



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2957

DATE FILMED 4/12/89 CAMERA NO. 2

CAMERAMAN AS

89040721874



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 16, 1989

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: UNAUTHORIZED QUARTERLY FILERS WHICH FAILED TO FILE
THE 1988 12 DAY PRE-GENERAL REPORT BY ELECTION DAY

JUN 19 1989 P 1:41

The attached list of unauthorized committees consists of thirty-seven (37) quarterly filers which failed to file a 1988 12 Day Pre-General Report by Election Day, November 8, 1988.

Unlike the mandatory reporting requirement placed upon monthly filers, 2 U.S.C. §434(a)(4)(A)(ii) requires quarterly filers to submit 12 Day Pre-General Reports only if the committees make contributions to or expenditures on behalf of federal candidates in the general election. All unauthorized committees were sent prior notification regarding the pre- and post-general filing requirements on October 3, 1988 (Attachment 38).

The Party/Non-Party Branch conducted a thorough examination to identify quarterly filers disclosing contributions or expenditures between October 1 and October 19, 1988. The research revealed committees that submitted:

- a) 12 Day Pre-General Reports in an untimely manner;
- b) 30 Day Post-General Reports indicating that 12 Day Pre-General Reports should have been filed; and
- c) Year End Reports indicating that 12 Day Pre-General Reports should have been filed.

If you have any questions regarding this matter, please contact Lisa J. Stolaruk at 376-2480.

A-000-1

30040721875

List of Committees and Prior Commission Actions

- 1.
- 2.
3. ~~232~~
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14. C00215285 General Atomics Political Action
Committee
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A-00002

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320407B1377

A-00003

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A-00004

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILER ATCH

REPORTS FILED,
RESPONSES

99040761979

A-000005

33040761330

A-00000

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILER ATCH

REPORTS FILED/
RESPONSES

00040761831

.....
C00215285
GENERAL ATOMICS POLITICAL ACTION COMMITTEE
TREASURER'S NAME: ANTHONY G NAVARRA
PO BOX 83608
SAN DIEGO CA 92138

Attachments 14a-14f

None

1998 10 Day
Post-General
Report filed
12/5/98

A-00007

PAGES 8 THROUGH 12 DO NOT PERTAIN TO THESE RESPONDENTS.

33040761882

A-00000

General Atomics Political Action Committee
(Attachments 14a - 14f)

220407612335

COMMITTEE	DOCUMENT	RECEIPT	DISBURSEMENTS	# OF COVERAGE DATES	OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
FEDERAL ATOMIC POLITICAL ACTION COMMITTEE				ID #C00215285 NON-PARTY QUALIFIED		
SUSPECTED ORGANIZATION: GA TECHNOLOGIES INC						
1987 STATEMENT OF ORGANIZATION				26MAY87	3	87FEC/468/2440
MID-YEAR REPORT				1APR87 -30JUN87	3	87FEC/473/2646
YEAR-END				1JUL87 -31DEC87	5	88FEC/498/3393
YEAR-END AMENDMENT				1JUL87 -31DEC87	3	88FEC/498/5066
YEAR-END AMENDMENT				1JUL87 -31DEC87	3	88FEC/518/1455
YEAR-END AMENDMENT				1JUL87 -31DEC87	5	88FEC/529/123
YEAR-END AMENDMENT				1JUL87 -31DEC87	7	88FEC/540/1862
REQUEST FOR ADDITIONAL INFORMATION				1JUL87 -31DEC87	1	88FEC/515/3250
REQUEST FOR ADDITIONAL INFORMATION				1JUL87 -31DEC87	1	88FEC/532/0744
REQUEST FOR ADDITIONAL INFORMATION END				1JUL87 -31DEC87	2	88FEC/538/3309
1988 STATEMENT OF ORGANIZATION - AMENDMENT				24MAR88	2	88FEC/515/1204
APRIL QUARTERLY				1JAN88 -31MAR88	8	88FEC/515/3889
APRIL QUARTERLY AMENDMENT				1JAN88 -31MAR88	7	88FEC/529/1224
APRIL QUARTERLY AMENDMENT				1JAN88 -31MAR88	4	88FEC/533/1940
APRIL QUARTERLY AMENDMENT				1JAN88 -31MAR88	6	88FEC/540/1869
REQUEST FOR ADDITIONAL INFORMATION				1JAN88 -31MAR88	4	88FEC/532/0739
REQUEST FOR ADDITIONAL INFORMATION END				1JAN88 -31MAR88	1	88FEC/538/3190
JULY QUARTERLY				1APR88 -30JUN88	9	88FEC/534/0069
OCTOBER QUARTERLY				1JUL88 -30SEP88	14	88FEC/550/2781
POST-GENERAL				1OCT88 -28NOV88	7	88FEC/570/1595
YEAR-END				29NOV88 -31DEC88	15	89FEC/577/3403
TOTAL					110	TOTAL PAGES

All reports have been reviewed.

Ending cash-on-hand as of 12/31/88: \$15,137

Outstanding debts owed to or by the committee as of 12/31/88: \$0

8 9 0 4 0 7 6 1 2 8 5

FEDERAL ELECTION COMMISSION

1989 1990

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 13JUN89

PAGE 21

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
GENERAL ATOMICS POLITICAL ACTION COMMITTEE						
CONNECTED ORGANIZATION: GENERAL ATOMICS						
1989 POST-SPECIAL		10,399	5,423	1JAN89 -16MAY89	7	89FEC/595/4618
TOTAL		10,399	0		7	TOTAL PAGES

ID #C00215285 NON-PARTY QUALIFIED

This report has not been reviewed.

Ending cash-on-hand as of 5/16/89: \$4,346

Outstanding debts owed to or by the committee as of 5/16/89: \$0

ATTACHMENT 14b

For filing with the National Commission
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION

00 DEC -9 PH 1:29

USE PRE-PAID LABEL
OR
TYPE ON POST

000215285 H 210 110908
ANTHONY G NAVARRA
GENERAL ATOMICS POLITICAL ACTI
ON COMMITTEE
PO BOX 85608
SAN DIEGO CA 92138

1. FEC IDENTIFICATION NUMBER

3. ☐ This committee qualified as a multicandidate
committee DURING THIS Reporting Period
on 2/1/88 (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 or

Nov 8, 1988 in the State of CALIF

(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>4/30/89</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>		\$ <u>22,888.41</u>
b. Cash on Hand at Beginning of Reporting Period	\$ <u>17,365.50</u>	
c. Total Receipts from Line 18:	\$ <u>110.85</u>	\$ <u>36,317.64</u>
d. Subtotal: (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ <u>18,476.35</u>	\$ <u>38,606.05</u>
7. Total Disbursements from Line 28:	\$ <u>14,150.00</u>	\$ <u>34,257.70</u>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ <u>4,346.35</u>	\$ <u>4,346.35</u>
9. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	\$ <u>0</u>	For further information contact: Federal Election Commission 999 E Street NW Washington, DC 20463 Toll Free 800 424 9541 Local 202 376 3121
10. Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)	\$ <u>0</u>	

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

ANTHONY G. NAVARRA

Signature of Treasurer

Anthony G. Navarra

Date

12/5/88

Submitting false or erroneous or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 4373.

FEC FORM 3X

Revised 4-88

DETAILED SUMMARY PAGE of Receipts and Disbursements Page 2, FISC FORM 270

Name of Committee (in full)		Report Covering the Period From	To	
COLUMBIA UNIVERSITY POLITICAL ACTION COMMITTEE		1/1/87	11/30/87	
I. RECEIPTS		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:				
(a) Individuals/Persons Other Than Political Committees				
(i) Itemized (use Schedule A)		1000.00	20,254.00	11000
(ii) Unitemized		-	15,645.00	11000
(iii) Total of contributions from individuals		1000.00	35,899.00	11000
(b) Political Party Committees				1100
(c) Other Political Committees (such as PACs)				1100
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))		1000.00	35,899.00	1100
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES				12
13. ALL LOANS RECEIVED				13
14. LOAN REPAYMENTS RECEIVED				14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)				15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES				16
17. OTHER RECEIPTS (Dividends, Interest, etc.)		110.85	415.64	17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)		1110.85	36,317.64	18
II. DISBURSEMENTS				
19. OPERATING EXPENDITURES		-	9.70	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES				20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		14,150.00	34,250.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)				22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)				23
24. LOAN REPAYMENTS MADE				24
25. LOANS MADE				25
26. REFUNDS OF CONTRIBUTIONS TO				
a) Individuals/Persons Other Than Political Committees				26-a
b) Political Party Committees				26-b
c) Other Political Committees (such as PACs)				26-c
d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))				26-d
27. OTHER DISBURSEMENTS				27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d), and 27)		14,150.00	34,259.70	28
III. NET CONTRIBUTIONS OPERATING EXPENDITURES				
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))		1000.00	35,899.00	29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))				30
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)		1000.00	35,899.00	31
32. TOTAL OPERATING EXPENDITURES (from Line 19)				32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)				33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)				34

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use spaces provided for each category of the Budget 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)

General Affairs Political Action Comm

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Duncan Hunter for Congress 133 Cannon House Office Bldg Washington D.C. 20515-0518	General Support Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/1/88	600.00
B. Full Name, Mailing Address and ZIP Code Floyd Spence for Congress 2113 Rayburn House Office Bldg Washington D.C. 20515-4002	General Support Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/1/88	500.00
C. Full Name, Mailing Address and ZIP Code Clyde W. Hight for Senate 302 Hart Senate Office Bldg Washington D.C.	General Support Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/1/88	500.00
D. Full Name, Mailing Address and ZIP Code Roy D. Dymally for Congress 224 Cannon House Office Bldg Washington D.C. 20515-2001	General Support Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/1/88	500.00
E. Full Name, Mailing Address and ZIP Code Robert Byrd for Senate 116 Longworth House Office Bldg Washington D.C. 20515-4323	General Support Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/1/88	500.00
F. Full Name, Mailing Address and ZIP Code Bill Nichols for Congress 2405 Rayburn House Office Bldg Washington D.C. 20515-0602	General Support Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/1/88	2000.00
G. Full Name, Mailing Address and ZIP Code Susan Ruckelshaus 517 2nd St N.E. Washington D.C. 20002	General Support Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/1/88	500.00
H. Full Name, Mailing Address and ZIP Code California for Senate Race 720 Hart Senate Office Bldg Washington D.C. 20510-0502	General Support Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/1/88	1000.00
I. Full Name, Mailing Address and ZIP Code Democratic Senatorial Campaign 430 South Capitol St Washington D.C. 20003	General Support Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/1/88	500.00

SUBTOTAL of Disbursements This Page (optional)

6600.00

TOTAL This Period (last page this line number only)

RECEIVED
FEDERAL ELECTION COMMISSION

89 AUG -9 AM 10:03

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRAL: 89NF-69 thru
89NF-105

STAFF MEMBER: Gregory Baker

SOURCE: Internally Generated

RESPONDENTS: a.

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89040761300

m.

n. General Atomics Political Action Committee and
Anthony G. Navarra, as treasurer (89NF-82)

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

INTERNAL REPORTS CHECKED: Disclosure Reports and
Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the above (37) committees to the Office of the General Counsel on June 16, 1989. (Attachment 1). The basis for the attached referral is

8 3 0 4 0 7 6 1 8 0 2

the committees' failure to file the 12 Day Pre-General Report by October 27, 1988.

II. FACTUAL AND LEGAL ANALYSIS

A. Filing of Reports

8 7 7 4 0 7 6 1 8 9 5
The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall submit 12 Day Pre-General Reports if the Committees make any contributions to or expenditures on behalf of federal candidates in the general election. 2 U.S.C. § 434(a)(4)(A)(ii). The 12 Day Pre-General Report is due as of the 12th day before the election (October 27, 1988) and should be complete as of the 20th day before the election (October 19, 1988). The Committees were notified on October 3, 1988, that the report was due on October 27, 1988.

The (37) committees fall into three categories;
(1) committees that filed 12 Day Pre-General Reports in an untimely manner, (2) committees that filed 30 Day Post-General Reports indicating that 12 Day Pre-General Reports should have been filed, and (3) committees that filed Year End Reports indicating that 12 Day Pre-General Reports should have been filed. The following Committees did not file the 1988 12 Day Pre-General Report by October 27, 1988:

- 2 9 0 4 0 7 6 1 8 9 4
- (2) 30 Day Post-General Reports Indicating that 12 Day
Pre-General Reports should have been filed.

General Atomics Political Action
Committee (89NF-82)

December 5, 1988

89040761893

- (3) Year End Reports Indicating that 12 day Pre-General Reports should have been filed.

3 9 0 4 0 7 6 1 8 9 5

Accordingly, the Office of the General Counsel recommends that the Commission open Matters Under Review and find reason to believe that the above committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

This Office also recommends that the Commission offer to enter into conciliation prior to a finding of probable cause to believe with respect to the (37) referred committees. Attached for the Commission's approval are proposed conciliation agreements (Attachment 2). The proposed agreements provide for an admission of the violation and civil penalties computed as follows:

89040761897

PAGES 9 THROUGH 44 DO NOT PERTAIN TO THESE RESPONDENTS.

83040761808

IV. 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)(A)(ii).

390407618999

General Atomics Political Action Committee and Anthony G. Navarra, as treasurer (89NF-82)

83040761000

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

2 2 0 4 0 7 6 1 9 0 1

General Atomics Political Action Committee and Anthony G.
Navarra, as treasurer (89NF-82)

8 3 0 4 0 7 6 1 3 0 2

33040761903

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

Lawrence M. Noble
General Counsel

Date 8/7/89

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

- A. Referral materials
- B. Proposed Conciliation Agreements (37),
Letters and Factual and Legal Analyses (37)

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23040761975

[illegible]

(continued)

3 2 0 4 0 7 6 1 9 0 5

[illegible]

(continued)

**Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989**

Page 4

8 7 6 5 4 3 2 1 0 9 8

(continued)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of August 22,
1989, do hereby certify that the Commission decided by a
vote of 4-0 to take the following actions with respect to
RAD Referrals 89NF-69 through 89NF-105:

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)(A)(ii):

(continued)

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 6

General Atomics Political Action Committee and
Anthony G. Navarra, as treasurer (89NF-82)

(continued)

89040751910

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 7

89040761911

(continued)

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 8

89040761912

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-69 through 89NF-105
August 22, 1989

Page 9

General Atomics Political Action Committee and
Anthony G. Navarra, as treasurer (89NF-82)

(continued)

89040761913

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 10

33040761914

(continued)

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 11

22040761915

(continued)

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 12

3. Approve the letters, Factual and Legal Analyses, and proposed conciliation agreements to be sent to the respective respondents listed in Action 2 above, as recommended in the General Counsel's report dated August 7, 1989, subject to amendment of two of the agreements as agreed in the meeting of August 22, 1989.

Commissioners Aikens, Elliott, Josefiak, and McDonald voted affirmatively for the decision; Commissioners McGarry and Thomas were not present.

Attest:

8-25-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

89040761915



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 6, 1989

Anthony G. Navarra, Treasurer
General Atomics Political
Action Committee
P. O. Box 85608
San Diego, CA 92138

RE: MUR 2954
General Atomics Political
Action Committee and
Anthony G. Navarra, as treasurer

Dear Mr. Navarra:

On August 22, 1989, the Federal Election Commission found that there is reason to believe General Atomics Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), 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 of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

89090761917

Anthony G. Navarra, Treasurer
Page 2

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.

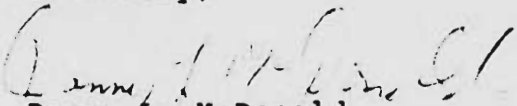
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures

- A. Factual and Legal Analysis
- B. Procedures
- C. Designation of Counsel Form
- D. Conciliation Agreement

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

89 OCT 13 AM 11:58

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

General Atomics Political Action)
Committee and Anthony G. Navarra,)
as treasurer)

MUR 2954

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Anthony G. Navarra, the treasurer of the General Atomics Political Action Committee. (Attachment 1). The Committee had failed to file its 1988 12-Day Pre-General Report in a timely fashion.

330407619

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the General Atomics Political Action Committee and Anthony G. Navarra, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

10-12-89
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

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

Staff Assigned: A. Buckley

33040761320

GENERAL ATOMIC/PAC

P. O. BOX 22930 455-2053
SAN DIEGO, CA 92122

165

90-8166/3222

PAY TO THE
ORDER OF

Federal Election Commission \$ 100.00
One Hundred ~~7/10~~ DOLLARS



**TORREY PINES FEDERAL
CREDIT UNION**
10715 SORRENTO VALLEY ROAD
SAN DIEGO, CALIFORNIA 92121

MEMO

⑆322281662⑆904 182056270⑆ 0165

Anthony Thomas

MEMORANDUM

OGC 4063

TO: DEBRA A. TRIMIEW

TO: CHERYL T WILLIAMS

FROM: CHERYL T WILLIAMS

FROM: DEBRA A. TRIMIEW

CHECK NO. 1165 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2954 AND NAME General Atomics PAC

(Buckley) WAS RECEIVED ON 9/21/89. PLEASE INDICATE THE ACCOUNT IN

WHICH IT SHOULD BE DEPOSITED:

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

SIGNATURE Debra A. Trimiew

DATE 9/21/89

FEDERAL BUREAU OF INVESTIGATION
OFFICE OF THE DIRECTOR
89 SEP 21 AM 10:28

040761922

GENERAL ATOMIC/PAC P. O. BOX 22930 455-2053 SAN DIEGO, CA 92122		166 9/22 1987 90-8166/3222
PAY TO THE ORDER OF <u>Federal Election Com</u>		\$ 250.00
<u>Two hundred & Fifty</u>		DOLLARS
	TORREY PINES FEDERAL CREDIT UNION 10715 SORRENTO VALLEY ROAD SAN DIEGO, CALIFORNIA 92121	
MEMO: <u>Anthony J. Williams</u>		
⑆322281662⑆904 182056270⑆ 0166		

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CHERYL T WILLIAMS

FROM: CHERYL T WILLIAMS

FROM: DEBRA A. TRIMIEW

CHECK NO. 166

{ A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2954

AND NAME

General Atomics PAC

WAS RECEIVED ON

(Buckley) 9/28/89

PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

/ ☒ /

BUDGET CLEARING ACCOUNT

{ 95FEB75.16 }

/

/ CIVIL PENALTIES ACCOUNT

{ 95-1099.160 }

/

/ OTHER

SIGNATURE

Debra A. Trimiew

DATE 9/28/89

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

General Atomics Political Action
Committee and Anthony G. Navarra,
as treasurer

)
)
) MUR 2954
)
)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 18, 1989, the Commission decided by a vote of 5-0 to take the following actions in MUR 2954:

1. Accept the conciliation agreement with the General Atomics Political Action Committee and Anthony G. Navarra, as treasurer, attached to the General Counsel's Report dated October 12, 1989.
2. Close the file.
3. Approve the letter attached to the General Counsel's Report dated October 12, 1989.

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

Attest:

10-18-89
Date

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

Received in the Secretariat: Friday, October 13, 1989 11:58
Circulated to the Commission: Monday, October 16, 1989 11:00
Deadline for vote: Wednesday, October 18, 1989 11:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 1, 1989

CLOSED

Anthony G. Navarra, Treasurer
General Atomics Political
Action Committee
P.O. Box 85608
San Diego, CA 92138

RE: MUR 2954
General Atomics Political
Action Committee

Dear Mr. Navarra:

On October 18, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on behalf General Atomics Political Action Committee and you, as treasurer, in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(ii), 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 Anthony Buckley, 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

2204761325

General Atomics Political Action
Committee and Anthony G. Navarra,
as treasurer

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MUR 2954

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 General Atomics Political Action Committee and Anthony G. Navarra, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(ii).

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 his matter.

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

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

1. General Atomics Political Action Committee is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Anthony G. Navarra is the treasurer of General Atomics Political Action Committee.

3. Section 434(a)(4)(A)(ii) of Title 2 provides that unauthorized committees filing quarterly shall file 12 Day Pre-General Reports if the committee makes any contributions to or expenditures on behalf of federal candidates in the general election. The pre-election reports are to be filed no later than the 12th day before the election and should be complete as of the 20th day before the election.

4. Respondents were required to file the 1988 12 Day Pre-General Report no later than October 27, 1988. Respondents did not file the 12 Day Pre-General Report until December 5, 1988, 39 days late, disclosing \$35.47 in receipts and \$6,600.00 in disbursements for the relevant reporting period.

V. Respondents failed to file the 1988 12 Day Pre-General Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(A)(ii).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Three Hundred Fifty Dollars (\$350.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed the 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

11-1-89
Date

FOR THE RESPONDENTS:

BY:

Anthony G. Navarra
Anthony G. Navarra, Treasurer
General Atomics Political
Action Committee

9/22/89
Date



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2954

DATE FILMED 11/12/89 CAMERA NO. 2

CAMERAMAN AS

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