



FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

THIS IS THE BEGINNING OF MUR # 8974

DATE FILMED 1-31-90 CAMERA NO. 3

CAMERAMAN AS

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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

10/11/89 P1:41

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

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List of Committees and Prior Commission Actions

- 1.
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34. C00112144

Transamerica Life Companies Political  
Action Committee "TALCPAC"

89NF-102

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37.

00040781221

A-00004

20040781222

PAGES 5 THROUGH 10 DO NOT PERTAIN TO THESE RESPONDENTS.

A-00005

COMMITTEE ID, NAME AND ADDRESS

CONTACTS  
WITH FILED ATCHREPORTS FILED/  
RESPONSES

00040781223

Attachments 34a-34j

C00112144

TRANSAMERICA LIFE COMPANIES POLITICAL ACTION COMMITTEE "TALCPAC"

TREASURER'S NAME: JAMES M JACKSON (5/1/87 to present)\*

1150 S OLIVE STREET, SUITE 2500

LOS ANGELES CA 90015

Telecon  
1/25/891988 30 Day Po  
General Report  
and letter  
filed 1/26/89

\*William Ouimette (pre-1/1/87-4/30/87)

A-00011

00040781224

A-00012

Transamerica Life Companies Political Action Committee "TALCPAC"

(Attachments 34a - 34j)

00040761225

0 0 0 4 0 7 8 1 2 2 0  
FEDERAL ELECTION COMMISSION  
1987-1988  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 17MAY89

PAGE 2

| COMMITTEE                                                        | DOCUMENT                               | RECEIPTS | DISBURSEMENTS | COVERAGE DATES   | # OF PAGES          | MICROFILM LOCATION |
|------------------------------------------------------------------|----------------------------------------|----------|---------------|------------------|---------------------|--------------------|
|                                                                  |                                        |          |               | TYPE OF FILER    |                     |                    |
| TRANSAMERICA LIFE COMPANIES POLITICAL ACTION COMMITTEE "TALCPAC" |                                        |          |               | ID #C00112144    | NON-PARTY QUALIFIED |                    |
| CONNECTED ORGANIZATION: TRANSAMERICA OCCIDENTAL LIFE INSUR CO    |                                        |          |               |                  |                     |                    |
| 1987                                                             | MID-YEAR REPORT                        | 22,097   | 4,898         | 1JAN87 -30JUN87  | 8                   | 87FEC/480/1668     |
|                                                                  | YEAR-END                               | 17,297   | 8,000         | 1JUL87 -31DEC87  | 26                  | 88FEC/500/1374     |
|                                                                  | YEAR-END - AMENDMENT                   | 17,297   | 8,000         | 1JUL87 -31DEC87  | 25                  | 88FEC/508/3240     |
| 1988                                                             | APRIL QUARTERLY                        | 13,735   | 3,386         | 1JAN88 -31MAR88  | 9                   | 88FEC/519/2432     |
|                                                                  | JULY QUARTERLY                         | 8,862    | 10,500        | 1APR88 -30JUN88  | 6                   | 88FEC/537/0463     |
|                                                                  | OCTOBER QUARTERLY                      | 7,237    | 33,259        | 1JUL88 -30SEP88  | 12                  | 88FEC/553/2558     |
|                                                                  | OCTOBER QUARTERLY - AMENDMENT          | 7,237    | 32,259        | 1JUL88 -30SEP88  | 11                  | 88FEC/565/0017     |
|                                                                  | REQUEST FOR ADDITIONAL INFORMATION     |          |               | 1JUL88 -30SEP88  | 1                   | 88FEC/561/216      |
|                                                                  | POST-GENERAL                           | -        | -             | 1OCT88 -28NOV88  | 11                  | 89FEC/579/544      |
|                                                                  | POST-GENERAL - AMENDMENT               | -        | -             | 1OCT88 -28NOV88  | 11                  | 89FEC/582/0822     |
|                                                                  | POST-GENERAL - AMENDMENT               | 4,020    | 24,050        | 1OCT88 -28NOV88  | 3                   | 89FEC/590/1842     |
|                                                                  | NOTICE OF FAILURE TO FILE              |          |               | 28NOV88          | 1                   | 89FEC/576/2015     |
|                                                                  | REQUEST FOR ADDITIONAL INFORMATION     |          |               | 1OCT88 -28NOV88  | 2                   | 89FEC/585/0900     |
|                                                                  | REQUEST FOR ADDITIONAL INFORMATION 2ND |          |               | 1OCT88 -28NOV88  | 3                   | 89FEC/588/0638     |
|                                                                  | REQUEST FOR ADDITIONAL INFORMATION     |          |               | 1OCT88 -28NOV88  | 1                   | 89FEC/594/1268     |
|                                                                  | YEAR-END                               | 8,871    | 26,059        | 1OCT88 -31DEC88  | 26                  | 89FEC/582/0796     |
|                                                                  | YEAR-END - AMENDMENT                   | 2,580    | 2,000         | 29NOV88 -31DEC88 | 21                  | 89FEC/590/1847     |
|                                                                  | YEAR-END - AMENDMENT                   | -        | -             | 29NOV88 -31DEC88 | 2                   | 89FEC/595/0203     |
|                                                                  | REQUEST FOR ADDITIONAL INFORMATION     |          |               | 1OCT88 -31DEC88  | 2                   | 89FEC/586/3333     |
|                                                                  | REQUEST FOR ADDITIONAL INFORMATION 2ND |          |               | 1OCT88 -31DEC88  | 3                   | 89FEC/589/4259     |
|                                                                  | REQUEST FOR ADDITIONAL INFORMATION     |          |               | 29NOV88 -31DEC88 | 1                   | 89FEC/594/1270     |
| TOTAL                                                            |                                        | 75,828   | 0             | 85,093           | 0                   | 185 TOTAL PAGES    |

All reports have been reviewed.

Ending cash-on-hand as of 12/31/88: \$13,751

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

0 0 0 4 0 7 3 1 2 2 7

FEDERAL ELECTION COMMISSION  
1989-1990  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 13JUN89

PAGE 10

| COMMITTEE                                                        | DOCUMENT                                   | RECEIPTS | DISBURSEMENTS | COVERAGE DATES | # OF<br>PAGES<br>TYPE OF FILER | MICROFILM<br>LOCATION |
|------------------------------------------------------------------|--------------------------------------------|----------|---------------|----------------|--------------------------------|-----------------------|
| TRANSAMERICA LIFE COMPANIES POLITICAL ACTION COMMITTEE "TALCPAC" |                                            |          |               |                |                                |                       |
| CONNECTED ORGANIZATION: TRANSAMERICA OCCIDENTAL LIFE INSUR CO    |                                            |          |               |                |                                |                       |
|                                                                  | 1989 STATEMENT OF ORGANIZATION - AMENDMENT |          |               | 10APR89        | 2                              | 89FEC/590/4510        |
|                                                                  | STATEMENT OF ORGANIZATION - AMENDMENT      |          |               | 22MAY89        | 2                              | 89FEC/595/5304        |
|                                                                  | TOTAL                                      | 0        | 0             |                | 4                              | TOTAL PAGES           |

ID #C00112144 NON-PARTY QUALIFIED

ATTACHMENT 34b

TELECON

**ANALYST:** DAVID J. BLAKELEY  
**CONVERSATION WITH:** CHARLOTTE S. LIPTAK  
**COMMITTEE:** TRANSAMERICA LIFE COMPANIES POLITICAL ACTION COMMITTEE "TALCPAC"  
**DATE:** JANUARY 25, 1989  
**SUBJECT(S):** THE NON-FILING OF THE THIRTY DAY POST-GENERAL ELECTION REPORT

On January 25, 1989, I received a telephone call from Charlotte S. Liptak of the Transamerica Life Companies Political Action Committee. She informed me that they had received a Non-Filer Notice for the Thirty Day Post-General Election Report, and that although the report had been completed, the person authorized to sign the report was out of town. I advised her that the committee should send an unsigned copy as soon as possible, then follow immediately with a signed copy upon the return of the treasurer.

00040761228

Transamerica  
Life Companies  
T

Transamerica Center  
1140 South Ohio  
Los Angeles, California 90015-2211  
Mailing Address  
Box 2101 Terminal Annex  
Los Angeles, California 90061-0101

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM  
09 JAN 26 AM 8:59

ATTACHMENT 34d

January 25, 1989

Mr. David Blakeley  
Federal Election Commission  
Political Records Office  
299 E Street, N.W.  
Washington, D.C. 20463

Re: Thirty Day Post-General Report (Through  
11/28/88)  
Transamerica Life Companies Political  
Action Committee

Dear Mr. Blakeley:

This will confirm our telephone conversation of January 25, 1989, concerning the above. As we discussed, we have prepared the report, but the person who must sign it, Mr. James Jackson, is out of town until January 27, 1989. As we do not have another individual who can sign the forms, we are sending them to you unsigned, in order to get them to you as quickly as possible. When Mr. Jackson returns on January 27, 1989, we will have him sign the forms and send them to you immediately.

If you need anything further, please feel free to contact Mr. Jackson or the undersigned. Thank you.

Very truly yours,

*Charlotte S. Liptak*  
Charlotte S. Liptak  
Associate Counsel

CSL:sb

Enclosure

230049723121259

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM  
09 JAN 26 AM 8:59

**Report of Campaign and Expenditures**  
For a Political Committee Other Than an Authorized Committee

FEDERAL ELECTION COMMISSION

(Summary Page)

ATTACHMENT 34 e

**1. NAME OF COMMITTEE (in Full)**

**Transamerica Life Companies Political Action Committee**

**1150 South Olive Street**

**City, State and ZIP Code**

**Los Angeles, CA 90014**

☐ Check here if address is different than previously reported.

**2. FEC Identification Number**

**C00112144**

☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_

**4. TYPE OF REPORT (Check appropriate)**

- ☐ April 15 Quarterly Report    ☐ October 15 Quarterly Report  
☐ July 15 Quarterly Report    ☐ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-Election Year Only)  
☐ Monthly Report for \_\_\_\_\_  
☐ Twelfth day report preceding \_\_\_\_\_  
☒ Thirtieth day report following the General Election  
on Nov 8 in the State of CA  
1988  
☐ Termination Report

**5. Is this Report an Amendment?**

☐ YES    ☐ NO

**SUMMARY**

**6. Covering Period** 10/01/88 through 11/28/88

**6. (a) Cash on hand January 1, 19** 88

**(b) Cash on Hand at Beginning of Reporting Period**

**(c) Total Receipts (from Line 1B)**

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

**7. Total Disbursements (from Line 2B)**

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

**9. Debts and Obligations Owed TO The Committee**  
(Itemize all on Schedule C or Schedule D)

**10. Debts and Obligations Owed BY the Committee**  
(Itemize all on Schedule C 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.

James M. Jackson  
Title or Print Name of Treasurer

**SIGNATURE OF TREASURER**

**Date**

**NOTE:** Submission of false or fraudulent or misleading information may subject the person signing this report to the penalties of 2 U.S.C. § 437e.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

For further information contact:  
Federal Election Commission  
Toll Free 800-426-6930  
Local 202 523-4088

FEC FORM 3x (3/80)

8 7 3 3 7 9 5 4 1 7

## References

|    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |     |
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| 24 | 25 | 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 | 37 | 38 | 39 | 40 | 41 | 42 | 43 | 44 | 45 | 46 | 47 | 48 | 49 | 50 | 51 | 52 | 53 | 54 | 55 | 56 | 57 | 58 | 59 | 60 | 61 | 62 | 63 | 64 | 65 | 66 | 67 | 68 | 69 | 70 | 71 | 72 | 73 | 74 | 75 | 76 | 77 | 78 | 79 | 80 | 81 | 82 | 83 | 84 | 85 | 86 | 87 | 88 | 89 | 90 | 91 | 92 | 93 | 94 | 95 | 96 | 97 | 98 | 99 | 100 |
|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|-----|

SECTION 3

DISBURSEMENT REPORT

Page 1 of 4  
 Attached to the  
 Original Primary Page

1 4  
 FOR LINE NUMBER

ATTACHMENT 24 g

Any information obtained from such reports and documents 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)

**TRANSAMERICA LIFE COMPANIES POLITICAL ACTION COMMITTEE**

|                                                                                                                                                                  |                                                                                                                                                                                                                          |                                                   |                                                                  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|------------------------------------------------------------------|
| <b>A. Full Name, Mailing Address and ZIP Code</b><br><b>America's Leaders Fund</b><br><b>333 South Grand Avenue</b><br><b>Los Angeles, CA 90071</b>              | <b>Purpose of Disbursement</b><br><b>Support Candidate</b><br><b>Dan Rostenkowski</b><br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify) | <b>Date (month, day, year)</b><br><b>10/12/88</b> | <b>Amount of Each Disbursement This Period</b><br><b>500.00</b>  |
| <b>Full Name, Mailing Address and ZIP Code</b><br><b>American Council Of Life Ins - Life Pac</b><br><b>1850 K Street N.W.</b><br><b>Washington, D.C. 20006</b>   | <b>Purpose of Disbursement</b><br><b>Support Candidate</b><br><b>PAC</b><br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)              | <b>Date (month, day, year)</b><br><b>11/04/88</b> | <b>Amount of Each Disbursement This Period</b><br><b>2000.00</b> |
| <b>Full Name, Mailing Address and ZIP Code</b><br><b>Beryl Anthony for Congress</b><br><b>P.O. Box 1871</b><br><b>El Dorado, AK 91730</b>                        | <b>Purpose of Disbursement</b><br><b>Support Candidate</b><br><b>Beryl Anthony</b><br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)    | <b>Date (month, day, year)</b><br><b>10/12/88</b> | <b>Amount of Each Disbursement This Period</b><br><b>500.00</b>  |
| <b>Full Name, Mailing Address and ZIP Code</b><br><b>Bill Thomas Campaign Committee</b><br><b>P.O. Box 395</b><br><b>Bakersfield, CA 93302</b>                   | <b>Purpose of Disbursement</b><br><b>Support Candidate</b><br><b>Bill Thomas</b><br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)      | <b>Date (month, day, year)</b><br><b>11/02/88</b> | <b>Amount of Each Disbursement This Period</b><br><b>2500.00</b> |
| <b>Full Name, Mailing Address and ZIP Code</b><br><b>Campaign for Richard Lehman</b><br><b>P.O. Box 829</b><br><b>Fresno, CA 93712</b>                           | <b>Purpose of Disbursement</b><br><b>Support Candidate</b><br><b>Richard Lehman</b><br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)   | <b>Date (month, day, year)</b><br><b>11/04/88</b> | <b>Amount of Each Disbursement This Period</b><br><b>1000.00</b> |
| <b>Full Name, Mailing Address and ZIP Code</b><br><b>Cheney For Congress</b><br><b>P.O. Box 37035</b><br><b>Washington, D.C. 20013</b>                           | <b>Purpose of Disbursement</b><br><b>Support Candidate</b><br><b>Dick Cheney</b><br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)      | <b>Date (month, day, year)</b><br><b>10/12/88</b> | <b>Amount of Each Disbursement This Period</b><br><b>500.00</b>  |
| <b>Full Name, Mailing Address and ZIP Code</b><br><b>Citizens for Shumway</b><br><b>P.O. Box 77725</b><br><b>Stockton, CA 95207</b>                              | <b>Purpose of Disbursement</b><br><b>Support Candidate</b><br><b>Norman Shumway</b><br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)   | <b>Date (month, day, year)</b><br><b>10/26/88</b> | <b>Amount of Each Disbursement This Period</b><br><b>1000.00</b> |
| <b>Full Name, Mailing Address and ZIP Code</b><br><b>Committee for Sam Gibbons</b><br><b>4603 Wishart Blvd.</b><br><b>Tampa, FL 33603</b>                        | <b>Purpose of Disbursement</b><br><b>Support Candidate</b><br><b>Sam Gibbons</b><br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)      | <b>Date (month, day, year)</b><br><b>10/12/88</b> | <b>Amount of Each Disbursement This Period</b><br><b>500.00</b>  |
| <b>Full Name, Mailing Address and ZIP Code</b><br><b>Committee to Reelect Congressman Torres</b><br><b>928 E. Lucille Avenue</b><br><b>West Covina, CA 91790</b> | <b>Purpose of Disbursement</b><br><b>Support Candidate</b><br><b>Esteban Torres</b><br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)   | <b>Date (month, day, year)</b><br><b>10/25/88</b> | <b>Amount of Each Disbursement This Period</b><br><b>1000.00</b> |

SUBTOTAL OF DISBURSEMENTS This Page: 000.00

TOTAL TO PAGE 22 (SEE PAGE 11 FOR NUMBER OF)

018  
 30243379545332

Any information obtained from such Reports and Disbursements 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)

**TRANSAMERICA LIFE COMPANIES POLITICAL ACTION COMMITTEE**

|                                                                                                                                                                     |                                                                                                                                                                                                                                                      |                                                     |                                                                    |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|--------------------------------------------------------------------|
| <p>A. Full Name, Mailing Address and ZIP Code<br/> <b>Committee to Reelect Jack Brooks</b><br/> <b>1762 Church Street N.W.</b><br/> <b>Washington, DC 20036</b></p> | <p>Purpose of Disbursement<br/> <b>Support Candidate</b><br/> <b>Jack Brooks</b><br/>                     Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify)</p>      | <p>Date (month, day, year)<br/> <b>10/12/88</b></p> | <p>Amount of Each Disbursement This Period<br/> <b>1000.00</b></p> |
| <p>B. Full Name, Mailing Address and ZIP Code<br/> <b>Committee to Reelect Tom Foley</b><br/> <b>West 830 First Avenue</b><br/> <b>Spokane, Wa 99204</b></p>        | <p>Purpose of Disbursement<br/> <b>Support Candidate</b><br/> <b>Tom Foley</b><br/>                     Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify)</p>        | <p>Date (month, day, year)<br/> <b>10/12/88</b></p> | <p>Amount of Each Disbursement This Period<br/> <b>750.00</b></p>  |
| <p>C. Full Name, Mailing Address and ZIP Code<br/> <b>Coyne For Congress</b><br/> <b>P.O. Box 70957</b><br/> <b>Washington, D.C. 20024</b></p>                      | <p>Purpose of Disbursement<br/> <b>Support Candidate</b><br/> <b>William Coyne</b><br/>                     Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify)</p>    | <p>Date (month, day, year)<br/> <b>10/12/88</b></p> | <p>Amount of Each Disbursement This Period<br/> <b>500.00</b></p>  |
| <p>D. Full Name, Mailing Address and ZIP Code<br/> <b>Dixon For Congress</b><br/> <b>1581 Roxbury Drive</b><br/> <b>Los Angeles, CA 90035</b></p>                   | <p>Purpose of Disbursement<br/> <b>Support Candidate</b><br/> <b>Julian Dixon</b><br/>                     Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify)</p>     | <p>Date (month, day, year)<br/> <b>10/31/88</b></p> | <p>Amount of Each Disbursement This Period<br/> <b>1000.00</b></p> |
| <p>E. Full Name, Mailing Address and ZIP Code<br/> <b>Drier for Congress</b><br/> <b>P.O. Box 1110</b><br/> <b>Covina, CA 91772</b></p>                             | <p>Purpose of Disbursement<br/> <b>Support Candidate</b><br/> <b>David Dreier</b><br/>                     Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify)</p>     | <p>Date (month, day, year)<br/> <b>11/16/88</b></p> | <p>Amount of Each Disbursement This Period<br/> <b>500.00</b></p>  |
| <p>F. Full Name, Mailing Address and ZIP Code<br/> <b>Ed Jenkins for Congress</b><br/> <b>P.O. Box 70</b><br/> <b>Jasper, GA 30143</b></p>                          | <p>Purpose of Disbursement<br/> <b>Support Candidate</b><br/> <b>Ed Jenkins</b><br/>                     Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify)</p>       | <p>Date (month, day, year)<br/> <b>10/12/88</b></p> | <p>Amount of Each Disbursement This Period<br/> <b>500.00</b></p>  |
| <p>G. Full Name, Mailing Address and ZIP Code<br/> <b>Friends of Byron Dorgan</b><br/> <b>618 E. Street SE</b><br/> <b>Washington, DC 20003</b></p>                 | <p>Purpose of Disbursement<br/> <b>Support Candidate</b><br/> <b>Byron Dorgan</b><br/>                     Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify)</p>     | <p>Date (month, day, year)<br/> <b>10/12/88</b></p> | <p>Amount of Each Disbursement This Period<br/> <b>500.00</b></p>  |
| <p>H. Full Name, Mailing Address and ZIP Code<br/> <b>Gephardt in Congress</b><br/> <b>3800 Hampton Avenue</b><br/> <b>St. Louis, MO 63109</b></p>                  | <p>Purpose of Disbursement<br/> <b>Support Candidate</b><br/> <b>Ricahrd Gephardt</b><br/>                     Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year)<br/> <b>10/12/88</b></p> | <p>Amount of Each Disbursement This Period<br/> <b>500.00</b></p>  |
| <p>I. Full Name, Mailing Address and ZIP Code<br/> <b>IMPAC 2000</b><br/> <b>300 Capitol Mall, Suite 350</b><br/> <b>Sacramento, CA 94814</b></p>                   | <p>Purpose of Disbursement<br/> <b>Support Candidate</b><br/> <b>Vic Fazio</b><br/>                     Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify)</p>        | <p>Date (month, day, year)<br/> <b>10/18/88</b></p> | <p>Amount of Each Disbursement This Period<br/> <b>1000.00</b></p> |

SUBTOTAL OF DISBURSEMENTS This Page (optional)

TOTAL This Period (in duplicate line number only)

Information reported from such to 2010 and 2011 may not be used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any individual mentioned to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

ATTACHMENT 34 i

**TRANSAMERICA LIFE COMPANIES POLITICAL ACTION COMMITTEE**

|                                                                                                                                                                 |                                                                                                                                                                                                                                                     |                                                     |                                                                    |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|--------------------------------------------------------------------|
| <p>A. Full Name, Mailing Address and ZIP Code<br/> <b>J.J. JAKE PICKLE REELECTION</b><br/> <b>P.O. Box 717</b><br/> <b>Austin, TX 78767</b></p>                 | <p>Purpose of Disbursement<br/> <b>Support Candidate</b><br/> <b>Jake Pickle</b><br/>                     Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify)</p>     | <p>Date (month, day, year)<br/> <b>10/12/88</b></p> | <p>Amount of Each Disbursement This Period<br/> <b>1000.00</b></p> |
| <p>B. Full Name, Mailing Address and ZIP Code<br/> <b>Levine for Congress</b><br/> <b>P.O. Box 2474</b><br/> <b>Washington, DC 20013</b></p>                    | <p>Purpose of Disbursement<br/> <b>Support Candidate</b><br/> <b>Sander Levin</b><br/>                     Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify)</p>    | <p>Date (month, day, year)<br/> <b>10/12/88</b></p> | <p>Amount of Each Disbursement This Period<br/> <b>300.00</b></p>  |
| <p>C. Full Name, Mailing Address and ZIP Code<br/> <b>Malcolm Wallop Senate Drive</b><br/> <b>1455 Pennsylvania Avenue</b><br/> <b>Washington, DC 20004</b></p> | <p>Purpose of Disbursement<br/> <b>Support Candidate</b><br/> <b>Malcolm Wallop</b><br/>                     Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify)</p>  | <p>Date (month, day, year)<br/> <b>10/12/88</b></p> | <p>Amount of Each Disbursement This Period<br/> <b>500.00</b></p>  |
| <p>D. Full Name, Mailing Address and ZIP Code<br/> <b>McGrath For Congress</b><br/> <b>P.O. Box 633</b><br/> <b>Valley Stream, NY 11580</b></p>                 | <p>Purpose of Disbursement<br/> <b>Support Candidate</b><br/> <b>Raymond McGrath</b><br/>                     Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year)<br/> <b>10/12/88</b></p> | <p>Amount of Each Disbursement This Period<br/> <b>500.00</b></p>  |
| <p>E. Full Name, Mailing Address and ZIP Code<br/> <b>Mike Andrews for Congress</b><br/> <b>1200 Smith Suite 3600</b><br/> <b>Houston, TX 77002</b></p>         | <p>Purpose of Disbursement<br/> <b>Support Candidate</b><br/> <b>Mike Andrews</b><br/>                     Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify)</p>    | <p>Date (month, day, year)<br/> <b>10/12/88</b></p> | <p>Amount of Each Disbursement This Period<br/> <b>500.00</b></p>  |
| <p>F. Full Name, Mailing Address and ZIP Code<br/> <b>New Mexicans for Bill Richards</b><br/> <b>P.O. box 518</b><br/> <b>Santa Fe, New Mexico 87504</b></p>    | <p>Purpose of Disbursement<br/> <b>Support Candidate</b><br/> <b>Bill Richards</b><br/>                     Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify)</p>   | <p>Date (month, day, year)<br/> <b>10/12/88</b></p> | <p>Amount of Each Disbursement This Period<br/> <b>500.00</b></p>  |
| <p>G. Full Name, Mailing Address and ZIP Code<br/> <b>Rangel Reelection Committee</b><br/> <b>2030 Allen Place N.W.</b><br/> <b>Washington, DC 20515</b></p>    | <p>Purpose of Disbursement<br/> <b>Support Candidate</b><br/> <b>Charles Rangel</b><br/>                     Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify)</p>  | <p>Date (month, day, year)<br/> <b>10/12/88</b></p> | <p>Amount of Each Disbursement This Period<br/> <b>500.00</b></p>  |
| <p>H. Full Name, Mailing Address and ZIP Code<br/> <b>Ronnie G. Flippo Committee</b><br/> <b>P.O. Box 1221</b><br/> <b>Florence, AL 35631</b></p>               | <p>Purpose of Disbursement<br/> <b>Support Candidate</b><br/> <b>Ronnie Flippo</b><br/>                     Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify)</p>   | <p>Date (month, day, year)<br/> <b>10/12/88</b></p> | <p>Amount of Each Disbursement This Period<br/> <b>500.00</b></p>  |
| <p>I. Full Name, Mailing Address and ZIP Code<br/> <b>The Roth for Senate Committee</b><br/> <b>P.O. Box 105</b><br/> <b>Wilmington, DE 19899</b></p>           | <p>Purpose of Disbursement<br/> <b>Support Candidate</b><br/> <b>William Roth</b><br/>                     Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br/> <input type="checkbox"/> Other (specify)</p>    | <p>Date (month, day, year)<br/> <b>10/12/88</b></p> | <p>Amount of Each Disbursement This Period<br/> <b>500.00</b></p>  |

SUBTOTAL Disbursements This Page (add lines)

Page 1 of 1 (add page this line number only)

**DPB**

NAME OF COMPANY TO BE PAID

ATTACHMENT 34 j

|  |                  |
|--|------------------|
|  | <b>E. Pull N</b> |
|  | <b>F. Pull N</b> |
|  | <b>G. Pull N</b> |

TOTAL THIS PAGE 03 .01 PAGE THIS LINE NUMBER ON 1

24050.00

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.

b.

c.

d.

e.

f.

g.

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20040761236

m.

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00040781237

aa.

bb.

cc.

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ee.

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gg.

hh. Transamerica Life Companies Political Action Committee "TALCPAC" and James M. Jackson, as treasurer (89NF-102)

ii.

jj.

kk.

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

00040761238

## II. FACTUAL AND LEGAL ANALYSIS

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:

00040781240

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

20040781241

-7-

Transamerica Life Companies Political  
Action Committee "TALCPAC"  
(89NF-102)

January 26, 1989

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

00040781242

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:

00040761243

PAGES 9 THROUGH 44 DO NOT PERTAIN TO THESE RESPONDENTS.

00040781244

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).

00040781245

00040781246

Transamerica Life Companies Political Action Committee  
"TALCPAC" and James M. Jackson, as treasurer (89NF-102)

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

00040761247

00040781248

00040781249

Transamerica Life Companies Political Action Committee  
"TALCPAC" and James M. Jackson, as treasurer (89NF-102)

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

8/7/69  
Date

BY:   
Lois G. Lerner  
Associate General Counsel

Attachments:

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

00040781250

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of

RAD REFERRALS  
#89NF-69 through  
#89NF-105

(continued)

00040781251

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

Page 2

00040781252

(continued)

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

Page 3

00040781253

(continued)

00040781254

[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)

00040781255

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

Page 6

00040701256

(continued)

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

Page 7

00040731257

(continued)

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

Page 8

Transamerica Life Companies Political Action  
Committee "TALPAC" and James M. Jackson, as  
treasurer (89NF-102)

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

(continued)

00040701258

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

Page 9

00040761259

(continued)

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

Page 10

00040781250

(continued)

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

Page 11

00040781251

Transamerica Life Companies Political Action  
Committee "TALCPAC" and James M. Jackson, as  
treasurer (89NF-102)

(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

00040781262



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

September 12, 1989

James M. Jackson, Treasurer  
Transamerica Life Companies  
Political Action Committee  
"TALCPAC"  
1150 S. Olive Street  
Suite 2500  
Los Angeles, CA 90015

RE: MUR 2974  
Transamerica Life Companies  
Political Action Committee  
"TALCPAC" and James M. Jackson,  
as treasurer

Dear Mr. Jackson:

On August 22, 1989, the Federal Election Commission found that there is reason to believe Transamerica Life Companies Political Action Committee "TALCPAC" ("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.

James M. Jackson, 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.

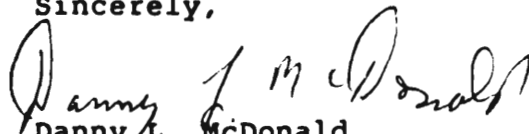
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Sandie Dunham, the staff person 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

Transamerica  
Life Companies



FROM TRANSAMERICA LAW 09/28/90 14:10

Transamerica Center  
1150 South Olive  
Los Angeles, California 90015-2211

Mailing Address  
Box 2101 Terminal Annex  
Los Angeles, California 90051-0101

September 28, 1989

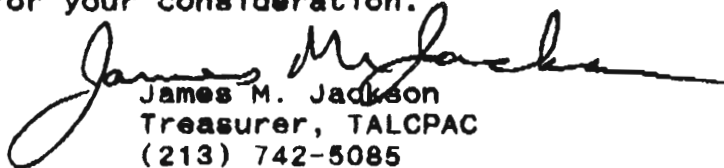
Federal Election Commission  
Washington D.C. 20463

SENT VIA FAX ON SEPT 28, 1989

Re: MUR 2974

Attention: Ms. Sandi Dunham, Esq.

Pursuant to instructions received from your staff by telephone today, please consider this as a request for a stay of the fifteen day limit on receipt of materials for the Commission's consideration in disposing of this matter. I would appreciate the opportunity of discussing this matter with you by telephone prior to proceeding with conciliation or other disposition. Business travel has cut short my ability to respond earlier to your letter (received September 14, 1989). Though I do not anticipate a factual dispute relating to this matter, I would appreciate the opportunity of discussing it with you before proceeding further. Thank you for your consideration.

  
James M. Jackson  
Treasurer, TALCPAC  
(213) 742-5085  
FAX (213) 741-6623

Transamerica Occidental Life Insurance Company ☐ (213) 742-2111  
Transamerica Life Insurance and Annuity Company ☐ (213) 742-3111  
Transamerica Assurance Company ☐ (213) 742-2345  
Transamerica Financial Resources, Inc. ☐ (213) 741-5792  
Transamerica International Insurance Services, Inc. ☐ (213) 742-3823



Transamerica Center  
1150 South Olive  
Los Angeles, CA 90015-2211

Mailing Address  
P.O. Box 2101  
Los Angeles, CA 90051-0101

7 028  
RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

89 OCT 10 AM 9:42

October 3, 1989

Federal Election Commission  
Washington, D.C. 20463

Attention: Ms. Sandi Dunham

Re: MUR 2974

Dear Ms. Dunham:

Pursuant to the suggestions you gave me in our telephone call of this morning, this letter is an explanation of extenuating circumstances relating to the above referenced matter. Our PAC has been in existence since about 1980. We have never had a problem with meeting filing requirements prior to the current time. Within the past months, we have had a personnel change which resulted in a new person keeping the records, preparing the reports, and so forth for our PAC. This has not worked out satisfactorily, as evidenced by the above matter. There have been some mathematical problems as well, but I did not think much of them until this situation came to light. As treasurer, of course, the responsibility for timely and accurate reports is mine, and I accept it. I do feel that our trouble free history and my admittedly poor choice of help contributed to this inadvertent filing error and should be considered as mitigating circumstances.

Yours truly,

James M. Jackson  
Treasurer, Transamerica  
Life Companies Political  
Action Committee

Transamerica Occidental Life Insurance Company ☐ (213) 742-2111  
Transamerica Life Insurance and Annuity Company ☐ (213) 742-3111  
Transamerica Assurance Company ☐ (213) 742-2345  
Transamerica Financial Resources, Inc. ☐ (619) 931-8666  
Transamerica International Insurance Services, Inc. ☐ (213) 742-3823

89 OCT 10 PM 1:17  
RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

90 JAN 11 PM 4:07

BEFORE THE FEDERAL ELECTION COMMISSION

**SENSITIVE**

In the Matter of )  
 )  
Transamerica Life Companies ) MUR 2974  
Political Action Committee )  
"TALCPAC" and James M. )  
Jackson, as treasurer )

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by James M. Jackson, the treasurer of Transamerica Life Companies Political Action Committee "TALCPAC".

The attached agreement contains no changes from the agreement approved by the Commission on December 7, 1989. A \$1,200.00 check for the civil penalty has been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Transamerica Life Companies Political Action Committee "TALCPAC" and James M. Jackson, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble  
General Counsel

1-11-90  
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 J. Dunham

00040781267

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Transamerica Life Companies ) MUR 2974  
Political Action Committee )  
"TALCPAC" and James M. )  
Jackson, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 17, 1990, the Commission decided by a vote of 5-0 to take the following actions in MUR 2974:

1. Accept the conciliation agreement with Transamerica Life Companies Political Action Committee "TALCPAC" and James M. Jackson, as treasurer, as recommended in the General Counsel's Report dated January 11, 1990.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report dated January 11, 1990.

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

Attest:

1-18-90

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

|                               |                       |            |
|-------------------------------|-----------------------|------------|
| Received in the Secretariat:  | Thurs., Jan. 11, 1990 | 4:07 p.m.  |
| Circulated to the Commission: | Fri., Jan. 12, 1990   | 12:00 p.m. |
| Deadline for vote:            | Wed., Jan. 17, 1990   | 4:00 p.m.  |



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

January 23, 1990

James M. Jackson, Treasurer  
Transamerica Life Companies  
Political Action Committee  
"TALCPAC"  
1150 S. Olive Street  
Suite 2500  
Los Angeles, CA 90015

RE: MUR 2974  
Transamerica Life Companies  
Political Action Committee  
"TALCPAC" and James M. Jackson,  
as treasurer

Dear Mr. Jackson:

On January 17, 1990, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on behalf of Transamerica Life Companies Political Action Committee "TALCPAC" 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.

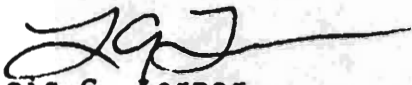
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James M. Jackson  
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Sandra J. Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

BY:   
Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Transamerica Life Companies ) MUR 2974  
Political Action Committee )  
"TALCPAC" and James M. Jackson, )  
as treasurer )

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Transamerica Life Companies Political Action Committee "TALCPAC" and James M. Jackson, 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 this matter.

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

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

1. Transamerica Life Companies Political Action Committee "TALCPAC" is a political committee within the meaning of 2 U.S.C. § 431(4).

2. James M. Jackson is the treasurer of Transamerica Life Companies Political Action Committee "TALCPAC".

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 26, 1989, 91 days late, disclosing \$1,085.09 in receipts and \$11,050.00 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 One Thousand Two Hundred dollars (\$1,200.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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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 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 requirement 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:

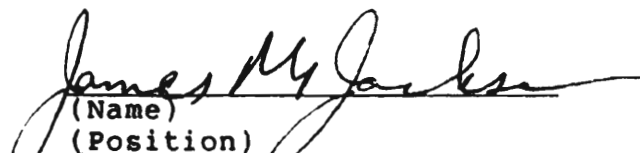
Lawrence M. Noble  
General Counsel

BY:

  
Lois G. Lerner  
Associate General Counsel

Jan. 23, 1990  
Date

FOR THE RESPONDENTS:

  
(Name)  
(Position)  
Treasurer  
TLC PAC

December 27, 1989  
Date

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2974  
DATE FILMED 1-31-90 CAMERA NO. 3  
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