



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE BEGINNING OF MUR # 2959

DATE FILMED 4/24/89 CAMERA NO. 4

CAMERAMAN AS

89040772837



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
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

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

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

83040712838

11:18 6/17/89

List of Committees and Prior Commission Actions

- 1.
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A-00002

89040772839

18.

19. C00210112

International Sanitary Supply
Association Political Action
Committee (ISSA CLEAN PAC)

89NF-87

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A-00003

89040772840

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PAGES 4 THROUGH 7 DO NOT PERTAIN TO THESE RESPONDENTS.

34.

35.

36.

37.

890407 / 2841

A-00004

8 9 0 4 0 7 / 2 8 4 2

Attachments 19a-g

C00210112

INTERNATIONAL SANITARY SUPPLY ASSOCIATION POLITICAL ACTION COMMITTEE (ISSA CLEAN PAC)

TREASURER'S NAME: E ALLEN JAMES (2/2/88 to present)*

7373 NORTH LINCOLN AVENUE

LINCOLNWOOD IL 60646

Telecon
1/10/891988 30 Day
Post-General
Report and
letter filed
1/11/89

*Jack Ramaley (8/15/86-2/1/88)

Attachments 20a-20d

A-00008

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILER ATCH

REPORTS FILED/
RESPONSES

99040712843

A-00000

990407 / 28444

A-00010

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILER ATCH

REPORTS FILED/
RESPONSES

970407/2845

A-00011

830407/2846

A-000-2

**International Sanitary Supply Association Political
Action Committee (ISSA Clean PAC)**

(Attachments 19a - 19g)

9304071247

FEDERAL ELECTION COMMISSION

1987-1988

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

ATTACHMENT 19a

DATE 19MAY89

PAGE 4

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
INTERNATIONAL SANITARY SUPPLY ASSOCIATION POLITICAL ACTION COMMITTEE (ISSA CLEAN PAC)				ID #C00210112 NON-PARTY QUALIFIED		
CONNECTED ORGANIZATION: INTERNATIONAL SANITARY SUPPLY ASSN						
1987	MID-YEAR REPORT	20,345	0	1JAN87 -30JUN87	6	87FEC/477/0874
	YEAR-END	11,258	1,500	1JUL87 -31DEC87	7	88FEC/500/2611
1988	STATEMENT OF ORGANIZATION - AMENDMENT			8FEB88	2	88FEC/508/0011
	APRIL QUARTERLY	1,910	500	1JAN88 -31MAR88	4	88FEC/519/3860
	APRIL QUARTERLY - AMENDMENT	1,910	500	1JAN88 -31MAR88	5	88FEC/528/1555
	REQUEST FOR ADDITIONAL INFORMATION			1JAN88 -31MAR88	1	88FEC/525/3755
	JULY QUARTERLY	6,575	7,850	1APR88 -30JUN88	8	88FEC/536/0092
	OCTOBER QUARTERLY	7,777	6,600	1JUL88 -30SEP88	7	88FEC/555/3395
	OCTOBER QUARTERLY - AMENDMENT	6,127	6,600	1JUL88 -30SEP88	7	89FEC/578/0644
	OCTOBER QUARTERLY - AMENDMENT	6,127	6,600	1JUL88 -30SEP88	8	89FEC/579/4780
	POST-GENERAL	5,260	14,000	1OCT88 -28NOV88	7	89FEC/578/0651
	POST-GENERAL - AMENDMENT	5,260	14,000	1OCT88 -28NOV88	7	89FEC/579/4788
	NOTICE OF FAILURE TO FILE			28NOV88	1	89FEC/576/2113
	YEAR-END	23	1,000	29NOV88 -31DEC88	4	89FEC/580/0193
TOTAL		51,498	0 31,450 0	74 TOTAL PAGES		

All reports have been reviewed.

Ending cash-on-hand as of 12/31/88: \$22,639

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

22040712848

ANALYST: Kate Henry

CONVERSATION WITH: Bill Balek

COMMITTEE: International Sanitary Supply Association Political Action
Committee (ISSA CLEAN PAC)

DATE: January 10, 1989

SUBJECT(S): 30 Day Post-General Non-Filer Notice

Mr. Balek had received the 30 Day Post-General Non-Filer Notice dated January 10, 1989. He explained that he had been unaware that the report was required and that he had not received prior notice. I reviewed the coverage dates and due dates with him. He said he would prepare the report and send it as soon as possible.

89040772849

International Sanitary Supply Association, Inc.
7373 North Lincoln Avenue, Lincolnwood, IL 60466-1799 USA
312/982-0800 • Telex II 910-221-5102 ISSA CGO

January 11, 1989

President
E. ALLEN JAMES

Consultant
JACK D. RAMALEY

BOARD OF DIRECTORS

Chairman of the Board
JERRY W. BARNES
Barnes Products Company
8889 Paradise Dr., Box 2964
Oakland, CA 94631
415/838-0870

Vice Chairman/Chairman Elect
LOUIS G. GOORLAND
Goorland & Mann, Inc.
825 N. Union Street
Wilmington, DE 19805
302/655-1514

Treasurer
SAMUEL B. PESKIN
Creative Chemicals, Inc.
3 Church St., Box 471
Palmer, MA 01969
413/283-9778

Secretary of the Board
BOB NAGEL
Bob Nagel Distributing Co.
2701 S.E. 7th Ave.
Portland, OR 97214
503/233-4331

International Director/
Immediate Past Chairman
DANIEL J. MIRTO
The Chief Supply Company
3735 Oakwood Ave., Box 2463
Youngstown, OH 44509
216/999-9709

District 1 Director
AN SCHWARTZ
Schwartz Chemical Co., Inc.
31st Street
York, NY 10027
212-6100

District 2 Director
H.E. GALER, III
Galer & Hulse, Inc.
81 611 & Madison Rd.
Hempden, PA 17044
717/547-4548

District 3 Director
ROBERT M. PRATER
Southern Products Co., Inc.
6113 S. Creek Rd., Box 5168
Chattanooga, TN 37406
615/264-0864

District 4 Director
JACK TIERNEY
Coopers, Inc.
1708 Harvey St., Box 638
Mankin, MI 49843
616/773-3211

District 5 Director
CARLTON G. WARD
Cover Supply Company, Inc.
215 N. Western, Box 20102
Oklahoma City, OK 73124
405/236-1539

District 6 Director
STEVEN MIRO
Biddford Brothers, Inc.
3943 N. Lincoln Avenue
Chicago, IL 60657
312/549-8836

District 7 Director
DENNIS W. REDMAN
Robrick Washroom Equipment, Inc.
71611 Hart Street
N. Hollywood, CA 91605
818/764-1080

District 8 Director
JOHN R. DUTRO
Dutro Manufacturing Co.
3000 E. 1st St.
San Jose, CA 95110
415/441-0800

District 9 Director
ALBERT FRIEDMAN
Safet Industries Inc.
5485 Boul. Des Grands Prairies
Montreal, PQ, Canada H1R 1B1
514/321-7111

District 10 Director
SID BERKMAN
Western Pacific Associates
10100 Orange Ave., Suite D
Pasadena, CA 91723
213/633-3903

Public Records Office
Federal Election Committee
999 E Street, N.W.
Washington, DC 20463

To Whom it May Concern:

In response to Assistant Staff Director, John D. Gibson's letter of January 6, 1989, kindly find enclosed the post-general election report of the International Sanitary Supply Association Political Action Committee. Copies of this report have also been sent to the relevant State Election Committees.

ISSA apologizes for the late filing of this report. This serious oversight was unintentional and will certainly never be repeated.

Although we understand it is our responsibility to adhere to the report dates, we have come to rely on the advance notice provided to us by the Federal Election Commission. For some reason, ISSA did not receive notice of the due date for this report as mentioned in Mr. Gibson's letter. Consequently we failed to file this report in a timely manner.

In addition, when preparing the enclosed post election report, ISSA discovered errors in its October 15 quarterly report covering the period of 7-01-88 through 9-30-88. Therefore, also find enclosed an amended report covering this period.

The errors in the original October 15 quarterly report appeared on pages 1 and 2 of the itemized receipts section, and on lines 11(a)(ii), 11(a)(iii), 11(a)(iv) and 11(d) of the detailed summary page. In effect ISSA overstated its receipts for the period covered by the report. Due to a data entry error, we erroneously included receipts in the October 15 report that were recorded in our July 15 quarterly report.

Please contact me if you have any questions regarding either of these matters.

Sincerely,

William C. Balek
Assistant Treasurer
CLEAN PAC

WCB/dn
Enclosure

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

ATTACHMENT 19d

FEDERAL ELECTION COMMISSION

09 JAN 17 PM 4:04

NAME OF COMMITTEE (in full)

International Sanitary Supply Association
Political Action Committee

ADDRESS (number and street)

Check if different than previously reported

7373 N. Lincoln Avenue

CITY, STATE and ZIP CODE

Lincolnwood, IL 60646

2. FEC IDENTIFICATION NUMBER

C-002-10112

3.

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

4. TYPE OF REPORT

(a) April 15 Quarterly Report

Monthly Report Due On

July 15 Quarterly Report

February 20

June 20

October 20

October 15 Quarterly Report

March 20

July 20

November 20

January 31 Year End Report

April 20

August 20

December 20

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

May 20

September 20

January 31

Twelfth day report preceding

(Type of Election)

election on

in the State of

XX Thirtieth day report following the General Election on

Termination Report

in the State of

(b) Is this Report an Amendment?

☐ YES

☒ NO

SUMMARY

5. Covering Period 10/1/88 through 11/28/88

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

6. (a) Cash on Hand January 1, 1988

\$ 32,692.66

(b) Cash on Hand at Beginning of Reporting Period

\$ 32,355.62

(c) Total Receipts (from Line 18)

\$ 5,260.00

\$ 19,872.96

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and
Lines 6(a) and 6(c) for Column B)

\$ 37,615.62

\$ 52,565.62

7. Total Disbursements (from Line 28)

\$ 14,000.00

\$ 28,950.00

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

\$ 23,615.62

\$ 23,615.62

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

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

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

Type or Print Name of Treasurer

William C. Balek, Assistant Treasurer

Signature of Treasurer

William C. Balek

Date

1-11-89

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

FEC FORM 3X
(revised 4/87)

DETAILED SUMMARY PAGEof Receipts and Disbursements
(Page 2 FEC FORM 3X)

Name of Committee: International Sanitary Supply Association Political Action Committee		Report Covering the Period From _____ To _____	
		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)			
		\$ 2,750.00	\$11,100.00
(ii) Unitemized			
		2,510.00	8,772.96
(iii) Total of contributions from individuals			
		5,260.00	19,872.96
(b) Political Party Committees			
		0	0
(c) Other Political Committees (such as PACs)			
		0	0
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))			
		\$ 5,260.00	\$19,872.96
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	0
18 TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)			
		\$ 5,260.00	\$19,872.96
II. DISBURSEMENTS			
19 OPERATING EXPENDITURES			
		0	0
20 TRANSFERS TO AFFILIATED OTHER PARTY COMMITTEES			
		0	0
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			
		\$14,000.00	\$28,950.00
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)			
		\$14,000.00	\$28,950.00
III. NET CONTRIBUTIONS OPERATING EXPENDITURES			
29 TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))			
		5,260.00	19,872.96
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))			
		0	0
31 NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)			
		\$ 5,260.00	\$19,872.96
32 TOTAL OPERATING EXPENDITURES (from Line 19)			
		0	0
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)			
		0	0
34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)			
		0	0

SCHEDULE B
ITEMIZED DISBURSEMENTS

ATTACHMENT 19f

 Use separate schedules
for each category of the
Date and Summary Page

 PAGE 1 OF 3
FOR LINE NUMBER 21

All information copied from such Reports and Statements may not be so disclosed by any person for the purpose of soliciting contributions for campaign purposes other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (in full)

International Sanitary Supply Association Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement/Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Engelletter for Senate Comm. P.O. Box 822 Brookfield, WI 53008	to Susan Engelletter Senate Candidate, WI Disbursement for ☒ Primary ☐ General ☐ Other (specify):	10/05/88	\$1,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement/Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Dan Coats for Congress P.O. Box 15551 Ft. Wayne, IN 46885	to Dan Coats House Candidate 4/IN Disbursement for ☐ Primary ☒ General ☐ Other (specify):	10/25/88	\$500.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement/Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Dannemeyer for Congress P.O. Box 4344 Fullerton, CA 92631	to Wm. Dannemeyer, House Candidate 39/CA Disbursement for ☐ Primary ☒ General ☐ Other (specify):	10/25/88	\$500.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement/Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Glickman for Congress 401 N. Market, Rm. 224 Wichita, KS 67202	to Dan Glickman, House Candidate 4/KS Disbursement for ☐ Primary ☒ General ☐ Other (specify):	10/25/88	\$500.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement/Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Sen. David Karnes P.O. Box 27246 Omaha, NE 68154	to David Karnes, Senate Candidate NE Disbursement for ☐ Primary ☒ General ☐ Other (specify):	10/28/88	\$1,000.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement/Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Morrison for Congress P.O. Box 105 Yakima, WA 98907	to Sid Morrison, House Candidate 4/WA Disbursement for ☐ Primary ☒ General ☐ Other (specify):	10/25/88	\$500.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement/Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
New Mexicans for B. Richardson 1918 Belmont Rd., NW Washington, DC 20003	to Bill Richardson, House Candidate 3/NM Disbursement for ☐ Primary ☒ General ☐ Other (specify):	10/25/88	\$500.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement/Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Cass Bellenger for Congress 361 10th Avenue Dr. NE, (Box Hickory, NC 28601 2552)	to Cass Ballenger, House Candidate 10/NC Disbursement for ☐ Primary ☒ General ☐ Other (specify):	10/25/88	\$500.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement/Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Steve Bartlett Campaign Comm. P.O. Box 671205 Dallas, TX 75367	to Steve Bartlett, House Candidate 3/TX Disbursement for ☐ Primary ☒ General ☐ Other (specify):	10/25/88	\$500.00

SUBTOTAL of Disbursements This Period

\$5,500.00

TOTAL This Period as reported on number 19



International Supply Supply Association, Inc.
200 North Street Avenue
Baltimore, Maryland 21201 USA



The Experts
on Cleaning and Maintenance

International Supply Supply Association, Inc.
200 North Street Avenue, Baltimore, MD 21201 USA

FIRST CLASS MAIL

Public Records Office
Federal Election Committee
999 E. Street, N.W.
Washington, DC 20463

P 664 746 229

RETURN POSTAGE GUARANTEED

09 JUN 17 PM 6:04

ATTACHMENT 19g

RECEIVED
FEDERAL ELECTION COMMISSION

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

89 AUG -9 AM 10:03

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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890407 / 2855

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s. International Sanitary Supply Association
Political Action Committee (ISSA CLEAN PAC) and
E. Allen James, as treasurer (89NF-87)

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890407/2856

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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

930407/1857

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

II. FACTUAL AND LEGAL ANALYSIS

A. Filing of Reports

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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.

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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:

390407 / 2859

- (2) 30 Day Post-General Reports Indicating that 12 Day Pre-General Reports should have been filed.

International Sanitary Supply
Association Political Action Committee
(ISSA CLEAN PAC)(89NF-87)

January 11, 1989

890407/2850

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

9 2 0 4 0 7 7 2 8 5 1

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:

2004072862

PAGES 9 THROUGH 44 DO NOT PERTAIN TO THESE RESPONDENTS.

83940712853

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).

89040712854

International Sanitary Supply Association Political Action
Committee (ISSA CLEAN PAC) and E. Allen James, as
treasurer (89NF-87)

920407 / 2865

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

820407/2856

International Sanitary Supply Association Political Action
Committee (ISSA CLEAN PAC) and E. Allen James, as
treasurer (89NF-87)

890407 / 2857

390407 / 2858

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

8/7/89
Date

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

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

300407/2357

89040712870

[illegible]

(continued)

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

Page 2

99040712871

International Sanitary Supply Associ-
ation Political Action Committee
(ISSA CLEAN PAC) and E. Allen James,
as treasurer (89NF-87)

(continued)

83040712872

[illegible]

(continued)

89040772875

[illegible]

(continued)

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

Page 5

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)

3 9 0 4 0 7 / 2 8 7 4

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

Page 6

33040772375

(continued)

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

Page 7

International Sanitary Supply Association
Political Action Committee (ISSA CLEAN PAC)
and E. Allen James, as treasurer (89NF-87)

89040712876

(continued)

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

Page 8

89040712877

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

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(continued)

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

Page 10

International Sanitary Supply Association
Political Action Committee (ISSA CLEAN PAC) and
E. Allen James, as treasurer (89NF-87)

(continued)

890407 / 2879

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

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89040712890

(continued)

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 27, 1989

**E. Allen James, Treasurer
International Sanitary Supply
Association Political Action Committee
(ISSA CLEAN PAC)
7373 North Lincoln Avenue
Lincolnwood, IL 60646**

**RE: MUR 2959
International Sanitary Supply
Association Political Action Committee
(ISSA CLEAN PAC) and E. Allen James,
as treasurer**

Dear Mr. James:

On August 22, 1989, the Federal Election Commission found that there is reason to believe International Sanitary Supply Association Political Action Committee (ISSA CLEAN PAC) ("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.

E. Allen James, 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 Frances B. Hagan, the staff person 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

ISSA

The Experts
on Cleaning and Maintenance

International Sanitary Supply Association, Inc. **FEDERAL ELECTION COMMISSION**
7373 North Lincoln Avenue, Lincolnwood, Illinois 60466 USA
312/982-0800 • Telex II 910-221-5102 ISSA CGO
Fax 312/982-1012
MAIL ROOM

89OCT 16 AM 9:19

President

E. ALLEN JAMES

Consultant

JACK D. RAMALEY

BOARD OF DIRECTORS

Chairman of the Board

JERRY W. BARNES

Steccone Products Company

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Oakland, CA 94621

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Goorland & Mann, Inc.

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Youngstown, OH 44509

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New York, NY 10027

212/281-6100

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Morsham, PA 19044

215/674-5400

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615/624-0066

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Muskegon, MI 49443

616/773-3211

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215 N. Western, Box 24102

Oklahoma City, OK 73124

405/236-1559

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2943 N. Lincoln Avenue

Chicago, IL 60657

312/549-0026

District 7 Director

DENNIS W. REDMAN

Bobrick Washroom Equipment Inc.

11611 Hart Street

N. Hollywood, CA 91605

818/764-1000

District 8 Director

JOHN R. DUTRO

Dutro Mat Manufacturing Co.

2675 Folsom St.

San Francisco, CA 94110

415/641-0800

District 10 Director

HERBERT FRIEDMAN

Cancot Industries Inc.

5485 Boul. Des Grandes Prairies

Montreal, PQ, Canada H1R 1B1

514/321-7111

Director-at-Large

SID BERKMAN

Western Pacific Associates

1511 E. Orangethorpe Ave., #8

Fullerton, CA 92631

714/525-6600

October 12, 1989

Ms. Frances Hagan
Federal Election Committee
Washington, DC 20463

Dear Ms. Hagan:

As per our conversation of October 11, the International Sanitary Supply Association (ISSA CLEAN PAC) wishes to enter into the conciliation agreement enclosed in the FEC's correspondence of September 27.

Therefore, kindly find enclosed the signed conciliation agreement and check #1083 in the amount of \$500.

Please contact me if you have any questions.

Sincerely,



William C. Balek
Assistant Treasurer
CLEAN PAC

WCB/dn
Enclosure

cc: A. James

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF CLERK
89OCT 19 PM 1:18

89 OCT 31 PM 4:50

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
) MUR 2959
International Sanitary Supply)
Association (ISSA CLEAN PAC))
E. Allen James, as treasurer)
)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by William C. Balek, assistant treasurer of the International Sanitary Supply Association (ISSA CLEAN PAC).

The attached agreement contains no changes from the agreement approved by the Commission on August 22, 1989. A check for the civil penalty has been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the International Sanitary Supply Association (ISSA CLEAN PAC) and E. Allen James, as treasurer.

2. Close the file.

3. Approve the attached letter.

Lawrence M. Noble
General Counsel

Date

10-31-89

BY:

Lois G. Lerner

Associate General Counsel

Attachments

- A. Conciliation Agreement
- B. Photocopy of civil penalty check
- C. Letter to Respondent

Staff Assigned: Frances B. Hagan

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
International Sanitary Supply) MUR 2959
Association (ISSA CLEAN PAC))
E. Allen James, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 3, 1989, the Commission decided by a vote of 5-0 to take the following actions in MUR 2959:

1. Accept the conciliation agreement with the International Sanitary Supply Association (ISSA CLEAN PAC) and E. Allen James, as treasurer, as recommended in the General Counsel's Report dated October 31, 1989.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report dated October 31, 1989.

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

Attest:

Nov. 3, 1989

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tuesday, October 31, 1989 4:50 a.m.
Circulated to the Commission: Wednesday, November 1, 1989 11:00 a.m.
Deadline for vote: Friday, November 3, 1989 11:00 a.m.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 16, 1989

William C. Balek, Assistant Treasurer
International Sanitary Supply Association
(ISSA CLEAN PAC)
7373 North Lincoln Avenue
Lincolnwood, Illinois 60646

CLOSED

RE: MUR 2959
International Sanitary Supply
Association (ISSA CLEAN PAC)
E. Allen James, as treasurer

Dear Mr. Balek:

On November 3, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on behalf of the International Sanitary Supply Association (ISSA CLEAN PAC) 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

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William C. Balek, Assistant Treasurer
Page 2

questions, please contact Frances B. Hagan, 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

890407/2888

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
International Sanitary Supply) MUR 2959
Association Political Action Committee)
(ISSA CLEAN PAC) and E. Allen James,)
as treasurer)

CONCILIATION AGREEMENT

990407 / 2399

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 International Sanitary Supply Association Political Action Committee (ISSA CLEAN PAC) and E. Allen James, 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. International Sanitary Supply Association Political Action Committee (ISSA CLEAN PAC) is a political committee within the meaning of 2 U.S.C. § 431(4).

2. E. Allen James is the treasurer of International Sanitary Supply Association Political Action Committee (ISSA CLEAN PAC).

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 January 11, 1989, 76 days late, disclosing \$2,053.20 in receipts and \$1,000.00 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 Five Hundred Dollars (\$500.00), 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

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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
Associate General Counsel

11-13-89
Date

FOR THE RESPONDENTS:

(Name)
(Position)

Date

930407/2801



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2259

DATE FILMED 11/22/89 CAMERA NO. 4

CAMERAMAN AS

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