



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3072

DATE FILMED 8/24/91 CAMERA NO. 3

CAMERAMAN AS

90040742121

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: April 23, 1990

ANALYST: Robert B. DiNardo

I. COMMITTEE: United Association Local 725 Pipefitters
Air Conditioning Political Action
Committee (C00160507)
James H. Conley, Treasurer
13185 NW 45th Avenue
Opa Locka, FL 33054

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(iv)
11 CFR §104.5(c)(2)(i)(B)

III. BACKGROUND:

Failure to Timely File the 1989 Year End Report

The United Association Local 725 Pipefitters Air Conditioning Political Action Committee ("the Committee") failed to file its 1989 Year End Report of Receipts and Disbursements in a timely manner. The Committee was notified on December 27, 1989, that the report was due on January 31, 1990 (Attachment 2).

On February 23, 1990, a Non-Filer Notice was sent to the Committee (Attachment 3).

On February 28, 1990, the treasurer of the Committee, James H. Conley, called the Reports Analysis Division ("RAD") analyst. He said that the two secretaries responsible for preparing the report were no longer employed by the Committee. Until their receipt of the Non-Filer Notice, the report had not been prepared. The RAD analyst told Mr. Conley to mail the report as soon as possible (Attachment 4).

On March 5, 1990, the Committee received written notice that the Committee was preparing the 1989 Year End Report and would mail it as soon as possible (Attachment 5).

On March 26, 1990, the Committee filed its 1989 Year End Report (Attachment 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

90040792122

DATE 17APR90

FEDERAL ELECTION COMMISSION

1989-1990

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION TYPE OF FILER
UNITED ASSOCIATION LOCAL 725 PIPEFITTERS AIR CONDITIONING POLITICAL ACTION COMMITTEE				ID #C00160507 NON-PARTY QUALIFIED		
CONNECTED ORGANIZATION: PLUMBING & PIPEFITTING INDUSTRY						
1989	MID-YEAR REPORT	36,128	17,730	1JAN89 -30JUN89	13	89FEC/607/0623
	MID-YEAR REPORT - AMENDMENT	41,128	22,410	1JAN89 -30JUN89	13	89FEC/610/4114
	MID-YEAR REPORT - AMENDMENT	40,309	21,116	1JAN89 -30JUN89	11	90FEC/632/0067
	REQUEST FOR ADDITIONAL INFORMATION			1JAN89 -30JUN89	2	89FEC/609/4383
	1ST LETTER INFORMATIONAL NOTICE			1JAN89 -30JUN89	1	89FEC/613/1530
	REQUEST FOR ADDITIONAL INFORMATION			1JAN89 -30JUN89	1	90FEC/632/4066
	YEAR-END	26,664	26,402	1JUL89 -31DEC89	14	90FEC/632/0079
	NOTICE OF FAILURE TO FILE			1JUL89 -31DEC89	1	90FEC/629/3260
	REQUEST FOR ADDITIONAL INFORMATION			1JUL89 -31DEC89	1	90FEC/632/4070
1990	MISCELLANEOUS NOTICE FROM FEC			26FEB90	2	90FEC/629/4592
	MISCELLANEOUS REPORT TO FEC			5MAR90	2	90FEC/630/0490
	TOTAL	66,973	0 47,518	0	61	TOTAL PAGES

All reports listed have been reviewed.

Ending cash-on-hand as of 12/31/89: \$39,960.34

Outstanding debts and obligations owed to committee as of 12/31/89: \$0

Outstanding debts and obligations owed by committee as of 12/31/89: \$0

YEAR-END REPORT NOTICE

Attachment 2

Page 1 of 2

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 27, 1989

WHO MUST FILE

PARTY COMMITTEES AND PACS (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) must file a Year-End Report in January.

REPORTING DATES

I. Semiannual Filers

REPORT	REPORTING PERIOD ^{1/}	REG./CERT.	FILING DATE
		MAILING DATE ^{2/}	
Year-End	07/01/89-12/31/89	01/31/90	01/31/90

The Year-End Report is due January 31, 1990, and must disclose financial activity that occurred from July 1 through December 31, 1989. Committees which have previously filed 1989 reports should only report activity from the closing date of the last report filed.

II. Monthly Filers

REPORT	REPORTING PERIOD ^{1/}	REG./CERT.	FILING DATE
		MAILING DATE ^{2/}	
Year-End	12/01/89-12/31/89	01/31/90	01/31/90

Committees that chose to file on a monthly basis must file the Year-End Report due January 31, 1990. The report must disclose financial activity from December 1 through December 31, 1989. All other monthly reports are due by the 20th of each month and cover all financial activity of the previous month.

WHAT MUST BE REPORTED

All financial activity (not previously reported) that occurred during the reporting period.

REPORTING FORMS

Use Form 3X (enclosed) for all reports.

WHERE TO FILE

Consult the instructions on the back of the Form 3X Summary Page. Note state filing requirements also.

^{1/}The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

^{2/}Reports sent by registered or certified mail will be considered filed on the date of the U.S. postmark. Reports hand delivered or mailed first class must be received by the filing date.

(over)



0040702124

LABEL

Affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

COMPLIANCE

TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS OR UNAPPROVED SCHEDULES WILL BE REQUIRED TO REFILE.

CHANGE IN FILING FREQUENCY

Committees that wish to change their reporting schedule (for example, from semiannual to monthly) must notify the Commission by sending a letter with the next report due under their current reporting schedule. Committees may change their filing frequency only once a year.

1990 REPORTING

PARTIES AND PACs

Committees should refer to the January 1990 Record for primary election dates and further reporting information.

90040742125



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20541

EQ-7

February 23, 1990

James H. Conley, Treasurer
United Association Local 725
Pipefitters Air Conditioning
Political Action Committee
13185 NW 45th Avenue
Opa Locka, FL 33054

Identification Number: C00160507

Reference: Year End Report (7/1/89-12/31/89)

Dear Mr. Conley:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§108.2, 108.3, 106.4).

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Robert DiNardo on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

00040792120

MEMORANDUM TO THE FILES:

COMMITTEE: United Association Local 725 Pipefitter Air Conditioning PAC
I.D. NUMBER: C00160507
CONTACT: James H. Conley, Treasurer
DATE: February 28, 1990
ANALYST: Robert B. DiNardo
SUBJECT: 1989 Year End Report

Mr. Conley called me at 2:30 in regard to the non-filing of the committee's 1989 Year End Report. He said the committee recently lost two secretaries who are responsible for typing the report. Until their receipt of the Non-Filer Notice the report was not prepared. I told him to prepare and mail the report as soon as possible. He said he would do so.

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United Association Local 725, Pipefitters-Air Conditioning
POLITICAL ACTION COMMITTEE

13185 N.W. 45th AVENUE

Tel. 681-8596

MIAMI, FLORIDA 33155

February 28, 1990

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

Re: Identification Number C00160507
Year End Report (7/1/89-12/31/89)

Dear Mr. NiNardo:

This to confirm our telephone conversation of this date in reference to our late filing of the Year End PAC Disbursement Report.

We have recently lost two secretaries to illness and disciplinary action. The report has been neglected until your recent correspondence.

We will complete the report and forward it to you as soon as possible.

Thank you for your patience.

Sincerely,

James H. Conley
James H. Conley
Financial Secretary-Treasurer

JHC:js

87-0112-0-00005

REPORT OF RECEIPTS AND DISBURSEMENTS HAND DELIVERED

For Other Than An Authorized Committee
(Summary Page)

Attachment 6
Page 1 Of 1

90 MAR 26 AM 9:06

TYPE OR PRINT

1 NAME OF COMMITTEE (in full) United Association Local Union 725 Pipefitters Air Conditioning Political Action Committee	2 FEC IDENTIFICATION NUMBER C00160507
ADDRESS (number and street) ☐ Check if different than previously reported 13185 Northwest 45 Avenue	3 ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)
CITY, STATE and ZIP CODE Opa-locka, Florida 33054	

4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☒ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Termination Report
- Monthly Report Due On
- | | | |
|--------------------------------------|---------------------------------------|--------------------------------------|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |
- ☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election 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>07/01/89</u> through <u>12/31/89</u>		
6	(a) Cash on Hand January 1, 19__		\$ 20,505.55
	(b) Cash on Hand at Beginning of Reporting Period	\$ 30,698.76	
	(c) Total Receipts (from Line 18)	\$ 26,664.18	\$ 66,973.62
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 66,362.94	\$ 87,479.17
7	Total Disbursements (from Line 28)	\$ 26,402.60	\$ 47,518.83
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 39,960.34	\$ 39,960.34
9	Debts and Obligations Owed TO 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 800-424-9630 Local 202-378-3120
10	Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)	\$ -0-	

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

James H. Conley

Signature of Treasurer

James H. Conley

Date

03/20/90

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
(Rev. 10-84)

90 MAY 29 AM 9:56

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral: 90NF-4
Staff Member: Nicole Corn

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENTS: The United Association Local 725 Pipefitters
Air Conditioning Political Action Committee
James H. Conley, as treasurer

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

INTERNAL REPORTS
CHECKED: Referral Materials

FEDERAL AGENCIES
CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred The United Association Local 725 Pipefitters Air Conditioning Political Action Committee ("the Committee") to the Office of the General Counsel on April 23, 1990. (Attachment 1). The reason for the referral was the Committee's failure to file the 1989 Year End Report in a timely manner.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended, requires unauthorized political committees to file reports during a non-election year covering July 1 through December 31 no later than January 31 of the following year. 2 U.S.C. § 434(a)(4)(A)(iv) and 11 CFR § 104.5(c)(2)(i)(B).

The Committee filed its 1989 Year End Report on March 26, 1990, 54 days late. Hence, the Office of the General Counsel

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recommends that the Commission open a MUR and find reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A)(iv).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

9004072131

IV. RECOMMENDATIONS

1. Open a Matter Under Review.
2. Find reason to believe The United Association Local 725 Pipefitters Air Conditioning Political Action Committee and James H. Conley, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).

3. Enter into conciliation with The United Association Local 725 Pipefitters Air Conditioning Political Action Committee and James H. Conley, as treasurer, prior to a finding of probable cause to believe.
4. Approve the appropriate letter, and attached factual and legal analysis and proposed conciliation agreement.

Lawrence M. Noble
General Counsel

May 25, 1990
Date

By:

Lois G. Lerner gB
Lois G. Lerner
Associate General Counsel

Attachments

1. Referral Materials
2. Proposed Conciliation Agreement
3. Factual and Legal Analysis

90040722132

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

The United Association Local 725
Pipefitters Air Conditioning Political
Action Committee and James H. Conley,
as treasurer

RAD Referral 90NF-4

(mk)
3072

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 31, 1990, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral 90NF-4:

1. Open a Matter Under Review.
2. Find reason to believe The United Association Local 725 Pipefitters Air Conditioning Political Action Committee and James H. Conley, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).
3. Enter into conciliation with The United Association Local 725 Pipefitters Air Conditioning Political Action Committee and James H. Conley, as treasurer, prior to a finding of probable cause to believe.
4. Approve the appropriate letter, and factual and legal analysis and proposed conciliation agreement, as recommended in the General Counsel's report dated May 25, 1990.

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

Attest:

May 31, 1990
Date

for Hilda Arnold
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tuesday, May 29, 1990 9:56 a.m.
Circulated to the Commission: Tuesday, May 29, 1990 4:00 a.m.
Deadline for vote: Thursday, May 31, 1990 4:00 p.m.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 5, 1990

James H. Conley, Treasurer
The United Assoc. Local 725
Pipefitters Air Conditioning
Political Action Committee
13185 NW 45th Avenue
Opa Locka, FL 33054

RE: MUR 3072

Dear Mr. Conley:

On May 31, 1990, the Federal Election Commission found that there is reason to believe the United Association Local 725 Pipefitters Air Conditioning Political Action Committee ("the Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), 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 toward 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.

If you are interested in expediting the resolution of this matter by pursuing preprobable 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

James H. Conley, treasurer
Page 2

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 Nicole Corn, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,



Lee Ann Elliot
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

90040792133

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: The United Association Local 725 MUR: 3072
Pipefitters Air Conditioning
Political Action Committee and James
H. Conley, as treasurer

The Federal Election Campaign Act of 1971, as amended, requires an unauthorized political committee in a non-election year to file reports covering July 1 through December 31 by January 31 of the following year. 2 U.S.C. § 434(a)(4)(A)(iv) and 11 CFR § 104.5(c)(2)(i)(B).

Respondents filed the 1989 Year End Report on March 26, 1990, 54 days late. Hence, there is reason to believe the United Association Local 725 Pipefitters Air Conditioning Political Action Committee and James H. Conley, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 2, 1990

Eric S. Johnson, Treasurer
The United Assoc. Local 725
Pipefitters Air Conditioning
Political Action Committee
13185 NW 45th Avenue
Opa Locka, FL 33054

RE: MUR 3072

Dear Mr. Johnson:

This is to confirm and follow-up on your July 30 and 31, 1990 telephone conversations with Nicole Corn, a staff member at the Commission, wherein you agreed to have your name substituted in place of James H. Conley, the former treasurer of The United Association Local 725 Pipefitters Air Conditioning Political Action Committee (the "Committee"), on the conciliation agreement that you signed on June 12, 1990. As Ms. Corn explained, this change was necessary since you have replaced Mr. Conley as treasurer of the Committee.

This revision will only require changes in the first two pages of the agreement. Pursuant to your conversations with Ms. Corn, we have revised those pages to list you as treasurer of the Committee and have inserted the new pages into the agreement. The revised conciliation agreement will now be submitted to the Commission for its consideration. We will contact you when the Commission acts upon the agreement.

We note that the Commission has not yet received an amended statement of organization reflecting the change in treasurer. Under the Federal Election Campaign Act of 1971 (the "Act") and accompanying Commission regulations (copies enclosed), that amended statement was due within ten days of the change in treasurer. See 11 C.F.R. § 102.2(a)(2). Please file the amended statement as soon as possible. Copies of the appropriate form are enclosed for this purpose.

Should you have any questions or problems regarding any aspect of this matter, please contact Nicole Corn at (202) 376-5690. General information regarding the Committee's

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Eric S. Johnson, treasurer
Page 2

obligations under the Act may be obtained from the Commission's
Information Division at (800) 424-9530.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure
Copies of Act and Regulations
Copies of Statement of Organization Form

90040742138

90 AUG -8 AM 10:12

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3072
The United Association Local)
725 Pipefitters Air Conditioning)
and Eric S. Johnson, as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Eric S. Johnson, the secretary-treasurer of the United Association Local 725 Pipefitters Air Conditioning Political Action Committee. Attachment 1.

The attached agreement is identical to the agreement approved by the Commission on May 31, 1990, except for one change. The name of the Committee's new treasurer, Eric S. Johnson, has been substituted for that of James H. Conley.¹ A check for the civil penalty has been received. Attachment 2.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the United Association Local 725 Pipefitters Air Conditioning Political Action Committee.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

8/7/90
Date

BY: 
Lois G. Lerner
Associate General Counsel

1. The Committee has been reminded to file an amended statement of organization reflecting this change.

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Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check

Staff Assigned: Nicole Corn

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3072
The United Association Local 725)
Pipefitters Air Conditioning and)
Eric S. Johnson, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 10, 1990, the Commission decided by a vote of 6-0 to take the following actions in MUR 3072:

1. Accept the conciliation agreement with the United Association Local 725 Pipefitters Air Conditioning Political Action Committee, as recommended in the General Counsel's Report dated August 7, 1990.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report dated August 7, 1990.

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

Attest:

8-13-90
Date

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

Received in the Secretariat: Wed., August 8, 1990 10:12 a.m.
Circulated to the Commission: Wed., August 8, 1990 4:00 p.m.
Deadline for vote: Fri., August 10, 1990 4:00 p.m.

dh

90040792141



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 15, 1990

CLOSED

Eric S. Johnson, Treasurer
United Association Local 725
Pipefitters Air Conditioning
Political Action Committee
13185 NW 45th Avenue
Opa Locka, FL 33054

RE: MUR 3072
United Association Local 725
Pipefitters Air Conditioning
Political Action Committee
and Eric S. Johnson, as
treasurer

Dear Mr. Johnson:

On August 10, 1990, the Federal Election Commission accepted the signed conciliation agreement submitted by you in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(iv), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to the Committee and you, as treasurer.

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.

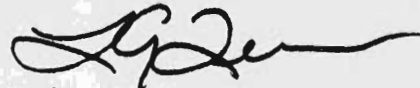
20040792142

Mr. Johnson
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

00040792143

90 JUN 25 AM 10:58

BEFORE THE FEDERAL ELECTION COMMISSION

06C 6739

In the Matter of)
The United Association Local) MUR 3072
725 Pipefitters Air Conditioning)
and James H. Conley, 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 the United Association Local 725 Pipefitters Air Conditioning Political Action Committee and James H. Conley, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(iv).

NOW, THEREFORE, the Commission and 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 Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 434(a)(4)(A)(i).

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

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

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

1. The United Association Local 725 Pipefitters Air Conditioning Political Action Committee is a political committee within the meaning of 2 U.S.C. § 431(4).

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 JUN 26 PM 3:14

4 1 7 6 2 0 5 0 0 0

2. James H. Conley is the treasurer of the United Association Local 725 Pipe fitters Air Conditioning Political Action Committee.

3. Title 2 U.S.C. § 434(a)(4)(A)(iv) requires an unauthorized political committee in a non-election year to file a report covering the period beginning July 1 and ending December 31 no later than January 31 of the following calendar year.

4. Respondents filed the 1989 Year End Report, which was due on January 31, 1990, on March 26, 1990, 54 days late. The total amount of financial activity disclosed was \$114,491.

V. Respondents failed to file their 1989 Year End Report in a timely manner in violation of 2 U.S.C. § 434(a)(4)(A)(iv).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of One Thousand One Hundred Dollars (\$1,100), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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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 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 Lerner
Associate General Counsel

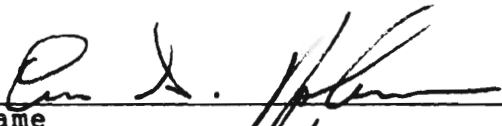
Date

8/14/90

FOR THE RESPONDENTS:

Name

Position


Eric L. Tasson
Sec Tasson.

June 12, 1990
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3072

DATE FILMED 8/25/90 CAMERA NO. 3

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