



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2850

DATE FILMED 8/18/89 CAMERA NO. 2

CAMERAMAN AS

89040760297

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: March 14, 1989ANALYST: Margo Herbert

I. COMMITTEE: Combustion Engineering Inc. Political
Action Committee (COMPAC) (C00041947)
Errick V. Jones, Treasurer
(3/3/87 - Present)
James F. Brandt, Treasurer
(8/1/85 - 3/2/87)
900 Long Ridge Road
Stamford, CT 06904

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

III. BACKGROUND:

Failure to Timely File Reports

Combustion Engineering Inc. Political Action Committee (COMPAC) ("the Committee") failed to file three (3) Reports of Receipts and Disbursements in a timely manner during the 1987-1988 election cycle (see Chart). The reports were filed between ten (10) and fifty-five (55) calendar days late.

On March 8, 1988, a Chronic Late Filer Notice was sent to the Committee for failure to file the 1987 Mid-Year and Year End Reports in a timely manner (Attachment 5). The Notice advised the Committee that any additional late filing of reports could result in legal enforcement action. In a cover letter submitted with the 1987 Year End Report, the treasurer, Errick V. Jones, stated that he did not realize that there were penalties for submitting a late report and that arrangements had been made to insure that future reports would be submitted on time (Attachment 7).

89040760298

COMBUSTION ENGINEERING INC. POLITICAL
ACTION COMMITTEE (COMPAC)
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

On January 31, 1989 the Reports Analysis Division ("RAD") analyst telephoned Mr. Jones to inform him that the 30 Day Post-General Report had not been received by the Commission. Mr. Jones said that he was going to send the 30 Day Post-General Report and the 1988 Year End Report by Federal Express and that they should be received by the Commission the next day, February 1, 1989 (Attachment 10). Subsequent to the sending of the Chronic Late Filer Notice, the Committee filed the 1988 30 Day Post-General Report late (Attachment 11).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

39040760299

8 9 0 4 0 7 6 0 3 0 0

LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1987 Mid-Year Report (1/1/87-6/30/87)	7/7/87 (Attachment 2)	7/31/87	N/A	8/10/87 (Attachment 3)
1987 Year End (7/1/87-12/31/87)	12/18/87 (Attachment 4)	1/31/88	3/11/88 (Attachment 6)	3/29/88 (Attachment 7)
1988 30 Day Post-General (10/20/88-11/28/88)	10/3/88 (Attachment 8)	12/8/88	1/6/89 (Attachment 9)	2/1/89 (Attachment 11)

ATTACHMENT 1

FEDERAL ELECTION COMMISSION
1987-1988
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 9FEB89

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
COMBUSTION ENGINEERING INC POLITICAL ACTION COMMITTEE (COMPAC)				ID #C00041947	NON-PARTY QUALIFIED	
CONNECTED ORGANIZATION: COMBUSTION ENGINEERING INC						
1987	STATEMENT OF ORGANIZATION - AMENDMENT			20MAR87	3	87FEC/463/4443
	MID-YEAR REPORT	11,711	12,850	1JAN87 -30JUN87	7	87FEC/482/4684
	YEAR-END	12,049	13,721	1JUL87 -31DEC87	11	88FEC/515/3718
	NOTICE OF FAILURE TO FILE			31DEC87	1	88FEC/512/4257
1988	MISCELLANEOUS NOTICE FROM FEC			8MAR88	1	88FEC/512/2687
	APRIL QUARTERLY	10,546	5-	1JAN88 -31MAR88	6	88FEC/519/5150
	APRIL QUARTERLY - AMENDMENT	10,546	5-	1JAN88 -31MAR88	6	88FEC/538/1706
	JULY QUARTERLY	8,149	10,300	1APR88 -30JUN88	7	88FEC/538/1699
	OCTOBER QUARTERLY	7,943	24,900	1JUL88 -30SEP88	11	88FEC/554/4521
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL88 -30SEP88	2	88FEC/566/0150
	REQUEST FOR ADDITIONAL INFORMATION			1JUL88 -30SEP88	2	88FEC/565/2206
	PRE-GENERAL	2,576	-	1OCT88 -19OCT88	7	89FEC/582/0682
	POST-GENERAL	3,771	452-	20OCT88 -28NOV88	8	89FEC/582/0673
	NOTICE OF FAILURE TO FILE			28NOV88	1	89FEC/576/1949
	YEAR-END	2,652	-	29NOV88 -31DEC88	7	89FEC/582/0748
	TOTAL	59,397	0 61,314 0		80	TOTAL PAGES

All reports have been reviewed.

Cash-on-hand as of 12/31/88: \$16,661.19

Debts owed to the Committee as of 12/31/88: \$0

Debts owed by the Committee as of 12/31/88: \$0

89040760301

SEMI-ANNUAL
REPORT NOTICE

ATTACHMENT 2

2 pages

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

July 7, 1987

WHO MUST FILE

ALL PARTY COMMITTEES AND PACS (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) must file a report in July.

REPORTING DATES

Semiannual. The Mid-Year Report is due July 31 and must disclose financial activity that occurred from January 1 through June 30, 1987. Committees which have previously filed 1987 reports should only report activity from the closing date of the last report filed.

Monthly. If the committee chooses to file on a monthly basis, the next monthly report is due July 20 and must disclose financial activity from June 1 through June 30, 1987. Monthly reports are due by the 20th of each month and cover all financial activity of the previous month.

WHAT MUST BE REPORTED

A report must disclose all receipts and disbursements (not previously reported) that occurred during the reporting period. A newly registered political committee filing its first report should also include all amounts received and expended before the committee registered. See 11 CFR 104.3. For more detailed information on reporting instructions, consult your Campaign Guide.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC FORM 3X for details. Affix the peel-off label from the envelope to line 1 of the report. Any corrections should be made directly on the label.

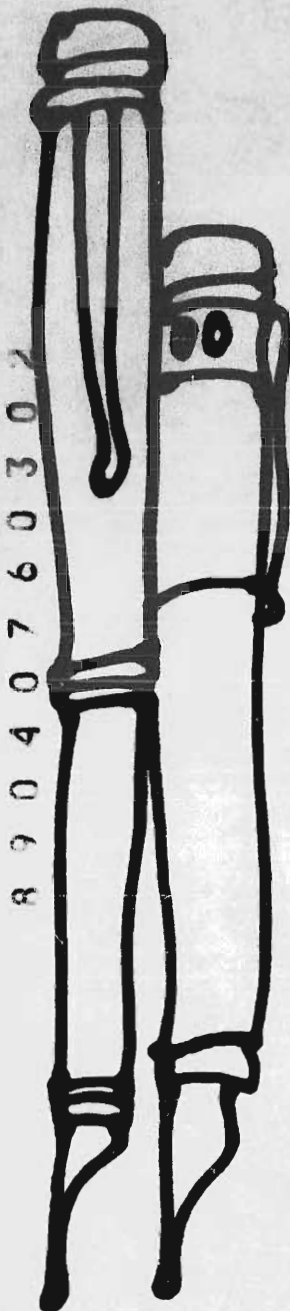
CHANGE IN FILING FREQUENCY

Committees that wish to change their reporting schedule (for example, from monthly to semiannual) must notify the Commission by sending a letter with the next report due under their current reporting schedule. Committees may change their filing frequency only once a year.

COMPLIANCE

Political committees are responsible for filing all reports required under the Act in a timely fashion. Committees and treasurers who file late reports, or fail to file reports, are subject to enforcement action. Illegible reports and reports submitted on non-FEC forms will not be accepted; committees filing such documents will be required to refile.

(over)



**1987 UPCOMING FILING SCHEDULE
PARTIES AND PACS**

Retain this report notice for future reference. The next notice will be sent December 18, 1987. Also, see the January 1987 issue of the FEC Record, which lists 1987 reporting dates.

SEMIANNUAL FILERS

Report	Period Covered 1/	Reg./Cert.	Filing
		Mailing Date 2/	Date 2/
Mid-Year	01/01 - 06/30	07/31/87	07/31/87
Year-End	07/01 - 12/31	01/31/88	01/31/88

MONTHLY FILERS

Report	Period Covered 1/	Reg./Cert.	Filing
		Mailing Date 2/	Date 2/
July	06/01 - 06/30	07/20/87	07/20/87
August	07/01 - 07/31	08/20/87	08/20/87
September	08/01 - 08/31	09/20/87	09/20/87
October	09/01 - 09/30	10/20/87	10/20/87
November	10/01 - 10/31	11/20/87	11/20/87
December	11/01 - 11/30	12/20/87	12/20/87
Year-End	12/01 - 12/31	01/31/88	01/31/88

1/ A newly registered committee should refer to "WHAT MUST BE REPORTED," on the reverse side.

2/ Reports sent by certified or registered mail must be postmarked by the mailing date. Reports mailed first class or hand delivered must be received by the filing date.

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

39040760303

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

ATTACHMENT 3 FEC

87 AUG 18 08:53

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1 NAME OF COMMITTEE (in full)
Combustion Engineering, Inc.
Political Action Committee (COMPAC)
ADDRESS (number and street) ☐ Check if different than previously reported
900 Long Ridge Road
CITY, STATE and ZIP CODE
Stamford, CT 06904

2 FEC IDENTIFICATION NUMBER

C00041947

3 ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☒ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On

☐ February 20	☐ June 20	☐ October 20
☐ March 20	☐ July 20	☐ November 20
☐ April 20	☐ August 20	☐ December 20
☐ May 20	☐ September 20	☐ January 31

☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____
in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

5 Covering Period 01/01/87 through 06/30/87

6 (a) Cash on Hand January 1, 19 87

(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 and/or Schedule D)

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

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

\$ 18,566.37

\$ 18,566.37

\$ 11,711.71 \$ 11,711.71

\$ 30,278.08 \$ 30,278.08

\$ 12,850.00 \$ 12,850.00

\$ 17,428.08 \$ 17,428.08

\$ -0-

\$ -0-

For further information
contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800 424 9530
Local 202 376 3120

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

Type or Print Name of Treasurer

Errick V Jones

Signature of Treasurer

Errick V Jones

Date

7/31/87

NOTE Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

FEC FORM 3X

(revised 4-87)

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 18, 1987

WHO MUST FILE

ALL PARTY COMMITTEES and PACs (NON-CONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) must file a Year End Report in January.

REPORTING DATES

Semiannual. The Year End Report is due January 31, 1988, and must disclose financial activity that occurred from July 1 through December 31, 1987. Committees which have previously filed 1987 reports should only report activity from the closing date of the last report filed.

Monthly. Committees that choose to file on a monthly basis must file the Year End Report due January 31, 1988. The report must disclose financial activity from December 1 through December 31, 1987. All other monthly reports are due by the 20th of each month and cover all financial activity of the previous month.

WHAT MUST BE REPORTED

A report must disclose all receipts and disbursements that occurred during the reporting period. A newly registered political committee filing its first report should also include all amounts received and expended before the committee registered. See 11 CFR 104.3. For more detailed information on reporting instructions, consult your Campaign Guide.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details. Affix the peel-off label from the envelope to line 1 of the report. Any corrections in the information should be made directly on the label.

CHANGE IN FILING FREQUENCY

Committees that wish to change their reporting schedule (for example, from semiannual to monthly) must notify the Commission by sending a letter with the next report due under their current reporting schedule. Committees may change their filing frequency only once a year.

COMPLIANCE

Political committees are responsible for filing all reports required under the Act in a timely fashion. Committees and treasurers who file late reports, or fail to file reports, are subject to enforcement action. Illegible reports and reports submitted on non-FEC forms will not be accepted; committees filing such documents will be required to refile.

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

89040760305





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

MB-6

Errick V. Jones, Treasurer
Combustion Engineering Inc.
Political Action Committee
(COMPAC)
900 Long Ridge Road
Stamford, CT 06904

NR 8 1000

Identification Number: C00041947

Reference: 1987-1988 Election Cycle Reports

Dear Mr. Jones:

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>
Mid-Year Report (1/1/87-6/30/87)	7/31/87	8/10/87
Year End Report (7/1/87-12/31/87)	1/31/88	Not Filed

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 Anthony Raymond 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

3 9 0 34 80 7 3 6 3 0 1 3 2 0 1



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

HQ-7

March 11, 1988

Errick V. Jones, Treasurer
Combustion Engineering Inc. Political
Action Committee (COMPAC)
900 Long Ridge Road
Stanford, CT 06904

Identification Number: C00041947

Reference: Year End Report (through 12/31/87)

Dear Mr. Jones:

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 Anthony Raymond 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

8 9 0 3 4 9 3 9 P 3 4 0 2 7 5 7

COMBUSTION ENGINEERING

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

88 APR -1 AM 10: 51

ATTACHMENT 7

3 PAGES

Errick V. Jones
Director,
Trade Finance and
Foreign Exchange

March 28, 1988

Ms. Leslie Anne Kupzleb
Reports Analyst
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Kupzleb:

Attached please find the year end 1987 report for Combustion Engineering, Inc., Political Action Committee. I am sorry that it has been submitted late. As indicated in my conversation with you and earlier with Anthony Raymond, I did not realize that there were penalties for submitting a late report.

My responsibilities as Treasurer of COMPAC are recent and voluntary, and my other expanding job responsibilities precluded me from giving this matter the attention I now know it deserves. I have now made arrangements to insure that future reports are submitted on time.

Thank you for your kind consideration.

Sincerely,


Errick V. Jones

EVJ12.27

88 3 28 10 38

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

00 APR -1 AM 10:51

USE FEC MAILING LABEL

OR PRINT

1. NAME OF COMMITTEE (in full) Combustion Engineering, Inc. Political Action Committee (COMPAC) ADDRESS (number and street) ☐ Check if different than previously reported 900 Long Ridge Road CITY, STATE and ZIP CODE Stamford, Connecticut 06904		2. FEC IDENTIFICATION NUMBER C00041947
3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).		

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☒ January 31 Year End Report

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

☐ Termination Report

Monthly Report Due On:

☐ February 20	☐ June 20	☐ October 20
☐ March 20	☐ July 20	☐ November 20
☐ April 20	☐ August 20	☐ December 20
☐ May 20	☐ September 20	☐ January 31

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	July 1, 1987 through December 31, 1987		
6. (a) Cash on Hand January 1, 1987			\$ 18,566.37
(b) Cash on Hand at Beginning of Reporting Period		\$ 17,428.08	
(c) Total Receipts (from Line 18)		\$ 12,049.12	\$ 23,760.83
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 29,477.20	\$ 42,327.20
7. Total Disbursements (from Line 28)		\$ 13,721.05	\$ 26,571.05
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 15,756.15	\$ 15,756.15
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$ -0-	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$ -0-	

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

Type or Print Name of Treasurer

Errick V. Jones

Signature of Treasurer

Errick V. Jones

Date

March 21, 1988

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

FEC FORM 3X
(revised 4-87)

8803017563073199

Combustion Engineering, Inc.
610 Long Ridge Road
P.O. Box 1000
Stamford, Connecticut 06904

FIRST CLASS

Ms. Leslie A. Kupzleb
Reports Analyst
Federal Election Commission
Washington, DC 20463

RECEIVED
FEDERAL ELECTION COMMISSION
NOV 14 1987
MAIL ROOM

Fold at line over top of envelope to the right
of the return address

CERTIFIED

P 702 540 59A

MAIL

8 9 0 4 0 7 6 0 3 1 0

GENERAL ELECTION REPORT NOTICE

ATTACHMENT 8

FEDERAL ELECTION COMMISSION

PARTIES AND PACs

October 3, 1988

I. ALL MONTHLY FILERS

Report	Reporting Period	Reg./Cert. Mailing Date*	Filing Date
Pre-General	10/01/88**-10/19/88	10/24/88	10/27/88
Post-General	10/20/88 -11/28/88	12/08/88	12/08/88

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 19***

Report	Reporting period	Reg./Cert. Mailing Date*	Filing Date
Pre-General	10/01/88**-10/19/88	10/24/88	10/27/88
Post-General	10/20/88 -11/28/88	12/08/88	12/08/88

III. QUARTERLY FILERS WHICH DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 19***

Report	Reporting Period	Reg./Cert. Mailing Date*	Filing Date
Post-General	10/01/88**-11/28/88	12/08/88	12/08/88

WHO MUST FILE

Party committees and PACs must follow the above charts in order to determine whether they must file the pre-general election report. All Party committees and PACs, regardless of financial activity, must file the post-general election report.

WHAT MUST BE REPORTED

All financial activity (not previously reported) that occurred during the reporting period.

*Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

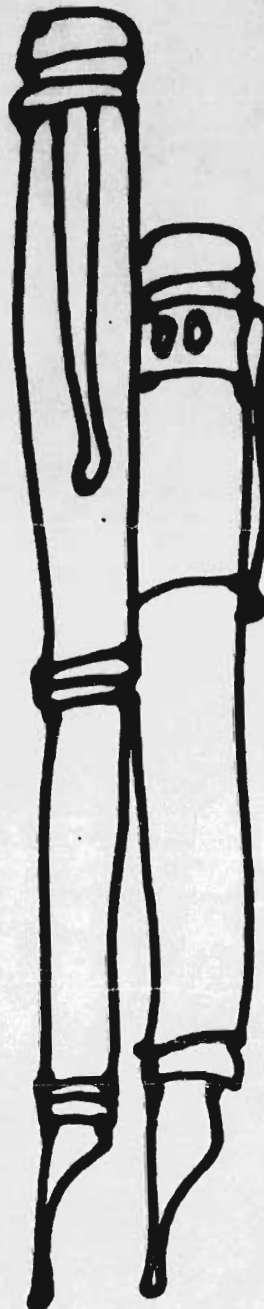
**Or from the date of registration, or the close of books of the last report filed, whichever is later.

***Committees that made general election contributions or expenditures prior to October 1 which have not been previously reported must also follow the Chart II reporting requirements.

FOR INFORMATION, Call: 202/376-3120 or 800/424-9530

(over)

89040760311



REPORTING FORMS

Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE

Consult the instructions on the back of the Form 3X Summary Page.
Note State filing requirements also.

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

LAST-MINUTE INDEPENDENT EXPENDITURES

Any PAC which makes any independent expenditures aggregating \$1,000 or more during the period beginning October 20 and ending November 6 must report them within 24 hours. Call the FEC for more information.

COMPLIANCE

TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

89040760312



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

January 6, 1980

Errick V. Jones, Treasurer
Combustion Engineering, Inc.
Political Action Committee
(COMPAC)
900 Long Ridge Road
Stamford, CT 06904

Identification Number: C9C041947

Reference: 30 Day Post-General Report (through 11/28/79)

Dear Mr. Jones:

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 Margo Herbert 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

839903450734938

TELECON:

ANALYST: Margo Herbert

CONTACT: Errick Jones, treasurer

COMMITTEE: Combustion Engineering Inc. Political Action Committee

DATE: 1/31/89

SUBJECT: Failure to file a 30 Day Post General Report

I spoke with Errick Jones, treasurer of the Combustion Engineering Inc. Political Action Committee. He said that he would be sending the 30 Day Post General and 1988 Year End Report by Federal Express and that the Commission should expect to receive them by the next day, February 1, 1989.

REPORT OF RECEIPTS AND DISBURSEMENTS AND DELIVERED

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

09 FEB -1 PM 1:59

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
Combustion Engineering, Inc.
Political Action Committee (COMPAC)

ADDRESS (number and street) ☐ Check if different than previously reported
900 Long Ridge Road

CITY, STATE and ZIP CODE
Stamford, CT 06904

2. FEC IDENTIFICATION NUMBER
C 00041947

3. ☐ This committee qualified as a multi-candidate committee DURING THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)

Monthly Report Due On

☐ February 20	☐ June 20	☐ October 20
☐ March 20	☐ July 20	☐ November 20
☐ April 20	☐ August 20	☐ December 20
☐ May 20	☐ September 20	☐ January 31

☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____

☒ Thirtieth day report following the General Election on
11/6/88 in the State of CT

☐ Termination Report

(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	10/20/88 through 11/28/88		
6. (a) Cash on Hand January 1, 1988			\$ 15,765.15
(b) Cash on Hand at Beginning of Reporting Period		\$ 9,785.61	
(c) Total Receipts (from Line 18)		\$ 3,771.48	\$ 32,986.94
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 13,557.09	\$ 48,752.09
7. Total Disbursements (from Line 28)		\$ (452.00)	\$ 34,743.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 14,009.09	\$ 14,009.09
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$	For further information contact: Federal Election Commission 990 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202 376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/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.

Type or Print Name of Treasurer

Eric V. Jones

Signature of Treasurer

Eric V. Jones

Date

1/31/89

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

FEC FORM 3X
(revised 4-87)

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

RECEIVED
FEDERAL ELECTION COMMISSION
89 APR 17 PM 2:39

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD Referral #89NF-45
Staff Member Sandra J. Dunham

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Combustion Engineering Inc. Political Action Committee (COMPAC) and Errick V. Jones, as treasurer

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

INTERNAL REPORTS CHECKED: Documents on C Index

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred Combustion Engineering Inc. Political Action Committee (COMPAC) (the "Committee") and Errick V. Jones, as treasurer, to the Office of the General Counsel on March 16, 1989. The Committee was referred as a chronic late filer for the late filing of the 1987 Mid-Year Report, the 1987 Year End Report and the 1988 Post-General Election Report. (Attachment 1).

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended (the "Act"), provides that all political committees which are not the authorized committees of a candidate and which choose to file quarterly, must file a post-general election report no later than the 30th day after the general election which shall be complete

89040760316

as of the 20th day after such general election. 2 U.S.C. § 434(a)(4)(A)(iii). The Committee filed its 1988 Post-General Election Report on February 1, 1989, 55 days late.

The Act also provides that all political committees which are not the authorized committees of a candidate and which choose to file quarterly, must file a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31, and a report covering the period beginning July 1 and ending December 31, which shall be filed no later than January 31, in all calendar years in which a general election is not held. 2 U.S.C. § 434(a)(4)(A)(iv). The Committee filed its 1987 Mid-year Report on August 10, 1987, 10 days late and filed its 1987 Year End Report on March 29, 1988, 58 days late.

Therefore, the Office of the General Counsel recommends that the Commission open a MUR and find reason to believe that the Combustion Engineering Inc. Political Action Committee (COMPAC) and Errick V. Jones, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

89040760317

89040760318

89040760319

IV. RECOMMENDATIONS

1. Open a MUR.

2. Find reason to believe Combustion Engineering Inc. Political Action Committee (COMPAC) and Errick V. Jones, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached letter, Factual and Legal Analysis, and proposed conciliation agreement.

Lawrence M. Noble
General Counsel

April 17, 1989
Date

BY:

George F. Rishel
George F. Rishel, Acting
Associate General Counsel

Attachments

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

89040760320

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Combustion Engineering Inc. Political
Action Committee (COMPAC) and Errick V.
Jones, as treasurer

RAD Ref. 89NF-45

(MUR)
2850

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on April 20,
1989, the Commission decided by a vote of 6-0 to take
the following actions in RAD Ref. 89NF-45:

1. Open a MUR.
2. Find reason to believe Combustion Engineering
Inc. Political Action Committee (COMPAC) and
Errick V. Jones, as treasurer violated
2 U.S.C. § 434(a)(4)(A)(iii) and (iv), and
enter into conciliation prior to a finding
of probable cause to believe.
3. Approve the letter, Factual and Legal Analysis,
and proposed conciliation agreement, as
recommended in the First General Counsel's
report signed April 17, 1989.

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

Attest:

April 20, 1989

Date

Hella Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Mon., 4-17-89, 2:39
Circulated on 48 hour tally basis: Tues., 4-18-89, 11:00
Deadline for vote: Thurs., 4-20-89, 11:00

89040760321



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 25, 1989

Errick V. Jones, Treasurer
Combustion Engineering Inc.
Political Action Committee (COMPAC)
900 Long Ridge Road
Stamford, Connecticut 06904

RE: MUR 2850
Combustion Engineering Inc.
Political Action Committee
(COMPAC) and Errick V. Jones,
as treasurer

Dear Mr. Jones:

On April 20, 1989, the Federal Election Commission found that there is reason to believe Combustion Engineering Inc. Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv), provisions 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 the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

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

In order to expedite the resolution of this matter, the Commission has also decided to offer 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.

89040760322

Errick V. Jones
Page 2

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, 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.

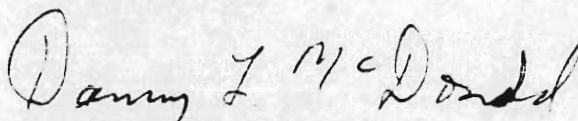
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the 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 J. Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Danny L. McDonald
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

39040760323

May 4, 1989

Laurence M. Noble, Esq.
General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR 2850 - Combustion Engineering, Inc.
Political Action Committee (COMPAC)
and Errick V. Jones, as Treasurer

Dear Mr. Noble:

This refers to a letter from the Chairman of the Commission to Errick V. Jones, dated April 25, 1989, relating to the filing of periodic reports by our separate segregated fund, COMPAC.

As counsel to COMPAC, I wish to take this opportunity to bring to your attention information which I believe constitutes mitigating circumstances. COMPAC has been in existence since 1976 and during that substantial period of more than twelve years, COMPAC has made prompt periodic reports (other than the 3 reports in question). This lengthy record evidences a conscientious effort and intent on the part of C-E and COMPAC to comply with the reporting requirements. There have been no previous charges of reporting violations by COMPAC. It has been, and is, the policy of Combustion Engineering to comply with the election laws at all levels of government. I attach a copy of our current written policy on this subject.

Mr. Jones assumed the position of Treasurer of COMPAC in 1987, and two of the filings in question relate to that year. He, in fact, has during his term as Treasurer filed most of the required reports on time, including four quarterly reports for 1988, an election year. Mr. Jones responded promptly by telephone to Mr. John Gibson's letter of January 6, 1989 regarding the 1988 post-general election report and asked whether it would be acceptable to file it with the 1988 year-end report, which was filed within the filing deadline. Mr. Jones was under the impression that this would be acceptable.

89 MAY -9 AM 11:29
FEDERAL ELECTION COMMISSION
RECEIVED

89040760324

8 9 0 4 0 7 6 0 3 2 5

More significantly, Combustion Engineering underwent a very significant downsizing during the period in question due to a serious erosion of its markets. All of this is public knowledge. Due to this downsizing, Mr. Jones, as well as our other executives, was required to assume considerable additional responsibilities beyond what normally would be expected. I believe these extenuating circumstances account for the inability of Mr. Jones to meet three filing deadlines. Mr. Jones and I would be pleased to meet with you to discuss this temporary situation in more detail.

I am convinced that we have made the necessary arrangements to comply with the Commission's filing deadlines in the future. One indication of this fact is that COMPAC made timely filings of all four quarterly reports in 1988. More specifically, a retired CPA has been engaged to prepare all future COMPAC reports under Mr. Jones' supervision. As you know, two or more days are required to complete and check each report. This individual has experience with these reports and I am certain that this change will cure the problem.

I hope that the above explanation is sufficient for you to close your file on this matter. If not, we would appreciate the opportunity to meet with you before a final decision is made to proceed further with this matter.

Sincerely,

William E. Kott

POLITICAL ACTIVITIES

STATEMENT: 3C

Page 1 of 3

Effective:

3/14/88

PURPOSE

The purpose of this statement is to set forth Company policy relating to political activity and political contributions and expenditures by, or on behalf of, the Company and its employees in the United States and in foreign countries.

SCOPE

This statement applies to Combustion Engineering, its domestic and foreign subsidiaries, and all of its and their directors, officers and employees.

REQUIREMENTS

Political Contributions and Election Campaign Activities

Contributions and expenditures by the Company and use of its facilities and personnel in connection with the election of candidates to political offices are regulated by federal, state and foreign laws. It is the policy of the Company to adhere strictly to such laws.

Except as below provided, no employee shall cause the Company or any business entity owned or controlled by the Company to contribute directly or indirectly any money, property, facilities or services of the Company to any candidate for any federal or foreign political office, or where prohibited for state or local political office, or to any committee for such a candidate, or to any political action committee (e.g., separate segregated fund) or to any other political committee in connection with the election of such a candidate.

- A. The Company may pay expenses in connection with establishing, administering and soliciting contributions from eligible Company employees to the Company's separate segregated fund, the Combustion Engineering Political Action Committee (COMPAC), but may not contribute to the fund itself.
- B. The Company may communicate directly to its stockholders and executive and administrative employees and their families on any subject,

8 9 0 4 0 7 6 0 3 2 6

partisan or non-partisan, in connection with a federal election, and may communicate with all of its employees on a non-partisan basis subject to certain limitations, but only after review by the Vice President-Corporate and Investor Relations and Vice President-Human Resources and Administrative Services.

- C. Employees may engage in occasional, isolated and incidental voluntary campaign activities on behalf of a candidate off Company premises during regular business hours, or if on Company premises whether or not during regular business hours, but only after obtaining approval of the Business Unit head and upon prior consultation with the Legal Department.

Employees are encouraged to engage in election campaign activities on their own time, off Company premises. However, none of the above activities may be carried out in the name, or on behalf of the Company.

- D. The Company or any business entity owned or controlled by the Company may contribute to a candidate for state or local or foreign political office, but only if such activity is determined to be lawful and if prior approval thereof is given according to the following procedure: upon the recommendation of a Business Unit and after review by the Legal Department, the Vice President-Government Affairs will review and forward the request to the appropriate Executive Vice-President for final approval and maintain such records and make such filings as are required by law.

Other Political Activities

The Company may participate in promotional and informational activities in connection with matters for which voters decide propositions and other issues which may significantly affect the business of the Company, but only upon approval of the appropriate Corporate or Executive Vice President in consultation with the Vice President-Government Affairs and the Vice President-Corporate and Investor Relations.

89040760327

POLITICAL ACTIVITY POLICY

Statement: 3C
Page 3 of 3

The Company and its employees may present to legislators, regulators and government executives views with respect to legislation, regulations or executive decisions. All such activities should be carried out in consultation with the Vice President-Government Affairs.

RESPONSIBILITY The responsibility for the maintenance and revision of this policy rests with the Vice President-Corporate and Investor Relations and the Vice President and General Counsel. Questions on interpretation of this policy should be referred to the Vice President-Government Affairs or the Vice President and General Counsel. The Vice President-Government Affairs in consultation with the Vice President and General Counsel and the Vice President-Corporate and Investor Relations is authorized to form committees and develop and implement programs within the Company to carry out the purposes of this Policy.

89040760328

GCC 3141

RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

89 JUN 19 AM 9:24

COMBUSTION ENGINEERING

William E. Huth
Assistant Secretary and
Assistant General Counsel

June 15, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 JUN 20 PM 4:02

Sandra Dunham, Esq.
Office of General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR 2850

Dear Ms. Dunham:

Enclosed, as we discussed, is the original copy of the Conciliation Agreement and a check in the amount of \$1,200, together with Designation of Counsel form. Please sign and date the second copy of the Conciliation Agreement on behalf of the Commission and return it to me for my records.

Sincerely yours,

William E. Huth

/mww

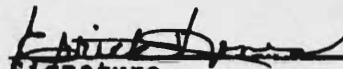
89040760329

STATEMENT OF DESIGNATION OF COUNSEL

NR 2850

NAME OF COUNSEL: William E. HuthADDRESS: Combustion Engineering, Inc.900 Long Ridge RoadStamford, CT 06902TELEPHONE: 203-328-2304

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.

May 26, 1989
Date
SignatureRESPONDENT'S NAME: Errick V. Jones and
ADDRESS: Combustion Engineering, Inc. Political Action Committee
(COMPAC)900 Long Ridge RoadStamford, CT 06902

HOME PHONE: _____

BUSINESS PHONE: 203-328-7796

89040760330

89 JUL 19 PM 5:06

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Combustion Engineering, Inc.) MUR 2850
Political Action Committee)
(COMPAC) and Errick V. Jones,)
as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by William E. Huth, the Assistant General Counsel of the Combustion Engineering, Inc. Political Action Committee (COMPAC). A check for the civil penalty has been received.

II. RECOMMENDATIONS

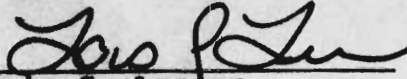
1. Accept the attached conciliation agreement with Combustion Engineering, Inc. Political Action Committee (COMPAC) and Errick V. Jones, as treasurer.

89040760331

2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

7/19/89
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

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

Staff Assigned: Sandra J. Dunham

89040760332

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Combustion Engineering, Inc.) MUR 2850
Political Action Committee)
(COMPAC) and Errick V. Jones,)
as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 24, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 2850:

1. Accept the conciliation agreement with Combustion Engineering, Inc. Political Action Committee (COMPAC) and Errick V. Jones, as treasurer, as recommended in the General Counsel's report dated July 19, 1989.
2. Close the file.
3. Approve the letter attached to the General Counsel's report dated July 19, 1989.

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

Attest:

7-24-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the FEC Secretariat at 5:06 on July 19, 1989.
Circulated to the Commission at 11:00 a.m. on July 20, 1989.
Deadline for vote: 11:00 a.m. on July 24, 1989.

mwe

89040760333



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 28, 1989

William E. Huth, Assistant General Counsel
Combustion Engineering, Inc.
900 Long Ridge Road
Stamford, Connecticut 06904

RE: MUR 2850
Combustion Engineering, Inc.
Political Action Committee
(COMPAC) and Errick V.
Jones, as treasurer

Dear Mr. Huth:

On July 24, 1989, 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)(A)(iii) and (iv), 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 Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

89040760334

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Combustion Engineering Inc.) MUR 2850
Political Action Committee (COMPAC))
and Errick V. Jones, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Combustion Engineering Inc. (COMPAC) and Errick V. Jones, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv).

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. Combustion Engineering Inc. Political Action Committee (COMPAC) is a political committee within the meaning of 2 U.S.C. § 431(4).

89040760335

2. Errick V. Jones is the treasurer of Combustion Engineering Inc. Political Action Committee (COMPAC).

3. Respondents failed to file three (3) reports of receipts and disbursements in a timely manner.

4. The reports were filed between 10 and 58 days late as follows:

<u>REPORT</u>	<u>DATE DUE</u>	<u>DATE FILED</u>	<u>DAYS LATE</u>
1987 Mid-Year	7/31/87	8/10/87	10
1987 Year End	1/31/88	3/29/88	58
1988 Post-General	12/8/88	2/1/89	55

5. The 1987 Mid-Year Report disclosed \$11,711 in receipts and \$12,850 in disbursements; the 1987 Year End Report disclosed \$12,049 in receipts and \$13,721 in disbursements; and the 1988 Post-General Election Report disclosed \$3,771 in receipts and \$452 in disbursements.

V. Respondents failed to timely file reports in violation of 2 U.S.C. § 434(a)(4)(A)(iii) and (iv). Respondents contend that it is not a knowing and willful violation.

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of One Thousand Two Hundred dollars (\$1,200.00), 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.

89040760336

-3-

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 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
General Counsel

BY:

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

Date

July 28, 1989

FOR THE RESPONDENTS:

(Name)

William E. Huth
William E. Huth
(Position) Assistant Secretary
and Assistant General Counsel

Date

May 26, 1989

89040760337



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2850

DATE FILMED 8/16/89 CAMERA NO. 2

CAMERAMAN AS

89040760338