



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2854

DATE FILMED 12/27/89 CAMERA NO. 4

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REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: March 17, 1989

ANALYST: Margo Herbert

I. COMMITTEE: National Federation of Federal Employees
Public Affairs Council
(C00098855)
Marie Odile Winslow, Treasurer
(November 15, 1988-present)
Stephanie Boteler, Treasurer
(March 5, 1986-November 14, 1988)
1016 16th Street, NW
Washington, DC 20036

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

III. BACKGROUND:

Chronic Late Filing of Reports and Failure to File the 12 Day Pre-General Report by Election Day

The National Federation of Federal Employees Public Affairs Council ("the Council") failed to file three (3) Reports of Receipts and Disbursements in a timely manner for the 1987-1988 election cycle (see Chart). The reports were filed between eleven (11) and forty-two (42) calendar days late. In addition, one of the late filings, the 1988 12 Day Pre-General Report, was not filed by Election Day, November 8, 1988.

On May 18, 1988 a Chronic Late Filing Notice was sent to the Council for failing to file the 1987 Year End and 1988 April Quarterly Reports in a timely manner (Attachment 6). The Notice advised the Council that any additional late filing of reports may result in legal enforcement action. On October 3, 1988, the Council was notified that all committees making contributions or expenditures in connection with the general election during the period ending October 19, 1988 must file a pre-election report by October 27, 1988 if such activity has not previously been disclosed (Attachment 8).

Subsequent to the sending of the Chronic Late Filing Notice, the Council filed the 1988 12 Day Pre-General Report

890407/4392

**NATIONAL FEDERATION OF FEDERAL
EMPLOYEES PUBLIC AFFAIRS COUNCIL
REPORTS ANALYSIS OGC REFERRAL
PAGE 2**

late (Attachment 9). The report disclosed \$4,700 in contributions to twelve (12) federal candidates on October 11, 1988 indicating that a 12 Day Pre-General Report should have been filed by October 27, 1988.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

89040774395

LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1987 Year End ^{1/} (7/1/87-12/31/87)	12/18/87 (Attachment 2)	1/31/88	N/A	2/11/88 (Attachment 3)
1988 April Quarterly (1/1/88-3/31/88)	3/22/88 (Attachment 4)	4/15/88	5/6/88 (Attachment 5)	5/19/88 (Attachment 7)
1988 12 Day Pre-General (10/1/88-10/19/88)	10/3/88 (Attachment 8)	10/27/88	N/A	12/8/88 (Attachment 9)

^{1/} The Council filed two (2) quarterly reports in lieu of a semiannual report.

FEDERAL ELECTION COMMISSION
1987-1988

Attachment #1

DATE 13MAR89

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	# OF MICROFILM	
				COVERAGE DATES	PAGES LOCATION TYPE OF FILER
NATIONAL FEDERATION OF FEDERAL EMPLOYEES PUBLIC AFFAIRS COUNCIL				ID #C00098855 NON-PARTY QUALIFIED	
CONNECTED ORGANIZATION: FEDERAL EMPLOYEES; NAT'L FEDERATION OF					
1987	APRIL QUARTERLY	4,140	3,303	1JAN87 -31MAR87	4 87FEC/465/1354
	JULY QUARTERLY	3,110	3,712	1APR87 -30JUN87	6 87FEC/480/4404
	OCTOBER QUARTERLY	8,316	1,448	1JUL87 -30SEP87	5 87FEC/492/0515
	YEAR-END	7,589	6,628	1OCT87 -31DEC87	6 88FEC/509/0347
1988	MISCELLANEOUS NOTICE FROM FEC			18MAY88	1 88FEC/525/3678
	STATEMENT OF ORGANIZATION - AMENDMENT			18NOV88	2 88FEC/565/2845
	APRIL QUARTERLY	6,009	13,838	1JAN88 -31MAR88	7 88FEC/525/3860
	APRIL QUARTERLY - AMENDMENT	7,764	13,838	1JAN88 -31MAR88	7 88FEC/568/2538
	NOTICE OF FAILURE TO FILE			1JAN88 -31MAR88	1 88FEC/524/4934
	JULY QUARTERLY	4,203	5,900	1APR88 -30JUN88	5 88FEC/535/0419
	JULY QUARTERLY - AMENDMENT	3,735	5,900	1APR88 -30JUN88	5 88FEC/568/2546
	OCTOBER QUARTERLY	7,270	8,222	1JUL88 -30SEP88	7 88FEC/555/5471
	OCTOBER QUARTERLY - AMENDMENT	4,028	8,157	1JUL88 -30SEP88	6 88FEC/568/2552
	PRE-GENERAL	4,339	7,015	1OCT88 -19OCT88	5 88FEC/568/2559
	POST-GENERAL	172	1,050	20OCT88 -24NOV88	4 88FEC/568/2565
	YEAR-END	19	25	25NOV88 -31DEC88	5 89FEC/582/4387
	TOTAL	43,212	0 51,076	0	76 TOTAL PAGES

9304071-395

All reports have been reviewed.
Ending cash-on-hand as of 12/31/88: \$ 4054.85
Outstanding debts owed by the committee as of
12/31/88: \$ 0.

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



870907/1395

FEDERAL ELECTION COMMISSION

08 FEB 11 AM 11:20

1. NAME OF COMMITTEE
 National Federation of Independent Business

2. FEDERAL IDENTIFICATION NUMBER
 13-16 - 2624 Street, NW
 Washington, D.C. 20004

3. FED IDENTIFICATION NUMBER
 00000055

This committee qualified as a noncandidate committee during Web Reporting Period

4. TYPE OF REPORT

- April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Plan-election Year Only)
- Termination Report

Monthly Report Due On:

- February 20
- March 20
- April 20
- May 20
- June 20
- July 20
- August 20
- September 20
- October 20
- November 20
- December 20
- January 21

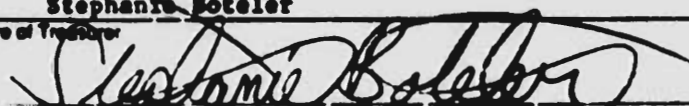
- Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? YES NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Covering Period	10-1-87 through 12-31-87		
(a) Cash on Hand January 1, 1987			\$ 8,858.58
(b) Cash on Hand at Beginning of Reporting Period		\$ 15,961.50	
(c) Total Receipts (from Line 10)		\$ 7,589.48	\$ 23,156.75
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 23,550.98	\$ 37,015.33
7. Total Disbursements (from Line 20)		\$ 6,628.00	\$ 15,092.35
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 16,922.98	\$ 16,922.98
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 900 E Street, NW Washington, DC 20463 Toll Free 800-424-9630 Local 202-378-3120
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
Stephanie Boteler

Signature of Treasurer


Date
 2-10-88

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)

96035090347

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 22, 1988

REPORT	REPORTING PERIOD	REG./CERT.	FILING
		MAILING DATE*	DATE
April Quarterly	01/01/88**-03/31/88	04/15/88	04/15/88

WHO MUST FILE

PARTY COMMITTEES AND PACS (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) filing on a quarterly basis must file their next report in April.

WHAT MUST BE REPORTED

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

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.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with a candidate's primary election, must also file a 12-day Pre-Election Report if the activity was not previously reported. See the January Record.

LAST-MINUTE INDEPENDENT EXPENDITURES

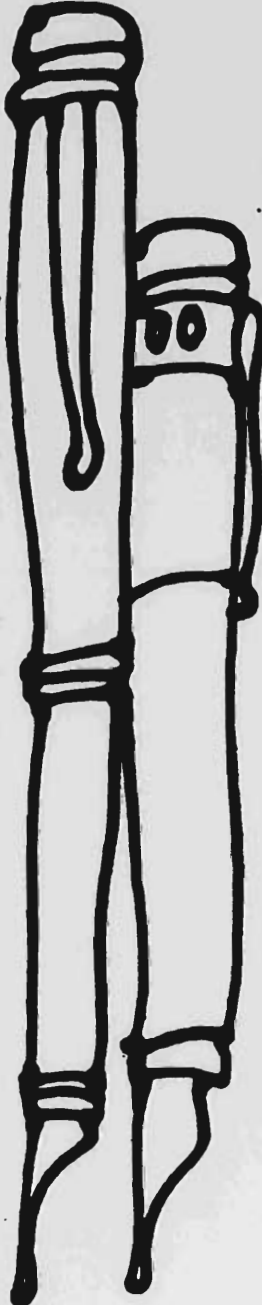
Committees which make an independent expenditure of \$1,000 or more, after the 20th day, but more than 24 hours before an election, must report it within 24 hours.

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.

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

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



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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

FD-7

May 6, 1968

Stephanie Boteler, Treasurer
National Federation of Federal
Employees Public Affairs Council
1016 16th Street, NW
Washington, DC 20036

Identification Number: C00090033

Reference: April Quarterly Report (1/1/68-1/31/68)

Dear Ms. Boteler:

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

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

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

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

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

MS-2

NOV 18 1988

Stephanie Boteler, Treasurer
National Federation of Federal
Employees Public Affairs Council
1016 - 16th Street, NW
Washington, DC 20036

Identification Number: C00098855

Reference: 1987-1988 Election Cycle Reports

Dear Ms. Boteler:

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>
1987 Year End (7/1/87-12/31/87)	01/31/88	02/11/88
1988 April Quarterly (1/1/88-3/31/88)	04/15/88	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 Alva Smith 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

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HAND DELIVERED

Attachment 17

THE PUBLIC AFFAIRS COUNCIL

1016 16th Street, Northwest
FEDERAL ELECTION COMMISSION
RECORDS SECTION



88 MAY 19 AM 9:29

Washington, D.C. 20036

NATIONAL FEDERATION OF FEDERAL EMPLOYEES

May 18, 1988

Mr. John Gibson
Assistant Staff Director
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: ID# C00098855

Dear Mr. Gibson:

Enclosed is our April Quarterly Report. I sincerely apologize for the untimely submission of this report and promise it will never happen again. We are very short staffed here at NFFE and I was never able to complete it and then I just simply forgot about it. Being Treasurer of the NFFE Public Affairs Council is not my main responsibility here at NFFE, but I have marked my calendar through the end of the year to remind me.

I hope you will accept my apology.

Sincerely,
Stephanie Boteler

Stephanie Boteler
Treasurer, NFFE
Public Affairs Council

JUN 15 1988

88033273881

RECEIVED
 FEDERAL ELECTION COMMISSION
 REPORTS ANALYSIS SECTION

08 MAY 19 AM 9:30

USE FEC NUMBER LINE
 OR
 TYPE OR PRINT

Public Affairs Council of the National Federation of Federal Employees

ADDRESS (number and street) Check if different than previously reported
 1016 - 16th Street, NW

CITY, STATE and ZIP CODE
 Washington, D.C. 20036

FEC IDENTIFICATION NUMBER
 C9998855

This committee qualified as a multicandidate committee DURING THIS Reporting Period

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 <u>1-1-88</u> through <u>3-31-88</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>		\$ 16,922.98
(b) Cash on Hand at Beginning of Reporting Period	\$ 16,922.98	
(c) Total Receipts (from Line 18)	\$ 6,009.89	\$ 6,009.89
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 22,932.87	\$ 22,932.87
7. Total Disbursements (from Line 28)	\$ 13,838.00	\$ 13,838.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 9,094.87	\$ 9,094.87
9. Debts and Obligations Owed TO the Committee (Remove 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 (Remove 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
Stephanie Boteler
 Signature of Treasurer: *Stephanie Boteler*

Date
 5 15 88

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 6437g

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REPORT NOTICE

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.

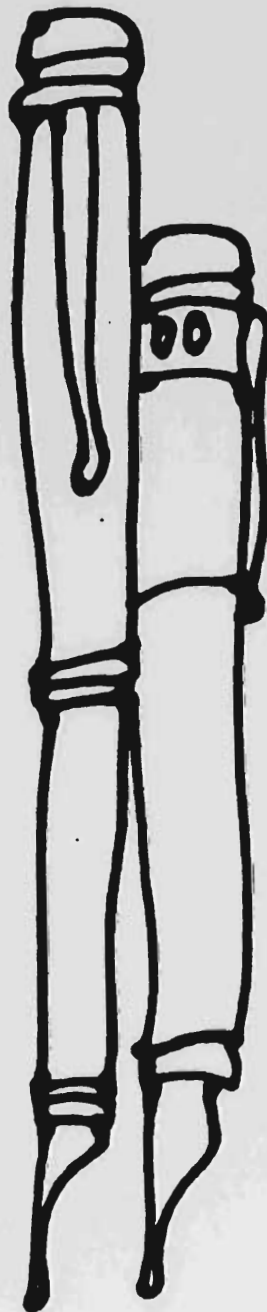
*Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

**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)



207407/1400

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.

8 2 0 4 0 7 / 6 4 0 4

08 DEC -8 14:08:08

USE FEC MAILING LABEL OR TYPE OR PRINT

1. Name of Committee Public Affairs Committee of The National Federation of Federal Employees		2. FEC IDENTIFICATION NUMBER C00098855
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 1016 - 16th Street, N.W.		
CITY, STATE and ZIP CODE Washington, D.C. 20036		

4. TYPE OF REPORT

Pre-General

- (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 <u>10-1-88</u> through <u>10-19-88</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>		\$ 19,983.67
(b) Cash on Hand at Beginning of Reporting Period	\$ 7,616.06	
(c) Total Receipts (from Line 18)	\$ 4,339.40	\$ 19,866.79
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 11,955.46	\$ 39,850.46
7. Total Disbursements (from Line 28)	\$ 7,015.95	\$ 34,910.95
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 4,939.51	\$ 4,939.51
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and or Schedule D)	\$ -0-	
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
 Marie Odile Winslow

Signature of Treasurer

Marie Odile Winslow

Date

12-7-88

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §477g

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DETAILED SUMMARY PAGE
of Receipts and Disbursements
 For 1988

Name of Committee (in full) Public Affairs Committee of the National Federation of Federal Employees	Report Covering the Period From 10-1-88 To 10-19-88	
	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
I. RECEIPTS		
11 CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	-0-	1,460.00
(ii) Unitemized	4,339.40	18,018.78
(iii) Total of contributions from individuals	4,339.40	19,478.78
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees (such as PACs)	-0-	-0-
(d) TOTAL CONTRIBUTIONS (add 11(a)(i), (b), and (c))	4,339.40	19,478.78
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-
13 ALL LOANS RECEIVED	-0-	-0-
14 LOAN REPAYMENTS RECEIVED	-0-	-0-
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-
17 OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	388.01
18 TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	4,339.40	19,866.79
II. DISBURSEMENTS		
19 OPERATING EXPENDITURES	2,315.95	12,190.95
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	4,700.00	22,720.00
22 INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	-0-	-0-
24 LOAN REPAYMENTS MADE	-0-	-0-
25 LOANS MADE	-0-	-0-
26 REFUNDS OF CONTRIBUTIONS TO		
a) Individuals/Persons Other Than Political Committees	-0-	-0-
b) Political Party Committees	-0-	-0-
c) Other Political Committees (such as PACs)	-0-	-0-
d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	-0-	-0-
27 OTHER DISBURSEMENTS	-0-	-0-
28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d), and 27)	7,015.95	34,910.95
III. NET CONTRIBUTIONS OPERATING EXPENDITURES		
29 TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	4,339.40	19,478.78
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	-0-	-0-
31 NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	4,339.40	19,478.78
32 TOTAL OPERATING EXPENDITURES (from Line 19)	2,315.95	12,190.95
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)	-0-	-0-
34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)	2,315.95	12,190.95

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page

PAGE **1** OF **2**
FOR LINE NUMBER

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

NAME OF COMMITTEE (in Full)

Public Affairs Council of the National Federation of Federal Employees

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Topco Personalized Products 2531 N. Dirksen Pkwy. Springfield, IL 62702	Operating Costs Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-11-88	\$2,315.95
B. Full Name, Mailing Address and ZIP Code Alan Wehat for Congress P.O. Box 76611 Washington, D.C. 20013-6611	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) (D-MO)	10-11-88	300.00
C. Full Name, Mailing Address and ZIP Code Hoyer for Congress Committee P.O. Box 2884 Washington, D.C. 20013	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) (D-MD)	10-11-88	350.00
D. Full Name, Mailing Address and ZIP Code Friends of Rep. Sikorski 410 New Jersey Ave., SE Washington, D.C. 20003	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) (D-MN)	10-11-88	500.00
E. Full Name, Mailing Address and ZIP Code Pat Williams Campaign Comm. 6719-K Victoria Drive Alexandria, VA 22310	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) (D-MT)	10-11-88	500.00
F. Full Name, Mailing Address and ZIP Code Burdick Campaign Committee P.O. Box 75162 Washington, D.C. 20013-5162	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) (D-ND)	10-11-88	250.00
G. Full Name, Mailing Address and ZIP Code Bonior for Congress 106 Eighth Street, NE Washington, D.C. 20002	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) (D-NI)	10-11-88	500.00
H. Full Name, Mailing Address and ZIP Code Nagle '88 Committee P.O. Box 2884 Washington, D.C. 20013	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) (D-IA)	10-11-88	250.00
I. Full Name, Mailing Address and ZIP Code Liaisons for Stallings P.O. Box 2884 Washington, D.C. 20013 Richard Stallings	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) (D-ID)	10-11-88	300.00

SUBTOTAL: \$10,000.00

TOTAL: \$10,000.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Classified Summary Page

PAGE 2 OF 2
FOR LINE NUMBER 21

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

NAME OF COMMITTEE (in Full)

Public Affairs Council of the National Federation of Federal Employees

20080512 533

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Reese Lindquist for Congress 10742 5th Ave., NE Seattle, WA 98125	Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General (D-WA) <input type="checkbox"/> Other (specify)	10-11-88	\$250.00
B. Full Name, Mailing Address and ZIP Code Committee to Re-Elect Wm. Ford 1656 Penobscot Bldg. Detroit, MI 48226	Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General (D-MI) <input type="checkbox"/> Other (specify)	10-11-88	250.00
C. Full Name, Mailing Address and ZIP Code John Bryant Campaign 1631 Woodstock Street, N. Arlington, VA 22207	Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General (D-TX) <input type="checkbox"/> Other (specify)	10-11-88	250.00
D. Full Name, Mailing Address and ZIP Code Frank Horton Committee P.O. Box 14532 Rochester, NY 14614	Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General (R-NY) <input type="checkbox"/> Other (specify)	11-18-88	1,000.00
E. Full Name, Mailing Address and ZIP Code	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL

7,015.00

FEDERAL RECEIVED

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

89 APR 25 AM 11:55

FIRST GENERAL COUNSEL'S REPORT

RAD Referral #89NF-51
Staff Member Sandra J. Dunham

SOURCE: INTERNALLY GENERATED
RESPONDENTS: National Federation of Federal Employees
Public Affairs Council and Marie Odile
Winslow, as treasurer
RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(i), (ii) and (iv)
INTERNAL REPORTS
CHECKED: Documents on C Index
FEDERAL AGENCIES
CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the National Federation of Federal Employees Public Affairs Council (the "Committee") and Marie Odile Winslow, as treasurer, to the Office of the General Counsel on March 21, 1989. The Committee was referred as a chronic late filer for the late filing of the 1987 Year End Report, the 1988 April Quarterly Report and the 1988 12 Day Pre-General Election Report.

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 the quarterly report no later than the 15th day after the last day of the calendar quarter in a calendar

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year in which a regularly scheduled general election is held.

2 U.S.C. § 434(a)(4)(A)(i). The Committee filed its 1988 April Quarterly Report on May 19, 1988, 34 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 pre-election report, which shall be filed no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election, and which shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii). The Committee filed its 1988 12 Day Pre-General Election Report on December 8, 1988, 42 days.

The Act further provides that all political committees which are not the authorized committees of a candidate and which chose to file quarterly, must file no later than January 31, a report covering the period beginning July 1 and ending December 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 Year End Report on February 11, 1988, 11 days late.

Therefore, the Office of the General Counsel recommends that the Commission open a MUR and find reason to believe that the National Federation of Federal Employees Public Affairs Council and Marie Odile Winslow, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii) and (iv).

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III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe the National Federation of Federal Employees Public Affairs Council and Marie Odile Winslow, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii) 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 24, 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

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BEFORE THE FEDERAL ELECTION COMMISSION

(MUR 2854)

In the Matter of)
)
 National Federation of Federal Employees) RAD Ref. 89NF-51
 Public Affairs Council and Marie Odile)
 Winslow, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 27, 1989, the Commission decided by a vote of 5-0 to take the following actions in RAD Ref. 89NF-51:

1. Open a MUR.
2. Find reason to believe the National Federation of Federal Employees Public Affairs Council and Marie Odile Winslow, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii) 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 24, 1989.

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

Attest:

4-27-89
 Date

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

Received in the Office of Commission Secretary:	Tues., 4-25-89,	11:56
Circulated on 48 hour tally basis:	Tues., 4-25-89,	4:00
Deadline for vote:	Thurs., 4-27-89,	4:00

990407 / 414

plm



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 2, 1989

Marie Odile Winslow, Treasurer
National Federation of
Federal Employees
Public Affairs Council
1016 16th Street, N.W.
Washington, D.C. 20036

RE: MUR 2854
National Federation of Federal
Employees Public Affairs
Council and Marie Odile
Winslow, as treasurer

Dear Ms. Winslow:

On April 27, 1989, the Federal Election Commission found that there is reason to believe National Federation of Federal Employees Public Affairs Council ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii) 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.

390407 / 4415

Marie Odile Winslow
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.

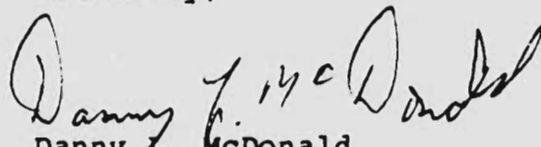
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

870407/9410

060 2724

National Federation of Federal Employees



James M. Peirce • President
Ronald W. Kipke • Secretary Treasurer

In reply refer to: _____

AMR 2854

May 9, 1989

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

Dear Ms. Dunham:

In accordance with our telephone conversation of May 8, 1989, and per your request, I have enclosed the following materials in connection with Matter Under Review 2845: (1) answer to the three charges of alleged FEC reporting violations, and (2) a copy of my letter to former FEC analyst Paul Dixon.

I am most sincerely interested in resolving this matter. As explained in my statement, two of the reporting violations occurred before I became NFFE's PAC treasurer. The third alleged violation occurred when I followed the explicit instructions of Mr. Dixon, while attempting to correct our records.

None of these violations were willful or knowing on my part, or on the part of the NFFE PAC officers. I would appreciate the opportunity to enter into pre-probable cause conciliation with the FEC.

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89 MAY 10 11 0 12
FBI - WASH DC

1016 16th Street, NW; Washington, D.C. 20036; Phone: (202) 862-4400

NFFE National Vice Presidents:

- Region 1, Georgiana Kachura, Huntington, NY
- Region 2, Robert W. Simmons, Newark, NJ
- Region 3, A. B. Reynolds, Panama City, FL
- Region 4, Vivian W. Greer, Shreveport, LA

- Region 5, Arthur R. Guarriello, Jr., Santa Fe, NM
- Region 6, James G. McDonald, Bishop, CA
- Region 7, Douglas D. Wright, Missoula, MT
- Region 8, Brenda K. Oistad, Moorhead, MN
- Region 9, Sheila Velazco, Muncie, IN

If there is any further information which you require, please do not hesitate to contact me at 862-4437. I look forward to hearing from you regarding the swift disposition of this matter.

Sincerely,

Marie Odile Winslow

Marie Odile Winslow
NFFE Pac Treasurer

Encls (2)

32040774413

STATEMENT BY MARIE ODILE WINSLOW, TREASURER, NATIONAL
FEDERATION OF FEDERAL EMPLOYEES PUBLIC AFFAIRS COUNCIL, IN
RESPONSE TO MUR 2854, ALLEGED VIOLATION OF 2 U.S.C. SEC. 434
(A) (4) (I), (II) AND (IV), PROVISION OF THE FEDERAL
ELECTION CAMPAIGN ACT OF 1971 AS AMENDED.

As Treasurer of the National Federation of Federal Employees
Public Affairs Council, I attest to the following:

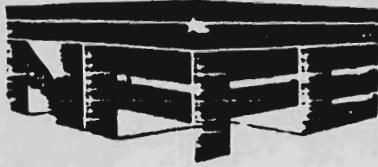
In the matter of the first charge, that NFFE filed its 1988
April Quarterly Report on May 19, 1988, 34 days late, I can
confirm that this is true. This report was filed by
Stephanie Boteler, the previous NFFE PAC Treasurer. I was
appointed PAC Treasurer on November 21, 1988.

In the matter of the second charge, that the Committee filed
its 1988 12 Day Pre-General Election Report on December 8,
1988, 42 days late, I can confirm that this was done with
the knowledge, approval, and indeed, recommendation of
former Federal Election Commission Analyst Paul Dixon.

When I first became PAC Treasurer, I became aware that there
had been a long-running reporting error. I immediately
contacted Mr. Dixon, who was at that time the analyst
assigned to the NFFE PAC. I informed Mr. Dixon that I did
not want to sign a report I knew to be incorrect and that I
could not reconstruct the NFFE accounts in time to meet the
filing date for the Pre-General Election Report. I asked
Mr. Dixon for his guidance and advice in this matter. Mr.
Dixon instructed me to reconstruct one year's finances,
amend the previous reports for 1988, and submit them along
with the Post General Election Report in time for the Post
General Election Report filing date. I did as Mr. Dixon
instructed me. (See attached letter , Appendix 1). I
followed up a few days later with a telephone call to Mr.
Dixon, who informed me that the NFFE PAC was once again in
compliance with FEC regulations.

In the matter of the third charge, that NFFE filed its 1987
Year End Report on February 11, 1988, 11 days late, I can
confirm that this statement is true. This report was also
filed by Stephanie Boteler before my tenure as NFFE PAC
Treasurer.

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James M. Peirce • President
 Ronald M. Kipke • Secretary Treasurer

In reply refer to: _____

December 7, 1988

Mr. Paul Dixon
 Reports Analysis Division
 Federal Election Commission
 999 E Street, N.W.
 Washington, D.C. 20463

Dear Mr. Dixon:

In accordance with our telephone conversations, I have enclosed for your inspection amended Federal Election Commission Forms 3X covering the first three quarters of 1988 and an amended Form 3X for the Pre-General Election reporting period. I have also enclosed the Post General Election Report due December 8, 1988.

As you suggested, I have reviewed all the records available to me once I became the Public Affairs Council Secretary, and have attempted to reconstruct the NFFE PAC finances for the past 18 months. I have discovered that there has been an underreporting of "cash-on-hand" that predates my assumption of this office, and apparently predates the tenure of my predecessor.

As a result, I have corrected this error on all of the enclosed reports. If you compare the first three quarterly reports with my amended reports, you will note that the cash-on-hand figure on the reports I have submitted is larger by \$3,060.69. To the best of my knowledge, my cash-on-hand figure of \$19,983.67 accurately reflects the 1988 beginning-year assets of the NFFE PAC. The discrepancy undoubtedly reflects deposits over the years which were never recorded.

You will also notice discrepancies between the originally submitted reports and my amended reports regarding receipts. I have carefully reviewed the bank records, and believe my figures on receipts for each quarter and the Pre- and Post General Election periods to be correct.

Finally, you will notice discrepancies for the notations on interest earned. I have provided net interest figures,

1016 16th Street, NW; Washington, DC 20036; Phone: (202) 862-4400

NFFE National Vice Presidents:

Region 1, Georgiana Kachura, Huntington, NY
 Region 2, Robert Simmons, Newark, NJ
 Region 3, A.B. Reynolds, Panama City, FL
 Region 4, Vivian Greer, Shreveport, LA

Region 5, Art Guarriello, Santa Fe, NM
 Region 6, Jim McDonald, Bishop, CA
 Region 7, Doug Wright, Missoula, MT
 Region 8, Brenda Cistad, Moorhead, MN
 Region 9, Sheila Velazco, Muncie, IN

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which are interest paid to the NFFE accounts, minus bank fees charged against the NFFE accounts. If you wish me to provide the gross interest and monthly bank fees for you files I will be happy to do so. You will, however, notice that on the Post-General report I have listed the bank charges separately from interest. I so noted these figures because the charges were greater than the interest for that period. I plan to list bank charges separately from interest charges on all future reports.

I wish to thank you for your patience and timely assistance in this matter. I am anxious to clear up all problems relating to the NFFE PAC and begin anew with stringently accurate reporting. If there is any further information you wish me to provide, please do not hesitate to contact me at 862-4437.

Sincerely,

Marie Odile Winslow

Marie Odile Winslow
Secretary Treasurer
NFFE PAC

encls. (5)

89040776421

BEFORE THE FEDERAL ELECTION COMMISSION JUN -9 AM 10:16

In the Matter of)
)
National Federation of Federal)
Employees Public Affairs Council)
and Marie Odile Winslow, as)
treasurer)

MUR 2854

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On April 27, 1989, the Federal Election Commission found reason to believe that the National Federation of Federal Employees Public Affairs Council (the "Committee") and Marie Odile Winslow, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii) and (iv) for failing to file the 1987 Year End Report, the 1988 April Quarterly Report and the 1988 12 Day Pre-General Election Report in a timely manner. By a letter dated May 9, 1989, the Committee requested pre-probable cause conciliation.

II. DISCUSSION OF CONCILIATION

890407 / 4422

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IV. RECOMMENDATIONS

1. Enter into conciliation with National Federation of Federal Employees Public Affairs Council and Marie Odile Winslow, as treasurer.

2. Approve the attached proposed conciliation agreement and letter.

Lawrence M. Noble
General Counsel

6-8-89
Date

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Request for conciliation
2. Proposed Conciliation Agreement and letter

Staff Assigned: Sandra J. Dunham

300407 / 2425

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
National Federation of Federal)	MUR 2854
Employees Public Affairs Council)	
and Marie Odile Winslow, as)	
treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 16, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 2854:

1. Enter into conciliation with National Federation of Federal Employees Public Affairs Council and Marie Odile Winslow, as treasurer, as recommended in the General Counsel's report signed June 8, 1989.
2. Approve the proposed conciliation agreement and letter, as recommended in the General Counsel's report signed June 3, 1989.

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

Attest:

June 16, 1989
Date

Hilda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Fri.,	6-9-89,	10:16
Circulated on 48 hour tally basis:	Mon.,	6-12-89,	11:00
Deadline for vote:	Fri.,	6-16-89,	4:00

990407 / 4426

NFFE PAC

1016 16th St. NW
Washington, DC 20036

National Federation of Federal Employees
Public Affairs Council

MUR 2854



November 22, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
89 NOV 30 PM 1:42

Mr. Lawrence M. Noble
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Noble,

In accordance with the terms of the Conciliation Agreement, delivered to the Federal Election Commission on November 9, 1989, I am enclosing \$1,000, the agreed upon amount for assessed civil penalties.

Please feel free to contact me or NFFE PAC Secretary-Treasurer, Mr. Julius Hall, if you have any questions or if further action is necessary. Thank you for your time and attention to this matter.

Sincerely,

James M. Peirce
Chairman, NFFE PAC
Board of Directors

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
89 NOV 24 AM 9:29

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69 NOV 30 PM 4:42

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)	
)	
National Federation of Federal)	MUR 2854
Employees Public Affairs Council)	
and Julius L. Hall, as treasurer)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Julius L. Hall, the treasurer of the National Federation of Federal Employees Public Affairs Council.

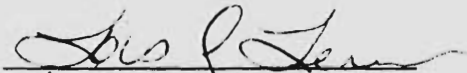
The attached agreement contains no changes from the agreement approved by the Commission on October 20, 1989. A check for the civil penalty has not been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the National Federation of Federal Employees Public Affairs Council and Julius L. Hall, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

11-30-89
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Letter to Respondent

Staff Assigned: Sandra Dunham

890407/4428

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Federation of Federal) MUR 2854
Employees Public Affairs Council)
and Julius L. Hall, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 5, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 2854:

1. Accept the conciliation agreement with the National Federation of Federal Employees Public Affairs Council and Julius L. Hall, as treasurer, as recommended in the General Counsel's Report dated November 30, 1989.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report dated November 30, 1989.

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

Attest:

12/6/89

Date

Hilda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Thurs., Nov. 30, 1989 4:42 p.m.
Circulated to the Commission: Friday, Dec. 1, 1989 12:00 p.m.
Deadline for vote: Tuesday, Dec. 5, 1989 4:00 p.m.

990407 / 4429



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 14, 1989

Beth Moten, Executive Director
National Federation of Federal
Employees Public Affairs Council
1016 16th Street, N.W.
Washington, D.C. 20036

RE: MUR 2854
National Federation of Federal
Employees Public Affairs
Council and Julius L. Hall, as
treasurer

Dear Ms. Moten:

On December 5, 1989, the Federal Election Commission accepted the signed conciliation agreement submitted on behalf of the National Federation of Federal Employees Public Affairs Council and Julius L. Hall, as treasurer, in settlement of a violation of 2 U.S.C. §§ 434(a)(4)(A)(i), (ii) and (iv), provisions 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.

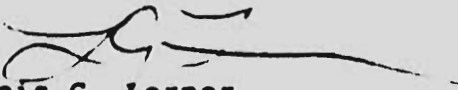
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Beth Moten
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Sandra J. 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

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RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

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In the Matter of)	
)	
National Federation of Federal)	MUR 2854
Employees Public Affairs Council)	
and Julius L. Hall, as treasurer)	

Dunham

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 National Federation of Federal Employees Public Affairs Council and its treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(1), (ii) 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)(1).

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. National Federation of Federal Employees Public Affairs Council is a political committee within the meaning of 2 U.S.C. § 431(4).

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2. Stephanie Boteler was the treasurer of the National Federation of Federal Employees Public Affairs Council from March 5, 1986 through November 14, 1988.

3. Marie Odile Winslow was the treasurer of the National Federation of Federal Employees Public Affairs Council from November 15, 1988 through July 19, 1989.

4. Julius L. Hall is the current treasurer of the National Federation of Federal Employees Public Affairs Council.

5. Section 434(a)(4)(A)(i) of Title 2 provides that unauthorized committees filing quarterly, shall file quarterly reports in a calendar year in which a regularly scheduled election is held. Quarterly reports are to be filed no later than the 15th day after the last day of each calendar quarter.

6. Section 434(a)(4)(A)(ii) of Title 2 provides that unauthorized committees filing quarterly, shall file a pre-election report, which shall be filed no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election and which shall be complete as of the 20th day before the election.

7. Section 434(a)(4)(A)(iv) of Title 2 provides that unauthorized committees filing quarterly, shall 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 of the following calendar year in

any calendar year during which a regularly scheduled general election is not held.

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

9. The reports were filed between 11 and 42 days late as follows:

<u>REPORT</u>	<u>DATE DUE</u>	<u>DATE FILED</u>	<u>DAYS LATE</u>
1987 Year End	1/31/88	2/11/88	11
1988 April Quarterly	4/15/88	5/19/88	34
1988 12 Day Pre-General	10/27/88	12/8/88	42

10. The 1987 Year End Report disclosed \$7,589 in receipts and \$6,628 in disbursements; the amended 1988 April Quarterly Report disclosed \$7,764 in receipts and \$13,838 in disbursements; and the 1988 12 Day Pre-General Report disclosed \$4,339 in receipts and \$7,015 in disbursements.

V. Respondents failed to timely file reports in violation of 2 U.S.C. § 434(a)(4)(A)(i), (ii) and (iv).

VI. Respondents contend that this was not a knowing and willful violation.

VII. Respondents will pay a civil penalty to the Federal Election Commission in the amount of One Thousand dollars (\$1,000.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any

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requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.


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

X. 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.

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

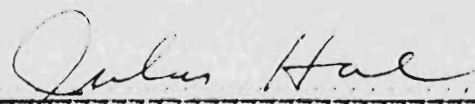
FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

.....12/11/89.....
Date

FOR THE RESPONDENTS:


(Name)
(Position) Secretary-Treasurer

.....November 8, 1989.....
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2054

DATE FILMED 12/27/89 CAMERA NO. 4

CAMERAMAN AS

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