



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

THIS IS THE BEGINNING OF MUR # 2909

DATE FILMED 8/29/89 CAMERA NO. 4

CAMERAMAN AS

99040762354



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 15, 1989

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF MONTHLY UNAUTHORIZED COMMITTEES FOR
FAILURE TO FILE THE 1988 12 DAY PRE-GENERAL REPORT
BY ELECTION DAY

Attached are referrals of thirteen (13) monthly unauthorized committees that failed to file the 1988 12 Day Pre-General Report by Election Day, November 8, 1988.

Each monthly filer was sent prior notice of the due date of the report on October 3, 1988 (Attachment 14).

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

Attachment

89040762355

C00035493: Federal Arthur Young & Company Political
Action Committee

89NF-32

89040762356

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page 1

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILER ATCH

REPORTS FILED/
RESPONSES

.....
C00035493
FEDERAL ARTHUR YOUNG & COMPANY POLITICAL ACTION COMMITTEE
TREASURER'S NAME: CARL D. LIGGIO
277 PARK AVE
NEW YORK NY 10172
.....

None

12 Day Pre-General
Report filed
11/9/88

Federal Arthur Young & Company Political Action Committee
(Attachments 4a - 4b)

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Attachment 1 (22)

8 9 0 4 0 7 6 2 3 5 9
FEDERAL ELECTION COMMISSION
1987-1988
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 08FEB89

PAGE 11

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
					TYPE OF FILER	
FEDERAL ARTHUR YOUNG & COMPANY POLITICAL ACTION COMMITTEE						
CONNECTED ORGANIZATION:	ARTHUR YOUNG & CO					
1987	STATEMENT OF ORGANIZATION - AMENDMENT			21DEC87	2	87FEC/497/0242
	FEBRUARY MONTHLY	11,763	568	1JAN87 -31JAN87	7	87FEC/461/3506
	REQUEST FOR ADDITIONAL INFORMATION			1JAN87 -31JAN87	1	87FEC/492/3299
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN87 -31JAN87	2	87FEC/495/2469
	MARCH MONTHLY	9,061	416	1FEB87 -28FEB87	6	87FEC/463/4194
	APRIL MONTHLY	68	2,073	1MAR87 -31MAR87	5	87FEC/466/1034
	MAY MONTHLY	1,533	7,552	1APR87 -30APR87	6	87FEC/468/3080
	JUNE MONTHLY	450	4,552	1MAY87 -31MAY87	6	87FEC/471/1794
	JULY MONTHLY	1,512	1,352	1JUN87 -30JUN87	6	87FEC/478/4821
	AUGUST MONTHLY	193	1,552	1JUL87 -31JUL87	6	87FEC/484/1471
	SEPTEMBER MONTHLY	1,002	3,452	1AUG87 -31AUG87	7	87FEC/486/1204
	OCTOBER MONTHLY	1,888	2,052	1SEP87 -30SEP87	8	87FEC/492/3739
	1'ST LETTER INFORMATIONAL NOTICE			1SEP87 -30SEP87	1	87FEC/493/3765
	NOVEMBER MONTHLY	2,656	1,461	1OCT87 -30OCT87	6	87FEC/495/1212
	DECEMBER MONTHLY	2,420	1,094	1NOV87 -30NOV87	6	88FEC/499/0054
	YEAR-END	37,312	18,452	1DEC87 -31DEC87	18	88FEC/507/2125
	YEAR-END - AMENDMENT	37,312	18,452	1DEC87 -31DEC87	22	88FEC/513/4144
	REQUEST FOR ADDITIONAL INFORMATION			1DEC87 -31DEC87	2	88FEC/510/3643
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1DEC87 -31DEC87	3	88FEC/513/2742
1988	FEBRUARY MONTHLY	30,375	630	1JAN88 -31JAN88	33	88FEC/510/1906
	FEBRUARY MONTHLY - AMENDMENT			1JAN88 -31JAN88	3	88FEC/515/3056
	1'ST LETTER INFORMATIONAL NOTICE			1JAN88 -31JAN88	1	88FEC/513/2874
	MARCH MONTHLY	4,334	1,902	1FEB88 -29FEB88	6	88FEC/513/3208
	MARCH MONTHLY - AMENDMENT	4,334	1,902	1FEB88 -29FEB88	8	88FEC/513/4250
	APRIL MONTHLY	5,156	4,567	1MAR88 -31MAR88	10	88FEC/523/0051
	MAY MONTHLY	4,196	6,167	1APR88 -30APR88	3	88FEC/526/3029
	MAY MONTHLY - AMENDMENT	4,196	6,167	1APR88 -30APR88	7	88FEC/529/3271
	REQUEST FOR ADDITIONAL INFORMATION			1APR88 -30APR88	1	88FEC/528/4790
	JUNE MONTHLY	6,442	6,182	1MAY88 -31MAY88	5	88FEC/529/2917
	JUNE MONTHLY - AMENDMENT	6,442	6,182	1MAY88 -31MAY88	13	88FEC/533/1957
	REQUEST FOR ADDITIONAL INFORMATION			1MAY88 -31MAY88	1	88FEC/532/0797
	JULY MONTHLY	2,981	3,652	1JUN88 -30JUN88	6	88FEC/538/2514
	AUGUST MONTHLY	5,741	852	1JUL88 -31JUL88	4	88FEC/542/5246
	AUGUST MONTHLY - AMENDMENT	5,741	852	1JUL88 -31JUL88	7	88FEC/547/3789
	REQUEST FOR ADDITIONAL INFORMATION			1JUL88 -31JUL88	1	88FEC/545/4707
	SEPTEMBER MONTHLY	4,332	4,702	1AUG88 -31AUG88	4	88FEC/546/0032
	SEPTEMBER MONTHLY - AMENDMENT	4,332	4,702	1AUG88 -31AUG88	6	88FEC/561/1876
	REQUEST FOR ADDITIONAL INFORMATION			1AUG88 -31AUG88	1	88FEC/556/2298
	OCTOBER MONTHLY	7,367	29,952	1SEP88 -30SEP88	8	88FEC/556/3405
	OCTOBER MONTHLY - AMENDMENT	7,367	29,952	1SEP88 -30SEP88	11	88FEC/565/0702
	REQUEST FOR ADDITIONAL INFORMATION			1SEP88 -30SEP88	1	88FEC/564/2960
	PRE-GENERAL	352	1,602	1OCT88 -19OCT88	4	88FEC/565/1428
	NOTICE OF FAILURE TO FILE			1OCT88 -19OCT88	1	88FEC/565/2030
	POST-GENERAL	2,910	2,452	20OCT88 -28NOV88	6	88FEC/574/2176

Attachment 1 (23)

ATTACHMENT 4a
(Page 1 of 2)

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

DATE 8FEB89

PAGE 12

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES TYPE OF FILER	MICROFILM LOCATION
	YEAR-END	1,926	52	29NOV88 -31DEC88	3	89FEC/581/0939
	TOTAL	145,970	0 107,288	0	274	TOTAL PAGES

All reports except the 1988 Year End Report have been reviewed.
Ending cash-on-hand as of 12/31/88: \$83,498
Outstanding debts owed to/by the committee as of 12/31/88: \$0

Attachment (24)

42

2124072801:0 4

RECEIVED
FEDERAL COMMISSION
FBI ROOM

ATTACHMENT 4b
(Page 1 of 2)

08 NOV 14 PM 1:24 (Pac)

ARMED AND DANGEROUS
DO NOT RESIST
YOUR RIGHTS ARE PROTECTED

1. NAME OF COMMITTEE (NAME)		08 NOV 14 PM 1:22	
FEDERAL ARTHUR YOUNG & co Political Action Com			
ADDRESS (number and street) ☐ Check if different than previously reported		2. POC IDENTIFICATION NUMBER	
277 Park Ave		C-00035492	
CITY, STATE AND ZIP CODE		3. ☐ This committee qualified as a multicandidate committee during this reporting period or	
New York, NY 10172		(none)	

(b) ☐ 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)

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

election on Nov 8, 94 in the State of _____

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

II. Government Response

☒ YES ☐ NO

SUMMARY		COLUMN A Total Period	COLUMN B Calendar Year-to-Date
6	Covering Period <u>10-01-87</u> through <u>10-19-87</u>		
6	(a) Cash on Hand January 1, 19 <u>87</u>		\$ 70,095.22
	(b) Cash on Hand at Beginning of Reporting Period	\$ 82,414.87	
	(c) Total Receipts from Line 1(b)	\$ 352.00	\$ 71,278.87
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 82,766.87	\$ 141,374.09
7	Total Disbursements from Line 2(b)	\$ 1,602.00	\$ 60,209.22
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 81,164.87	\$ 81,164.87
9	Debits and Obligations Owed TO the Commission (Reported on on Schedule C under Schedule D)	\$	
10	Debits and Obligations Owed BY the Commission (Reported on on Schedule C under Schedule D)	\$	

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

For further information
contact:
Federal Election Commission
600 E Street, NW
Washington, DC 20543
Toll Free 800-426-9833
Local 202-376-3180

Ref: 519610

Carleton

11/5/5

NOTE: Summary of laws, orders, or regulatory information may follow the portion labeling the Report as the contents of F U R C (2027)

Attachment (b5) REC FORM 5X

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4/10/11

Arthur Young
37 MAX WALKER
NEW YORK, NEW YORK 10077

Public Records Office
Federal Election Commission
999 E Street, NW
Washington, DC 20003

CERTIFIED
P 005 105 306
MAIL

Attachment 1 (26)

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RECEIVED
FEDERAL ELECTION COMMISSION

FEDERAL ELECTION COMMISSION

999 E Street, N.W.
Washington, D.C. 20463

89 JUN -9 AM 10:16

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD Referral #89NF-29
thru 89NF-41
Staff Member Ivonne Cotto

SOURCE:

I N T E R N A L L Y G E N E R A T E D

RESPONDENTS:

Federal Arthur Young & Company Political
Action Committee and Carl D. Liggio,
as treasurer (89NF-32)

89040762365

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(B)

INTERNAL REPORTS

CHECKED: Referral Materials

FEDERAL AGENCIES

CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the above thirteen (13) committees to the Office of the General Counsel on February 16, 1989. (Attachment 1). The basis for the attached referral is the committees' failure to file the 1988 12 Day Pre-General Report in a timely manner.

II. FACTUAL AND LEGAL ANALYSIS

A. Filing of Reports

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that unauthorized committees which file on a monthly basis shall file a pre-election report, which shall be filed no later than the 12th day before such election, and which should be complete as of the 20th day before the election.

2 U.S.C. § 434(a)(4)(B). The committees were notified on October 3, 1988, that the report was due on October 27, 1988.

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The committees filed the information required to be in the
1988 12 Day Pre-General Report as follows:

A. 12 Day Report filed late

Name of Committee

Date Report Filed

Federal Arthur Young & Company
Political Action Committee

November 9, 1988

89040762365

Accordingly, the Office of the General Counsel recommends that the Commission open Matters Under Review and find reason to believe with respect to the above committees and their treasurers.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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III. RECOMMENDATIONS

1. Open Matters Under Review with respect to the following committees and their treasurers and find reason to believe that these committees and their treasurers violated 2 U.S.C. § 434(a)(4)(B).

Federal Arthur Young & Company Political
Action Committee and Carl D. Liggio,
as treasurer

- 3 9 0 4 0 7 6 2 3 7 9
2. Enter into conciliation with the following committees and their treasurers prior to a finding of probable cause to believe.

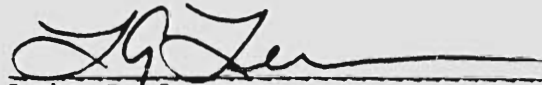
Federal Arthur Young & Company Political
Action Committee and Carl D. Liggio,
as treasurer

89040762380

3. Approve the attached letters, Factual and Legal Analyses, and proposed conciliation agreements to be sent to the respective committees listed in recommendation 2.

Lawrence M. Noble
General Counsel

C-8-89
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Referral Materials
2. Proposed Conciliation Agreements (13)
3. Letters and Factual and Legal Analyses (13)

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Federal Arthur Young & Company
Political Action Committee and
Carl D. Liggio, as treasurer
(89NF-32)

(continued)

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CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on June 19,
1989, the Commission decided by a vote of 5-0 to take
the following actions with respect to the above-
captioned referrals:

1. Open Matters Under Review with respect to the
following committees and their treasurers and
find reason to believe that these committees
and their treasurers violated 2 U.S.C.
section 434(a)(4)(B):

Federal Arthur Young & Company Political
Action Committee and Carl D. Liggio, as
treasurer

(continued)

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Federal Election Commission
Certification for RAD Referrals #89NF 29-41
June 19, 1989

Page 3

89040762383

2. Enter into conciliation with the following committees and their treasurers prior to a finding of probable cause to believe:

(continued)

Federal Election Commission
Certification for RAD Referrals 89NF 29-41
June 19, 1989

Page 4

Federal Arthur Young & Company Political
Action Committee and Carl D. Liggio, as
treasurer

89040762384

(continued)

3. Approve the letters, Factual and Legal Analyses, and proposed conciliation agreements to be sent to the respective committees listed in action 2, as recommended in the First General Counsel's Report signed June 8, 1989.

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

Attest:

6-19-89
Date

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

890040762385



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 27, 1989

Carl D. Liggio,
Treasurer
Federal Arthur Young & Company
Political Action Committee
277 Park Avenue
New York, NY 10172

RE: MUR 2909
Federal Arthur Young &
Company Political Action
Committee and Carl D. Liggio,
as treasurer

Dear Mr. Liggio:

On June 19, 1989, the Federal Election Commission found that there is reason to believe Federal Arthur Young & Company Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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

89040762380

Carl D. Liggio
Page 2

of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

If you are interested in expediting the resolution of this matter by pursuing pre-probable 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.

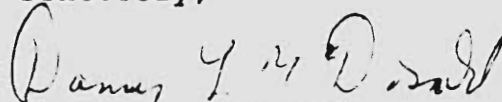
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Phillip L. Wise, the attorney 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

89040762387

06C 3409

FEDERAL ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE

277 PARK AVENUE
NEW YORK, N. Y. 10172
212-407-2367

July 12, 1989

Federal Express

Hon. Danny L. McDonald
Chairman
Federal Election Commission
Washington, DC 20463

Re: MUR 2909

Federal Arthur Young Political Action Committee

Dear Chairman McDonald:

I am in receipt of your letter of June 27, 1989 with respect to our filing 12 Day Pre-General report.

As a result of your letter, I immediately conducted an inquiry to determine whether we were in fact late; and if so why. As a result of that investigation, I found a break down in our internal controls, which I have now corrected.

You are correct that we made a late filing. Such late filing was caused by the turmoil in Arthur Young's accounting department, which had been given the responsibility for preparing the necessary FEC compliance paperwork. (Unfortunately, the personnel employed by Arthur Young's accounting department have not been particularly strong. We have had in a constant effort to upgrade the quality of the personnel who work in the accounting department since the department relocated from New York City to New Jersey.) The individual who had the responsibility for preparing the FEC compliance reports in October, 1988 has, since then, been terminated because of poor performance. Unfortunately, the late filing of the Pre-General report is one example of that poor performance.

You will also find that our filing for the month of May was late. Again, it was caused by the problem of poor performance in our accounting department. Apparently, we recently had a change of the personnel in accounting (as a result of the failure of performance) who were responsible for preparing the FEC compliance report. I have been advised that the supervisor had failed to impress upon the new clerical staff, who had taken over the FEC compliance activities, the importance of timely filings notwithstanding my prior admonitions to them to this affect.

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FEDERAL ARTHUR YOUNG POLITICAL ACTION COMMITTEE

Date: July 11, 1989

To: HAREN J. BHATT
cc: A.S. Berk

From: CARL D. LIGGIO

Subject: FAYPAC

This is to again impress upon you the importance of the timely filing of all FAYPAC reports with the FEC.

Reports are due on a monthly basis on the 20th day following the end of the prior month. It is not acceptable for me to receive those reports on the 19th day of the month. All such reports shall be on my desk no later than the 10th day of any month.

In addition, during the months of October and November, there are special reporting requirements due to the November elections. We receive notices from the SEC on a regular basis with respect to the time in which 12-day Pre-General filing reports must be made. Although you get these directly, we will remind you of these reports in a timely fashion. The time after the close of the period to which it applies in which the 12-day Pre-General filing reports must be filed is considerably shorter than the normal filing period. Procedures must be in place so that reports can be delivered to me within 24 hours as close to the period to which the 12-day Pre-General report applies so that it may be immediately filed.

I have instructed my staff to contact you if the reports are not on my desk in the time periods set forth above.

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 2909
NAME OF COUNSEL: CARL D. LIGGIO
ADDRESS: 277 Park Ave
NY NY 10172
TELEPHONE: 212-407-2367

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

7/12/89
Date

Carl D. Liggio
Signature

RESPONDENT'S NAME: CARL D. LIGGIO
ADDRESS: 277 PARK AVE
NY NY 10172
HOME PHONE: 212-407-2367
BUSINESS PHONE: 212-407-2367

39040762391

FEDERAL ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE

06C3612
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

89 JUL 26 AM 9:22

277 PARK AVENUE
NEW YORK, N. Y. 10172
212-407-2367

July 20, 1989

Mr. Philip Wise
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Mr. Wise:

In accordance with our conversation of Wednesday, July 19, 1989, I am returning the executed conciliation agreement and a check from FAYPAC in the amount of \$375.

Very truly yours,

Carl W. Haggard

Enclosure

3 9 0 4 0 7 6 2 3 9 2
RECEIVED
FEDERAL ELECTION COMMISSION
89 JUL 31 PM 4:04

89 AUG -7 PM 1:09

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Federal Arthur Young & Company) MUR 2909
Political Action Committee)
and Carl D. Liggio, as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Carl D. Liggio, the treasurer of Federal Arthur Young & Company Political Action Committee. (Attachment 1.)

The attached agreement contains no changes from the agreement approved by the Commission on June 19, 1989. The Respondents also tendered a check in the amount of \$375.00, which represents the Commission approved civil penalty. (Attachment 2).

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Federal Arthur Young & Company Political Action Committee and Carl D. Liggio, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

8/4/89
Date

BY:


Lois G. Lerner
Associate General Counsel

Attachments

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

Staff Assigned: Phillip L. Wise

39040762393

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Federal Arthur Young & Company)
Political Action Committee and) MUR 2909
Carl D. Liggio, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 10, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 2909:

1. Accept the conciliation agreement with Federal Arthur Young & Company Political Action Committee and Carl D. Liggio, as treasurer, as recommended in the General Counsel's Report to the Commission dated August 4, 1989.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report to the Commission dated August 4, 1989.

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

Attest:

8-11-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Monday, August 7, 1989 at 1:09 p.m.
Circulated to the Commission: Wednesday, August 9, 1989 at 11:00 a.m.
Deadline for vote: Friday, August 11, 1989 at 11:00 a.m.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 15, 1989

Carl D. Liggio, -
Treasurer
Federal Arthur Young & Company
Political Action Committee
277 Park Avenue
New York, NY 10172

RE: MUR 2909
Federal Arthur Young &
Company Political Action
Committee and Carl D.
Liggio, as treasurer

Dear Mr. Liggio:

On August 10, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on behalf of Federal Arthur Young & Company Political Action Committee and you, as treasurer in settlement of a violation of 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

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

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

89040762395

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Federal Arthur Young & Company) MUR 2909
Political Action Committee)
and Carl D. Liggio, 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 Federal Arthur Young & Company Political Action Committee and Carl D. Liggio, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(B).

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

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

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

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

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

1. Federal Arthur Young & Company Political Action Committee is a political committee within the meaning of 2 U.S.C. § 431(4).

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2. Carl D. Liggio, is the treasurer of Federal Arthur Young & Company Political Action Committee.

3. Section 434(a)(4)(B) of Title 2 provides that unauthorized committees which file on a monthly basis shall file a pre-election report, which shall be filed no later than the 12th day before such election, and which shall be complete as of the 20th day before the election.

4. Respondents filed a 1988 12 Day Pre-General Report on November 9, 1988, thirteen days after the October 27 deadline. The total amount of financial activity disclosed was \$1,954.00

V. Respondents failed to file its 1988 12 Day Pre-General Report in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(B).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Three Hundred Seventy-five Dollars (\$375.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

IX. Respondents shall have no more than 30 days from the

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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

8/15/89
Date

FOR THE RESPONDENT(S):

Carol D. Huggins
Carol D. Huggins, TREASURER
(Name)
(Position)

7/25/89
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2909

DATE FILMED 8/29/89 CAMERA NO. 1

CAMERAMAN AS

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