



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2961

DATE FILMED 11/12/89 CAMERA NO. 2

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FEDERAL ELECTION COMMISSION

WASHINGTON, DC 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

33040781761

JUN 19 11:41

List of Committees and Prior Commission Actions

- 1.
- 2.
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A-00002

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21. C00080390 Marshall Political Action Committee 39NF-89

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A-000003

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PAGES 4 THROUGH 8 DO NOT PERTAIN TO THESE RESPONDENTS.

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37.

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A-00004

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILER ATCHREPORTS FILED/
RESPONSES

C00080390

MARSHALL POLITICAL ACTION COMMITTEE
TREASURER'S NAME: RALPH S. SNYDER, ESQUIRE
SUITE 3600 1600 MARKET STREET
PHILADELPHIA PA 19103

Attachments 21a-21e

None

1988 12 Day
Pre-General
Report filed
11/21/88

390407B1735

A-00000

820407B1736

A-00010

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILER ATCH

REPORTS FILED/
RESPONSES

00040781767

A-00011

23040781758

A-000-2

Marshall Political Action Committee
(Attachments 21a - 21e)

000407B1769

8 9 0 4 0 7 8 1 7 7 0

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

DATE 13MAY89

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
MARSHALL POLITICAL ACTION COMMITTEE						
CONNECTED ORGANIZATION: SCHNADER HARRISON SEGAL & LEWIS						
1987	APRIL QUARTERLY	15,923	2,507	1JAN87 -31MAR87	13	87FEC/466/3642
	1ST LETTER INFORMATIONAL NOTICE			1JAN87 -31MAR87	2	87FEC/495/1397
	MID-YEAR REPORT	1,031	8,050	1APR87 -30JUN87	13	87FEC/478/1040
	MID-YEAR REPORT - AMENDMENT	-	-	1APR87 -30JUN87	2	87FEC/497/3262
	REQUEST FOR ADDITIONAL INFORMATION			1APR87 -30JUN87	2	87FEC/495/2596
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR87 -30JUN87	1	87FEC/497/1823
	OCTOBER QUARTERLY	0	4,500	1JUL87 -30SEP87	5	87FEC/491/1248
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL87 -30SEP87	1	88FEC/497/3374
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL87 -30SEP87	2	88FEC/509/2388
	REQUEST FOR ADDITIONAL INFORMATION			1JUL87 -30SEP87	2	87FEC/495/2599
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL87 -30SEP87	5	87FEC/497/1818
	YEAR-END	12,300	15,500	1OCT87 -31DEC87	20	88FEC/510/5007
	NOTICE OF FAILURE TO FILE			31DEC87	1	88FEC/510/2958
	1ST LETTER INFORMATIONAL NOTICE			1OCT87 -31DEC87	1	88FEC/515/1998
1988	MISCELLANEOUS REPORT TO FEC			25FEB88	1	88FEC/512/1698
	APRIL QUARTERLY	2,450	2,500	1JAN88 -31MAR88	8	88FEC/519/4121
	1ST LETTER INFORMATIONAL NOTICE			1JAN88 -31MAR88	1	88FEC/525/1788
	JULY QUARTERLY	20,664	4,350	1APR88 -30JUN88	10	88FEC/535/4669
	OCTOBER QUARTERLY	0	15,200	1JUL88 -30SEP88	4	88FEC/556/2734
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL88 -30SEP88	2	89FEC/577/2255
	REQUEST FOR ADDITIONAL INFORMATION			1JUL88 -30SEP88	1	88FEC/574/4292
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL88 -30SEP88	2	89FEC/576/2489
	PRE-GENERAL	3,482	4,750	1OCT88 -19OCT88	5	88FEC/565/4937
	1ST LETTER INFORMATIONAL NOTICE			1OCT88 -19OCT88	1	88FEC/570/4175
	POST-GENERAL	4,226	3,850	20OCT88 -28NOV88	7	88FEC/573/1417
	POST-GENERAL - AMENDMENT	-	-	20OCT88 -28NOV88	3	89FEC/592/4987
	REQUEST FOR ADDITIONAL INFORMATION			20OCT88 -28NOV88	1	89FEC/589/3797
	REQUEST FOR ADDITIONAL INFORMATION 2ND			20OCT88 -28NOV88	2	89FEC/591/1837
	YEAR-END	0	0	29NOV88 -31DEC88	3	89FEC/582/3850
	YEAR-END - AMENDMENT	-	-	29NOV88 -31DEC88	2	89FEC/592/4990
	REQUEST FOR ADDITIONAL INFORMATION			29NOV88 -31DEC88	1	89FEC/589/3796
	REQUEST FOR ADDITIONAL INFORMATION 2ND			29NOV88 -31DEC88	2	89FEC/591/1835
TOTAL		60,126	0 61,207 0	126 TOTAL PAGES		

All reports except the amended 1988 30 Day Post-General and Year End Reports have been reviewed.

Ending cash-on-hand as of 12/31/88: \$434

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

ATTACHMENT 21a

Marshall Political Action Committee
 Address (Number and Street) 1400 N. 4th St. and Suite 500
 City, State and ZIP Code Philadelphia Pa 19103
 C 000 80390
☐ This committee qualified as a noncandidate committee during this Reporting Period

4. TYPE OF REPORT

☐ April 15 Quarterly Report☐ July 15 Quarterly Report☐ October 15 Quarterly Report☐ January 31 Year End Report☐ July 31 Mid Year Report (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

☐ Twelve day report preceding General
(Type of Election)election on 11/1/88 in the State of Pa☐ Twelve day report following the General Election on

in the State of _____

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

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5 Covering Period <u>10/1/88</u> through <u>10/1/88</u>		
6 (a) Cash on Hand January 1, 1988		\$ 260 15
(b) Cash on Hand at Beginning of Reporting Period	\$ 1,324.76	
(c) Total Receipts (from Line 18)	\$ 3,402.90	\$ 2,547.41
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 4,727.56	\$ 2,567.56
* Total Disbursements (from Line 28)	\$ 4,750.00	\$ 2,500.00
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 57.56	\$ 57.56
9 Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	
10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$	

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

Signature of Treasurer: Richard J. Snyder

Date

If Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of the law.

REC FORM 3X

(Revised 4-87)

87035654937

Name of Committee (Print)		For the Period	From	To
Marshall PAC		10/1/98	10/1/98	
I. RECEIPTS		Column A	Column B	
11. CONTRIBUTIONS (other than loans): Total:				
(a) Individuals, Persons Other Than Political Committees:				
(i) For year (use Schedule A):		3,482.80	26,347.41	
(ii) Unitemized:				
(iii) Total of contributions from individuals:		3,482.80	26,347.41	
(b) Political Party Committees:				
(c) Other Political Committees (such as PACs):				
(d) TOTAL CONTRIBUTIONS (add 11(a)(i), (b), and (c)):		3,482.80	26,347.41	
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES:			250.00	
13. ALL LOANS RECEIVED:				
14. LOAN REPAYMENTS RECEIVED:				
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.):				
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES:				
17. OTHER RECEIPTS (Dividends, Interest, etc.):				
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17):		3,482.80	26,547.41	
II. DISBURSEMENTS				
19. OPERATING EXPENDITURES:				
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES:			5,000.00	
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES:		4,750.00	17,450.00	
22. INDEPENDENT EXPENDITURES (use Schedule E):				
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F):				
24. LOAN REPAYMENTS MADE:				
25. LOANS MADE:				
26. REFUNDS OF CONTRIBUTIONS TO:				
(a) Individuals, Persons Other Than Political Committees:				
(b) Political Party Committees:				
(c) Other Political Committees (such as PACs):				
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c)):				
27. OTHER DISBURSEMENTS:			4,200.00	
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d), and 27):		4,750.00	26,650.00	
III. NET CONTRIBUTIONS OPERATING EXPENDITURES				
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d)):				
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d)):				
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29):				
32. TOTAL OPERATING EXPENDITURES (from Line 19):				
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15):				
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32):				

0 2 0 4 0 7 6 1 7 7 2 8
 8 3 7 3 5 6 5 4 9 3 8

SCHEDULE B

ITEMIZED DISBURSEMENTS

LAST PERIOD

24

Any information copied from such Reports and transmitted may not be sold or used by any person for any purpose other than for the original purpose for which it was collected, and for no other purpose.

NAME OF COMMITTEE (in Full)

Marshall PAC

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
1. Full Name, Mailing Address and ZIP Code Leins for Senate 122 C Street Northwest Suite 650 WASHINGTON D.C. 20037-6426	Purpose of Disbursement <u>Contribution</u> Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/12/88	3,000.00
2. Full Name, Mailing Address and ZIP Code Friends for Eric Prentiss Committee 910 B Chestnut Street Philadelphia PA 19107	Purpose of Disbursement <u>Contribution</u> Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/12/88	1,250.00
3. Full Name, Mailing Address and ZIP Code Republican City Committee 17th and The Parkway - W 1301 Philadelphia PA 19103	Purpose of Disbursement <u>Contribution</u> Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/12/88	500.00
4. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
5. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
6. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
7. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
8. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
9. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
10. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
11. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

GRAND TOTAL of Disbursements This Period

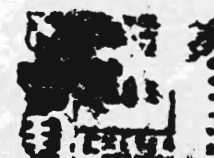
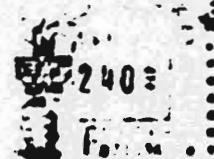
TOTAL This Period of Disbursements

3373565491077

0 Market Street
te 600
ladelphia, PA 19103

! 1p355 4.51A

MAIL



Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

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

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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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83040781775

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u. Marshall Political Action Committee and
Ralph S. Snyder, Esquire, as treasurer (89NF-89)

v.

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330407B1770

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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

830407777

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

II. FACTUAL AND LEGAL ANALYSIS

A. Filing of Reports

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:

2904078

Marshall Political Action Committee
(89NF-89)

November 21, 1981/

3 0 0 4 0 7 7 7 9

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

390407 1780

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

330407 1731

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:

890407 1782

PAGES 9 THROUGH 44 DO NOT PERTAIN TO THESE RESPONDENTS.

33040781785

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).

33040781784

Marshall Political Action Committee and Ralph S. Snyder, Esquire, as treasurer (89NF-89)

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

3 3 0 4 0 7 6 1 7 8 5

32040761787

Marshall Political Action Committee and Ralph S.
Snyder, Esquire, as treasurer (89NF-89)

8 2 0 4 0 7 6 1 7 3 8

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)

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22040761700

[illegible]

(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

00040761703

(continued)

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

Page 7

Marshall Political Action Committee and
Ralph S. Snyder, Esquire, as treasurer
(89NF-89)

89040761700

(continued)

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

Page 8

93040761707

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

22040761728

(continued)

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

Page 10

83040761799

Marshall Political Action Committee and Ralph
S. Snyder, Esquire, as treasurer (89NF-89)

(continued)

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

Page 11

22040761800

(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

89040761801



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 6, 1989

Ralph S. Snyder, Esquire, Treasurer
Marshall Political Action Committee
Suite 3600
1600 Market Street
Philadelphia, PA 19103

RE: MUR 2961
Marshall Political Action Committee
and Ralph S. Snyder, Esquire,
as treasurer

Dear Mr. Snyder:

On August 22, 1989, the Federal Election Commission found that there is reason to believe Marshall 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.

Ralph S. Snyder, Esquire, 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 Sandra Robinson, 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

20040761803

89 OCT 31 AM 11:17

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)

Marshall Political Action Committee)
and Ralph S. Snyder, Esquire, as treasurer) MUR 2961

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Ralph S. Snyder, the treasurer of Marshall Political Action Committee. Attachment I.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Marshall Political Action Committee and Ralph S. Snyder, Esquire, as treasurer.

2. Close the file.

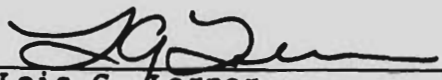
89040761804

3. Approve the attached letter.

Lawrence M. Noble
General Counsel

10-30-89
Date

BY:


Lois G. Lerner
Associate General Counsel

Attachments

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

Staff Assigned: Sandra H. Robinson

890407618005

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Marshall Political Action Committee) MUR 2961
and Ralph S. Snyder, Esquire, 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 2961:

1. Accept the conciliation agreement with Marshall Political Action Committee and Ralph S. Snyder, Esquire, as treasurer, recommended in the General Counsel's Report dated October 30, 1989.
2. Close the file.
3. Approve the letter recommended in the General Counsel's Report dated October 30, 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	11:18
Circulated to the Commission:	Wednesday, November 1, 1989	11:00
Deadline for vote:	Friday, November 3, 1989	11:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1989

Ralph S. Snyder, Esquire, Treasurer
Marshall Political Action Committee
Suite 3600
1600 Market Street
Philadelphia, PA 19103

CLOSED

RE: MUR 2961
Marshall Political Action
Committee and Ralph S. Snyder,
Esquire, as treasurer

Dear Mr. Snyder:

On November 3, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on behalf of Marshall 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.

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Ralph S. Snyder, Esquire, Treasurer
Page 2

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

33040761308

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Marshall Political Action Committee)
Committee and Ralph S. Snyder, Esquire,)
as treasurer)

MUR 2961

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE
89 OCT 25 PM 4:23

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Marshall Political Action Committee and Ralph S. Snyder, Esquire, 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:

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

2. Ralph S. Snyder, Esquire, is the treasurer of Marshall 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 November 21, 1988, 25 days late, disclosing \$3,482.30 in receipts and \$4,750.00 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 Fifty Dollars (\$550.00), 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.

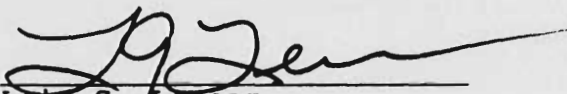
IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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:

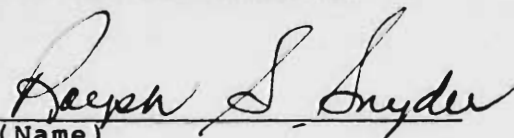
Lawrence M. Noble
General Counsel

BY:


Lois G. Lerner
Associate General Counsel

11-7-89
Date

FOR THE RESPONDENTS:


(Name)
(Position)
Treasurer,
Marshall Political Action Committee

10/17/89
Date

33040781311



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2961

DATE FILMED 11/12/89 CAMERA NO. 2

CAMERAMAN AS

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