR ADDITIONAL INFORMATION			1OCT86 -24NOV86	1	87FEC/459/5845
	YEAR-END	8,930	7,756	22NOV86 -31DEC86	8	87FEC/457/1113
	1 ST LETTER INFORMATIONAL NOTICE			22NOV86 -31DEC86	1	87FEC/460/4295
1987	STATEMENT OF ORGANIZATION - AMENDMENT			20JAN87	2	87FEC/460/4129
	TOTAL	290,447	0 281,129	0	159	TOTAL PAGES

All reports have been reviewed.

Ending cash-on-hand as of 12/31/86: \$12,453.86

Debts and obligations owed to and by the committee as of 12/31/86: \$0

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.

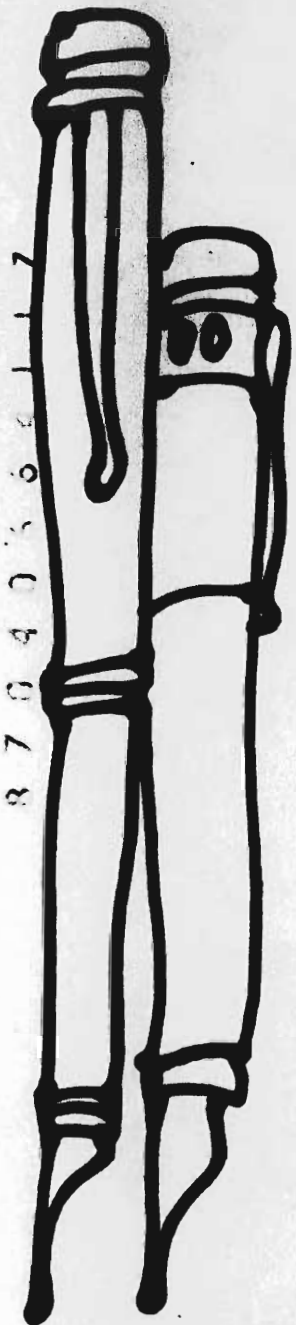
MONTHLY FILERS

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).



REMITTERS**QUARTERLY FILERS**

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

MONTHLY FILERS

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

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

INDEPENDENT EXPENDITURES

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

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

BG-7

May 7, 1986

Rita Liebowitz, Treasurer
Hudson Valley Political Action
Committee
c/o Ganchrow 12 Miriam Lane
Monsey, NY 10952

Identification Number: C00158865

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

Dear Ms. Liebowitz:

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

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

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

If you have any questions, please contact Edward Ryan 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

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

26 MAY 1986 P 1: 50

(Summary Page)

ALIAS AREA

ALIAS AREA

1. Name of Committee (in Full)

HUDSON VALLEY POLITICAL ACTION
COMMITTEE

Address (Number and Street)

c/o GANCROW
12 MIRIAM LANE
City, State and ZIP Code

MONSEY, N.Y. 10952

☐ Check here if address is different than previously reported.

2. FEC Identification Number

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 _____
☐ Twelfth day report preceding _____
election on _____ in the State of _____
☐ Thirtieth day report following the General Election
on _____ in the State of _____
☐ Termination Report

(b) Is this Report an Amendment?

☐ YES ☐ NO

SUMMARY

5. Covering Period JAN-1-86 through MARCH-31-86

6. a. Cash on hand January 1, 1986

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

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

7. Total Disbursements (from Line 28)

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

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

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

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

RITA LEIBOWITZ

Rita Leibowitz
Signature of Treasurer

500

All previous versions of FEC Form 280

For further information contact:

Federal Election Commission

P.O. Box 60, 434 St. J.

Washington, D.C. 20543

Rita Leibowitz, Treasurer
HUDSON VALLEY POLITICAL ACTION COMMITTEE
c/o Gancrow 12 Miriam Lane
Monsey, NY 10952

HUDSON
C/O CANTON
12 N. 10th St.
Mansfield

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PAGE

September 19, 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).

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.</u> <u>MAILING</u> <u>DATE</u>	<u>FILING</u> <u>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

87040364123

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GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PAGE

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.

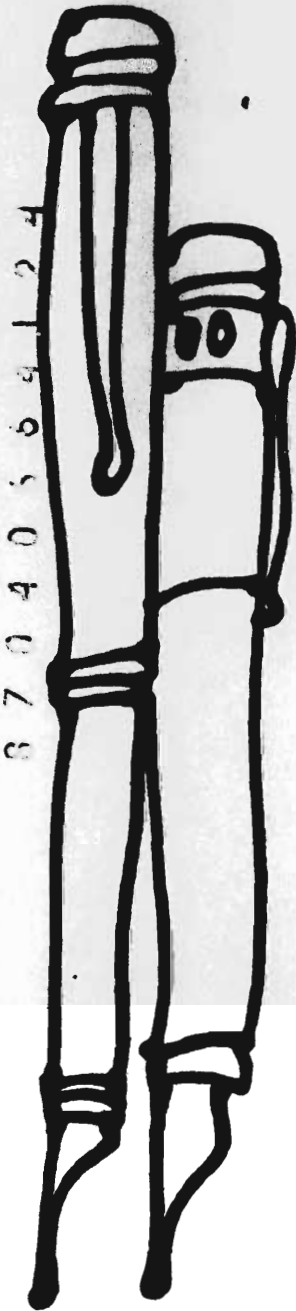
WHAT MUST BE REPORTED

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).



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

87040564125

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

(Summary Page)

66 OCT 30 AM 11:43

1. Name of Committee (in full)
**Hudson Valley Political
Action Committee**

4. TYPE OF REPORT (Check appropriate boxes)

- (a) ☐ April 15 Quarterly Report ☒ October 15 Quarterly Report
☐ July 15 Quarterly Report ☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-Election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ (Year 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

Address (Number and Street)

**100 Red Schoolhouse Rd.
Suite A7A**

City, State and ZIP Code

Spring Valley, NY 10977

☒ Check here if address is different than previously reported.

2. FEC Identifier Number

C00158865

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

SUMMARY

5. Covering Period **July 1, 1966** through **Sept. 30, 1966**

6. (a) Cash on hand January 1, 19 **06**

7. (b) Cash on Hand at Beginning of Reporting Period

8. (c) Total Receipts (from Line 18)

9. (d) Subtotal (Add Lines 6(b) and 8(c) for Column A and Lines 6(a) and 8(c) for Column B)

10. Total Disbursements (from Line 28)

11. Cash on Hand at Close of Reporting Period (subtract Line 10 from Line 9(d))

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

13. 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

Federal Election Commission
800 E Street, NW
Washington, D.C. 20543
Tel. Room 225-4242
Local 225-3129

Rita Leibel
Type or Print Name of Treasurer

Rita Leibel **10/10/66**
Signature of Treasurer

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

FEC FORM 3A (3-60)



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

FD-2

NOV 19 1986

Rita Leibovitz, Treasurer
Hudson Valley Political Action Committee
100 Red Schoolhouse Road, Suite A7A
Spring Valley, NY 10977

Identification Number: C90138065

Reference: 1985-1986 Election Cycle Reports

Dear Ms. Leibovitz:

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>
April Quarterly (1/1/86-3/31/86)	4/15/86	5/12/86
October Quarterly (7/1/86-9/30/86)	10/15/86	10/30/86

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

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

Sincerely,

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

36031413487



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

EQ-7

December 23, 1986

Rita Leibovits, Treasurer
Hudson Valley Political Action Committee
100 Red Schoolhouse Road, Suite A7A
Spring Valley, NY 10977

Identification Number: C00150065

Reference: 30 Day Post-General Report (through 11/30/86)

Dear Ms. Leibovits:

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 Joseph Rawson 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

8704064128



HUDSON VALLEY POLITICAL ACTION COMMITTEE
100 RED SCHOOLHOUSE ROAD • SUITE A-7A • SPRING VALLEY • NEW YORK 10977

ATTACHMENT 10

RECEIVED AT THE FEC:

(Page 1 of 7) BH

27 JAN 23 AM: 28

(214) 386-0190

January 29, 1987

Mr. John A. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Gibson,

This is in reply to your letter of
December 23rd. I am enclosing the
30 Day Post-General Report (through
11-24-86) requested.

Unfortunately, the management
changed and the report due was
sent by regular mail and obviously
lost.

The new Treasurer is James
Gray and hopefully everything

will be on time from now on.

Sincerely,
Janet Gray
Treasurer

87040564130

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1

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

Page 3 of 7

97 JAN 23 411:28

(Summary Page)

1 Name of Committee (in Full)

HUDSON VALLEY POLITICAL ACTION COMMITTEE

Address (Number and Street)

**100 RED SCHOOLHOUSE ROAD
SUITE A7A**

City, State and ZIP Code

SPRING VALLEY, N.Y. 10977

☐ Check here if address is different than previously reported.

2 FEC Identification Number

C00158865

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

4. TYPE OF REPORT (Check appropriate boxes)

☐ April 15 Quarterly Report ☐ October 17 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

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

☐ Monthly Report for _____

☐ Twelfth day report preceding _____

election on _____ in the State of _____

☒ Thirtieth day report following the General Election

on **Nov. 4** in the State of **NEW YORK**

☐ Termination Report

Is this Report an Amendment?

☐ YES ☒ NO

SUMMARY

5 Covering Period **OCT. 1, 1986** through **NOV. 24, 1986**

6 a) Cash on hand January 1, 1986

b) Cash on hand at beginning of Reporting Period

c) Total Receipts (from Line 10)

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

7 Total Disbursements (from Line 20)

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

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 and correct.

JEANNE GRAY

Signature of Treasurer

Jeanne Gray

1-20-87

All previous versions of FEC 44

C00158865

9012119

RITA LEINOWITZ

HUDSON VALLEY POLITICAL ACTION COMMITTEE

**100 RED SCHOOLHOUSE NJ, SUITE A7A
SPRING VALLEY NY 10977**

For further information contact:

Federal Election Commission

400 E Street N.W.

Washington, D.C. 20543

Toll Free 800-426-6922

Local 202-376-3120

Hudson Valley Rural Land Co. **11-26-71** **11-27-71**

RECEIPTS		EXPENDITURES	
LINE	DESCRIPTION	AMOUNT	CHECK NO.
11	CONTRIBUTIONS (other than loans from)		
(a)	Individuals/Persons Other Than Political Committees		
	(Name, Amount, Date) 11,500.00		
(b)	Political Party Committees		
(c)	Other Political Committees		
(d)	TOTAL CONTRIBUTIONS (other than loans from Lines 11(a), 11(b) and 11(c))		
12	TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13	ALL LOANS RECEIVED		
14	LOAN REPAYMENTS RECEIVED		
15	OFFSETS TO OPERATING EXPENDITURES (Interest, Taxes, etc.)		
16	REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17	OTHER RECEIPTS (Interest, Income, etc.)		
18	TOTAL RECEIPTS (Add Lines 11, 12, 13, 14, 15, 16 and 17)		
II. DISBURSEMENTS			
19	OPERATING EXPENDITURES		
20	TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21	CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
22	INDEPENDENT EXPENDITURES (See Schedule C)		
23	COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 (a)(1) (See Schedule F))		
24	LOAN REPAYMENTS MADE		
25	LOANS MADE		
26	REFUNDS OF CONTRIBUTIONS TO		
(a)	Individuals/Persons Other Than Political Committees		
(b)	Political Party Committees		
(c)	Other Political Committees		
(d)	TOTAL CONTRIBUTION REFUNDS (Add Lines 26(a), 26(b) and 26(c))		
27	OTHER DISBURSEMENTS		
28	TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29	TOTAL CONTRIBUTIONS (other than loans from Line 11(a))		
30	TOTAL CONTRIBUTION REFUNDS from Line 26(d)		
31	NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)		
32	TOTAL OPERATING EXPENDITURES from Line 19		
33	OFFSETS TO OPERATING EXPENDITURES from Line 15		
34	NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)		

SCHEDULE B

ITEMIZED DISBURSEMENTS

(Page 5 of 7)

The amounts scheduled for each category of the Budget Summary Page

FOR LINE NUMBER

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

NAME OF COMMITTEE (in full)

Hudson Vauzy Political Action Committee

A. Full Name, Mailing Address and ZIP Code BUTCHER FOR CONGRESS AND 205 NO. BUCKEYS ST. KENNETH, IND. 46794	Purpose of Disbursement HOUSE OF REP. DIST. IND. Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10-3-86	Amount of Cash Disbursement This Period 500.00
B. Full Name, Mailing Address and ZIP Code COMMITTEE TO RE-ELECT CONG. CHRIS SMITH 817 HANCOCK ST. BRIDGEWATER, N.J. 08917	Purpose of Disbursement HOUSE OF REP. DIST. N.J. Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10-9-86	Amount of Cash Disbursement This Period 500.00
C. Full Name, Mailing Address and ZIP Code COMMITTEE TO RE-ELECT SENATOR CRANSTON 6350 WILSHIRE BLVD. #1115 LOS ANGELES, CAL. 90048	Purpose of Disbursement SENATE - CRANSTON DIST. TO DATE \$200.00 Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10-9-86	Amount of Cash Disbursement This Period 2500.00
D. Full Name, Mailing Address and ZIP Code CANADA FOR CONGRESS COMMITTEE 1062 ALASKA RD. - SUITE 12A VIRGINIA BEACH, VA.	Purpose of Disbursement HOUSE OF REP. DIST. VA. Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10-16-86	Amount of Cash Disbursement This Period 350.00
E. Full Name, Mailing Address and ZIP Code TEJANS FOR LARRY GONZALEZ 1801 NE LOOP 410 SUITE 630 SAN ANTONIO, TEXAS 78217	Purpose of Disbursement HOUSE OF REP. DIST. TEXAS Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10-17-86	Amount of Cash Disbursement This Period 500.00
F. Full Name, Mailing Address and ZIP Code PENNSYLVANIANS FOR CONG. PAUL E. MANJACKI, COM. 109 S. MANVOER ST. HANTICORA, PA. 17334	Purpose of Disbursement HOUSE OF REP. DIST. PA. Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10-17-86	Amount of Cash Disbursement This Period 500.00
G. Full Name, Mailing Address and ZIP Code FRIENDS OF JIM JAMES P.O. BOX 2885 TULSA, OKLAHOMA 74101	Purpose of Disbursement HOUSE OF REP. DIST. OKLA. Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10-17-86	Amount of Cash Disbursement This Period 500.00
H. Full Name, Mailing Address and ZIP Code CLAUDE HARRIS FOR CONGRESS COM. 2723 75 ST. BIRMINGHAM, ALA. 35401	Purpose of Disbursement HOUSE OF REP. DIST. ALA. Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10-17-86	Amount of Cash Disbursement This Period 500.00
I. Full Name, Mailing Address and ZIP Code JOHN LEWIS FOR CONGRESS 354 PEACHTREE ST, NE ATLANTA, GA. 30301	Purpose of Disbursement HOUSE OF REP. DIST. GA. Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10-17-86	Amount of Cash Disbursement This Period 250.00

SUBTOTAL of Disbursements This Page (optional)

6100.00

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

See Instructions
for completion of this page
on page 1 of the Schedule
Summary Page

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

Name of Committee (in Full)

Hudson Valley Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Cash Disbursement This Period
STACEY FOR CONGRESS P.O. BOX 443 CHARLESTON SC. 29402	HOUSE OF REP. 15 CONG. DIST. SC. TOTAL \$250.00 Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	10-13-86	\$250.00
SAIKI FOR CONG. 0017. 1270 QUEEN KIANA ST. SUITE 402 HONOLULU, HAWAII 96813	HOUSE OF REP. 15 CONG. DIST. HI. TOTAL \$250.00 Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	10-14-86	250.00
CON. TO RE-ELECT CONG. BILL SCHWARTZ 3715 ASHMAN ST. MINNEAPOLIS, MINN. 55404	HOUSE OF REP. 105 CONG. DIST. MINN. TOTAL \$250.00 Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	11-10-86 10-15-86	250.00 500.00
CON. TO RE-ELECT LARRY SHIM P.O. BOX 9456 PERRIS, CALIF. 92524	CONG. DIST 376 PERMID TOTAL \$250.00 Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	11-13-86	1000.00
CON. TO RE-ELECT FRANK WOLF P.O. BOX 1055 VIENNA, VA. 22180	HOUSE OF REP. 10 CONG. DIST. VA. TOTAL \$500.00 Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	10-12-86	500.00
CON. TO RE-ELECT CONG. DAN HICK P.O. BOX 4 MONTICELLO, FLA. 33425	HOUSE OF REP. 14 CONG. DIST. FLA. TOTAL \$500.00 Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	10-15-86	500.00
CON. TO RE-ELECT CONG. PAUL P.O. BOX 1555 EAST LANSING, MICH. 48823	HOUSE OF REP. 6 CONG. DIST. MICH. TOTAL \$500.00 Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	10-15-86	500.00
FRIENDS OF PAUL TRIBLE 8510 CRENSHAW RD RICHMOND, VA 23229	SENATE - VA. TOTAL \$150.00 Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	10-1-86	150.00
SUBTOTAL of Disbursements This Page (optional)			3900.00
TOTAL This Period (last page this line number only)			15350.00



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

FIRST GENERAL COUNSEL'S REPORT

Date and Time of Transmittal
By OGC to the Commission _____

RAD Referral 87NF-53
Staff
Eric Kleinfeld

SOURCE OF MUR: INTERNALLY GENERATED
RESPONDENTS' NAMES: Hudson Valley Political Action
Committee
Jeanne Gray, treasurer
RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)
INTERNAL REPORTS
CHECKED: Disclosure Reports
FEDERAL AGENCIES
CHECKED: None

GENERATION OF MATTER

On February 19, 1987, the Hudson Valley Political Action Committee ("Committee") and Jeanne Gray, as treasurer, were referred by the Reports Analysis Division ("RAD") to the Office of General Counsel.

SUMMARY OF ALLEGATIONS

The basis for RAD's referral is the Committee's failure to timely file four (4) reports of political activity during the 1985-1986 election cycle.

FACTUAL AND LEGAL ANALYSIS

The Committee files reports on a quarterly basis. The four reports filed late by the Committee were the 1986 April and October Quarterlies, the 12 Day Pre-general and the 30 Day Post-general reports.

The reporting requirements for an unauthorized political committee filing on a quarterly basis during an election year are

set forth at 2 U.S.C. § 434(a)(4) as follows:

(A) (i) quarterly reports, in a calendar year in which a regularly scheduled general election is held, which shall be filed no later than the 15th day after the last day of each calendar quarter: except that the report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year;

(ii) a pre-election report, which shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election, and which shall be complete as of the 20th day before the election;

(iii) a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election.

Prior notices were sent to the Committee for all four late reports. The following chart summarizes the Committee's late filing:

<u>Report</u>	<u>Date Due</u>	<u>Date Filed</u>	<u>Days Late</u>
April Quarterly	04/15/86	05/12/86	27
October Quarterly	10/15/86	10/30/86	15
12 Day Pre-general	10/23/86	01/20/87 <u>1</u> /	89
30 Day Post-general	12/04/86	01/20/87	47

Non-filer notices were sent by RAD for April Quarterly on May 7, 1986 and for the 30 Day Post-General on December 23, 1986.

1/ The 30 Day Post-general report filed on January 20, 1987 contained the 12 Day Pre-general activity and covered the period October 1, 1986 to November 24, 1986.

The Committee was referred to the Office of General Counsel on February 19, 1987 as a chronic late filer. Because the Committee filed four reports late during 1986, the Office of General Counsel recommends that the Commission open a MUR and find reason to believe that the Committee and Jeanne Gray, as treasurer, violated 2 U.S.C. § 434(a).

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Hudson Valley Political Action Committee and Jean Gray, as treasurer, violated 2 U.S.C. § 434(a).
3. Approve the attached letter.
4. Approve the attached factual and legal analysis.

Charles N. Steele
General Counsel

Date

3/4/87

By:

Lawrence M. Noble
Deputy General Counsel

Attachments

1. Referral Materials
2. Letter
3. Factual and Legal Analysis

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Attachments to First General
Counsel's Report

have been removed from this
position in the Public Record
File either because they
duplicate documents located
elsewhere in this file, or
because they reflect exempt
information.

For Attachment 1 see 1
2 4

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Hudson Valley Political Action
Committee
Jeanne Gray, treasurer

RAD Ref. 87NF-53

(MUR
2362)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 9, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 87NF-53:

1. Open a MUR.
2. Find reason to believe that the Hudson Valley Political Action Committee and Jean Gray, as treasurer, violated 2 U.S.C. § 434(a).
3. Approve the letter, as recommended in the First General Counsel's Report signed March 4, 1987.
4. Approve the factual and legal analysis, as recommended in the First General Counsel's Report signed March 4, 1987.

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

Attest:

3-9-87

Date

Marjorie W. Emmons
by *MUR*
Marjorie W. Emmons
Secretary of the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 11, 1987

Jeanne Gray, treasurer
The Hudson Valley Political Action Committee
100 Red Schoolhouse Road
Suite A7
Spring Valley, NY 10977

RE: MUR 2362
Hudson Valley Political Action
Committee, Jeanne Gray,
treasurer

Dear Ms. Gray:

On March 9, 1987, the Federal Election Commission determined that the Hudson Valley Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-

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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.

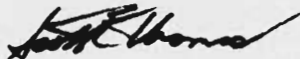
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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 Eric Kleinfeld, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

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

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4



Hudson Valley Political Action Committee
12 Miriam Lane/Monsey, New York 10952

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87 MAR 24 AM: 27
(914) 352-3412

March 20, 1987

87 MAR 24 P 2: 42

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

Mandell I. Ganchrow, M.D.
President

Hana Goldberg
1st Vice-President

Harvey M. Peck, M.D.
2nd Vice-President

Allen Finkelstein, D.D.S.
Secretary

Jeanne Gray
Treasurer

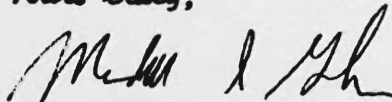
Mr. Eric Kleinfeld
Federal Election Committee
Washington, D.C. 20463

Dear Mr. Kleinfeld:

As per our discussion I hereby request a one week
stay in order to contact an attorney to advise us
regarding MUR 2362.

Thankyou for all the courtesey extended, I am

Yours truly,


Mandell I. Ganchrow M.D. President
100 Red Schoolhouse Road
Suite A7
Spring Valley, N.Y. 10977

EXECUTIVE BOARD
Murray Applebaum
Irene Balsam
Frank Bolnick
Jay Coral
Irving Eisenman
Michael Goldberg, M.D.
Stanley Goldberg, M.D.
Robert Gruenenbaum
Oscar Hausdorf D.D.S.
Elaine Jatkoff
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Harry Levinson
Dr. Allen Marber
Barbara Miller
Renée Schreiber
Deanne Shapiro
Leonard Steinfeld, M.D.
Col. Myer Tulkoff
Phyllis Wind
Harvey Wolinetz
(Committee in Formation)

MIG/Lm

87 APR 2 AM: 45

Lawrence M. Noble
Acting General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

March 30, 1987

Re: MUR 2362

Dear Mr. Noble:

This response is submitted on behalf of the Hudson Valley Political Action Committee, Mandell I. Ganchrow, M.D., President, and Jeanne Gray, Treasurer, to the above-referenced complaint. The respondents request pre-probable cause conciliation in this matter.

The Hudson Valley PAC was established nearly five years ago. To the best knowledge of the PAC's President, Dr. Ganchrow, prior to the reports at issue in this MUR, the PAC always filed its reports in a timely fashion.

From its establishment until 1986, the Hudson Valley PAC was operated entirely on a volunteer basis. In 1986, a decision was made to hire an Executive Director to run the PAC, raise funds and file FEC disclosure reports. The PAC President and Treasurer believed that the Executive Director was filing reports in a timely fashion and were totally unaware of the late filing. At the end of 1986, the services of the Executive Director were terminated because he was not fulfilling his other responsibilities. When he was terminated, he assured the PAC President that all required FEC reports were filed. Subsequent to his departure, the President and Treasurer discovered that the year-end report had not been prepared, and in the course of preparing it, discovered that the 30 Day Post General Election Report had not been filed. Until notification of this MUR, the President and Treasurer did not know that the other reports had been filed late.

Jeanne Gray, who was Treasurer prior to 1986 has once again assumed the duties of Treasurer, and the PAC has a new director. The respondents made every effort to rectify the situation as soon as it was brought to their attention. Further, they believe that the PAC will not be in this situation in the future, since Ms. Gray filed the reports in a timely fashion for the first years of the PAC's existence. We urge the Commission to take these

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OFFICE OF THE
GENERAL COUNSEL

87 APR 2 PM: 40

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Page Two - Lawrence M. Noble

circumstances into account in its further consideration of this matter.

If you have any questions, please contact me at 333-4591.

Sincerely,

Carolyn U. Oliphant

Carolyn U. Oliphant
Suite 214
2233 Wisconsin Avenue, N.W.
Washington, D.C. 20007

cc: Mandell I. Ganchrow
Jeanne Gray

87040664145

6

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2362

NAME OF COUNSEL: Carolyn U. Oliphant

ADDRESS: 2233 Wisconsin Avenue, N.W.
Suite 214

Washington, D.C. 20007

TELEPHONE: 333-4591

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.

3/25/87
Date

Mandell I. Ganchrow M.D.
Signature President.

RESPONDENT'S NAME: Mandell I. Ganchrow, M.D.
President, Hudson Valley Political
Action Committee

ADDRESS: 100 Red Schoolhouse Road
Suite A7
Spring Valley, NY 10977

HOME PHONE: 914-352-3412

BUSINESS PHONE: 914-357-8800

87040564146

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
GC#3085
87 APR 10 10:36

MUR 2362

NAME OF COUNSEL: Carolyn U. Oliphant
ADDRESS: 2233 Wisconsin Avenue, N.W.
Suite 214
Washington, D.C. 20007

TELEPHONE: 333-4591

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.

4-6-87
Date

Jeanne Gray
Signature

87 APR 10 10:39

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OFFICE OF THE
GENERAL COUNSEL

RESPONDENT'S NAME: Jeanne Gray
ADDRESS: Treasurer, Hudson Valley Political
Action Committee

100 Red Schoolhouse Road
Suite A7
Spring Valley, NY 10977

HOME PHONE: 914-354-3568

BUSINESS PHONE: 914-358-4490

870040564147

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of Hudson Valley)
Political Action Committee and) MUR 2362
Jeanne Gray as treasurer)

GENERAL COUNSEL'S REPORT

87 MAY 6 PM 5:01

I. BACKGROUND

On March 9, 1987, the Commission found reason to believe that Hudson Valley Political Action Committee and Jeanne Gray, as treasurer, violated 2 U.S.C. § 434(a) by failing to file the 1986 April and October Quarterly, the 12 Day Pre-election and the 30 Day Post-general Election reports in a timely manner. By letter dated March 30, 1987, respondents requested that this matter be settled prior to a finding of probable cause to believe (Attachment 1).

*Remainder of p. 1 and all of p. 2 deleted.
See 24 USC § 437g (a)(4)(B)(i).*

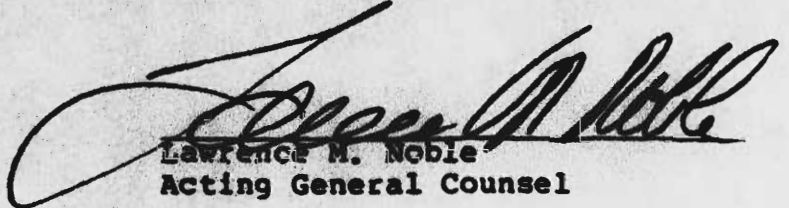
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III. RECOMMENDATIONS

1. Enter into conciliation with Hudson Valley Political Action Committee and Jeanne Gray as treasurer prior to a finding of probable cause to believe.
2. Approve and send the attached proposed conciliation agreement and letter.

Date

5/6/87


Lawrence M. Noble
Acting General Counsel

Attachments

1. Request for conciliation
2. Proposed agreement and letter

(footnote continued)

according to the reported date and pro-rating unitemized amounts according to the number of days in the respective reporting periods.

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Attachments to General
Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 1 see 6
2 ✓

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Hudson Valley Political Committee)
and Jeanne Gray as treasurer)

MUR 2362

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 11, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2362:

1. Enter into conciliation with Hudson Valley Political Action Committee and Jeanne Gray as treasurer prior to a finding of probable cause to believe.
2. Approve and send the proposed conciliation agreement and letter, as recommended in the General Counsel's Report signed May 6, 1987.

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

Attest:

5-11-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Wed., 5-06-87, 5:01
Circulated on 48 hour tally basis: Thurs., 5-07-87, 11:00
Deadline for vote: Mon., 5-11-87, 11:00

/jm/

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1987

Carolyn U. Oliphant, Esq.
Suite 214
2233 Wisconsin Avenue, N.W.
Washington, D.C. 20007

RE: MUR 2362
Hudson Valley Political
Action Committee; Jeanne
Gray, treasurer

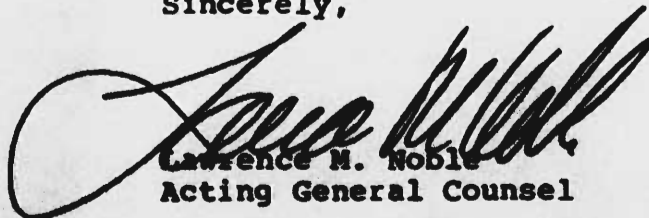
Dear Ms. Oliphant:

On March 9, 1987, the Federal Election Commission found reason to believe that Hudson Valley Political Action Committee and Jeanne Gray as treasurer violated 2 U.S.C. § 434(a). At your request, on May 11, 1987, the Commission determined 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 and your client 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 Celia Jacoby, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Hudson Valley Political)
Action Committee and)
Jeanne Gray, as treasurer)

MUR 2362

ST 101 15
18:31

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On March 9, 1987, the Federal Election Commission (the "Commission") found reason to believe that Hudson Valley Political Action Committee and Jeanne Gray, as treasurer (the "Respondents"), had violated 2 U.S.C. § 434(a) by failing to file the 1986 April and October Quarterly, the 12 Day Pre-election and the 30 Day Post-general Election reports in a timely manner. By letter dated March 30, 1987, the Respondents requested that this matter be settled prior to a finding of probable cause to believe. On May 11, 1987, the Commission determined to enter negotiations for conciliation of this matter, and on May 14th, an agreement in conciliation was sent to the Respondents. The Respondents have submitted a counterproposal (Attachment 1) for the Commission's consideration.

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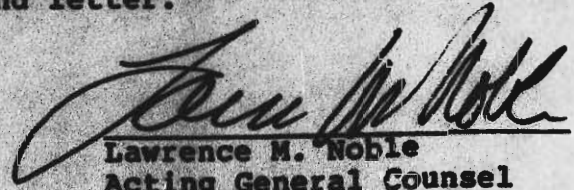
III. RECOMMENDATIONS

1. Reject the conciliation agreement proposed by Hudson Valley Political Action Committee and Jeanne Gray, as treasurer.

//

2. Approve and send the attached revised proposed conciliation agreement and letter.

Date 7/15/82


Lawrence M. Noble
Acting General Counsel

Attachments

1. Conciliation Agreement proposed by Respondents
2. Proposed revised Conciliation Agreement
3. Letter to Respondents

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Attachments to General
Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 1 see DeKad

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Hudson Valley Political) MUR 2362
Action Committee and)
Jeanne Gray, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 20, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2362:

1. Reject the conciliation agreement proposed by Hudson Valley Political Action Committee and Jeanne Gray, as treasurer, as recommended in the General Counsel's Report signed July 15, 1987.
2. Approve and send the revised proposed conciliation agreement and letter, as recommended in the General Counsel's Report signed July 15, 1987.

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

Attest:

7-21-87

Date

Mary W. Emmons
for

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Wed., 7-15-87, 3:31
Circulated on 48 hour tally basis: Thurs., 7-16-87, 11:00
Deadline for vote: Mon., 7-20-87, 11:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 22, 1987

Carolyn U. Oliphant, Esq.
Suite 214
2233 Wisconsin Avenue, N.W.
Washington, D.C. 20007

RE: MUR 2362
Hudson Valley Political
Action Committee; Jeanne
Gray, treasurer

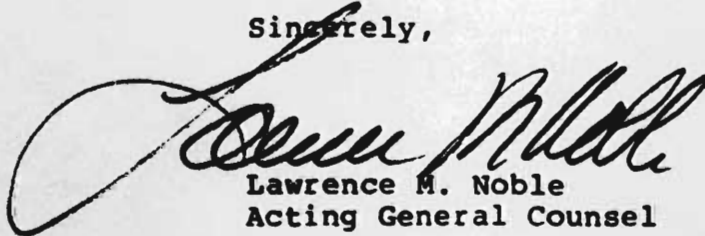
Dear Ms. Oliphant:

This letter is to confirm the Federal Election Commission's receipt of the proposed conciliation agreement which you submitted on behalf of the Hudson Valley Political Action Committee and Jeanne Gray, as treasurer, on June 19, 1987. The Commission has reviewed and rejected this counterproposal.

Enclosed herewith is a conciliation agreement that the Commission has approved in settlement of this matter. If you and your clients 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 Celia Jacoby, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

6CC 4142
RECEIVED AT THE FEC
HAND DELIVERED
87 AUG 10 AM: 19

August 10, 1987

Lawrence M. Noble
Acting General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 2362

87 AUG 12 AM: 06

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

Dear Mr. Noble:

The Hudson Valley Political Action Committee has accepted the Commission's counterproposal of July 22, 1987 in settlement of the above-referenced matter. Enclosed is a signed copy of the Agreement and a check in the amount of \$3,000.

Please forward me a signed copy of the Agreement for our files when it has been signed for the Commission.

Sincerely,

Carolyn W. Oliphant
Carolyn W. Oliphant
2233 Wisconsin Avenue, N.W.
Suite 214
Washington, D.C. 20007

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Attachments to Correspondence
dtol 10 Aug 87

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 1 see 17

_____	_____
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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
87 AUG 28 PM 12:15
SECRETARIAT

In the Matter of)

Hudson Valley Political Action)
Committee and Jeanne Gray, as)
treasurer)

MUR 2362

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Jeanne Gray, treasurer of Hudson Valley Political Action Committee.

The attached agreement contains no changes from the agreement approved by the Commission on July 20, 1987. A check in the amount of Three Thousand Dollars (\$3,000.00), representing payment of the civil penalty, was also received. This Office recommends that the Commission accept this agreement in settlement of this matter with Hudson Valley Political Action Committee and Jeanne Gray, as treasurer.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Hudson Valley Political Action Committee and Jeanne Gray, as treasurer.
2. Close the file.
3. Approve and send the attached letter.

8/29/87
Date

Lawrence M. Noble
Lawrence M. Noble
Acting General Counsel

Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check
3. Letter to Respondents

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Jacoby

Attachment 2

HUDSON VALLEY POLITICAL ACTION COMMITTEE 130 NORTH MAIN STREET NEW CITY, NY 10956		1485
PAY TO THE ORDER OF <u>Federal Election Commission</u>		August 3, 1987
<u>Three thousand</u> ⁺⁺ FX		\$ <u>3000</u> ⁺⁺ FX
		DOLLARS
FOR <u>Payment of penalty</u>		<u>Urbely</u> <u>M. W. J. Ghauri</u>
THE BANK OF NEW YORK 2 New Hempstead Road New City, N.Y. 10956		
⑆001485⑆ ⑆02190246⑆ ⑆258017987⑆		

MEMORANDUM

GCC # 4142

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER
FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

CHECK NO. 1485 { A COPY OF WHICH IS ATTACHED } RELATING TO
PUR 2312 AND NAME Hudson Valley Political Action Cmte., and
Jeanne Gray, as treasurer

WAS RECEIVED ON 8/12/87. PLEASE INDICATE THE ACCOUNT INTO
WHICH IT SHOULD BE DEPOSITED:

/ ☒ BUDGET CLEARING ACCOUNT { 95F3875.16 }
/ / CIVIL PENALTIES ACCOUNT { 95-1099.160 }
/ / OTHER _____

SIGNATURE Debra A. Trimiew DATE 8/12/87

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(5)

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Attachments to General
Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 143 see 17

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_____	_____
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Hudson Valley Political Action)
Committee and Jeanne Gray, as)
treasurer)

MUR 2362

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 9, 1987, the Commission decided by a vote of 5-0 to take the following actions in MUR 2362:

1. Accept the conciliation agreement with Hudson Valley Political Action Committee and Jeanne Gray, as treasurer, as recommended in the General Counsel's report signed August 27, 1987.
2. Close the file.
3. Approve and send the letter, as recommended in the General Counsel's report signed August 27, 1987.

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

Attest:

9-10-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Fri., 8-28-87, 12:14
Circulated on 48 hour tally basis: Mon., 8-31-87, 11:00
Extended Deadline for vote: Wed., 9-09-87, 4:00

jw

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 14, 1987

Carolyn U. Oliphant, Esquire
2233 Wisconsin Avenue, N.W.
Suite 214
Washington, D.C. 20007

RE: MUR 2362
Hudson Valley Political
Action Committee and
Jeanne Gray, as treasurer

Dear Ms. Oliphant:

On September 9, 1987, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of a violation of 2 U.S.C. §§ 434(a)(4)(A)(i), (ii) and (iii), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your clients, Hudson Valley Political Action Committee and Jeanne Gray, 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 Celia L. Jacoby, the attorney 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 Hudson Valley)
Political Action Committee and) MUR 2362
Jeanne Gray, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Hudson Valley Political Action Committee and Jeanne Gray, as treasurer (the "Respondents"), violated 2 U.S.C. § 434(a).

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

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

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

1. Respondent, Hudson Valley Political Action Committee, is a political committee within the meaning of 2 U.S.C. § 431(4), and is registered with the Commission.

2. Respondent, Jeanne Gray, is currently the treasurer of Hudson Valley Political Action Committee (the "PAC"). Ms. Gray was not treasurer of the PAC at the times the

reports in question were due.

3. The Respondents were required to file the 1986 April Quarterly Report by April 15, 1986. The report was filed on May 12, 1986, 27 days late.

4. The Respondents were required to file the 1986 October Quarterly Report by October 15, 1986. The report was filed on October 30, 1986, 15 days late.

5. The Respondents were required to file the 1986 12 Day Pre-Election Report by October 10, 1986. The report was filed on January 20, 1987, 89 days late.

6. The Respondents were required to file the 1986 30 Day Post-General Election Report by December 4, 1986. The report was filed on January 20, 1987, 47 days late.

V. Respondents failed to file timely their 1986 April and October Quarterly, 12 Day Pre-Election and 30 Day Post-General Election Reports, in violation of 2 U.S.C. §§ 434(a)(4)(A)(i), (ii) and (iii).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Three Thousand Dollars (\$3,000.00), 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.

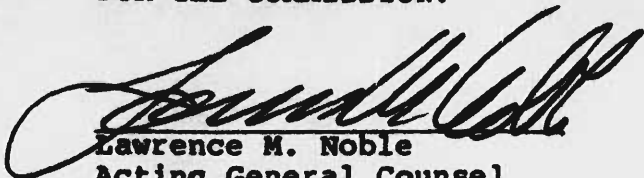
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VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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 enforceable.

FOR THE COMMISSION:


Lawrence M. Noble
Acting General Counsel

9/14/87
Date

FOR THE RESPONDENTS:


Jeanne Gray
Treasurer

August 3, 1987
Date



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

THIS IS THE END OF MUR # 2362

DATE FILMED 11/25/87 CAMERA NO. 3

CAMERAMAN AS

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