



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3310

DATE FILMED 11/27/91 CAMERA NO. 8

CAMERAMAN AS

21040880763

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 9 April 1991

ANALYST: KRISTEN LIEBSCHER

I. COMMITTEE: Osteopathic Political Action Committee
(C00113803)
Frank J. McDivitt, Treasurer
P.O. Box 454
Garret Park, MD 20896

II. RELEVANT STATUTE: 2 U.S.C. §§434(a)(4)(A)(i), (ii) & (iii)
11 CFR §§104.5(c)(1)(i), (ii) & (iii)

III. BACKGROUND:

Chronic Late Filing of Reports and Failure to File Reports by
Election Day, November 6, 1990

The Osteopathic Political Action Committee ("the Committee") failed to file five (5) Reports of Receipts and Disbursements in a timely manner for the 1989-1990 election cycle. These reports were filed between eight (8) and one hundred fifty-three (153) calendar days late. In addition, three of these reports, the 1990 July Quarterly Report, the 1990 October Quarterly Report and the 1990 12 Day Pre-General Report were not filed by Election Day, November 6, 1990 (See Chart and Attachments).

A Prior Notice was sent on June 21, 1990 informing the Committee that the 1990 July Quarterly Report was due on July 15, 1990 (Attachment 2). A Non-Filer Notice was sent on August 7, 1990 for failure to file the 1990 July Quarterly Report (Attachment 3).

A Prior Notice was sent on September 21, 1990 informing the Committee that the 1990 October Quarterly Report was due on October 15, 1990 (Attachment 4). A Prior Notice was sent on October 1, 1990 informing the Committee that the 1990 12 Day Pre-General Report was due on October 25, 1990, and the 1990 30 Day Post-General Report was due on December 6, 1990. The Notice informed the Committee that quarterly filers that make General Election contributions or expenditures from October 1 through October 17, 1990 must file a 1990 12 Day Pre-General Report by October 25, 1990 (Attachment 5).

21040880764

OSTEOPATHIC POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

A Non-Filer Notice was sent to the Committee on November 7, 1990 for failing to file the 1990 October Quarterly Report (Attachment 6). On November 8, 1990, the Committee filed its 1990 July Quarterly Report (Attachment 7).

A Chronic Late Filer Notice was sent to the Committee on November 29, 1990 for failure to timely file the 1990 July Quarterly Report, and the 1990 October Quarterly Report. This notice advised the Committee that any additional late filing of reports may result in legal enforcement action (Attachment 8).

Subsequent to the sending of the Chronic Late Filing Notice, the Committee failed to file the 1990 Year End Report in a timely manner. On December 18, 1990, the Committee filed its 1990 October Quarterly Report (Attachment 9).

On December 27, 1990, the Committee was notified that the 1990 Year End Report was due by January 31, 1991 (Attachment 10). On December 31, 1990, a Non-Filer Notice was sent to the Committee for failing to file the 1990 30 Day Post-General Report (Attachment 11).

The Committee filed its 1990 30 Day Post-General Report on January 22, 1991. The report disclosed contributions made to two (2) federal candidates totalling \$1,000 on October 1, 1990, indicating the Committee was required to file the 1990 12 Day Pre-General Report (Attachment 12). The Committee filed its 1990 Year End Report on February 8, 1991 (Attachment 13).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

2104080765

LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1990 July Quarterly (4/1/90-6/30/90)	6/21/90 (Attachment 2)	7/15/90	8/7/90 (Attachment 3)	11/8/90 (Attachment 7)
1990 October Quarterly (7/1/90-9/30/90)	9/21/90 (Attachment 4)	10/15/90	11/7/90 (Attachment 6)	12/18/90 (Attachment 9)
1990 12 Day Pre-General ^{1/} (10/1/90-10/17/90)	10/1/90 (Attachment 5)	10/25/90	None	Not Filed
1990 30 Day Post-General (10/1/90-11/26/90)	10/1/90 (Attachment 5)	12/6/90	12/31/90 (Attachment 11)	1/22/91 (Attachment 12)
1990 Year End (11/27/90-12/31/90)	12/27/90 (Attachment 10)	1/31/91	None	2/8/91 (Attachment 13)

^{1/} The Committee filed the 1990 30 Day Post-General Report which indicated the Committee's need to file a 1990 12 Day Pre-General Report.

**FEDERAL ELECTION COMMISSION
1987-1990
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)**

Attachment 1

DATE 20FEB91

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
OSTEOPATHIC POLITICAL ACTION COMMITTEE				ID #C00113803 NON-PARTY QUALIFIED		
CONNECTED ORGANIZATION: AMERICAN OSTEOPATHIC ASSOCIATION						
1989	MISCELLANEOUS REPORT FROM FEC			14JUN89	1	89FEC/597/2010
	STATEMENT OF ORGANIZATION - AMENDMENT			14JUL89	4	89FEC/600/4284
	MID-YEAR REPORT	3,115	671	1JAN89 -30JUN89	7	89FEC/600/3486
	YEAR-END	2,313	3,047	1JUL89 -31DEC89	8	90FEC/627/0721
1990	MISCELLANEOUS NOTICE FROM FEC			29NOV90	1	90FEC/671/4091
	STATEMENT OF ORGANIZATION - AMENDMENT			24DEC90	2	90FEC/679/1244
	APRIL QUARTERLY	400	5,701	1JAN90 -31MAR90	6	90FEC/636/4553
	JULY QUARTERLY	8,659	2,369	1APR90 -30JUN90	8	90FEC/670/4158
	JULY QUARTERLY - AMENDMENT	8,659	3,369	1APR90 -30JUN90	8	91FEC/686/5123
	NOTICE OF FAILURE TO FILE			1APR90 -30JUN90	1	90FEC/651/3824
	REQUEST FOR ADDITIONAL INFORMATION			1APR90 -30JUN90	1	90FEC/676/3370
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR90 -30JUN90	2	91FEC/681/3451
	OCTOBER QUARTERLY	34,862	2,808	1JUL90 -30SEP90	12	90FEC/679/1064
	OCTOBER QUARTERLY - AMENDMENT	34,862	2,808	1JUL90 -30SEP90	11	91FEC/686/5131
	NOTICE OF FAILURE TO FILE			1JUL90 -30SEP90	1	90FEC/670/2939
	POST-GENERAL	772	11,077	1OCT90 -26NOV90	9	91FEC/683/3475
	POST-GENERAL - AMENDMENT	772	11,077	1OCT90 -26NOV90	8	91FEC/686/5142
	NOTICE OF FAILURE TO FILE			1OCT90 -26NOV90	1	90FEC/679/2838
	YEAR-END	256	15	27NOV90 -31DEC90	6	91FEC/687/5429
	TOTAL	50,377	0 26,688 0		97	TOTAL PAGES

All Reports Have Been Reviewed,
Cash on Hand as of 1/31/91: \$81,399
Debts Owed To The Committee as of 1/31/91 \$0
Debts Owed By The Committee as of 1/31/91 \$0

21040880767

QUARTERLY REPORT NOTICE

Attachment 2

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

June 21, 1990

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
July Quarterly	04/01/90**--06/30/90	07/15/90	07/15/90

WHO MUST FILE

PARTY COMMITTEES AND PACS (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) filing on a quarterly basis must file a quarterly report in July.

WHAT MUST BE REPORTED

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

REPORTING FORMS

Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE

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

LABEL

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

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with a candidate's primary election, must also file a 12-day Pre-Election Report if the activity was not previously reported. See the January Record.

LAST-MINUTE INDEPENDENT EXPENDITURES

Committees which make an independent expenditure of \$1,000 or more, after the 20th day, but more than 24 hours before an election, must report it within 24 hours.

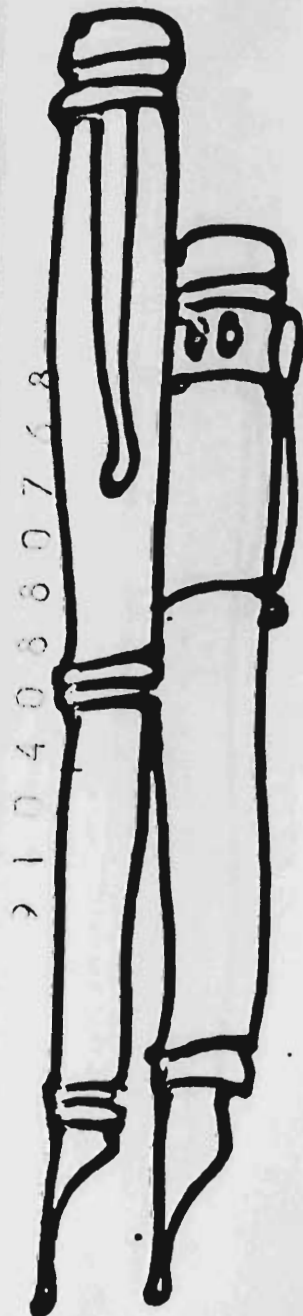
COMPLIANCE

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 WILL BE REQUIRED TO REFILE.

*Reports sent by registered 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.

**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.

FOR INFORMATION, call (202)376-3120 or 1(800)424-9530





FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RQ-7

August 7, 1990

Frank J. McDevitt, Treasurer
Osteopathic Political Action Committee
P.O. Box 454
Garrett Park, MD 20896

Identification Number: C00113803

Reference: July Quarterly Report (4/1/90-6/30/90)

Dear Mr. McDevitt:

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, 108.4).

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 Donald Averett 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

2910043068781058294

QUARTERLY REPORT NOTICE

Attachment 4
Page 1 of 2

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 21, 1990

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
October Quarterly	07/01/90**-09/30/90	10/15/90	10/15/90

WHO MUST FILE

PARTY COMMITTEES AND PACs (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) filing on a quarterly basis must file a Quarterly Report in October.

WHAT MUST BE REPORTED

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

REPORTING FORMS

Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE

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

LABEL

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

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with a candidate's primary election must also file a 12-day Pre-Election Report if the activity was not previously reported. See the January Record.

LAST-MINUTE INDEPENDENT EXPENDITURES

Committees which make an independent expenditure of \$1,000 or more, after the 20th day, but more than 24 hours before an election, must report it within 24 hours.

*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.

**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.

(over)

PARTIES AND PACS

OCTOBER QUARTERLY

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 WILL BE REQUIRED TO REFILE.

21040880771

FOR INFORMATION, Call: 800/424-9530 or 202/376-3120

GENERAL ELECTION REPORT NOTICE

Attachment 5
Page 1 of 2

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

October 1, 1990

I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
Pre-General	10/01/90**-10/17/90	10/22/90	10/25/90
Post-General	10/18/90 - 11/26/90	12/06/90	12/06/90

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 17***

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
Pre-General	10/01/90**-10/17/90	10/22/90	10/25/90
Post-General	10/18/90 - 11/26/90	12/06/90	12/06/90

III. QUARTERLY FILERS WHICH DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 17***

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
Post-General	10/01/90**-11/26/90	12/06/90	12/06/90

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) must follow the above charts in order to determine whether they must file the pre-general election report. All party committees and PACs, regardless of financial activity, must file the post-general election report.

WHAT MUST BE REPORTED

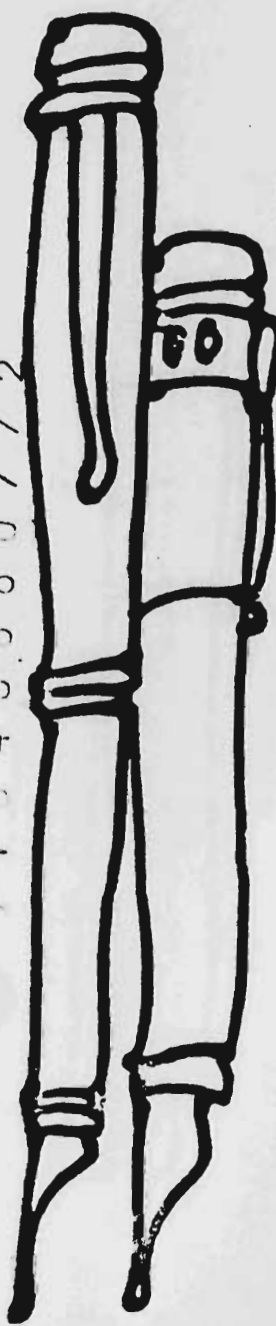
All financial activity (not previously reported) that occurred during the reporting period.

*Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

**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.

***Committees that made general election contributions or expenditures prior to October 1 which have not been previously reported must also follow the Chart II reporting requirements.

21040880772



PARTIES AND PACs

GENERAL ELECTION

REPORTING FORMS

Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE

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

LABEL

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

LAST-MINUTE INDEPENDENT EXPENDITURES

Any PAC which makes any independent expenditures aggregating \$1,000 or more during the period beginning October 18 and ending November 4 must report them within 24 hours. Call the FEC for more information.

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 WILL BE REQUIRED TO REFILE.

FOR INFORMATION, Call: 202/376-3120 or 800/424-9530

21040880773



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

RQ-7

November 7, 1990

Frank J. McDevitt, Treasurer
 Osteopathic Political Action Committee
 P.O. Box 454
 Garrett Park, MD 20896

Identification Number: C00113803

Reference: October Quarterly Report (7/1/90-9/30/90)

Dear Mr. McDevitt:

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, 108.4).

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 Donald Averett on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson
 Assistant Staff Director
 Reports Analysis Division

11/07/90

92036382938

MCCULLOUGH, CAMPBELL & LANE

ATTORNEYS AT LAW

401 NORTH MICHIGAN AVENUE
CHICAGO, ILLINOIS 60611-4277

TELEPHONE (312) 923-4000
TELEX 4974810
TELEFAX (312) 923-4329

JOHN W. MCCULLOUGH
JOHN O. CAMPBELL
MICHAEL M. LANE
DENNIS L. PROSTIC
LAWRENCE M. GILL
JAMES D. WANGELIN
JOHN A. HUBBACH
KENT A. WILSON
RICHARD J. GEDDES

RICHARD T. GREENBERG
F. DENNIS NELSON
MICHAEL C. COOK
PAUL S. TURNER
PATRICK M. GRABER
RICHARD R. RYAN
STEVEN R. SMITH
THOMAS W. ENGELHARDT

ROBERT B. BAKER
MICHAEL J. BAUGHMAN
ROBERT B. BLASIO
THOMAS A. BRUSSTAR
GEORGE M. CARVER
PETER F. CLANCY
DEBRA A. EMRY
HENRY T. FRENCH
ANN P. GOODMAN
SCOTT B. HAMILTON
DAVID L. HARTBELL

MICHAEL B. HULTQUIST
ANNE E. LAYOIE
LINDA L. MCCARTY
M. BART RINN
MICHAEL B. SATZ
EDWARD W. SCHWARTZ
MARK D. SIEBERT
EVAN T. SMITH
SUZANNE SMITH
RAY E. WILDE

WALTER M. DJOKIC
OF COUNSEL

November 6, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

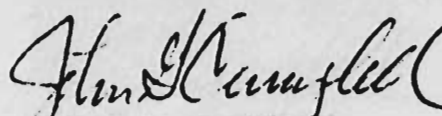
Re: Osteopathic Political Action Committee

Gentlemen:

Enclosed please find the July 15th Quarterly Report of Receipts and Disbursements in regard to the above-noted matter.

If you have any questions, please do not hesitate to call.

Very truly yours,


John G. Campbell

JGC:jk

Enclosure

379 NOV 29 1990

REPORT OF RECEIPTS AND DISBURSEMENTSFor Other Than An Authorized Committee
(Summary Page)

1 NAME OF COMMITTEE (in full)

Osteopathic Political Action Committee

ADDRESS (number and street)

☐ Check if different than previously reported

P. O. Box 454

CITY, STATE and ZIP CODE

Garrett Park, Maryland 20896

2 FEC IDENTIFICATION NUMBER

C00113803

3 ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on (date)**4. TYPE OF REPORT**(a) ☐ April 15 Quarterly Report☒ July 15 Quarterly Report☐ October 15 Quarterly Report☐ January 31 Year End Report☐ July 31 Mid Year Report (Non-election Year Only)☐ Termination Report

Monthly Report Due On

☐ February 20☐ June 20☐ October 20☐ March 20☐ July 20☐ November 20☐ April 20☐ August 20☐ December 20☐ May 20☐ September 20☐ January 31☐ Twelfth day report preceding

(Type of Election)

election on

in the State of

☐ Thirtieth day report following the General Election on

in the State of

(b) Is this Report an Amendment?

☐ YES☒ NO**SUMMARY**5. Covering Period 4/1/90 through 6/30/90COLUMN A
This PeriodCOLUMN B
Calendar Year-to-Date6 (a) Cash on Hand January 1, 19 90

\$ 59,421.71

(b) Cash on Hand at Beginning of Reporting Period

\$ 54,120.31

(c) Total Receipts (from Line 18)

\$ 8,659.00

\$ 9,059.00

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

\$ 62,779.31

\$ 68,480.71

7 Total Disbursements (from Line 28)

\$ 2,369.11

\$ 8,070.51

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

\$ 60,410.20

\$ 60,410.20

9 Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)

\$ - 0 -

10 Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)

\$ - 0 -

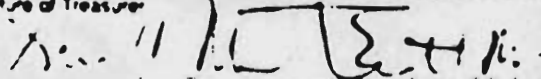
For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202 376-3120

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

Type or Print Name of Treasurer

Frank J. McDevitt, D.O.

Signature of Treasurer



Date

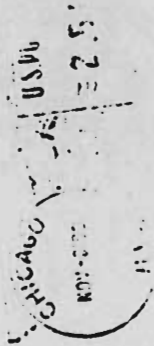
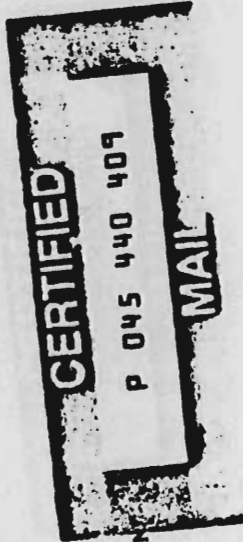
10 30 90

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
(revised 4/87)

21040880777

JOHN G. CAMPBELL
ULLOUGH, CAMPBELL & LAM
ATTORNEYS AT LAW
401 NORTH MICHIGAN AVENUE
CHICAGO, ILLINOIS 60611-4277

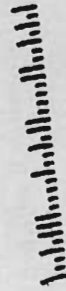


NOV 25 1966

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

670416





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MS-L

Frank J. McDevitt, Treasurer
 Osteopathic Political Action Committee
 P.O. Box 454
 Garrett Park, MD 20896

NOV 29 1990

Identification Number: C00113803

Reference: 1989-1990 Election Cycle Reports

Dear Mr. McDevitt:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. §434(a), by failing to timely file Reports of Receipts and Disbursements. The following is a list of the reports in question.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
July Quarterly (4/1/90-6/30/90)	7/15/90	11/8/90
October Quarterly (7/1/90-9/30/90)	10/15/90	Not Filed

Timely filing is a specific requirement of the Federal Election Campaign Act ("the Act") and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views failure to timely file reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending before the Commission, any additional report which is not submitted in a timely manner by your committee may result in the Commission initiating legal enforcement or audit action.

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Donald Averett on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Lisa J. Stolaruk
 Chief, Party/Non-Party Branch
 Reports Analysis Division

81 70 04 81 06 43 00 19

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

McCULLOUGH, CAMPBELL & LANE

ATTORNEYS AT LAW

90 DEC 26 AM 10:47

401 NORTH MICHIGAN AVENUE
CHICAGO, ILLINOIS 60611-4277

TELEPHONE (312) 923-4000
TELEX 4974810
TELEFAX (312) 923-4320

JOHN W. McCULLOUGH
JOHN G. CAMPBELL
MICHAEL M. LANE
DENNIS L. PROSTIC
LAWRENCE M. GILL
JAMES D. WANGELIN
JOHN A. HUBBUCH
RENT A. WILSON
RICHARD J. GEDDES

RICHARD T. GREENBERG
F. DENNIS NELSON
MICHAEL C. COOK
PAUL S. TURNER
PATRICK M. GRABER
RICHARD R. RYAN
STEVEN R. SMITH
THOMAS W. ENGELHARDT

ROBERT B. BAKER
MICHAEL J. BAUGHMAN
ROBERT S. BLASIO
THOMAS A. BRUSSTAR
GEORGE M. CARVER
PETER F. CLANCY
DEBRA A. EMRY
HENRY T. FRENCH
ANN P. GOODMAN
SCOTT B. HAMILTON
DAVID L. HARTSELL

MICHAEL B. MULTQUIST
ANNE E. LAVOIE
LINDA L. McCARTY
M. BART RINN
MICHAEL B. SATZ
EDWARD W. SCHWARTZ
MARK D. SIEBERT
EVAN T. SMITH
SUZANNE SMITH
RAY E. WILDE

WALTER H. DJOKIC
OF COUNSEL

December 18, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: Osteopathic Political Action Committee

Gentlemen:

Enclosed please find the October 15th Quarterly Report of Receipts and Disbursements in regard to the above-noted matter.

If you have any questions, please do not hesitate to call.

Very truly yours,

John G. Campbell
John G. Campbell

JGC:jk

Enclosure

408
JAN 16 1991

291 30 04 30 68 78 90 17 07 69 4

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee RECEIVED
(Summary Page) FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

Attachments 9
Page 2 of 3

USE FEC MAILING LABEL
OR
TYPE ON POST

1 NAME OF COMMITTEE (in full) Osteopathic Political Action Committee		90 DEC 26 AM 10:47
ADDRESS (number and street) ☐ Check if different than previously reported P. O. Box 454		2 FEC IDENTIFICATION NUMBER CO0113803
CITY, STATE and ZIP CODE Garrett Park, Maryland 20896		3 ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (Date)

4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☒ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report
- Monthly Report Due On
☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31
- ☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
☐ Thirtieth day report following the General Election on _____
in the State of _____

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

SUMMARY

6	Covering Period <u>7/1/90</u> through <u>9/30/90</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
(a)	Cash on Hand January 1, 1990		\$ 59,421.71
(b)	Cash on Hand at Beginning of Reporting Period	\$ 60,410.20	
(c)	Total Receipts (from Line 18)	\$ 34,862.00	\$ 43,921.00
(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 95,272.20	\$ 103,342.71
7	Total Disbursements (from Line 28)	\$ 2,808.36	\$ 10,878.87
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 92,463.84	\$ 92,463.84
9	Debts and Obligations Owed TO the Committee (itemize a on Schedule C and or Schedule D)	\$ 0	
10	Debts and Obligations Owed BY the Committee (itemize a 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

Frank J. McDevitt, D.O.

Signature of Treasurer

Frank J. McDevitt

Date

12-12-90

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

FEC FORM 3X

(revised 4-87)

90036791065

LLOUGH, CAMPBELL & LANE

ATTORNEYS AT LAW

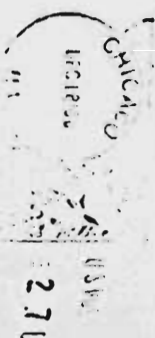
21 NORTH MICHIGAN AVENUE
CHICAGO, ILLINOIS 60611-4577

IS



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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



18708804016

YEAR-END REPORT NOTICE

Attachement 10
Page 1 of 2

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 27, 1990

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
Year-End	11/27/90**-12/31/90	01/31/91	01/31/91

WHO MUST FILE

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

WHAT MUST BE REPORTED

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

REPORTING FORMS

Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE

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

LABEL

Committees should 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 WILL BE REQUIRED TO REFILE.

*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.

**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.

(over)

21040380782

**1991 REPORTING SCHEDULE
PARTIES AND PACS**

I. SEMIANNUAL FILERS*

REPORT	PERIOD COVERED	REG./CERT.	FILING DATE
		MAILING DATE**	
Mid-Year	01/01/91-06/30/91	07/31/91	07/31/91
Year-End	07/01/91-12/31/91	01/31/92	01/31/92

II. MONTHLY FILERS

REPORT	PERIOD COVERED	REG./CERT.	FILING DATE
		MAILING DATE**	
February	01/01/91-01/31/91	02/20/91	02/20/91
March	02/01/91-02/28/91	03/20/91	03/20/91
April	03/01/91-03/31/91	04/20/91	04/20/91
May	04/01/91-04/30/91	05/20/91	05/20/91
June	05/01/91-05/31/91	06/20/91	06/20/91
July	06/01/91-06/30/91	07/20/91	07/20/91
August	07/01/91-07/31/91	08/20/91	08/20/91
September	08/01/91-08/31/91	09/20/91	09/20/91
October	09/01/91-09/30/91	10/20/91	10/20/91
November	10/01/91-10/31/91	11/20/91	11/20/91
December	11/01/91-11/30/91	12/20/91	12/20/91
Year-End	12/01/91-12/31/91	01/31/92	01/31/92

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from monthly to semiannual or vice versa) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

*Committees that filed quarterly reports in 1990 are only required to file semiannually in 1991.

**Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

FOR INFORMATION, Call: Information Services Division
202/376-3120 or 800/424-9530

31040880783



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RQ-7

December 31, 1990

Frank J. McDevitt, Treasurer
Osteopathic Political Action Committee
P.O. Box 454
Garrett Park, MD 20896

Identification Number: C00113803

Reference: 30 Day Post-General Report (10/1/90-11/26/90)

Dear Mr. McDevitt:

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, 108.4).

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 Donald Averett on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

JAN 02 1991

291 00 04 30 88 90 27 88 34 8

McCULLOUGH, CAMPBELL & LANE

ATTORNEYS AT LAW

401 NORTH MICHIGAN AVENUE
CHICAGO, ILLINOIS 60611-4277

TELEPHONE (312) 923-4000

TELEX 4974810

TELEFAX (312) 923-4329

JOHN W. McCULLOUGH
JOHN G. CAMPBELL
MICHAEL M. LANE
DENNIS L. FROSTIC
LAWRENCE M. GILL
JAMES D. WANGELIN
JOHN A. HUBBUCH
RENT A. WILSON
RICHARD J. GEODES

RICHARD T. GREENBERG
F. DENNIS NELSON
MICHAEL C. COOK
PAUL B. TURNER
PATRICK M. GRABER
RICHARD R. RYAN
STEVEN R. SMITH
THOMAS W. ENGELHARDT

ROBERT B. BAKER
MICHAEL J. BAUGHMAN
ROBERT B. SLADIO
THOMAS A. BRUBAKER
GEORGE M. CARVER
PETER F. CLANCY
DEBRA A. EMRY
HENRY T. FRENCH
ANN P. GOODMAN
SCOTT B. HAMILTON
DAVID L. HARTSELL

MICHAEL D. HULTQUIST
ANNE E. LAVOIE
LINDA L. MCCARTY
M. BART RINN
MICHAEL B. SATZ
EDWARD W. SCHWARTZ
MARK D. SIEBERT
EVAN T. SMITH
SUZANNE SMITH
MAY E. WILDE

WALTER M. DJOKIC
OF COUNSEL

January 31, 1991

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

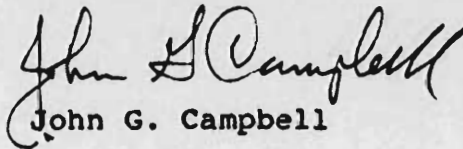
Re: Osteopathic Political Action
Committee ("OPAC")
I.D. No. C00113803

Gentlemen:

With respect to your letters of December 28, 1990 and January 17, 1991, we would like to inform you that, for whatever reason, OPAC first received the earlier dated letter as an enclosure to the January letter.

In any event, we are enclosing amended Forms 3X for the July 15, October 15 and thirtieth day report following the November 6, 1990 election. These forms have been amended to give effect to the change necessitated by the arithmetic contained in the July 15 report.

Very truly yours,


John G. Campbell

JGC:jk

Enclosures

FEB 11 1991

91 FEB -5 AM 11:46

FEDERAL ELECTION COMMISSION
RECEIVED

291100430688605718253

FEB 15 1991

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

Attachment 12
Page 2 of 4

91 JAN 29 AM 9:29

NAME OF COMMITTEE (in full) Osteopathic Political Action Committee		FEC IDENTIFICATION NUMBER CO0113893
ADDRESS (number and street) ☐ Check if different than previously reported P. O. Box 454		
CITY, STATE and ZIP CODE Garrett Park, Maryland 20896		
		3 ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (Date)

4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report
- Monthly Report Due On
☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31
- ☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
- ☒ Thirtieth day report following the General Election on
11/6/90 in the State of Maryland

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period <u>10/1/90</u> through <u>11/26/90</u>		
6	(a) Cash on Hand January 1, 19 <u>90</u>		\$ 59,421.71
	(b) Cash on Hand at Beginning of Reporting Period	\$ 92,463.84	
	(c) Total Receipts (from Line 18)	\$ 772.00	\$ 44,693.00
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 93,235.84	\$ 104,114.71
7	Total Disbursements (from Line 28)	\$ 11,077.02	\$ 21,955.89
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 82,158.82	\$ 82,158.82
9	Debits and Obligations Owed TO the Committee (itemize as on Schedule C and or Schedule D)	\$ - 0 -	
10	Debits and Obligations Owed BY the Committee (itemize as 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
Frank J. McDevitt, D.O.

Signature of Treasurer

Frank J. McDevitt

Date

1-15-91

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

FEC FORM 3X
(revised 4/87)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Osteopathic Political Action Committee

Attachment 12
Page 3 of 4

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Andrews for Congress Committee Baker, Brown, Sharman & Parker 1260 Smith, Suite 3600 Houston, TX 77002	Fundraiser Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/1/90	500.00
Slattery for Congress Committee P. O. Box 1978 Topeka, KS 66601	Fundraiser Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/1/90	500.00
Rowland for Congress P. O. Box 1345 Dublin, GA 31040	Fundraiser Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/26/90	250.00
Bruce for Congress P. O. Box 2156 Springfield, VA 22152	Fundraiser Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/26/90	250.00
Citizens for Cardiss Collins P. O. Box 956 Alexandria, VA 22313	Fundraiser Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/26/90	250.00
Hall for Congress P. O. Box 711 Rockwall, TX 75087	Fundraiser Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/26/90	500.00
Committee to Re-elect Edolphus Towns 321 Stuyvesant Avenue Brooklyn, NY 11283	Fundraiser Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/26/90	250.00
Citizens for Madigan 2432 Rockbridge Street Vienna, VA 22180	Fundraiser Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/26/90	250.00
Bond for Congress P. O. Box 790 Greeley, CO 80632	Fundraiser Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/26/90	250.00

SUBTOTAL of Disbursements This Page (optional)

3,000.00

TOTAL This Period (last page this line number only)

91040880788

4N G. CAMPBELL
ILLLOUGH, CAMPBELL & LANE
ATTORNEYS AT LAW
101 NORTH MICHIGAN AVENUE
CHICAGO, ILLINOIS 60611-4877



91040880788

CHICAGO
JAN 22 2011
91 JAN 23 PM 9:29
256
FEDERAL ELECTION COMMISSION

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

McCULLOUGH, CAMPBELL & LANE
ATTORNEYS AT LAW

REC'D
FEB 19 1991
91 FEB 19 AM 11:31

401 NORTH MICHIGAN AVENUE
CHICAGO, ILLINOIS 60611-4877

TELEPHONE (312) 623-4000
TELEX 4874810
TELEFAX (312) 623-4380

February 8, 1991

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

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

Re: **Osteopathic Political Action Committee**
FEC Identification Number: C00113803

Gentlemen:

Enclosed please find FEC Form 3X for the January 31 Year-End Report of Receipts and Disbursements in regard to the above-noted matter.

If you have any questions, please do not hesitate to call.

Very truly yours,

John G. Campbell
John G. Campbell

JGC:jx

Enclosure

REPORT OF RECEIPTS AND DISBURSEMENTS

(For Other Than An Authorized Committee)
(Summary Page)

Attachement 13
Page 2 of 3

1. NAME OF COMMITTEE (in full) Osteopathic Political Action Committee		FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20543	
ADDRESS (number and street) P. O. Box 456		2. FEC IDENTIFICATION NUMBER C00113005	
CITY, STATE and ZIP CODE Garrett Park, Maryland 20896		3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)	

4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☒ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report
- Monthly Report Due On:
☐ February 28 ☐ June 30 ☐ October 30
☐ March 30 ☐ July 30 ☐ November 30
☐ April 30 ☐ August 30 ☐ December 30
☐ May 30 ☐ September 30 ☐ 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
6. Covering Period	<u>11/27/90</u> through <u>12/31/90</u>		
6. (a) Cash on Hand January 1, 19 <u>90</u>			\$ 59,421.71
(b) Cash on Hand at Beginning of Reporting Period		\$ 81,158.82	
(c) Total Receipts (from Line 18)		\$ 256.00	\$ 44,949.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 81,414.82	\$ 104,370.71
7. Total Disbursements (from Line 28)		\$ 15.50	\$ 22,971.39
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 81,399.32	\$ 81,399.32
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$ - 0 -	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$ - 0 -	

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
Frank J. McDevitt, D.O.

Signature of Treasurer
Frank J. McDevitt

Date
1-30-91

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

FEC FORM 3X
(revised 4/87)

W. G. CAMPBELL & LANE
ATTORNEYS AT LAW
WASHINGTON, D.C.



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

9/11/13 11:31

11/11/13 11:31

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral #91NF-59
Staff Member: Jeffrey Long

SOURCE: I N T E R N A L L Y G E N E R A T E D

RESPONDENTS: Osteopathic Political Action Committee and
Frank J. McDivitt, as treasurer

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

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the Osteopathic Political Action Committee ("Committee") and Frank J. McDivitt, as treasurer, to the Office of the General Counsel on April 10, 1991. Attachment 1. The basis for the attached referral is the Committee's failure to timely file the 1990 July and October Quarterly Reports, the 1990 12 Day Pre-General and 1990 30 Day Post-General Reports, and the 1990 Year End Report.

II. FACTUAL AND LEGAL ANALYSIS

For the Factual and Legal Analysis, see Attachment 2.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

2104080792

91040880793

21040880794

21040880795

21040880796

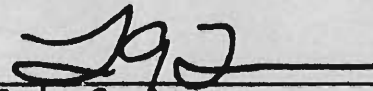
IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe Osteopathic Political Action Committee and Frank J. McDivitt, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), 434(a)(4)(A)(ii), and 434(a)(4)(A)(iii), and enter into conciliation prior to a finding of probable cause to believe.

3. Approve the attached Factual and Legal Analysis and conciliation agreement, and the appropriate letter.

Lawrence M. Noble
General Counsel

Date 5/3/91

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Referral Materials
2. Factual and Legal Analysis
3. Proposed agreement

21040880797

BEFORE THE FEDERAL ELECTION COMMISSION

(MUR)
3310

In the Matter of)
)
Osteopathic Political Action) RAD Referral #91NF-59
Committee and Frank J. McDivitt,)
as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 17, 1991, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral #91NF-59:

1. Open a MUR.
2. Find reason to believe Osteopathic Political Action Committee and Frank J. McDivitt, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), 434(a)(4)(A)(ii), and 434(a)(4)(A)(iii), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the Factual and Legal Analysis and conciliation agreement, and the appropriate letter, as recommended in the General Counsel's Report dated May 13, 1991.

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

Attest:

5-20-91
Date

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

Received in the Secretariat: Tues., May 14, 1991 2:12 p.m.
Circulated to the Commission: Wed., May 15, 1991 11:00 a.m.
Deadline for vote: Fri., May 17, 1991 11:00 a.m.

21040880798



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

May 29, 1991

Frank J. McDivitt, Treasurer
Osteopathic Political Action Committee
P.O. Box 454
Garret Park, Maryland 20896

RE: MUR 3310
Osteopathic Political Action
Committee and Frank J.
McDivitt, as treasurer

Dear Mr. McDivitt:

On May 17, 1991, the Federal Election Commission found that there is reason to believe Osteopathic Political Action Committee and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), 434(a)(4)(A)(ii), and 434(a)(4)(A)(iii), provisions of 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.

9104080799

Frank J. McDivitt, Treasurer
Page 2

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

Sincerely,

Joan D. Aikens

Joan D. Aikens
Vice Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

2104080800

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Osteopathic Political Action Committee and Frank J. McDivitt,
as treasurer MUR 3310

21040880801
The Federal Election Campaign Act of 1971, as amended (the "Act"), provides that an unauthorized committee, filing quarterly, shall file quarterly reports in a calendar year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(A)(i). Quarterly Reports are to be filed no later than the 15th day after the last day of each calendar quarter. The report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year. Thus the due date for the 1990 July Quarterly Report was July 15, 1990, the due date for the 1990 October Quarterly was October 15, 1990, and the due date for the 1990 year End Report was January 31, 1991. The Osteopathic Political Action Committee ("Committee") and Frank J. McDivitt, as treasurer, filed its 1990 July Quarterly Report on November 8, 1990, its 1990 October Quarterly Report on December 18, 1990, and its 1990 Year End Report on February 8, 1991.

The Act further requires an unauthorized committee to file a pre-election report no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. On October 1, 1990, the Committee made contributions to two

federal candidates totaling \$1,000. Therefore, the Committee required to file a 12 Day Pre-General Election Report on October 25, 1990. The Committee instead included this activity in its 1990 Post-General Election Report, without filing the required the pre-election report.

The Act also requires an unauthorized committee to file a post-general election report no later than the 30th day after the general election. The Committee was required to file a 30 Day Post-General Election Report on December 6, 1990. The Committee filed its Post-General Report on January 22, 1991.

Therefore, there is reason to believe that the Osteopathic Political Action Committee and Frank J. McDivitt, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), 434(a)(4)(A)(ii) and 434(a)(4)(A)(iii), by failing to file the file the 1990 July Quarterly Report, the 1990 October Quarterly Report, the 12 Day Pre-General Election Report, the 30 Day Post-General Election Report, and the 1990 Year End Report in a timely manner.

2104080802



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 11, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Frank J. McDivitt, Treasurer
Osteopathic Political Action Committee
P.O. Box 23340
Washington, D.C. 20026

RE: MUR 3310
Osteopathic Political Action
Committee and Frank J.
McDivitt, as treasurer

Dear Mr. McDivitt:

On May 29, 1991, you were notified that the Federal Election Commission, on May 17, 1991, found reason to believe the Osteopathic Political Action Committee and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), 434(a)(4)(A)(ii), and 434(a)(4)(A)(iii). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against the Osteopathic Political Action Committee and you, as treasurer.

A review of our files indicates that to date you have not responded to the Commission's findings. Unless we receive a response from you within 10 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

2104080803

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
1994

McCULLOUGH, CAMPBELL & LANE

ATTORNEYS AT LAW

91 JUL 25 AM 10:45

401 NORTH MICHIGAN AVENUE
CHICAGO, ILLINOIS 60611-4277

TELEPHONE (312) 923-4000
TELEX 4974810
TELEFAX (312) 923-4329

July 22, 1991

JOHN W. McCULLOUGH
JOHN G. CAMPBELL
MICHAEL M. LANE
DENNIS L. FROSTIC
LAWRENCE M. GILL
JAMES D. WANGELIN
JOHN A. HUBBUCH
KENT A. WILSON
RICHARD J. GEODES

RICHARD T. GREENBERG
F. DENNIS NELSON
MICHAEL C. COOK
PAUL S. TURNER
PATRICK M. GRABER
RICHARD R. RYAN
STEVEN R. SMITH
THOMAS W. ENGELHARDT
MICHAEL B. SATZ

ROBERT B. BAKER
ROBERT B. BLASIO
THOMAS A. BRUSSTAR
GEORGE M. CARVER
PETER F. CLANCY
DEBRA A. EMRY
HENRY T. FRENCH
ANN P. GOODMAN
KENNETH M. GORENBERG
SCOTT B. HAMILTON
JULIA E. HAMRICK
DAVID L. HARTSELL

MICHAEL D. HULTQUIST
ROBERT C. JOHNSON
ANNE E. LAVOIE
LINDA L. MCCARTY
JOSHUA L. PROBER
M. BART RINN
EDWARD W. SCHWARTZ
MARK D. SIEBERT
EVAN T. SMITH
SUZANNE SMITH
KAY E. WILDE
PAUL C. ZIEBERT

WALTER H. DJOKIC
OF COUNSEL

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

Attention: Office of General Counsel
George F. Rishel, Esq.
Assistant General Counsel

Re: MUR 3310
Osteopathic Political Action Committee and
Frank J. McDevitt, D.O., as Treasurer

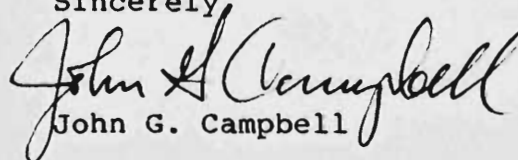
Dear Mr. Rishel:

At the suggestion of Mr. Jeffrey Long, I am enclosing a statement by the Respondents in response to the notification of the Commission's finding reason to believe that the Respondents are in violation of the Act. The Designation of Counsel will be forwarded shortly under separate cover.

The Osteopathic Political Action Committee's ("OPAC") limited activities are handled gratuitously by several volunteers. Over the last year, there have been changes in such volunteers and various other circumstances have changed. For example, you will note that the notification dated May 29, 1991 went to a post office box in Garrett Park, Maryland, whereas a new box was engaged in Washington, to which your July 11, 1991 correspondence was addressed. The first notification was effectively not delivered.

OPAC is desirous of entering into a mutually satisfactory conciliation agreement. If a personal conference in Washington would facilitate reaching such an agreement, please let me know.

Sincerely,


John G. Campbell

JGC:jk
Enclosure

91 JUL 26 AM 10:35

2104030304

**Statement by Respondents, Osteopathic
Political Action Committee and
Frank J. McDevitt, D.O., as Treasurer**

This statement is made by Respondents by their counsel, John G. Campbell, in response to the notification dated May 29, 1991 that the Federal Election Commission found reason to believe that the Respondents violated §§ 434(a)(4)(A)(i), 434 (a)(4)(A)(ii) and 434 (a)(4)(A)(iii), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act").

The Factual and Legal Analysis served with such notification recites the Federal Election Commission's finding that two 1990 Quarterly Reports and the 1990 Year-End Report were filed after their respective due dates by Respondent. It was also recited that a 1990 pre-election report was not filed, but the activity to be included in that report was included in the 1990 Post-Election Report and that this latter report was filed after its due date.

The Respondents are desirous of entering into a conciliation agreement with regard to these matters and in furtherance thereof state:

1. The Osteopathic Political Action Committee ("OPAC") is a political action committee which was formed by a group of osteopathic physicians to pursue various public and professional interests on behalf of the profession of osteopathic medicine. The osteopathic profession is less than five percent (5%) of the size of the allopathic profession (MDs), and OPAC is, therefore, a relatively small committee. Its members are practicing osteopathic physicians located in various parts of the country.

2. The administration of OPAC is done on a volunteer and gratuitous basis by several individuals with family and other connections to osteopathic medicine.

3. It has been difficult to gather the necessary information for the various reports in a timely fashion due in part to the far-flung nature of its membership; and on a number of occasions OPAC volunteers have contacted various members of the Commission staff with regard to the probability of late filings. Staff members have been very helpful and accommodating and the volunteers assumed that there was flexibility in filing deadlines.

4. With respect to the pre-election report cited in the Factual and Legal Analysis, it was at the suggestion of Commission staff that the activity to be included therein was included in the 1990 Post-General Election Report.

2104080805

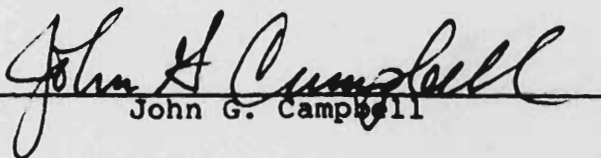
5. OPAC's activities in other regards have not involved any improprieties and good faith efforts have been made, and it is respectfully submitted that civil penalties should be waived.

6. OPAC has at this time taken measures to insure that all filings from this date forward will be made on a timely basis. OPAC regrets any inconvenience caused to the Commission and its staff

Respectfully submitted,

Respondents, Osteopathic Political
Action Committee and Frank J.
McDevitt, D.O., Treasurer

By:


John G. Campbell

06C 2030

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

McCULLOUGH, CAMPBELL & LANE

ATTORNEYS AT LAW

91 JUL 31 AM 11:34

401 NORTH MICHIGAN AVENUE
CHICAGO, ILLINOIS 60611-4277

TELEPHONE (312) 923-4000
TELEX 4974810
TELEFAX (312) 923-4329

JOHN W. McCULLOUGH
JOHN G. CAMPBELL
MICHAEL M. LANE
DENNIS L. FROSTIC
LAWRENCE M. GILL
JAMES D. WANGELIN
JOHN A. HUBBUCH
KENT A. WILSON
RICHARD J. GEDDES

RICHARD T. GREENBERG
F. DENNIS NELSON
MICHAEL C. COOK
PAUL S. TURNER
PATRICK M. GRABER
RICHARD R. RYAN
STEVEN R. SMITH
THOMAS W. ENGELHARDT
MICHAEL B. SATZ

ROBERT B. BAKER
ROBERT B. BLASIO
THOMAS A. BRUBSTAR
GEORGE M. CARVER
PETER F. CLANCY
DEBRA A. EMRY
HENRY T. FRENCH
ANN P. GOODMAN
KENNETH M. GORENBERG
SCOTT B. HAMILTON
JULIA E. HAMRICK
DAVID L. HARTSELL

MICHAEL D. MULTQUIST
ROBERT C. JOHNSON
ANNE E. LAVOIE
LINDA L. MCCARTY
JOSHUA L. PROBER
M. BART RINN
EDWARD W. SCHWARTZ
MARK D. SIEBERT
EVAN T. SMITH
SUZANNE SMITH
RAY E. WILDE
PAUL C. ZIEBERT

WALTER H. DUOKIC
OF COUNSEL

July 25, 1991

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

Attention: Office of General Counsel
George F. Rishel, Esq.
Assistant General Counsel

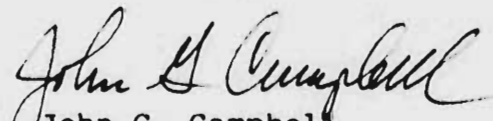
Re: MUR 3310
Osteopathic Political Action Committee and
Frank J. McDevitt, D.O., as Treasurer

Dear Mr. Rishel:

As indicated by my letter to you dated July 22, 1991, I am enclosing herewith the Designation of Counsel for the above-noted account.

Please call me if you have any questions or comments concerning this matter.

Very truly yours,


John G. Campbell

JGC:jk

Enclosure

21040880807

91 JUL 31 PM 3:29

FEDERAL ELECTION COMMISSION

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3310

NAME OF COUNSEL: John G. Campbell

ADDRESS: 401 North Michigan Avenue
Chicago, IL 60611-4277

TELEPHONE: (312) 923-4300

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

7-24-91
Date

Sam M. T. Feltro
Signature

RESPONDENT'S NAME: Frank J. McDevitt, D.O.

ADDRESS: 33100 Freedom Road
Farmington Hills, MI 48336

HOME PHONE: 313 - 348-5024

BUSINESS PHONE:

21040880808

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Osteopathic Political Action)
Committee and Frank J. McDevitt,) MUR 3310
as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by John Campbell, counsel for the Respondents.

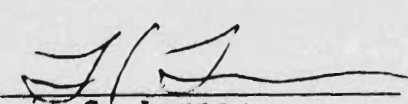
II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Osteopathic Political Action Committee and Frank J. McDevitt, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

10-21-91
Date

BY:


Lois G. Lerner
Associate General Counsel

Attachment

1. Conciliation Agreement

Staff Assigned: Jeffrey Long

21040880809



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20461

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/BONNIE J. FAISON *[Signature]*
COMMISSION SECRETARY

DATE: OCTOBER 23, 1991

SUBJECT: MUR 3310 - WITHDRAWAL AND RECIRCULATION OF
PAGE 1 OF GENERAL COUNSEL'S REPORT
DATED OCTOBER 17, 1991. MEMORANDUM
TO THE COMMISSION DATED OCTOBER 22, 1991.

The above-captioned document was circulated to the
Commission on Monday, October 21, 1991 at 4:00 p.m..

Objection(s) have been received from the Commissioner(s)
as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	XXX _____
Commissioner McGarry	_____
Commissioner Thomas	_____

This matter will be placed on the meeting agenda
for Tuesday, October 29, 1991.

Please notify us who will represent your Division before the
Commission on this matter.

21040880810

91040880811

)
)
)
)

MUR 3310

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on October 29, 1991, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3310:

1. Accept the conciliation agreement with the Osteopathic Political Action Committee and Frank J. McDevitt, as treasurer, as recommended in the General Counsel's report dated October 21, 1991.
2. Close the file.
3. Approve the appropriate letter as recommended in the General Counsel's report dated October 21, 1991.

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

Attest:

10-30-91
Date

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



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

November 6, 1991

CLOSED

John G. Campbell, Esquire
McCullough, Campbell & Lane
401 North Michigan Avenue
Chicago, Illinois 60611-4277

RE: MUR 3310
Osteopathic Political Action
Committee and Frank J. McDevitt, as
treasurer

Dear Mr. Campbell:

On October 29, 1991, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. §§ 434(a)(4)(A)(i), 434(a)(4)(A)(ii) and 434(a)(4)(A)(iii), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

This matter will be placed on the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. I remind you that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

2104080812

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Osteopathic Political Action) MUR 3310
Committee and Frank J. McDevitt,)
as treasurer)

CONCILIATION AGREEMENT

21040880813
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 Osteopathic Political Action Committee and Frank J. McDevitt, as treasurer ("Respondents"), violated 2 U.S.C. §§ 434(a)(4)(A)(i), 434(a)(4)(A)(ii), and 434(a)(4)(A)(iii).

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.

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

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

- 2104080814
2. Frank J. McDevitt is the treasurer of the Osteopathic Political Action Committee.
 3. The Federal Election Campaign Act of 1971, as amended (the "Act"), provides that an unauthorized committee, filing quarterly, shall file quarterly reports in a calendar year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(A)(i). Quarterly Reports are to be filed no later than the 15th day after the last day of each calendar quarter. The report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year. Thus the due date for the 1990 July Quarterly Report was July 15, 1990, the due date for the 1990 October Quarterly Report was October 15, 1990 and the due date for the 1990 Year End Report was January 31, 1991.
 4. The Respondents filed the 1990 July Quarterly Report on November 8, 1990, which was 116 days late and disclosed \$8,659 in receipts, \$3,369 in disbursements, and \$59,410 cash on hand.
 5. The Respondents filed the 1990 October Quarterly Report on December 18, 1990, which was 64 days late and disclosed \$34,862 in receipts, \$2,808 in disbursements, and \$91,463 cash on hand.
 6. The Respondents filed the 1990 Year End Report on February 8, 1991, which was 8 days late and disclosed \$256 in receipts, \$15 in disbursements, and \$81,399 cash on hand.
 7. The Act further requires an unauthorized committee to file a pre-election report no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. The 1990 Pre-General Report was due on October 25, 1990. On October 1 the Respondents made contributions to two federal candidates totaling \$1,000. The Respondents did not file a 1990 Pre-General Report.
 8. The Act also requires an unauthorized committee to file a post-general election report no later than the 30th day after the general election, thus the 1990 30-Day Post-General Election Report was due on December 6, 1990.

9. The Committee filed its Post-General Election Report on January 22, 1991, which was 47 days late and disclosed \$772 in receipts, \$11,077 in disbursements, and \$81,158 cash on hand, of which \$152 in receipts and \$1,000 in disbursements occurred in the period covered by the Pre-General Report and should have been disclosed on it.

V. 1. The Respondents failed to timely file the 1990 July Quarterly Report, the 1990 October Quarterly Report, the 1990 12-Day Pre-General Report, the 30-Day Post-General Election Report, and the 1990 Year End Report, in violation of 2 U.S.C. §§ 434(a)(4)(A)(i), 434(a)(4)(A)(ii) and 434(a)(4)(A)(iii).

2. The Respondents contend that the violations were not knowing and willful.

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Two Thousand Dollars (\$2,000.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

VIII. This agreement shall become effective as to 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

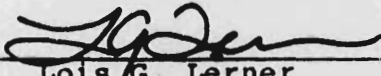
implement the requirement contained in this agreement and to so notify the Commission.

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

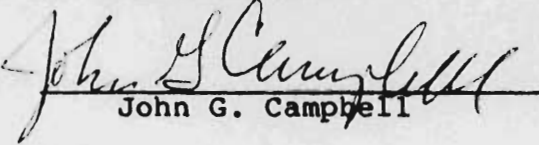
By: _____


Lois G. Lerner
Associate General Counsel

11-6-91
Date

FOR THE RESPONDENTS:

By: _____


John G. Campbell

Date



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE END OF MUR # 3310

DATE FILMED 11/22/91 CAMERA NO. 2
CAMERAMAN AS

21040880817



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3310.

12/17/91

91040884062



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Dec. 3, 1991

TWO WAY MEMORANDUM

TO: Fabrae Brunson
OGC, Docket

FROM: Philomena Brooks
Accounting Technician

CLOSED

SUBJECT: Account Determination for Funds Received

We recently received a check from Osteopathic Political Action Cmte., check number 594, dated Nov. 27, 1991, and in the amount of \$ 2000.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

*no correspondence

TO: Philomena Brooks
Accounting Technician

FROM: Fabrae Brunson *JB*
OGC, Docket

In reference to the above check in the amount of \$ 2000.00, the MUR number is 3310 and in the name of Osteopathic Political Action Cmte. The account into which it should be deposited is indicated below:

- ☐ Budget Clearing Account (OGC), 95F3875.16
- ☒ Civil Penalties Account, 95-1099.160
- ☐ Other: _____

Fabrae Brunson
Signature

12/3/91
Date

91040884063

006 3610

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK

91 DEC -3 PM 3:46

OSTEOPATHIC POLITICAL ACTION COMMITTEE
P. O. BOX 10345
CHICAGO, ILL. 60610

LAKE SHORE BANK
LAKE SHORE NATIONAL BANK
605 NORTH MICHIGAN AVENUE
CHICAGO, ILLINOIS 60611

594

2-303
710

PAY Two Thousands dollars and no cents

TO
THE
ORDER
OF

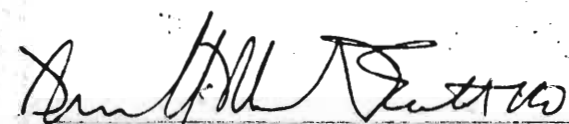
Federal Election Commission

DATE

AMOUNT

11/27/91

\$ 2000.00



⑈00059⑈ ⑆07100801617 5000 086 1⑈