



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

THIS IS THE BEGINNING OF MUR # 2448^I
DATE FILMED 12/3/87 CAMERA NO. 3
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87040365195

Public Record Index - MUR 2448

1. Memo, 10 Feb 87, John D. Gibson (Reports Analysis Division) to Charles N. Steele (General Counsel), subj: Referral of the Singer Company Political Action Committee, w/atch (RAD Referral Package).
2. First General Counsel's Report, 18 May 87.
3. Certification of Commission Actions, 22 May 87.
4. Ltr, dtd 8 Jun 87, Scott E. Thomas (Chairman, FEC) to William G. Dauna (Treas, Singer Company PAC).
5. Ltr, dtd 22 Jun 87, Raymond M. Vorce (Treas, Singer Company PAC) to FEC.
6. Statement of Designation of Counsel, 1 Jul 87, Aileen Meyer & Michael Dolan named counsel for Singer Company PAC.
7. Ltr, dtd 16 Jul 87, M.W. Dolan to FEC.
8. General Counsel's Report, 7 Aug 87.
9. Certification of Commission Action, 20 Aug 87.
10. Ltr, dtd 28 Sept 87, M.W. Dolan to FEC.
11. General Counsel's Report, 13 Oct 87.
12. Certification of Commission Action, 16 Oct 87.
13. Ltr, dtd 19 Oct 87, Lawrence M. Noble (Acting General Counsel) to M.W. Dolan, w/atch (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.

87040565196

Attachment 1



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

February 10, 1987

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: NON-FILER REFERRALS OF MONTHLY UNAUTHORIZED COMMITTEES

Attached is a listing of thirty-four (34) monthly filers which failed to file a report covering the pre-election period by Election Day, November 4, 1986. In accordance with Standard 3 of the 1985-1986 RAD Review and Referral Procedures, further examination is required by your office.

On September 29, 1986, prior notification was sent to all unauthorized committees which specifically informed monthly filers of the requirement to file a 12 Day Pre-General Report by October 23, 1986 (Attachment 35). Each committee which failed to submit either a 12 Day Pre-General Report or a November Monthly Report was sent a Non-Filer Notice on November 14, 1986 (Attachment 36). The following six (6) committees were not sent Non-Filer Notices because a report covering the pre-election period was indexed by November 14, 1986:

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The attached printout lists the name, address and treasurer for each committee being referred. Any telephone conversations are referenced under Contacts with Filers. The Summary Pages of the late-filed reports and/or letters of explanation are included under Reports Filed/Response(s).

In addition, a "C" index has been included for each committee. Please note that the aggregate receipt and disbursement figures may be inflated in some cases because a) reports were submitted covering portions of the same period (e.g., a 12 Day Pre-General Report covering October 1, 1986 through October 15, 1986 and a November Monthly Report covering October 1, 1986 through October 31, 1986), or b) 1987 February Monthly Reports have been filed.

If you have any questions, please contact Lisa Stolaruk at 376-2480.

Attachments

37040665198

1

(4)

SEL

8704065199

C00172585

Singer Company Political Action Committee

87NF-38

~~112~~ (121)

SINGER COMPANY POLITICAL ACTION COMMITTEE
(Attachments 31a - 31d)

87040365200

8 7 0 4 0 6 5 2 0 1
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 4FEB87
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
SINGER COMPANY POLITICAL ACTION COMMITTEE (SHORTENED FORM: SINGER PAC) CONNECTED ORGANIZATION: SINGER COMPANY, THE				NON-PARTY QUALIFIED	ID 6C56172585	
1985	STATEMENT OF ORGANIZATION - AMENDMENT			7MAY85	2	85FEC/372/5212
	FEBRUARY MONTHLY	113	0	1JAN85 - 31JAN85	3	85FEC/346/5359
	MARCH MONTHLY	4,016	1,000	1FEB85 - 28FEB85	4	85FEC/369/6234
	APRIL MONTHLY	5,409	833	1MAR85 - 31MAR85	4	85FEC/371/4171
	MAY MONTHLY	6,499	0	1APR85 - 30APR85	4	85FEC/374/3502
	JUNE MONTHLY	3,608	750	1MAY85 - 31MAY85	8	85FEC/380/0813
	JUNE MONTHLY - AMENDMENT	3,608	750	1MAY85 - 31MAY85	5	85FEC/380/4299
	NOTICE OF FAILURE TO FILE			1MAY85 - 31MAY85	1	85FEC/378/3106
	JULY MONTHLY	3,984	2,650	1JUN85 - 30JUN85	5	85FEC/380/2480
	AUGUST MONTHLY	3,609	0	1JUL85 - 31JUL85	4	85FEC/385/5449
	SEPTEMBER MONTHLY	4,685	15,650	1AUG85 - 31AUG85	7	85FEC/388/2890
	OCTOBER MONTHLY	3,360	500	1SEP85 - 30SEP85	5	85FEC/390/0947
	NOVEMBER MONTHLY	4,254	1,500	1OCT85 - 31OCT85	5	85FEC/391/4979
	DECEMBER MONTHLY	3,942	2,000	1NOV85 - 30NOV85	6	85FEC/393/3345
	YEAR-END	9,186	5,000	1DEC85 - 31DEC85	12	85FEC/397/9149
1986	FEBRUARY MONTHLY	1,450	0	1JAN86 - 31JAN86	3	86FEC/403/4979
	FEBRUARY MONTHLY - AMENDMENT	1,450	0	1JAN86 - 31JAN86	4	86FEC/416/1917
	REQUEST FOR ADDITIONAL INFORMATION			1JAN86 - 31JAN86	3	86FEC/416/0906
	MARCH MONTHLY	4,285	0	1FEB86 - 28FEB86	3	86FEC/406/2844
	MARCH MONTHLY - AMENDMENT	4,285	0	1FEB86 - 28FEB86	3	86FEC/416/1921
	REQUEST FOR ADDITIONAL INFORMATION			1FEB86 - 28FEB86	1	86FEC/416/0907
	APRIL MONTHLY	3,942	2,248	1MAR86 - 31MAR86	5	86FEC/411/3686
	MAY MONTHLY	3,778	0	1APR86 - 30APR86	4	86FEC/415/2290
	JUNE MONTHLY	3,909	9,149	1MAY86 - 31MAY86	6	86FEC/418/1517
	JULY MONTHLY	3,186	2,250	1JUN86 - 30JUN86	4	86FEC/424/1327
	AUGUST MONTHLY	7,530	0	1JUL86 - 31JUL86	4	86FEC/429/1484
	SEPTEMBER MONTHLY	5,219	28,133	1AUG86 - 31AUG86	6	86FEC/431/4798
	OCTOBER MONTHLY	6,055	0	1SEP86 - 30SEP86	4	86FEC/442/2603
	PRE-GENERAL	3,238	41,366	1OCT86 - 15OCT86	10	86FEC/444/3135
	NOTICE OF FAILURE TO FILE			1OCT86 - 15OCT86	1	86FEC/444/1536
	POST-GENERAL	5,843	3,250	16OCT86 - 24NOV86	5	86FEC/449/1162
	TOTAL	101,100	0 116,279	0	139	TOTAL PAGES

Ending cash-on-hand as of 11/24/86: \$4,708

Debts: \$0

All reports have been reviewed except the 1986 30 Day Post-General Report.

ATTACHMENT 31a

122

TELECON

ATTACHMENT 31b

123

ANALYST: Jimeson

CONVERSATION WITH:

COMMITTEE: Singer Company Political Action Committee (SINGER PAC)
(C00172585)

DATE: 11/17/86

SUBJECT(S): 12 Day Pre-General Report

A representative of the Singer Company PAC called to ask what they should do about filing the 12 Day Pre-General report. I explained that the report should cover 10/1/86-10/15/86 and should be filed immediately. I also stated that the 30 Day Post general report should be filed by 12/4/86 and cover 10/16/86-11/24/86.

9704065202

124
HAND DELIVERED
NOV 18 1986
SINGER

November 18, 1986

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Mr. John D. Gibson

We received your November 14, 1986 letter (copy attached) yesterday afternoon. We immediately called your Mr. Robyn Jenson for guidance on the confirmation of our filing problem.

In immediate response to her suggestions, we prepared the attached report and have sent it to you in the most expeditious manner.

Singer is undergoing rather significant internal reorganizations, a fact that is directly related to our inadvertent oversight of this interim due date.

Historically, Singer's Political Action Committee has never missed a due date. We can assure you that procedures have been put in place to avoid this situation from reoccurring.

In light of the above facts, we request your waiving any penalty that exists and apologize for any inconvenience that our oversight has caused you.

Thank you for your consideration in this matter.

Sincerely,

William G. Duma

William G. Duma
Treasurer, Singer Political Action Committee

WGD:mc
9449W

FEC FORM 3X (3/80)

SENSITIVE

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 _____

RAC REFERRALS 97NF-08 to 41
STAFF MEMBER
Deborah Curry

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

RESPONDENTS' NAMES:

87040465205

-2-

87040465206

Singer Company Political Action Committee
and William G. Douma, as treasurer

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

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This matter was generated by the Reports Analysis Division ("RAD") after a review of the disclosure reports of the above-named committees. The RAD referral reveals that the above mentioned committees and their treasurers, may have violated 2 U.S.C. § 434(a)(4)(B) by failing to file the 1986 Pre-General Election Report in a timely manner.

II. FACTUAL AND LEGAL ANALYSIS

Attached is a listing of thirty-four (34) monthly filers which failed to file a report covering the pre-election period by Election Day, November 4, 1986. (Attachment 1) On September 29, 1986, prior notification was sent to all unauthorized committees which specifically informed monthly filers of the requirement to file a 12 Day Pre-General Report by October 23, 1986. (Attachment 1, page 137) Each committee which failed to submit either a 12 Day Pre-General Report or a November Monthly Report was sent a Non-Filer Notice on November 14, 1986. (Attachment 1, page 139) The following six (6) committees were not sent Non-Filer Notices because a report covering the pre-election period was indexed by November 14, 1986:

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The attached printout lists the name, address and treasurer for each committee being referred. (Attachment 1, pages 5-10) Any telephone conversations are referenced under Contacts with Filers. The Summary Pages of the late-filed reports and/or letters of explanation are included under Reports Filed/Response(s).

In addition, a "C" index has been included for each committee. (Attachment 1) Please note that the aggregate receipt and disbursement figures may be inflated in some cases because (a) reports were submitted covering portions of the same period (e.g., a 12 Day Pre-General report covering October 1, 1986 through October 15, 1986 and a November Monthly Report covering October 1, 1986 through October 31, 1986), or (b) 1987 February Monthly Reports have been filed.

2 U.S.C. § 434(a)(4)(B) requires that monthly filers file a Pre-General Election Report, covering financial activity from October 1 through October 15, by October 23, 1986. The above

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referenced committees failed to file the 1986 Pre-General Election Report by the required deadline. Therefore, though the Commission is in receipt of report(s) disclosing financial activity covering the pre-general election period, such report(s) were not filed in a timely manner.

With regard to thirty-two non-filers listed below, the Office of General Counsel recommends that the Commission open MURs and find reason to believe these committees and their treasurers violated 2 U.S.C. § 434(a)(4)(B).

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III. RECOMMENDATIONS

1. Open MURs with respect to those committees listed in Recommendation 2.
2. Find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(B):

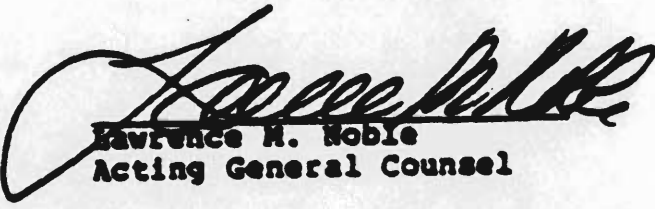
87040365209

Singer Company Political Action Committee
and William G. Douma, as treasurer

3. Approve the attached sample letter and sample Factual and Legal Analysis to be sent to each committee listed in Recommendation 2.

Date

5/18/87


Lawrence M. Noble
Acting General Counsel

Attachments

1. Referral Materials
2. Sample Letter (1)
3. Sample Factual and Legal Analysis (1)

87040365210

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

RAD Ref. 87NF-08 to 41

87040365211

(continued)

Federal Election Commission
Certification for RAD Ref. 87NF-08 to 41
May 21, 1987

Page 2.

3704065212

Singer Company Political Action Committee
and William G. Douma, as treasurer

3

(continued)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 21, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 87NF-08 to 41:

1. Open MURs with respect to those committees listed in Recommendation 2.
2. Find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a) (4) (B):

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Federal Election Commission
Certification for RAD Ref. 87NF-08 to 41
May 21, 1987

Page 4

8704065214

3

(continued)

Singer Company Political Action Committee
and William G. Douma, as treasurer

3. Approve the sample letter and sample Factual and Legal Analysis to be sent to each committee listed in Recommendation 2, as recommended in the First General Counsel's Report signed May 18, 1987.
- 4.

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

Attest:

5-22-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Tues., 5-19-87, 9:00
Circulated on 48 hour tally basis: Tues., 5-19-87, 4:00
Deadline for vote: Thurs., 5-21-87, 4:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

John
June 8, 1987

William G. Douma, Treasurer
Singer Company Political Action Committee
8 Stanford Forum
Stanford, CT 06904

RE: MUR 2448
Singer Company Political
Action Committee and William
G. Douma, as treasurer

Dear Mr. Douma:

On May 21, 1987, the Federal Election Commission determined there is reason to believe Singer Company Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The 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 you, 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

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recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Statement

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Tanner

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Singer Company Political Action
Committee and William G. Douma,
as treasurer

MUR 2448

The RAD referral reveals that the above-mentioned committee and treasurer, may have violated 2 U.S.C. § 434(a)(4)(B) by failing to file the 1986 Pre-General Election Report in a timely manner.

On September 29, 1986, prior notification was sent to all unauthorized committees which specifically informed monthly filers of the requirement to file a 12 Day Pre-General Election Report by October 23, 1986. The above-mentioned Committee failed to file a report covering the pre-election period by Election Day, November 4, 1986. Each Committee which failed to submit either a 12 Day Pre-General Election Report or a November Monthly Report was sent a Non-filer Notice on November 14, 1986, unless the Commission had received the reports by that date.

2 U.S.C. § 434(a)(4)(B) required that monthly filers file a Pre-General Election Report, covering financial activity from October 1 through October 15, by October 23, 1986. The above-referenced committee failed to file the 1986 Pre-General Election Report by the required deadline. Though the Committee may have filed a report which disclosed financial activity covering the pre-general election period, such report was not filed in a

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timely manner. Therefore, the Office of General Counsel recommends the Commission open a MUR in this matter and find reason to believe the above-mentioned Respondents have violated 2 U.S.C. § 434(a)(4)(B).

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SINGER

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- *mm* 2448

The Singer Company
8 Stamford Forum
P.O. Box 10151
Stamford, CT 06904-2151
Telephone (203) 356-4200

June 22, 1987

87 JUN 29 P 2: 40

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Mr. Scott E. Thomas, Chairman

Re: Pre-General Election Report

Gentlemen:

As the successor to William G. Douma as Treasurer of The Singer Company's Political Action Committee (the "Singer PAC"), I received your letter dated June 8, 1987 concerning the Singer PAC's failure to file the Pre-General Election Report on time last October.

As Mr. Douma explained in his letter to you dated November 18, 1986, a copy of which is attached hereto, our failure to file occurred during a period of reorganization at Singer after the spin-off of our sewing and furniture businesses into a new public company. Once we became aware that we had missed a filing date, we immediately contacted the Commission for guidance on how to rectify the situation and then promptly implemented the Commission's suggestions. The filing was received by the Commission on November 19, 1986, within two days after we received notification from the Commission of our failure to file.

I wish to emphasize that the Singer PAC has never failed to comply with any filing or other requirement, except in connection with the October, 1986 Pre-General Election Report, and that I will certainly bend every effort to avoid a repetition of this incident.

I deeply regret our failure to file the Report on time. In view of the circumstances noted above and in Mr. Douma's letter, I hope that you will not deem it necessary to take any further action in connection with this matter.

Very truly yours,

Raymond M. Vorce

Raymond M. Vorce
Treasurer, The Singer Company
Political Action Committee

RMV/dle
5287E

Attachment

8704065221

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SINGER

November 18, 1986

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Mr. John D. Gibson

We received your November 14, 1986 letter (copy attached) yesterday afternoon. We immediately called your Ms. Robyn Jameson for guidance on the confirmation of our filing problem.

In immediate response to her suggestions, we prepared the attached report and have sent it to you in the most expeditious manner.

Singer is undergoing rather significant internal reorganizations, a fact that is directly related to our inadvertent oversight of this interim due date.

Historically, Singer's Political Action Committee has never missed a due date. We can assure you that procedures have been put in place to avoid this situation from reoccurring.

In light of the above facts, we request your waiving any penalty that exists and apologize for any inconvenience that our oversight has caused you.

Thank you for your consideration in this matter.

Sincerely,

William G. Douma

William G. Douma
Treasurer, Singer Political Action Committee

WGD:mc
5449W

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STATEMENT OF DESIGNATION OF COUNSEL

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HAND DELIVERED
87 JUL 2 AM: 110

MUR 2448 Aileen Meyer, Esq.
NAME OF COUNSEL: Michael W. Dolan, Esq.
ADDRESS: Winthrop, Stimson, Putnam & Roberts
1155 Connecticut Avenue, N.W.
Washington, D.C. 20036
TELEPHONE: (202) 457-9500

87 JUL 2 PM: 00

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

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.

7/1/87
Date

Raymond M. Vorce
Signature Raymond M. Vorce, Treasurer
The Singer Company
Political Action Committee

RESPONDENT'S NAME: The Singer Company Political Action Committee
ADDRESS: 8 Stamford Forum
Stamford, CT 06904
HOME PHONE: (203) 227-7360 (R. M. Vorce, Treasurer)
BUSINESS PHONE: (203) 356-4200

97040565223

LAW OFFICES OF

WINTHROP, STIMSON, PUTNAM & ROBERTS

1155 CONNECTICUT AVENUE, N.W. WASHINGTON, D.C. 20036

TELEPHONE: 202-457-9900

TELEX: WINSTIM DC 318222

TELECOPIER: 202-533-5481

MAIN OFFICE

40 WALL STREET, NEW YORK, N.Y. 10005

TELEPHONE: 212-843-0700 CABLE: WINSTIM, N.Y.

TELEX: 62854

CONNECTICUT OFFICE
480 SUMNER STREET
STAMFORD, CONN. 06901
TELEPHONE: 203-348-2300

FLORIDA OFFICE
125 WORTH AVENUE
PALM BEACH, FLA. 33480
TELEPHONE: 305-655-7257

EUROPEAN OFFICE
SALISBURY HOUSE
PINSBURY CIRCUS
LONDON, EC2M 8RO, ENGLAND
TELEPHONE: 01-638-4831

GERALD D. MORGAN, JR.
RAYMOND S. CALAMARO
PETER F. GOLD*
RESIDENT PARTNERS

ROBERT REED GRAY
LOUIS H. KURRELMAYER
JOHN E. GILICK

*FEDERAL PRACTICE ONLY

July 16, 1987

BY HAND

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

ATTN: Ms. Sandra Robinson

Re: MUR 2448

Dear Mr. Thomas:

This is a request on behalf of the Singer Company Political Action Committee ("Singer PAC") that the Commission take no further action on MUR 2448. If, in spite of the facts outlined below, the Commission believes that MUR 2448 should not be closed, Singer PAC requests the opportunity to enter into pre-probable cause conciliation.

On November 14, 1986, the Commission notified Singer PAC that it may be in violation of 2 U.S.C. §434(a) by its failure to file the twelve-day pre-general election report. Upon receipt of the Commission's notice, William G. Douma, the Treasurer of Singer PAC, telephoned the Commission, and the next day, on November 18, 1987, wrote to the Commission and filed the report.

97 JUL 16 P4:11

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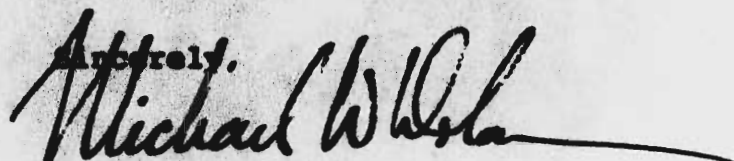
Mr. Douma's November 18th letter noted that Singer PAC had never missed a due date and that the PAC's procedures had been revised to prevent the situation from recurring. Mr. Douma observed that the filing oversight was directly related to the fact that the Singer Company had undergone significant internal reorganizations.

By letter dated June 8, 1987, the Commission advised Singer PAC that on May 21, 1987, the Commission determined that there was reason to believe that Singer PAC violated the pre-election report provisions of 2 U.S.C. §434(a)(4)(B).

On June 22, 1987, Mr. Douma's successor as Treasurer of Singer PAC, Raymond M. Vorce, wrote to the Commission, noting that the failure to file the November 1986 pre-election report occurred during a period of corporate reorganization following the spin-off of the Singer sewing machine and furniture businesses into a public company. Mr. Vorce reiterated that Singer PAC had never before failed to meet a filing deadline and that as the new Treasurer he would work to prevent a repetition of the delayed filing.

Because Singer PAC deeply regrets the late filing and has taken steps to ensure that this one instance will not be repeated, it believes that the Commission should close MUR 2448 without further action. If, however, the Commission does not intend to close the matter, Singer PAC requests the opportunity to enter into pre-probable cause conciliation.

Copies of Mr. Douma's letter of November 18, 1986,
and Mr. Vorce's letter of June 22, 1987, are enclosed.

Sincerely,

Michael W. Dolan

Enclosure

87040565226

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Singer Company Political Action)
Committee and Raymond M. Vorce,)
as treasurer)

MUR 2448

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On May 21, 1987, the Commission found reason to believe that Singer Company Political Action Committee and William G. Douma, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), by failing to file the 1986 Pre-General Election Report in a timely manner. By letter dated July 16, 1987, respondents requested to settle this matter prior to a finding of probable cause to believe (Attachment 1).

Singer Company Political Action Committee filed an amended Statement of Organization on March 25, 1987, showing a change of treasurer from William G. Douma to Raymond M. Vorce, effective March 17, 1987, pursuant to 2 U.S.C. § 433(c). At the time of the Commission's finding of reason to believe, however, William G. Douma, the previous treasurer, was named in the recommendation. Therefore, this Office recommends that the Commission take no further action against Mr. Douma, as treasurer, and find reason to believe that Raymond M. Vorce, as treasurer, violated 2 U.S.C. § 434(a)(4)(B). It is noted that Mr. Vorce contacted this Office via telephone to discuss the procedures in this matter, acknowledging receipt of the letter of notification, and he signed the designation of counsel form. Thus, Mr. Vorce has been notified of the factual and legal basis for the Commission's finding.

4457 P4:43

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II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

R 7 0 4 0 5 6 5 2 2 8

III. RECOMMENDATIONS

1. Find reason to believe Raymond M. Vorce, as treasurer of Singer Company Political Action Committee, violated 2 U.S.C. § 434(a)(4)(B).
2. Take no further action against William G. Douma, as treasurer of Singer Company Political Action Committee, for a violation of 2 U.S.C. § 434(a)(4)(B).
3. Enter into conciliation with Singer Company Political Action Committee and Raymond M. Vorce, as treasurer, prior to a finding of probable cause to believe.
4. Approve the attached proposed conciliation agreement and letter.

Date

8/7/87

Lawrence M. Noble (8/9/87)
Lawrence M. Noble
Acting General Counsel

Attachments

1. Request for conciliation
2. Proposed agreement and letter

87040565229



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Michael W. Dolan, Esquire
Winthrop, Stimson, Putnam & Roberts
1155 Connecticut Avenue, N.W.
Washington, D.C. 20036

RE: MUR 2448
Singer Company Political
Action Committee and
Raymond M. Vorce, as
treasurer

Dear Mr. Dolan:

On May 2, 1987, the Federal Election Commission found reason to believe that Singer Company Political Action Committee and William G. Douma, as treasurer, violated 2 U.S.C. § 434(a)(4)(B). On , 1987, the Commission found that there is reason to believe that your client, Raymond M. Vorce, as treasurer of Singer Company Political Action Committee, violated 2 U.S.C. § 434(a)(4)(B). On , 1987, the Commission also determined to take no further action against William G. Douma, as treasurer of Singer Company Political Action Committee, for a violation of 2 U.S.C. § 434(a)(4)(B).

At your request, on , 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 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.

ATCH 2.

Letter to Michael W. Dolan, Esquire
Page 2

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 Sandra H. Robinson, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

97040565231

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Singer Company Political Action)
Committee and Raymond M. Vorce,)
as treasurer)

MUR 2448

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of August 18, 1987, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2448:

1. Find reason to believe Raymond M. Vorce, as treasurer of Singer Company Political Action Committee, violated 2 U.S.C. § 434(a)(4)(B).
2. Take no further action against William G. Douma, as treasurer of Singer Company Political Action Committee, for a violation of 2 U.S.C. § 434(a)(4)(B).
3. Enter into conciliation with Singer Company Political Action Committee and Raymond M. Vorce, as treasurer, prior to a finding of probable cause to believe.

(continued)

Federal Election Commission
Certification for MUR 2448
August 18, 1987

Page 2

4. Approve the proposed conciliation agreement attached to the General Counsel's report dated August 7, 1987.
5. Approve the proposed letter attached to the General Counsel's report dated August 7, 1987, subject to amendment as agreed during the meeting.

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

Attest:

8-20-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

CC#4454

LAW OFFICES OF

WINTHROP, STIMSON, PUTNAM & ROBERTS

1155 CONNECTICUT AVENUE, N.W. WASHINGTON, D.C. 20036

TELEPHONE: 202-457-5500

TELEX: WINTSTN DC 316555

TELECOPIER: 202-633-8451

MAIN OFFICE

40 WALL STREET, NEW YORK, N.Y. 10005

TELEPHONE: 212-643-6700 CABLE: WINTSTN, N.Y.

TELEX: 68884

GERALD S. MORGAN, JR.

RAYMOND S. SALAMANO

PETER F. GELD

ROBERT M. MORGAN

ROBERT REED GRAY

LOUIS H. MURRELMAYER

JOHN E. GALLICK

FEDERAL PRACTICE ONLY

CONNECTICUT OFFICE

480 SUMNER STREET

STAMFORD, CONN. 06901

TELEPHONE: 203-348-2500

FLORIDA OFFICE

125 WORTH AVENUE

PALM BEACH, FLA. 33480

TELEPHONE: 305-655-7557

EUROPEAN OFFICE

SALISBURY HOUSE

FINCHBURY CIRCUS

LONDON, EC2M 6RG, ENGLAND

TELEPHONE: 01-625-4551

September 28, 1987

EX HAND

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

ATTN: Ms. Sandra Robinson

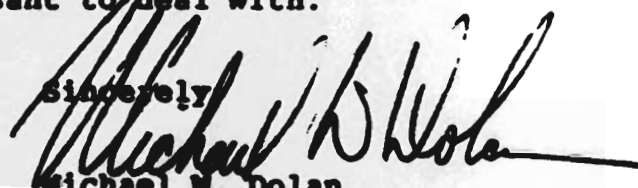
Re: MUR 2448

Dear Mr. Thomas:

On behalf of the Singer Company Political Action Committee and Raymond N. Vorce, its treasurer, I have signed and am returning herewith the conciliation agreement included with the Commission's letter of August 27, 1987. Also enclosed is a check for the sum of \$1,025.00, the amount of the civil penalty described in the conciliation agreement. Please provide us with a copy of the conciliation agreement after it has been signed for the Commission.

You should know that throughout this matter Ms. Sandra Robinson, the attorney assigned to this matter, was helpful, professional, and pleasant to deal with.

Sincerely,



Michael W. Dolan

Enclosure

bcc: John L. Hammond

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 SEP 28 PM 3:22

8704065234

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

87 OCT 13 PM 4:39

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

In the Matter of)
) MUR 2448
Singer Company Political Action)
Committee and Raymond M. Vorce,)
as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Michael W. Dolan, the attorney for Singer Company Political Action Committee and Raymond M. Vorce, as treasurer.

The attached agreement contains no changes from the agreement approved by the Commission on August 18, 1987. A check for the civil penalty in the amount of One Thousand Twenty Five Dollars (\$1,025) has also been received.

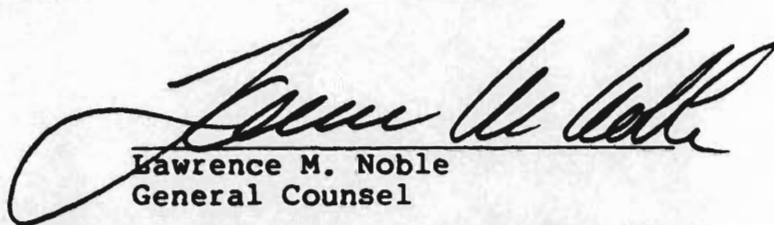
II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Singer Company Political Action Committee and Raymond M. Vorce, as treasurer.
2. Close the file.
3. Approve the attached letter.

Date

10/13/87

Lawrence M. Noble
General Counsel



Attachments

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

Robinson

SINGER

The Singer Company
8 Stamford Forum, Stamford, CT 06904-2151

09/24/87

20035809

62-23
311

Pay To The Order Of:

Pay Exactly

\$1,025.00

Federal Election Commission

Washington, DC 20463

One Thousand Twenty Five and 00/100 Dollars

Morgan Bank (Delaware)
Wilmington, Delaware 19801

20035809 1031100238

GCC#4454

MEMORANDUM

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

CHECK NO. 20035809 (A COPY OF WHICH IS ATTACHED) RELATING TO
MUR 2448 AND NAME Singer Company PAC and
Raymond M. Vorce, as treas.

WAS RECEIVED ON 9/28/87. 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 9/30/87

Attachment II

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 SEP 28 PM 3:22

11

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 13

3 13

87040465237

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Singer Company Political Action
Committee and Raymond M. Vorce,
as treasurer

MUR 2448

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on October 16,
1987, the Commission decided by a vote of 4-0 to take
the following actions in MUR 2448:

1. Accept the conciliation agreement with Singer
Company Political Action Committee and Raymond
M. Vorce, as treasurer, as recommended in the
General Counsel's report signed October 13, 1987.
2. Close the file.
3. Approve the letter, as recommended in the
General Counsel's report signed October 13, 1987.

Commissioners Aikens, Elliott, Josefiak, and McGarry
voted affirmatively for the decision;

Commissioners McDonald and Thomas did not cast a vote.

Attest:

10-16-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Tues., 10-13-87, 4:39
Circulated on 48 hour tally basis: Wed., 10-14-87, 11:00
Deadline for vote: Fri., 10-16-87, 11:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

19 October 1987

Michael W. Dolan, Esquire
Winthrop, Stimson, Putnam & Roberts
1155 Connecticut Avenue, N.W.
Washington, D.C. 20036

RE: MUR 2448
Singer Company Political
Action Committee and
Raymond M. Vorce, as
treasurer

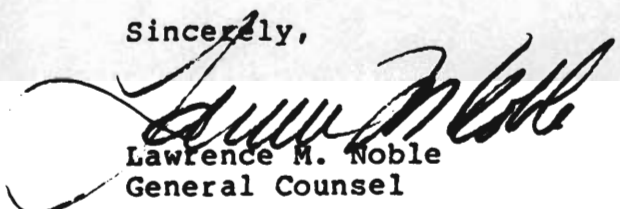
Dear Mr. Dolan:

On October 16, 1987, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. 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 Sandra H. Robinson, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,


Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Singer Company Political Action) MUR 2448
Committee and Raymond M. Vorce,)
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 the Singer Company Political Action Committee and Raymond M. Vorce, as treasurer ("Respondents"), violated 2 U.S.C. 434(a)(4)(B).

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, Singer Company Political Action Committee, is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent, Raymond M. Vorce, is treasurer of Singer Company Political Action Committee.

3. Respondent, Singer Company Political Action Committee, elected to file financial disclosure reports on a monthly basis with the Commission.

4. Respondents were required to file the 1986 Pre-General Election Report by October 23, 1986. Respondents filed the report on November 18, 1986, 26 days late.

V. Respondents failed to file the 1986 Pre-General Election Report in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(B).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of One Thousand Twenty Five Dollars (\$1,025.00), 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.

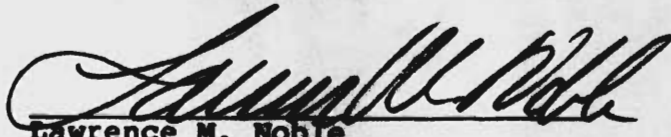
VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and

implement the requirement contained in this agreement and to so notify the Commission.

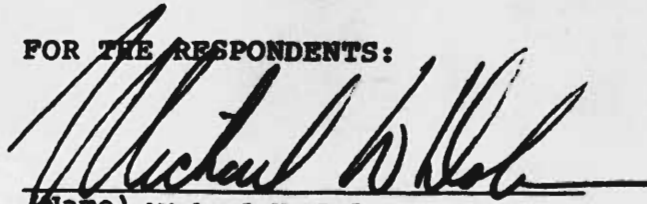
X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:


Lawrence M. Noble
General Counsel

Date 10/19/87

FOR THE RESPONDENTS:


(Name) Michael W. Dolan
(Position) Attorney for Singer Company
Political Action Committee and
Raymond M. Vorce

Date September 28, 1987

87040565242



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20543

THIS IS THE END OF MUR # 2448 I

DATE FILMED 12/3/87 CAMERA NO. 3

CAMERAMAN AS

87040565243



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

M03-14-88

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 2448

88040675463



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 27, 1987

Michael W. Dolan, Esquire
Winthrop, Stimson, Putnam & Roberts
1155 Connecticut Avenue, N.W.
Washington, D.C. 20036

RE: MUR 2448
Singer Company Political
Action Committee and
Raymond M. Vorce, as
treasurer

Dear Mr. Dolan:

On May 2, 1987, the Federal Election Commission found reason to believe that Singer Company Political Action Committee and William G. Douma, as treasurer, violated 2 U.S.C. § 434(a)(4)(B). On August 18, 1987, the Commission determined to take no further action against William G. Douma, since he is not the current treasurer of record. Accordingly, as your client has been substituted as treasurer, on August 18, 1987, the Commission found that there is reason to believe that Raymond M. Vorce, in his capacity as treasurer of Singer Company Political Action Committee, violated 2 U.S.C. § 434(a)(4)(B).

At your request, on August 18, 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 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.

83040575454

Letter to Michael W. Dolan, Esquire
Page 2

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 Sandra H. Robinson, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble (H2)
Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

98040675465

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Singer Company Political Action) MUR 2448
Committee and Raymond M. Vorce,)
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 the Singer Company Political Action Committee and Raymond M. Vorce, as treasurer ("Respondents"), violated 2 U.S.C. 434(a)(4)(B).

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, Singer Company Political Action Committee, is a political committee within the meaning of 2 U.S.C. § 431(4).

88040575466

2. Respondent, Raymond M. Vorce, is treasurer of Singer Company Political Action Committee.

3. Respondent, Singer Company Political Action Committee, elected to file financial disclosure reports on a monthly basis with the Commission.

4. Respondents were required to file the 1986 Pre-General Election Report by October 23, 1986. Respondents filed the report on November 18, 1986, 26 days late.

V. Respondents failed to file the 1986 Pre-General Election Report in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(B).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of One Thousand Twenty Five Dollars (\$1,025.00), 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.

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

83040575467

implement the requirement 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

Date

FOR THE RESPONDENTS:

(Name)
(Position)

Date

8
6
4
5
7
6
0
4
0
3
0
8



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Michael W. Dolan, Esquire
Winthrop, Stimson, Putnam & Roberts
1155 Connecticut Avenue, N.W.
Washington, D.C. 20036

RE: MUR 2448
Singer Company Political
Action Committee and
Raymond M. Vorce, as
treasurer

Dear Mr. Dolan:

On May 2, 1987, the Federal Election Commission found reason to believe that Singer Company Political Action Committee and William G. Douma, as treasurer, violated 2 U.S.C. § 434(a)(4)(B). On August 18, 1987, the Commission determined to take no further action against William G. Douma, since he is not the current treasurer of record. Accordingly, as your client has been substituted as treasurer, on August 18, 1987, the Commission found that there is reason to believe that Raymond M. Vorce, in his capacity as treasurer of Singer Company Political Action Committee, violated 2 U.S.C. § 434(a)(4)(B).

At your request, on August 18, 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 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.

SP

93040575469

Letter to Michael W. Dolan, Esquire
Page 2

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 Sandra H. Robinson, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

SR 8/25/87
HTR 8/26/87

88040675470

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Singer Company Political Action) MUR 2448
Committee and Raymond M. Vorce,)
as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of August 18,
1987, do hereby certify that the Commission decided by a
vote of 6-0 to take the following actions in MUR 2448:

1. Find reason to believe Raymond M. Vorce,
as treasurer of Singer Company Political
Action Committee, violated 2 U.S.C.
§ 434(a)(4)(B).
2. Take no further action against William
G. Douma, as treasurer of Singer Company
Political Action Committee, for a violation
of 2 U.S.C. § 434(a)(4)(B).
3. Enter into conciliation with Singer
Company Political Action Committee and
Raymond M. Vorce, as treasurer, prior to
a finding of probable cause to believe.

(continued)

83040575471

4. Approve the proposed conciliation agreement attached to the General Counsel's report dated August 7, 1987.
5. Approve the proposed letter attached to the General Counsel's report dated August 7, 1987, subject to amendment as agreed during the meeting.

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

Attest:

8-20-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

88040675472

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Singer Company Political Action) MUR 2448
Committee and Raymond M. Vorce,)
as treasurer)

AUG 7 P 4:43

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On May 21, 1987, the Commission found reason to believe that Singer Company Political Action Committee and William G. Douma, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), by failing to file the 1986 Pre-General Election Report in a timely manner. By letter dated July 16, 1987, respondents requested to settle this matter prior to a finding of probable cause to believe (Attachment 1).

Singer Company Political Action Committee filed an amended Statement of Organization on March 25, 1987, showing a change of treasurer from William G. Douma to Raymond M. Vorce, effective March 17, 1987, pursuant to 2 U.S.C. § 433(c). At the time of the Commission's finding of reason to believe, however, William G. Douma, the previous treasurer, was named in the recommendation. Therefore, this Office recommends that the Commission take no further action against Mr. Douma, as treasurer, and find reason to believe that Raymond M. Vorce, as treasurer, violated 2 U.S.C. § 434(a)(4)(B). It is noted that Mr. Vorce contacted this Office via telephone to discuss the procedures in this matter, acknowledging receipt of the letter of notification, and he signed the designation of counsel form. Thus, Mr. Vorce has been notified of the factual and legal basis for the Commission's finding.

89040575473

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

Attached for the Commission's approval is a proposed conciliation agreement with Singer Company Political Action Committee and Raymond M. Vorce, as treasurer (Attachment 2). The proposed agreement provides for an admission of the violation and the payment of a \$1,025.00 civil penalty. The amount of the civil penalty is based on the following considerations.

1986 Pre-General Election Report

<u>Receipts</u>	<u>Disbursements</u>	<u>Report Due</u>	<u>Report Filed</u>	<u>Days Late</u>
\$3,238.04	\$41,366.67	10/23/87	11/18/86	26
A1. Base: Monthly Filer			\$125	
A2. Not applicable - Report does not disclose combined receipts and disbursements of more than \$10,000 filed between 31 and 60 days late				
A3. Report discloses combined receipts and disbursements of more than \$10,000 filed late in calendar year with a regularly schedule election and covers a period of activity during an election year:			\$250	
A4. 12 Day Pre-General Election Report filed late:			\$250	
A5. Report discloses disbursements between \$10,000 and \$20,000:			\$100	
Report discloses disbursements between \$20,000 and \$30,000			\$100	
Report discloses disbursements between \$30,000 and \$40,000:			\$100	
Report discloses disbursements between \$40,000 and \$50,000:			\$100	
		TOTAL	<u>\$1,025</u>	

III. RECOMMENDATIONS

1. Find reason to believe Raymond M. Vorce, as treasurer of Singer Company Political Action Committee, violated 2 U.S.C. § 434(a)(4)(B).
2. Take no further action against William G. Douma, as treasurer of Singer Company Political Action Committee, for a violation of 2 U.S.C. § 434(a)(4)(B).
3. Enter into conciliation with Singer Company Political Action Committee and Raymond M. Vorce, as treasurer, prior to a finding of probable cause to believe.
4. Approve the attached proposed conciliation agreement and letter.

Date

8/7/87

Lawrence M. Noble (Signature)
Lawrence M. Noble
Acting General Counsel

Attachments

1. Request for conciliation
2. Proposed agreement and letter

88040675475

2745m
GERALD D. MORGAN, JR.
RAYMOND S. CALAMARO
PETER F. GOLD*
RESIDENT PARTNERS

ROBERT REED GRAY
LOUIS H. KURRELMAYER
JOHN E. GILICK

*FEDERAL PRACTICE ONLY

LAW OFFICES OF
WINTHROP, STIMSON, PUTNAM & ROBERTS

1155 CONNECTICUT AVENUE, N.W. WASHINGTON, D.C. 20036

TELEPHONE: 202-457-9500
TELEX: WINSTIM DC 316229
TELECOPIER: 202-633-6491

MAIN OFFICE
40 WALL STREET, NEW YORK, N.Y. 10005
TELEPHONE: 212-943-0700 CABLE: WINSTIM, N.Y.
TELEX: 62864

CONNECTICUT OFFICE
480 SUMMER STREET
STAMFORD, CONN. 06901
TELEPHONE: 203-348-2300

FLORIDA OFFICE
125 WORTH AVENUE
PALM BEACH, FLA. 33480
TELEPHONE: 305-655-7297

EUROPEAN OFFICE
SALISBURY HOUSE
FINCHBURY CIRCUS
LONDON, EC2M 5RO, ENGLAND
TELEPHONE 01-628-4931

July 16, 1987

BY HAND

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

ATTN: Ms. Sandra Robinson

Re: MUR 2448

Dear Mr. Thomas:

This is a request on behalf of the Singer Company Political Action Committee ("Singer PAC") that the Commission take no further action on MUR 2448. If, in spite of the facts outlined below, the Commission believes that MUR 2448 should not be closed, Singer PAC requests the opportunity to enter into pre-probable cause conciliation.

On November 14, 1986, the Commission notified Singer PAC that it may be in violation of 2 U.S.C. §434(a) by its failure to file the twelve-day pre-general election report. Upon receipt of the Commission's notice, William G. Douma, the Treasurer of Singer PAC, telephoned the Commission, and the next day, on November 18, 1987, wrote to the Commission and filed the report.

Attachment 1

83040675476

97 JUL 16 P4:11

GCCH 3936

Mr. Douma's November 18th letter noted that Singer PAC had never missed a due date and that the PAC's procedures had been revised to prevent the situation from recurring. Mr. Douma observed that the filing oversight was directly related to the fact that the Singer Company had undergone significant internal reorganizations.

By letter dated June 8, 1987, the Commission advised Singer PAC that on May 21, 1987, the Commission determined that there was reason to believe that Singer PAC violated the pre-election report provisions of 2 U.S.C. §434(a)(4)(B).

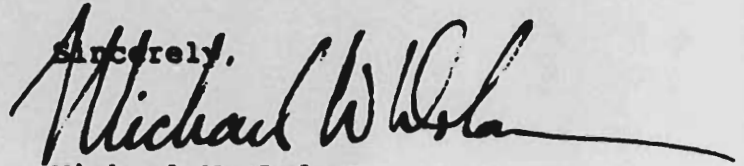
On June 22, 1987, Mr. Douma's successor as Treasurer of Singer PAC, Raymond M. Vorce, wrote to the Commission, noting that the failure to file the November 1986 pre-election report occurred during a period of corporate reorganization following the spin-off of the Singer sewing machine and furniture businesses into a public company. Mr. Vorce reiterated that Singer PAC had never before failed to meet a filing deadline and that as the new Treasurer he would work to prevent a repetition of the delayed filing.

Because Singer PAC deeply regrets the late filing and has taken steps to ensure that this one instance will not be repeated, it believes that the Commission should close MUR 2448 without further action. If, however, the Commission does not intend to close the matter, Singer PAC requests the opportunity to enter into pre-probable cause conciliation.

88040675477

Copies of Mr. Douma's letter of November 18, 1986,
and Mr. Vorce's letter of June 22, 1987, are enclosed.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael W. Dolan", with a long horizontal flourish extending to the right.

Michael W. Dolan

Enclosure

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SINGER

The Singer Company
8 Stamford Forum
PO Box 10151
Stamford, CT 06904-2151
Telephone (203) 356-4200

June 22, 1987

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Mr. Scott E. Thomas, Chairman

Re: Pre-General Election Report

Gentlemen:

As the successor to William G. Douma as Treasurer of The Singer Company's Political Action Committee (the "Singer PAC"), I received your letter dated June 8, 1987 concerning the Singer PAC's failure to file the Pre-General Election Report on time last October.

As Mr. Douma explained in his letter to you dated November 18, 1986, a copy of which is attached hereto, our failure to file occurred during a period of reorganization at Singer after the spin-off of our sewing and furniture businesses into a new public company. Once we became aware that we had missed a filing date, we immediately contacted the Commission for guidance on how to rectify the situation and then promptly implemented the Commission's suggestions. The filing was received by the Commission on November 19, 1986, within two days after we received notification from the Commission of our failure to file.

I wish to emphasize that the Singer PAC has never failed to comply with any filing or other requirement, except in connection with the October, 1986 Pre-General Election Report, and that I will certainly bend every effort to avoid a repetition of this incident.

98040575479

I deeply regret our failure to file the Report on time. In view of the circumstances noted above and in Mr. Douma's letter, I hope that you will not deem it necessary to take any further action in connection with this matter.

Very truly yours,

Raymond M. Vorce

Raymond M. Vorce
Treasurer, The Singer Company
Political Action Committee

RMV/dle
5287E

Attachment

88040575480

SINGER

November 18, 1986

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Mr. John D. Gibson

We received your November 14, 1986 letter (copy attached) yesterday afternoon. We immediately called your Ms. Robyn Jameson for guidance on the confirmation of our filing problem.

In immediate response to her suggestions, we prepared the attached report and have sent it to you in the most expeditious manner.

Singer is undergoing rather significant internal reorganizations, a fact that is directly related to our inadvertent oversight of this interim due date.

Historically, Singer's Political Action Committee has never missed a due date. We can assure you that procedures have been put in place to avoid this situation from reoccurring.

In light of the above facts, we request your waiving any penalty that exists and apologize for any inconvenience that our oversight has caused you.

Thank you for your consideration in this matter.

Sincerely,

William G. Duma

William G. Duma
Treasurer, Singer Political Action Committee

WGD:mc
5449W

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Singer Company Political Action) MUR 2448
Committee and Raymond M. Vorce,)
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 the Singer Company Political Action Committee and Raymond M. Vorce, as treasurer ("Respondents"), violated 2 U.S.C. 434(a)(4)(B).

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, Singer Company Political Action Committee, is a political committee within the meaning of 2 U.S.C. § 431(4).

Attachment 2

2. Respondent, Raymond M. Vorce, is treasurer of Singer Company Political Action Committee.

3. Respondent, Singer Company Political Action Committee, elected to file financial disclosure reports on a monthly basis with the Commission.

4. Respondents were required to file the 1986 Pre-General Election Report by October 23, 1986. Respondents filed the report on November 18, 1986, 26 days late.

V. Respondents failed to file the 1986 Pre-General Election Report in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(B).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of One Thousand Twenty Five Dollars (\$1,025.00), 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.

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

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implement the requirement 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

Date

FOR THE RESPONDENTS:

(Name)
(Position)

Date

88040675484

QCC#4454

LAW OFFICES OF

WINTHROP, STIMSON, PUTNAM & ROBERTS

1155 CONNECTICUT AVENUE, N.W. WASHINGTON, D.C. 20036

TELEPHONE: 202-457-9500

TELEX: WINSTIM DC 316229

TELECOPIER: 202-833-8491

MAIN OFFICE

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TELEX: 62854

GERALD D. MORGAN, JR.
RAYMOND S. CALAMARO
PETER F. GOLD*
RESIDENT PARTNERS

ROBERT REED GRAY
LOUIS H. KURRELMAYER
JOHN E. GILLOCK

*FEDERAL PRACTICE ONLY

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STAMFORD, CONN. 06901
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PALM BEACH, FLA. 33480
TELEPHONE: 305-655-7297

EUROPEAN OFFICE
SALISBURY HOUSE
FINSBURY CIRCUS
LONDON, EC2M 5RO, ENGLAND
TELEPHONE: 01-628-4931

September 28, 1987

BY HAND

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

ATTN: Ms. Sandra Robinson

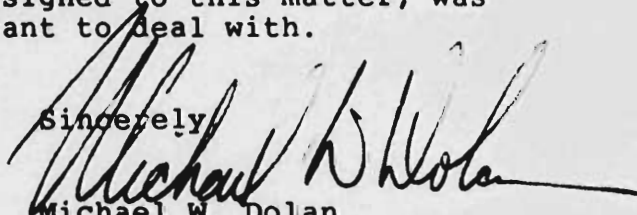
Re: MUR 2448

Dear Mr. Thomas:

On behalf of the Singer Company Political Action Committee and Raymond M. Vorce, its treasurer, I have signed and am returning herewith the conciliation agreement included with the Commission's letter of August 27, 1987. Also enclosed is a check for the sum of \$1,025.00, the amount of the civil penalty described in the conciliation agreement. Please provide us with a copy of the conciliation agreement after it has been signed for the Commission.

You should know that throughout this matter Ms. Sandra Robinson, the attorney assigned to this matter, was helpful, professional, and pleasant to deal with.

Sincerely,


Michael W. Dolan

Enclosure

bcc: John L. Hammond

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
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LONDON, EC2M 8RQ, ENGLAND
TELEPHONE: 01-628-4931

July 16, 1987

BY HAND

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

ATTN: Ms. Sandra Robinson

Re: MUR 2448

Dear Mr. Thomas:

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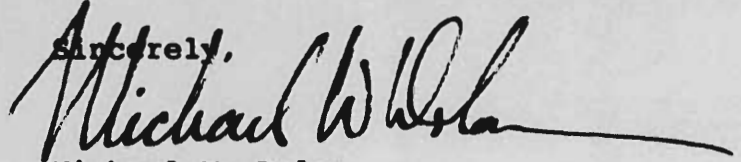
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83040675487

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Sincerely,

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Michael W. Dolan

Enclosure

83040675488

SINGER

The Singer Company
8 Stamford Forum
PO Box 10151
Stamford, CT 06904-2151
Telephone (203) 356-4200

June 22, 1987

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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Very truly yours,

Raymond M. Vorce

Raymond M. Vorce
Treasurer, The Singer Company
Political Action Committee

RMV/dle
5287E

Attachment

880406/5490

SINGER

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Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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Sincerely,

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William G. Duma
Treasurer, Singer Political Action Committee

WGD:mc
5449W