



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 34/2

DATE FILMED 12/12/91 CAMERA NO. 2

CAMERAMAN AS

21040881690



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

May 10, 1991

MEMORANDUM

TO: LAWRENCE C. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: UNAUTHORIZED QUARTERLY FILERS WHICH FAILED TO FILE
THE 1990 12 DAY PRE-GENERAL REPORT BY ELECTION DAY

The attached list of unauthorized committees consists of thirty-two (32) quarterly filers which failed to file a 1990 12 Day Pre-General Report by Election Day, November 6, 1990.

Unlike the mandatory reporting requirement placed upon monthly filers, 2 U.S.C. §434(a)(4)(A)(ii) requires quarterly filers to submit 12 Day Pre-General Reports only if the committees make contributions to or expenditures on behalf of federal candidates in the general election. All unauthorized committees were sent prior notification regarding the pre- and post-general filing requirements on October 1, 1990 (Attachment 33).

The Party/Non-Party Branch conducted a thorough examination to identify quarterly filers disclosing contributions or expenditures between October 1 and October 17, 1990. The research revealed committees that submitted:

- a) 12 Day Pre-General Reports in an untimely manner; or
- b) 30 Day Post-General Reports indicating that 12 Day Pre-General Reports should have been filed.

If you have any questions regarding this matter, please contact Lisa Stolaruk at 376-2480.

Attachment

00001

21040881692

27. C00107599

STERLPAC-Sterling Drug Inc Employee
Political Action Committee for
Improved Government

91NF-97

-Referred for failure to timely file
the 1990 April Quarterly Report (#90NF-
09, MUR 3088 closed on September 18, 1990)

00003

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILER ASCH

REPORTS FILED/
RESPONSES

.....

C00107590

STERLPAC-STERLING DRUG INC EMPLOYEE POLITICAL ACTION COMMITTEE FOR IMPROVED GOVERNMENT

TREASURER'S NAME: SAL J RUBINO

90 PARK AVE

NEW YORK

NY 10016

None

Attachments 27a-27e

1990 30 Day Post-

General Report

filed 12/5/90

210408169

C0010

STERLPAC-Sterling Drug Inc. Employee Political Action
Committee for Improved Government

(Attachments 27a - 27e)

21040881694

00204

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
STERLPAC-STERLING DRUG INC EMPLOYEE POLITICAL ACTION COMMITTEE FOR IMPROVED GOVERNMENT 10 000107599 NON-PARTY QUALIFIED						
CONNECTED ORGANIZATION: STERLING DRUG, INC.						
1989	STATEMENT OF ORGANIZATION - AMENDMENT			26JAN89	1	89FEC/579/5157
	MISCELLANEOUS REPORT FROM FEC			28JUN89	1	89FEC/598/4161
	STATEMENT OF ORGANIZATION - AMENDMENT			14JUL89	3	89FEC/600/3620
	MID-YEAR REPORT	14,247	13,225	1JAN89 - 30JUN89	13	89FEC/602/4983
	MID-YEAR REPORT - AMENDMENT	14,093	13,825	1JAN89 - 30JUN89	9	89FEC/609/3135
	1'ST LETTER INFORMATIONAL NOTICE			1JAN89 - 30JUN89	1	89FEC/608/4090
	YEAR-END	12,264	10,400	1JUL89 - 31DEC89	14	90FEC/627/2450
	YEAR-END - AMENDMENT	12,942	10,400	1JUL89 - 31DEC89	4	90FEC/642/3205
	REQUEST FOR ADDITIONAL INFORMATION			1JUL89 - 31DEC89	1	90FEC/630/4047
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL89 - 31DEC89	2	90FEC/632/5032
1990	STATEMENT OF ORGANIZATION - AMENDMENT			14AUG90	2	90FEC/652/2300
	APRIL QUARTERLY	6,162	8,925	1JAN90 - 31MAR90	11	90FEC/644/1619
	NOTICE OF FAILURE TO FILE			1JAN90 - 31MAR90	1	90FEC/639/0776
	JULY QUARTERLY	6,356	6,825	1APR90 - 30JUN90	11	90FEC/650/3123
	OCTOBER QUARTERLY	6,386	4,750	1JUL90 - 30SEP90	12	90FEC/658/2295
	POST-GENERAL	5,771	3,850	18OCT90 - 26NOV90	10	90FEC/676/0676
	YEAR-END	2,612	350	28NOV90 - 31DEC90	14	91FEC/683/2453
	YEAR-END - AMENDMENT	-	-	28NOV90 - 31DEC90	3	91FEC/691/2763
	1'ST LETTER INFORMATIONAL NOTICE			28NOV90 - 31DEC90	1	91FEC/688/2144
	TOTAL	54,322	0 48,925 0		114	TOTAL PAGES

All Reports Have Been Reviewed.

Ending Cash Balance as of 12/31/90: \$44,138.62

Debts and Obligations Owed To the Committee as of 12/31/90: \$0.00

Debts and Obligations Owed By the Committee as of 12/31/90: \$0.00

00205

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED

11/11/90

90 DEC -9 AM 8:08

USE PRECISE MAILING LABEL
OR
TYPE OR PRINT

C00107599
SAL J RUBIN
STEARLPAC-STEARLING DRUG INC EMP
LOYEE POLITICAL ACTION COMMITTEE
90 PARK AVE
NEW YORK
NY 10016

023090 202

Reported

2. FEC IDENTIFICATION NUMBER

C 00107599

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

Nov. 6 in the State of New York

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

SUMMARY

8. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
October 15 through November 26, 1990		
9. (a) Cash on Hand January 1, 1990		\$ 41,549.93
(b) Cash on Hand at Beginning of Reporting Period	\$ 39,955.35	
(c) Total Receipts (from Line 10)	\$ 5,771.25	\$ 24,676.67
(d) Subtotal (add Lines 9(b) and 9(c) for Column A and Lines 9(a) and 9(c) for Column B)	\$ 45,726.60	\$ 66,226.60
7 Total Disbursements (from Line 28)	\$ 3,850.00	\$ 24,350.00
6 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 9(d))	\$ 41,876.60	\$ 41,876.60
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 800-424-9530 Local 202-376-3120
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

SAL J. RUBIN

Signature of Treasurer

Date

December 3, 1990

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)

00206

3043087861066979

DETAILED SUMMARY PAGE of Receipts and Disbursements Page 2, FEC FORM 320

Name of Committee (in full) Sterling Drug Inc. Employee Political Action Committee for Improved Government		Report Covering the Period From: To:	
I. RECEIPTS		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees:			
(i) Itemized (use Schedule A):	\$ 600.00	\$ 6,127.62	110001
(ii) Unitemized:	4,461.60	15,914.80	110002
(iii) Total of contributions from individuals:	5,061.60	22,042.42	110003
(b) Political Party Committees:			1100
(c) Other Political Committees (such as PACs):			1100
(d) TOTAL CONTRIBUTIONS (add 11(a)(i), (ii), and (c)):	5,061.60	22,042.42	1100
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES:			12
13. ALL LOANS RECEIVED:			13
14. LOAN REPAYMENTS RECEIVED:			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.):			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES:			16
17. OTHER RECEIPTS (Dividends, Interest, etc.):	709.65	2,634.25	17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17):	5,771.25	24,676.67	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES:			19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES:			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES:	\$ 3,850.00	\$24,350.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E):			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F):			23
24. LOAN REPAYMENTS MADE:			24
25. LOANS MADE:			25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees:			26(a)
(b) Political Party Committees:			26(b)
(c) Other Political Committees (such as PACs):			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c)):			26(d)
27. OTHER DISBURSEMENTS:			27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27):	\$ 3,850.00	\$24,350.00	28
III. NET CONTRIBUTIONS OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d)):	5,061.60	22,042.42	29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d)):			30
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29):	5,061.60	22,042.42	31
32. TOTAL OPERATING EXPENDITURES (from Line 19):			32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15):			33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32):			34

00207

9 3 0 3 6 8 7 6 1 0 6 6 9 7 7 8

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule for each category of the Detailed Summary Page

PAGE **1** OF **1**
FOR LINE NUMBER **7**

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)
Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterIPAC)

A. Full Name, Mailing Address and ZIP Code NEMA PAC c/o Allan Rexinger 1150 Connecticut Avenue, NW Washington, D.C. 20036	Purpose of Disbursement Nonprescription Drug Manufacturers Association Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/8/90	Amount of Each Disbursement This Period \$500.00
B. Full Name, Mailing Address and ZIP Code Zimmer for Congress P.O. Box 107 Flemington, NJ 08822	Purpose of Disbursement Richard Zimmer New Jersey, 12th C.D. Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/8/90	Amount of Each Disbursement This Period \$500.00
C. Full Name, Mailing Address and ZIP Code The Committee for Congressman Bill Green	Purpose of Disbursement Bill Green New York, 15th C.D. Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/10/90	Amount of Each Disbursement This Period \$500.00
D. Full Name, Mailing Address and ZIP Code Dick Army Campaign Committee 3869 Beech Down Drive Chantilly, VA 22021	Purpose of Disbursement Dick Army Texas, 26th C.D. Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/10/90	Amount of Each Disbursement This Period \$350.00
E. Full Name, Mailing Address and ZIP Code Saiki in "90" Committee P.O. Box 4107 Honolulu, HI 96812	Purpose of Disbursement Pat Saiki Hawaii, 1st C.D. Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/16/90	Amount of Each Disbursement This Period \$500.00
F. Full Name, Mailing Address and ZIP Code Dick Nichols for Congress Committee P.O. Box 411 McPherson, KS 67460	Purpose of Disbursement Dick Nichols Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/16/90	Amount of Each Disbursement This Period \$500.00
G. Full Name, Mailing Address and ZIP Code Citizens for Arlen Specter The Curtis Center - Suite 126 6th & Walnut Streets	Purpose of Disbursement Arlen Specter Pennsylvania Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 11/6/90	Amount of Each Disbursement This Period \$1,000.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (last one!)

\$3,850.00

TOTAL This Period (all page this line number only)

\$3,850.00

00208

SterilPAC

STERILIZATION AND PACKAGING FOR THE FUTURE

20036760685



240

Thank you for using
SterilPAC Service

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

DEC-9 AM 8:18

60209

CERTIFIED MAIL
No. 042495
RETURN RECEIPT REQUESTED

Keep receipt up to date
with changes in address

RECEIVED
F.E.C.
SECRETARIAT

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

91 AUG 19 PM 4:06

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral: 91NF 71 - 102
Staff Member Jeffrey D. Long

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

RESPONDENTS:

21040881700

21040881701

STERLPAC-Sterling Drug Inc. Employees Political
Action Committee for Improved Government and Sal J.
Rubino, as treasurer

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

INTERNAL REPORTS CHECKED: Referral Materials
Disclosure Documents

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Report Analysis Division ("RAD") referred the above thirty-two (32) committees and their treasurers to the Office of the General Counsel on May 10, 1991. The basis for the attached RAD referral is the committees' failure to file the 1990 12 Day Pre-General Report in a timely manner in violation of 2 U.S.C. § 434(a)(4)(A)(ii).

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that all unauthorized committees filing quarterly reports shall file a pre-election report before any election in which the committee makes a contribution or expenditure on behalf of a candidate in such election. According to 2 U.S.C. § 434(a)(4)(A)(ii), the pre-election report shall be filed no later than the 12th day before the election and shall be complete as of the 20th day before the election.

With regard to the 1990 general election, unauthorized committees which made contributions or expenditures during the period of October 1 through October 17 were required to file a 12 Day Pre-General Election Report covering that period by

21040881702

October 25, 1990. On October 1, 1990, all unauthorized committees were sent prior notification regarding the filing of the pre-general and post-general reports, which specifically informed quarterly filers of the requirement to file a pre-general report if contributions or expenditures were made during the period between October 1 and October 17, 1990. (Attachment 1, page 253).

Of the thirty-two referred committees, twenty-four of the committees disclosed on their 30 Day Post-General Reports contributions or expenditures for the period between October 1 and October 17, 1990, indicating that the 12 Day Pre-General Reports should have been filed. The remaining eight of the referred committees filed the 12 Day Pre-General Reports but not in a timely manner. Accordingly, the Office of the General Counsel recommends that the Commission open Matters Under Review and find reason to believe that the 32 referred committees and their

21040881703

treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file timely the 1990 12 Day Pre-General Report.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

This Office also recommends that the Commission offer to enter into conciliation with the respondents prior to a finding of probable cause to believe.

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PAGES 6 THROUGH 23 DO NOT PERTAIN TO THESE RESPONDENTS.

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IV. RECOMMENDATIONS

1. Open Matters Under Review, find reason to believe that the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii) and enter into conciliation prior to a finding of probable cause to believe:

A.

B.

C.

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U.

V.

W.

X.

Y.

Z.

AA. STERLPAC-Sterling Drug Inc. Employees Political Action Committee for Improved Government and Sal J. Rubino, as treasurer

BB.

CC.

DD.

EE.

FF.

2. Approve the attached Factual and Legal Analyses and conciliation agreements, and the appropriate letters.

Lawrence M. Noble
General Counsel

8-19-91
Date

BY: Lois G. Lerner
Lois G. Lerner
Associate General Counsel

Attachments

1. Referral Materials
2. Factual and Legal Analysis (32)
3. Proposed agreements (32)

21040881708

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) RAD Referrals
) # 91NF 71-102
Thirty-two Committees and their)
treasurers.)

(
MURK
3386
70
3417
)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session on
August 27, 1991, do hereby certify that the Commission
decided by a vote of 6-0 to take the following actions
with respect to RAD Referrals 91NF 71 - 102:

1. Open Matters Under Review, find reason
to believe that the following committees
and their treasurers violated 2 U.S.C.
§ 434(a)(4)(A)(ii) and enter into
conciliation prior to a finding of
probable cause to believe:

A.

B.

C.

(continued)

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Federal Election Commission
Certification: RAD Referrals
#91NF 71 - 102
August 27, 1991

Page 2

D.

E.

F.

G.

H.

I.

J.

K.

L.

(continued)

21040881710

Federal Election Commission
Certification: RAD Referrals
#91NF 71 - 102
August 27, 1991

Page 3

M.

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(continued)

21040881711

Federal Election Commission
Certification: RAD Referrals
#91NF 71 - 102

Page 4

V.

W.

X.

Y.

Z.

AA. STERLPAC-Sterling Drug Inc.
Employees Political Action
Committee for Improved Government
and Sal J. Rubino, as treasurer;

BB.

CC.

DD.

EE.

FF.

(continued)

21040881712

Federal Election Commission
Certification: RAD Referrals
#91NF 71 - 102
August 27, 1991

Page 5

2. Approve the Factual and Legal Analyses, conciliation agreements, and the appropriate letters as recommended in the General Counsel's report dated August 19, 1991.

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

Attest:

9-4-91
Date

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

21040881713



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 13, 1991

Sal J. Rubino, Treasurer
STERLPAC-Sterling Drug Inc.
Employees Political Action Committee
for Improved Government
90 Park Avenue
New York, New York 10016

RE: MUR 3412
STERLPAC-Sterling Drug Inc.
Employees Political Action Committee
for Improved Government and
Sal J. Rubino, as treasurer

Dear Mr. Rubino:

On August 27, 1991, the Federal Election Commission found that there is reason to believe STERLPAC-Sterling Drug Inc. Employees Political Action Committee for Improved Government and Sal J. Rubino, as treasurer ("Committee"), violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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

1040881714

Sal J. Rubino, Treasurer

Page 2

be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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.

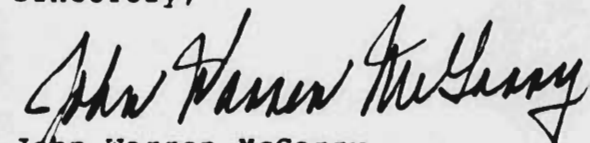
If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, 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.

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 Tammy Kapper, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,



John Warren McGarry
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

5104081715

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 3412

RESPONDENTS: STERLPAC-Sterling Drug Inc.
Employees Political Action Committee
for Improved Government and Sal
J. Rubino, as treasurer

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that all unauthorized committees filing quarterly reports, shall file a pre-election report before any election in which the committee makes a contribution to expenditure on behalf of a candidate in such election. According to 2 U.S.C. § 434(a)(4)(A)(ii), the pre-election report shall be filed no later than the 12th day before the election and which shall be complete as of the 20th day before the election.

With regard to the 1990 general election, unauthorized committees which made contributions or expenditures during the period of October 1 through October 17, were required to file a 12 Day Pre-General Election Report covering that period, by October 25, 1990. On October 1, 1990, all unauthorized committees were sent prior notification regarding the filing of the pre- and post-general reports, which specifically informed quarterly filers of the requirement to file a pre-general if contributions or expenditures were made during the period between October 1 and October 17, 1990.

The Respondents disclosed on their 30 Day Post-General Report contributions or expenditures for the period between October 1 and October 17, 1990, indicating that the 12 Day Pre-General Reports

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should have been filed. Therefore, there is reason to believe the Respondents violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to timely file the 1990 Pre-General Election Report.

21040881717



FEDERAL

OBC 3083

STERLING DRUG INC.

NINETY PARK AVENUE, NEW YORK, N.Y. 10016

JEFFREY J. FREEDMAN
ATTORNEYTELEPHONE (212) 607-3074
FAX (212) 607-3084

October 4, 1991

Mr. John Warren McGarry
Chairman
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Re: MUR 3412
STERLPAC - Sterling Drug Inc. Employee Political
Action Committee for Improved Government
Sterlpac FED ID #C00107599

Dear Mr. McGarry:

This is in response to your correspondence to Sal Rubino, Treasurer, Sterling Drug Inc. Employee Political Action Committee for Improved Government ("Sterlpac"). After review of this matter, Sterlpac agrees and requests that it be permitted to enter into a preprobable cause conciliation agreement with the Federal Election Commission.

Enclosed please find a executed Conciliation Agreement and a check payable to the Federal Election Commission in the amount of \$500.00. I am also enclosing a statement of Designation of Counsel which authorizes me to act on behalf of Sterlpac and Sal Rubino.

RECEIVED
FEDERAL ELECTION COMMISSION
OCT 9 1991
91 OCT -9 PM 4:01

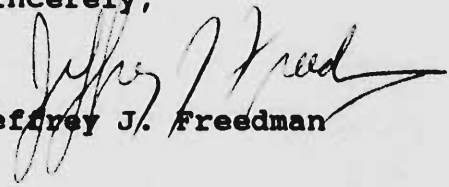
81718804081

Mr. John Warren McGarry
Chairman
October 4, 1991
Page two

I am submitting for your records a 12-day Pre-General Election Report for the period between October 1, 1990 and October 17, 1990. Because the filing of this report will result in changes for all subsequent reports, I am also forwarding to you Amended Reports for: Post-General Election, January 31 Year End Report, and the July 31 Mid Year Report.

Please contact me if you require further action to resolve this matter.

Sincerely,


Jeffrey J. Freedman

cc: Sal Rubino, Treasurer
SterlPAC
Bob Mannis, Esquire

Enclosure

JJF:pal

01040881719

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL:

Jeffrey J Freedman / Bob Mannis

ADDRESS:

90 Park Ave 3144 Floor

New York New York

Sterling Winter Legal Department

TELEPHONE:

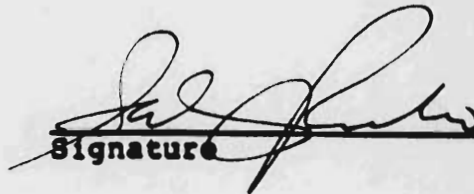
212-907-3074

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.

Date

10/4/91

Signature



RESPONDENT'S NAME:

SAL J Rubino / SterlPAC

ADDRESS:

90 PARK Ave

New York NY 10016

HOME PHONE:

(914) 769-3698

BUSINESS PHONE:

(212) 907 2008

21040881720

REPORT OF RECEIPTS AND DISBURSEMENTS

Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)		2. FEC IDENTIFICATION NUMBER C00107599
ADDRESS (number and street) ☐ Check if different than previously reported 90 Park Avenue		3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).
CITY, STATE and ZIP CODE New York, New York 10016		

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 General Election
(Type of Election)

election on 11/6/90 in the State of New York

☐ Thirtieth day report following the General Election on _____
in the State of _____

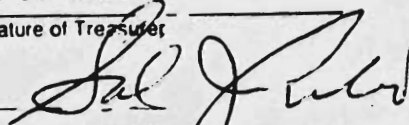
(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>10/1/90</u> through <u>10/17/90</u>		
6. (a) Cash on Hand January 1, 19 <u>90</u>			\$41,549.93
(b) Cash on Hand at Beginning of Reporting Period		\$ 39,955.35	
(c) Total Receipts (from Line 18)		\$ 0	\$18,905.42
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 39,955.35	\$60,455.35
7. Total Disbursements (from Line 28)		\$ 3,350.00	\$23,850.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 36,605.35	\$36,605.35
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 800-424-9530 Local 202-376-3120
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
Sal J. Rubino

Signature of Treasurer



Date

9/30/91

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)

1040881721

TAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in full) **Sterling Drug Inc. Employee
Political Action Committee for Improved Government**

Report Covering the Period

From: **10/1/90**

To: **10/17/90**

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(i) Itemized (use Schedule A)

(ii) Unitemized

(iii) Total of contributions from individuals

(b) Political Party Committees

(c) Other Political Committees (such as PACs)

(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES

17. OTHER RECEIPTS (Dividends, Interest, etc.)

18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES

22. INDEPENDENT EXPENDITURES (use Schedule E)

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees (such as PACs)

(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))

27. OTHER DISBURSEMENTS

28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)

III. NET CONTRIBUTIONS/OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))

30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))

31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)

32. TOTAL OPERATING EXPENDITURES (from Line 19)

33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)

34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)

**COLUMN A
Total This Period**

**COLUMN B
Calendar Year-To-Date**

11(a)(i)

11(a)(ii)

11(a)(iii)

11(b)

11(c)

11(d)

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26(a)

26(b)

26(c)

26(d)

27

28

29

30

31

32

33

34

2104081722

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 7

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)

Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)

A. Full Name, Mailing Address and ZIP Code NDMA PAC c/o Allan Rexinger 1150 Connecticut Avenue, NW Washington, D.C. 20036	Purpose of Disbursement Nonprescription Drug Manufacturers Association Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/8/90	Amount of Each Disbursement This Period \$1,000.00
B. Full Name, Mailing Address and ZIP Code Zimmer for Congress P.O. Box 107 Flemington, NJ 08822	Purpose of Disbursement Richard Zimmer New Jersey, 12th C.D. Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/8/90	Amount of Each Disbursement This Period \$500.00
C. Full Name, Mailing Address and ZIP Code The Committee for Congressman Bill Green	Purpose of Disbursement Bill Green New York, 15th C.D. Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/10/90	Amount of Each Disbursement This Period \$500.00
D. Full Name, Mailing Address and ZIP Code Dick Arney Campaign Committee 3869 Beech Down Drive Chantilly, VA 22021	Purpose of Disbursement Dick Arney Texas, 26th C.D. Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/10/90	Amount of Each Disbursement This Period \$350.00
E. Full Name, Mailing Address and ZIP Code Saiki in "90" Committee P.O. Box 4107 Honolulu, HI 96812	Purpose of Disbursement Pat Saiki Hawaii, 1st C.D. Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/16/90	Amount of Each Disbursement This Period \$500.00
F. Full Name, Mailing Address and ZIP Code Dick Nichols for Congress Committee P.O. Box 411 McPherson, KS 67460	Purpose of Disbursement Dick Nichols Kansas, 5th C.D. Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/16/90	Amount of Each Disbursement This Period \$500.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

\$3,350.00

3
2
7
1
8
0
4
1
2

Name of Committee (in full) **Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterIPAC)**

A. Full Name, Mailing Address and ZIP Code of Loan Source

Original Amount
of Loan

Cumulative Payment
To Date

Balance Outstanding at
Close of This Period

NO ACTIVITY THIS REPORTING PERIOD

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

B. Full Name, Mailing Address and ZIP Code of Loan Source

Original Amount
of Loan

Cumulative Payment
To Date

Balance Outstanding at
Close of This Period

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

SUBTOTALS This Period This Page (optional)

TOTALS This Period (last page in this line only)

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

21040881724

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Committee (In Full) Sterling Drug Inc. Employee Political Action Committee (SterlPAC)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor NO ACTIVITY THIS REPORTING PERIOD				
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

01040381725

ITEMIZED INDEPENDENT EXPENDITURES

Page ____ of ____ Pages

(See Reverse Side for Instructions)

Name of Committee (in Full) Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)			I.D. No C 00107599	
Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
NO ACTIVITY THIS REPORTING PERIOD				
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
(a) SUBTOTAL of Itemized Independent Expenditures (b) SUBTOTAL of Unitemized Independent Expenditures (c) TOTAL Independent Expenditures			\$ _____ \$ _____ \$ _____	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this _____ day of _____, 19____

My Commission expires _____

NOTARY PUBLIC

Signature

Date

21040881726

SCHEDULE F

**ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. §441a(d))**

Page ____ of ____ for
LINE NUMBER ____

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full) Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)				
Has your Committee been designated to make coordinated expenditures by a political party committee? YES NO If YES, name the designating committee:				
NO ACTIVITY THIS REPORTING PERIOD				

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—\$			

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—\$			

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—\$			

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—\$			

SUBTOTAL of Expenditures This Page (optional)				
TOTAL This Period (last page this line number only)				

1040881727

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Sterling Drug Inc. Employee Political Action Committee for Improved Government (SteriPAC)		2. FEC IDENTIFICATION NUMBER C00107599
ADDRESS (number and street) ☐ Check if different than previously reported 90 Park Avenue		3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).
CITY, STATE and ZIP CODE New York, New York 10016		

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 _____

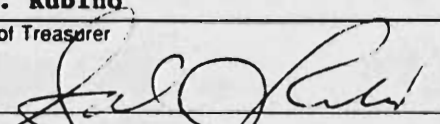
☒ Thirtieth day report following the General Election on

11/6/90 in the State of New York

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>10/18/90</u> through <u>11/26/90</u>		
6. (a) Cash on Hand January 1, 19 <u>90</u>			\$41,549.93
(b) Cash on Hand at Beginning of Reporting Period		\$ 36,605.35	
(c) Total Receipts (from Line 18)		\$ 5,771.25	\$24,676.67
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 42,376.60	\$66,226.60
7. Total Disbursements (from Line 28)		\$ 1,000.00	\$24,850.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 41,376.60	\$41,376.60
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 800-424-9530 Local 202-376-3120
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 Sal J. Rubino	Date <u>9/30/91</u>
Signature of Treasurer 	

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)

TAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in full) **Sterling Drug Inc. Employees
Political Action Committee for Improved Government**

Report Covering the Period
From: **10/18/90**

To: **11/26/90**

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	\$ 600.00	\$ 6,127.62	11(a)(i)
(ii) Unitemized	4,461.60	15,914.80	11(a)(ii)
(iii) Total of contributions from individuals	5,061.60	22,042.42	11(a)(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)			11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	5,061.60	22,042.42	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	709.65	2,634.25	17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	5,771.25	24,676.67	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES			19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	1,000.00	24,850.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees (such as PACs)			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1,000.00	24,850.00	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	5,061.60	22,042.42	29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))			30
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	5,061.60	22,042.42	31
32. TOTAL OPERATING EXPENDITURES (from Line 19)			32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)			33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)			34

01040881729

SCHEDULE A

ITEM RECEIPTS

Use separate schedule(s) for each category of the receipts and Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 11 (a) (i)

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)

Sterling Drug Inc. Employee Political Action Committee For Improved Government

A. Full Name, Mailing Address and ZIP Code John H. Wood 94 Yantacaw Road Upper Montclair, NJ 07043	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Vice President	Date (month, day, year) Bi-Monthly Paydays	Amount of Each Receipt this Period \$200.00 \$100.00/Payday Oct. - Nov.
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Aggregate Year-to-Date > \$ 900.00		
B. Full Name, Mailing Address and ZIP Code Louis P. Mattis 77 Park Avenue - Apt. 7E New York, NY 10016	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation C.E.O.	Date (month, day, year) Bi-Monthly Paydays	Amount of Each Receipt this Period \$200.00 \$100.00/Payday Oct. - Nov.
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Aggregate Year-to-Date > \$		
C. Full Name, Mailing Address and ZIP Code Richard Gaccione 18 Clover Street Larchmont, NY 10538	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Vice President	Date (month, day, year) Bi-Monthly Paydays	Amount of Each Receipt this Period \$200.00 \$100.00/Payday Oct. - Nov.
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Aggregate Year-to-Date > \$		
D. Full Name, Mailing Address and ZIP Code 	Name of Employer Occupation 	Date (month, day, year) 	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code 	Name of Employer Occupation 	Date (month, day, year) 	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code 	Name of Employer Occupation 	Date (month, day, year) 	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code 	Name of Employer Occupation 	Date (month, day, year) 	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional)

\$600.00

TOTAL This Period (last page this line number only)

\$600.00

21040881730

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

PAGE	OF
1	1
FOR LINE NUMBER	
7	

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)

Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Citizens for Arlen Specter The Curtis Center - Suite 126 6th & Walnut Streets	Arlen Specter Pennsylvania Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	11/6/90	\$1,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

\$1,000.00

21040881731

Name of Committee (in Full) **Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterIPAC)**

A. Full Name, Mailing Address and ZIP Code of Loan Source

Original Amount
of LoanCumulative Payment
To DateBalance Outstanding at
Close of This Period**NO ACTIVITY THIS REPORTING PERIOD**Election: ☐ Primary ☐ General ☐ Other (specify):Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apri) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

B. Full Name, Mailing Address and ZIP Code of Loan Source

Original Amount
of LoanCumulative Payment
To DateBalance Outstanding at
Close of This PeriodElection: ☐ Primary ☐ General ☐ Other (specify):Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apri) ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

SUBTOTALS This Period This Page (optional)

TOTALS This Period (last page in this line only)

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

21040881732

Name of Committee (In Full) Sterling Drug Inc. Employee Political Action Committee (SterIPAC)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor NO ACTIVITY THIS REPORTING PERIOD				
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

3
3
7
1
8
8
0
4
0
1

ITEMIZED INDEPENDENT EXPENDITURES

Page _____ of _____ Pages

(See Reverse Side for Instructions)

Name of Committee (in Full) Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)	ID No C 00107599
--	----------------------------

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
NO ACTIVITY THIS REPORTING PERIOD				
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures
 (b) SUBTOTAL of Unitemized Independent Expenditures
 (c) TOTAL Independent Expenditures

\$ _____
 \$ _____
 \$ _____

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this _____ day of _____, 19____

My Commission expires _____

NOTARY PUBLIC

Signature

Date

21040881734

ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. §441a(d))

Page ____ of ____ for
LINE NUMBER ____

(To be used only by Political Committees in the General Election)

Name of Political Committee (In Full) Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)				
Has your Committee been designated to make coordinated expenditures by a political party committee? ☐ YES ☐ NO If YES, name the designating committee:				
Full Name, Mailing Address and ZIP Code of Subordinate Committee NO ACTIVITY THIS REPORTING PERIOD				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—\$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—\$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—\$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—\$			
SUBTOTAL of Expenditures This Page (optional)				
TOTAL This Period (last page this line number only)				

5
3
7
1
8
3
0
4
0
1
1

REPORT OF RECEIPTS AND DISBURSEMENTS

Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)		2. FEC IDENTIFICATION NUMBER C00107599
ADDRESS (number and street) ☐ Check if different than previously reported 90 Park Avenue		3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).
CITY, STATE and ZIP CODE New York, New York 10016		

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>11/28/90</u> through <u>12/31/90</u>		
6. (a) Cash on Hand January 1, 19 <u>90</u>			\$41,549.93
(b) Cash on Hand at Beginning of Reporting Period		\$41,376.60	
(c) Total Receipts (from Line 18)		\$ 2,612.02	\$27,288.69
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$43,988.62	\$68,838.62
7. Total Disbursements (from Line 28)		\$ 350.00	\$25,200.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$43,638.62	\$43,638.62
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 800-424-9530 Local 202-376-3120
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
Sal J. Rubino

Signature of Treasurer

Date

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

FEC FORM 3X
(revised 4/87)

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in full) Sterling Drug Inc. Employee Political Action Committee for Improved Government		Report Covering the Period From: 11/28/90 To: 12/31/90	
		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)		\$ 2,058.00	\$ 8,185.62
(ii) Unitemized		554.02	16,468.82
(iii) Total of contributions from individuals		2,612.02	24,654.44
(b) Political Party Committees			
(c) Other Political Committees (such as PACs)			
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))		2,612.02	24,654.44
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			
13. ALL LOANS RECEIVED			
14. LOAN REPAYMENTS RECEIVED			
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			
17. OTHER RECEIPTS (Dividends, Interest, etc.)		0	2,634.25
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)		2,612.02	27,288.69
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES			
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		350.00	25,200.00
22. INDEPENDENT EXPENDITURES (use Schedule E)			
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			
24. LOAN REPAYMENTS MADE			
25. LOANS MADE			
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			
(b) Political Party Committees			
(c) Other Political Committees (such as PACs)			
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			
27. OTHER DISBURSEMENTS			
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		350.00	25,200.00
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))		2,612.02	24,654.44
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))			
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)		2,612.02	24,654.44
32. TOTAL OPERATING EXPENDITURES (from Line 19)			
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)			
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)			

21040881737

SCHEDULE A

DED RECEIPTS

separate schedule(s)
each category of the
Detailed Summary Page

PAGE 1 OF 5
FOR LINE NUMBER 11(a)(1)

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)

Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)

A. Full Name, Mailing Address and ZIP Code Govind Agrawal 129 Prospect Avenue Hillsdale, NJ 07642 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation VP, Manufacturing Aggregate Year-to-Date > \$320.07	Date (month, day, year) Bi-Monthly (Payroll Deduction) For 8/90; \$26.78 10/90; \$33.46Re	Amount of Each Receipt this Period \$ 33.46 (\$24.34/1/90-7/90; \$29.21)
B. Full Name, Mailing Address and ZIP Code James Bodnar 13 Forest Hills Lincoln, IL 62656 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Plant. Mgr. - IL Aggregate Year-to-Date > \$320.07	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 20.00 (\$20-1/90-12/90)
C. Full Name, Mailing Address and ZIP Code Paul Baehr 135 Rose Lane Haverford, PA 19041 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation VP & GM, Pharm. Prods. Aggregate Year-to-Date > \$600.00	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 50.00 (\$50 - 1/90-12/90)
D. Full Name, Mailing Address and ZIP Code Susan Danehower 360 West 22nd Street - #16B New York, NY 10011 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Dir., New Products. Aggregate Year-to-Date > \$211.40	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 18.18 (\$17.14 1/90-6/90; \$17.66 7/90; \$18.18 8/90-12/90)
E. Full Name, Mailing Address and ZIP Code Louis Dingerdisen 1 Terkuile Road Montvale, NJ 07645 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Dir., Health Grp., I.S. Aggregate Year-to-Date > \$1,017.52	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 89.38 (\$82.50 1/90-8/90; \$89.38 9/90-12/90)
F. Full Name, Mailing Address and ZIP Code Francis Dutko 453 Kenwood Avenue Delmar, NY 12954 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Associate Dir./SWRI Aggregate Year-to-Date > \$216.00	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 18.00 (\$18.00 1/90-12/90)
G. Full Name, Mailing Address and ZIP Code Raymond Everett 57 Middlesex Drive Slingerlands, NY 12159 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Section Head/SWRI Aggregate Year-to-Date > \$720.00	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 60.00 (\$60.00 1/90-3/90; \$90 4/90)

SUBTOTAL of Receipts This Page (optional) \$289.02

TOTAL This Period (last page this line number only)

01040881738

SCHEDULE A

DED RECEIPTS

Also separate schedule(s)
for each category of the
Detailed Summary Page

PAGE 2 OF 5
FOR LINE NUMBER 11(a)(1)

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)

Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)

A. Full Name, Mailing Address and ZIP Code Richard Gaccione P.O. Box 1061 Beaver Dam Road Pocono Pines, PA 18350 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation President, Glenbrook Aggregate Year-to-Date > \$1,143.84	Date (month, day, year) Bi-Monthly (Payroll Deduction) \$ 100.00 (\$93.76 1/90-9/90; \$100 10/90-12/90)	Amount of Each Receipt this Period
B. Full Name, Mailing Address and ZIP Code William Hickman 4557 187th Place, SE Issaquah, WA 98027 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation DM, Winthrop Pharm. Aggregate Year-to-Date > \$245.34	Date (month, day, year) Bi-Monthly (Payroll Deduction) \$ 40.92 (\$15.54 1/90-2/90; \$16.56 3/90-5/90; \$18.18 4/90-11/90)	Amount of Each Receipt this Period
C. Full Name, Mailing Address and ZIP Code Hilary Hinchman 215 East 73rd Street New York, NY 10021 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Dir., Advtising. Svcs. Aggregate Year-to-Date > \$240.00	Date (month, day, year) Bi-Monthly (Payroll Deduction) \$ 20.00 (\$20.00 1/90-12/90)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Heather Hollowell 35 East 35th Street - #5G New York, NY 10016 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Dir., Comm. & Indst. Rel Aggregate Year-to-Date > \$265.44	Date (month, day, year) Bi-Monthly (Payroll Deduction) \$ 22.12 (\$22.12 1/90-12/90)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Conrad Krebs 450 Forrest Avenue Jeffersonville, PA 19401 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Clinical Project Dir. Aggregate Year-to-Date > \$314.00	Date (month, day, year) Bi-Monthly (Payroll Deduction) \$ 50.00 (\$24.00 1/90-11/90; \$50.00 12/90)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code John Loftus R.D. #2 16 Cindy Lane Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Dir., Logistics Mgmt. Aggregate Year-to-Date > \$253.70	Date (month, day, year) Bi-Monthly (Payroll Deduction) \$ 21.26 (\$19.84 1/90-12/90; \$21.26 2/90-12/90)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Louis Mattis 156 Kemble Drive Sea Island, GA 31561 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation CEO Pres., Sterling Drug Inc. Aggregate Year-to-Date > \$1,200.00	Date (month, day, year) Bi-Monthly (Payroll Deduction) \$ 100.00 (\$100.00 1/90-12/90)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional) \$354.30

TOTAL This Period (last page this line number only)

01040881739

SCHEDULE A

DED RECEIPTS

separate schedule(s)
each category of the
Detailed Summary Page

PAGE 3 OF 5
FOR LINE NUMBER 11(a)(i)

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)

Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)

A. Full Name, Mailing Address and ZIP Code Jane Melville 603 Somerset Drive Slingerlands, NY 12159 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Pres., Sterling Organics Aggregate Year-to-Date > \$276.64	Date (month, day, year) Bi-Monthly (Payroll Deduction) 8/90-12/90	Amount of Each Receipt this Period \$ 25.00 (\$22.08 1/90-8/90; \$25.00 9/90-12/90)
B. Full Name, Mailing Address and ZIP Code Michael Nangle P.O. Box 354 Blooming Glen, PA 18911 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation VP, Mktg. Health Care Aggregate Year-to-Date > \$243.27	Date (month, day, year) Bi-Monthly (Payroll Deduction) 6/90-12/90	Amount of Each Receipt this Period \$ 20.84 (\$19.48 1/90-6/90; \$22.19 7/90-8/90-12/90)
C. Full Name, Mailing Address and ZIP Code Harry Ochsenbein P.O. Box 710510 Houston, TX 77271 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation DM, Winthrop Pharm. Aggregate Year-to-Date > \$240.00	Date (month, day, year) Bi-Monthly (Payroll Deduction) 12/90	Amount of Each Receipt this Period \$ 20.00 (\$20.00 1/90-12/90)
D. Full Name, Mailing Address and ZIP Code David Sager 7543 Herrick Park Drive Hudson, OH 44236 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation DM, Winthrop Pharm. Aggregate Year-to-Date > \$272.22	Date (month, day, year) Bi-Monthly (Payroll Deduction) 12/90	Amount of Each Receipt this Period \$ 35.55 (\$18.12 1/90; \$19.38 2-3/90; \$21.03 4/90; \$22.68 5-11/90)
E. Full Name, Mailing Address and ZIP Code John R. Shaffer 81 Revonah Avenue Stamford, CT 06905 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Dir., Int'l Pub. Affairs Aggregate Year-to-Date > \$240.00	Date (month, day, year) Bi-Monthly (Payroll Deduction) 12/90	Amount of Each Receipt this Period \$ 20.00 (\$20.00 1/90-12/90)
F. Full Name, Mailing Address and ZIP Code Harry Shoff 630 First Ave. -#26C New York, NY 10016 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Pres., Winthrop Pharm. Aggregate Year-to-Date > \$200.00	Date (month, day, year) Bi-Monthly (Payroll Deduction) 12/90	Amount of Each Receipt this Period \$ 100.00 (\$100.00 11/90-12/90)
G. Full Name, Mailing Address and ZIP Code John Sortor 33 Lakeshore Drive Oakland, NJ 07436 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Dir., Tech Svcs. Aggregate Year-to-Date > \$360.92	Date (month, day, year) Bi-Monthly (Payroll Deduction) 5/90-12/90	Amount of Each Receipt this Period \$ 30.86 (\$28.98 1/90-5/90; \$30.86 6/90-12/90)

SUBTOTAL of Receipts This Page (optional) **\$252.25**

TOTAL This Period (last page this line number only)

21040881740

SCHEDULE A

DED RECEIPTS

separate schedule(s)
each category of the
Detailed Summary Page

PAGE 4 OF 5
FOR LINE NUMBER 11(a)(1)

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)

Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)

A. Full Name, Mailing Address and ZIP Code Dr. James Stoker 74 Catalpa Road Wilton, CT 06897	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation VP, Quality	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 41.20 (\$20.00 1/90-10/90; \$30.60 11/90; \$41.20 12/90)
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Aggregate Year-to-Date > \$271.80		
B. Full Name, Mailing Address and ZIP Code Theodore Vilord 709 Werimus Road Washington Township, NJ 07675	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Corp. Dir., Engineering	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 20.00 (\$20.00 1/90-12/90)
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Aggregate Year-to-Date > \$240.00		
C. Full Name, Mailing Address and ZIP Code Stevenson Ward 11 Nolen Lane Darien, CT 06820	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation VP, Finance, Europa, AFR	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 84.35 (\$50.84 1/90-7/90; \$76.80 8/90; \$82.41 9/90-12/90)
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Aggregate Year-to-Date > \$764.26		
D. Full Name, Mailing Address and ZIP Code Kathleen M. Whyte 2905 Garfield St., NW Washington, D.C. 20008	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation VP, Govt. Affairs	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 66.88 (\$62.50 1/90-3/90; \$66.88 4/90-12/90)
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Aggregate Year-to-Date > \$789.42		
E. Full Name, Mailing Address and ZIP Code John H. Wood 94 Yantacaw Brook Road Upper Montclair, NJ 07043	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation VP, Public Affairs	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 100.00 (\$100.00 1/90-12/90)
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Aggregate Year-to-Date > \$1,200.00		
F. Full Name, Mailing Address and ZIP Code George Benjamin 26 Dover Hill Drive Nesconset, NY 11767	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation CFO, Sterling Drug Inc.	Date (month, day, year) Contribution via one-time check	Amount of Each Receipt this Period \$ 250.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Aggregate Year-to-Date > \$250.00		
G. Full Name, Mailing Address and ZIP Code Susan Danehower * 360 West 22nd Street - #16B New York, NY 10011	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Dir., New Products	Date (month, day, year) Contrib. via check	Amount of Each Receipt this Period \$ 150.00 (*See Sched.A, Page 1, #D)
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Aggregate Year-to-Date > \$150.00		

SUBTOTAL of Receipts This Page (optional) \$712.43

TOTAL This Period (last page this line number only)

0104081741

SCHEDULE A

RECEIPTS

separate schedule(s)
for each category of the
Detailed Summary Page

PAGE 5 OF 5
FOR LINE NUMBER 11(a)(1)

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)

Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterIPAC)

A. Full Name, Mailing Address and ZIP Code Dr. Jack Dean 6 Foxwood Circle East Greenbush, NY 12061 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation VP, Drug Safety Aggregate Year-to-Date > \$ 200.00	Date (month, day, year) Contrib. via one time check	Amount of Each Receipt this Period \$200.00
B. Full Name, Mailing Address and ZIP Code Herbert McKenzie 603 Wishing Well Road Wyckoff, NJ 07481 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Pres., Sterling Intl. Aggregate Year-to-Date > \$ 250.00	Date (month, day, year) Contrib. via one time check	Amount of Each Receipt this Period \$250.00
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)	\$450.00
TOTAL This Period (last page this line number only)	\$2,058.00

21040881742

SCHEDULE B

ITEMS DISBURSEMENTS

 Attach schedule(s)
for each category of the
Detailed Summary Page

 PAGE 1 OF 1
FOR LINE NUMBER 7

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)

Sterling Drug Inc. Employee Political Action Committee For Improved Government (SterlPAC)

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Gene Taylor For Congress P.O. Box 2639 St. Louis, MI 39521	Gene Taylor D-MI, 5th C.D. Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	12/10/90	\$ 350.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) \$350.00

TOTAL This Period (last page this line number only) \$350.00

21040881743

Name of Committee (in Full) **Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterIPAC)**

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
NO ACTIVITY REPORTED THIS PERIOD			
Election: ☐ Primary ☐ General ☐ Other (specify):			

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Election: ☐ Primary ☐ General ☐ Other (specify):			

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		

SUBTOTALS This Period This Page (optional)

TOTALS This Period (last page in this line only)

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

01040881744

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page ____ of ____ for
LINE NUMBER ____
(Use separate schedules
for each numbered line)

Name of Committee (in Full) Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterIPAC)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
NO ACTIVITY REPORTED THIS PERIOD				
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

21040881745

ITEMIZED INDEPENDENT EXPENDITURES

Page _____ of _____ Pages

(See Reverse Side for Instructions)

Name of Committee (in Full) Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)				I.D. No.	
Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought	
NO ACTIVITY REPORTED THIS PERIOD				☐ Support ☐ Oppose	
				☐ Support ☐ Oppose	
				☐ Support ☐ Oppose	
				☐ Support ☐ Oppose	
				☐ Support ☐ Oppose	
				☐ Support ☐ Oppose	
				☐ Support ☐ Oppose	
(a) SUBTOTAL of Itemized Independent Expenditures			\$ _____		
(b) SUBTOTAL of Unitemized Independent Expenditures			\$ _____		
(c) TOTAL Independent Expenditures			\$ _____		

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this _____ day of _____, 19____

My Commission expires _____

NOTARY PUBLIC

Signature

Date

01040881746

SCHEDULE F

**FINANCED COORDINATED EXPENDITURES BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. §441a(d))**

Page ____ of ____ for
LINE NUMBER ____

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full) Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)				
Has your Committee been designated to make coordinated expenditures by a political party committee? ☐ YES ☐ NO If YES, name the designating committee:				
Full Name, Mailing Address and ZIP Code of Subordinate Committee NO ACTIVITY REPORTED THIS PERIOD				

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—\$			
	Aggregate General Election Expenditure for this Candidate—\$			
	Aggregate General Election Expenditure for this Candidate—\$			
	Aggregate General Election Expenditure for this Candidate—\$			
	Aggregate General Election Expenditure for this Candidate—\$			
	Aggregate General Election Expenditure for this Candidate—\$			

SUBTOTAL of Expenditures This Page (optional)				
TOTAL This Period (last page this line number only)				

01040881747

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

USE FEC MAILING LABEL
OR
TYPE ON PRINT

1. NAME OF COMMITTEE (in full) **Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)**
ADDRESS (number and street) | | Check if different than previously reported

90 Park Avenue
CITY, STATE and ZIP CODE

New York, New York 10016

2. FEC IDENTIFICATION NUMBER

C00107599

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 1/1/91 through 6/30/91

6. (a) Cash on Hand January 1, 19 91

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 19)

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

7. Total Disbursements (from Line 30)

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

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

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

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

\$ 43,638.62

\$ 43,638.62

\$ 14,947.38

\$ 14,947.38

\$ 58,586.00

\$ 58,586.00

\$ 11,525.00

\$ 11,525.00

\$ 47,061.00

\$ 47,061.00

\$ 0

\$ 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

Signature of Treasurer

Date

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 1/1/91)

DETAILED SUMMARY PAGE

OF RECEIPTS AND DISBURSEMENTS

PAGE 2, FEC FORM 3X

(revised 1/1/91)

NAME OF COMMITTEE Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)		REPORT COVERING PERIOD FROM 1/1/91 TO: 6/30/91	
I. Receipts		COLUMN A Total This Period	COLUMN B Calendar Year
11. Contributions (other than loans) From:			
a. Individual/Persons Other Than Political Committees			
i. Itemized (use Schedule A)		\$ 4,758.63	\$ 4,758.63
ii. Unitemized		8,778.58	8,778.58
iii. Total (add i and ii) >		13,537.21	13,537.21
b. Political Party Committees		--	--
c. Other Political Committees (such as PACs)		--	--
d. Total Contributions (add a iii, b and c) >		13,537.21	13,537.21
12. Transfers From Affiliated/Other Party Committees			
13. All Loans Received			
14. Loan Repayments Received			
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)			
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees			
17. Other Federal Receipts (Dividends, Interest, etc.)		1,410.17	1,410.17
18. Transfers from Nonfederal Account for Joint Activity			
19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) >		14,947.38	14,947.38
20. Total Federal Receipts (subtract line 18 from line 19) >		14,947.38	14,947.38
II. Disbursements			
21. Operating Expenditures:			
a. Shared Federal/Non-Federal Activity (from Schedule H4)			
i. Federal Share			
ii. Non-Federal Share			
b. Other Federal Operating Expenditures			
c. Total Operating Expenditures (Add a i, a ii, and b) >			
22. Transfers to Affiliated/Other Party Committees			
23. Contributions to Federal Candidates/Committees and Other Political Committees		11,525.00	11,525.00
24. Independent Expenditures (use Schedule E)			
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F) ..			
26. Loan Repayments Made			
27. Loans Made			
28. Refunds of Contributions To:			
a. Individuals/Persons Other Than Political Committees			
b. Political Party Committees			
c. Other Political Committees (such as PACs)			
d. Total Contribution Refunds (Add a, b and c) >			
29. Other Disbursements			
30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >		11,525.00	11,525.00
31. Total Federal Disbursements (subtract line 21 a ii from line 30) >			
III. Net Contributions/Operating Expenditures			
32. Total Contributions (other than loans)(from line 11d)		13,537.21	13,537.21
33. Total Contribution Refunds (from line 28d)		--	--
34. Net Contributions (other than loans)(subtract line 33 from 32)		13,537.21	13,537.21
35. Total Federal Operating Expenditures (add 21 a i and 21 b) >			
36. Offsets to Operating Expenditures (from line 15)			
37. Net Operating Expenditures (subtract line 36 from 35) >			

21040881749

SCHEDULE A

ITEMIZED RECEIPTS

Rate schedule(s)
for category of the
Detailed Summary Page

PAGE 1 OF 2
FOR LINE NUMBER 11(a)(i)

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NAME OF COMMITTEE (in Full)

Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)

A. Full Name, Mailing Address and ZIP Code Govind Agrawal 129 Prospect Avenue Hillsdale, NJ 07642 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation VP, Manufacturing Aggregate Year-to-Date > \$ 212.66	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 33.46
B. Full Name, Mailing Address and ZIP Code Edward Albright 9 Nathalie Court RR 4 Peekskill, NY 10566 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation VP, Corporate Services Aggregate Year-to-Date > \$ 292.08	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 48.68
C. Full Name, Mailing Address and ZIP Code Paul Baehr 135 Rose Lane Haverford, PA 19041 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation VP & GM, Pharm. Prods. Aggregate Year-to-Date > \$ 300.00	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 50.00
D. Full Name, Mailing Address and ZIP Code Judy Camp 2708 Stoneham Drive West Chester, PA 19382 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Aggregate Year-to-Date > \$ 241.00	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$40.00 1/91-5/91; \$41.00 6/91
E. Full Name, Mailing Address and ZIP Code Conrad Krebs 320 Paoli Woods Paoli, PA 19301 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Clinical Project Dir. Aggregate Year-to-Date > \$ 300.00	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 50.00
F. Full Name, Mailing Address and ZIP Code Raymond Everett 57 Middlesex Drive Slingerlands, NY 12159 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Section Head/SWRI Aggregate Year-to-Date > \$ 360.00	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 60.00
G. Full Name, Mailing Address and ZIP Code George Flobeck 230 Hudson Street Piermont, NY 10968 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation Aggregate Year-to-Date > \$ 297.12	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$47.92 1/91-2/91; \$50.32 3/91-6/91

SUBTOTAL of Receipts This Page (optional)

\$2,002.86

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

 Attach schedule(s)
for each category of the
Detailed Summary Page

 PAGE 2 OF 2
FOR LINE NUMBER 11(a)(i)

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NAME OF COMMITTEE (in Full)

Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)

A. Full Name, Mailing Address and ZIP Code R. Kyle Greer 64 Mountain Avenue Mendham, NJ 07945	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation VP, Human Resources	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 50.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Aggregate Year-to-Date > \$300.00		
B. Full Name, Mailing Address and ZIP Code Louis P. Mattis 156 Kemble Drive Sea Island, GA 31561	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation CEO & President	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 100.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Aggregate Year-to-Date > \$600.00		
C. Full Name, Mailing Address and ZIP Code Ronald J. Prentki 4 Charter Oak Lane Greenwich, CT 06830	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$40.62 1/91-5/91; \$43.70 6/91
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Dir., Strategic Mktng. Aggregate Year-to-Date > \$246.80		
D. Full Name, Mailing Address and ZIP Code Harry Shoff 630 First Avenue - #26C New York, NY 10016	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 100.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Pres., Winthrop Pharm. Aggregate Year-to-Date > \$ 600.00		
E. Full Name, Mailing Address and ZIP Code Dr. James Stoker 74 Catalpa Road Wilton, CT 06897	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$ 41.20
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	VP, Quality Aggregate Year-to-Date > \$ 247.20		
F. Full Name, Mailing Address and ZIP Code Stevenson Ward 11 Nolen Lane Darien, CT 06820	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$67.17 1/91; \$54.92 2/91-6/91
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	VP, Finance, Europa, AFR Aggregate Year-to-Date > \$ 341.77		
G. Full Name, Mailing Address and ZIP Code Kathleen M. Whyte 2905 Garfield St., NW Washington, D.C. 20008	Name of Employer Sterling Drug Inc. 90 Park Avenue New York, NY 10016 Occupation	Date (month, day, year) Bi-Monthly (Payroll Deduction)	Amount of Each Receipt this Period \$66.88 1/91-3/91; \$73.12 4/91-6/91
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	VP, Government Affairs Aggregate Year-to-Date > \$420.00		

SUBTOTAL of Receipts This Page (optional)

\$2,755.77

TOTAL This Period (last page this line number only)

\$4,758.63

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

PAGE 1 OF 3
FOR LINE NUMBER 7

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)

Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)

A. Full Name, Mailing Address and ZIP Code Jerry Solomon For Congress c/o Geoffrey Gleason 6126 11th Road Arlington, VA 22205	Purpose of Disbursement Gerald Solomon R-NY-24th Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 2/14/91	Amount of Each Disbursement This Period \$ 500.00
B. Full Name, Mailing Address and ZIP Code Dick Nichols For Congress 305 Third Street, SE Washington, D.C. 20003	Purpose of Disbursement Dick Nichols R-KS-5th Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 2/21/91	Amount of Each Disbursement This Period \$ 600.00
C. Full Name, Mailing Address and ZIP Code Zimmer For Congress P.O. Box 107 Flemington, NJ 08822	Purpose of Disbursement Richard Zimmer R-NJ-12th Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 2/21/91	Amount of Each Disbursement This Period \$ 400.00
D. Full Name, Mailing Address and ZIP Code Kasten For Senate 512 Second Street, SE Washington, D.C. 20003	Purpose of Disbursement Robert W. Casten R-WI Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 2/27/91	Amount of Each Disbursement This Period \$1,000.00
E. Full Name, Mailing Address and ZIP Code Bliley For Congress P.O. Box 9871 Alexandria, VA 22304-0477	Purpose of Disbursement Thomas J. Bliley, Jr. R-VA-3rd Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 3/1/91	Amount of Each Disbursement This Period \$ 500.00
F. Full Name, Mailing Address and ZIP Code Jerry Solomon For Congress c/o Geoffrey Gleason 6126 11th Road	Purpose of Disbursement Gerald Solomon R-NY-24th Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 3/8/91	Amount of Each Disbursement This Period \$1,000.00
G. Full Name, Mailing Address and ZIP Code Lent For Congress P.O. Box 2301 Alexandria, VA 22202	Purpose of Disbursement Norman F. Lent R-NY-4th Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 3/8/91	Amount of Each Disbursement This Period \$ 500.00
H. Full Name, Mailing Address and ZIP Code Bob Matsui For Congress P.O. Box 2884 Washington, D.C. 20013	Purpose of Disbursement Robert T. Matsui D-CA-3rd Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 3/8/91	Amount of Each Disbursement This Period \$1,000.00
I. Full Name, Mailing Address and ZIP Code Rangel For Congress 2030 Allen Place, NW Washington, D.C. 20009	Purpose of Disbursement Charles Rangel D-NY-16th Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 3/11/91	Amount of Each Disbursement This Period \$ 500.00

SUBTOTAL of Disbursements This Page (optional)

\$6,000.00

TOTAL This Period (last page this line number only)

21040881752

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

PAGE 2 OF 3
FOR LINE NUMBER 7

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NAME OF COMMITTEE (in Full)

Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)

A. Full Name, Mailing Address and ZIP Code PMA Texas PAC Pharmaceutical Manufacturers Assoc. 1100 15th Street, NW Washington, D.C. 20005	Purpose of Disbursement Pharmaceutical Manufacturers Association PAC (Contrib.) Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 4/9/91	Amount of Each Disbursement This Period \$1,000.00
B. Full Name, Mailing Address and ZIP Code Dan Coats For Indiana 47 South Meridian Street Indianapolis, IN 46204	Purpose of Disbursement Dan Coats R-IN Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 5/6/91	Amount of Each Disbursement This Period \$ 500.00
C. Full Name, Mailing Address and ZIP Code Citizens For Gilman P.O. Box 3001 Middleton, NY 10940	Purpose of Disbursement Benjamin Gilman R-NY-22nd Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 5/9/91	Amount of Each Disbursement This Period \$ 375.00
D. Full Name, Mailing Address and ZIP Code New York State Senate Republican Campaign Committee P.O. Box 7229 - Capitol Station Albany, NY 12224	Purpose of Disbursement State Senate Republican Committee Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 5/17/91	Amount of Each Disbursement This Period \$1,000.00
E. Full Name, Mailing Address and ZIP Code Dick Armey Campaign Committee 3869 Beech Down Drive Chantilly, VA 22021	Purpose of Disbursement Dick Armey R-TX-26th Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 5/24/91	Amount of Each Disbursement This Period \$ 500.00
F. Full Name, Mailing Address and ZIP Code Bob Walker For Congress 4010 Franconia Road Alexandria, VA 22310	Purpose of Disbursement Robert S. Walker R-PA-16th Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 5/30/91	Amount of Each Disbursement This Period \$ 500.00
G. Full Name, Mailing Address and ZIP Code Eckart For Congress P.O. Box 1020 Mentor, OH 44061	Purpose of Disbursement Dennis Eckart D-OH-11th Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 5/31/91	Amount of Each Disbursement This Period \$ 500.00
H. Full Name, Mailing Address and ZIP Code Pennsylvania Senate Republican Campaign Committee P.O. Box 792 - Federal Square Stat. Harrisburg, PA 17108	Purpose of Disbursement State Senate Republican Reception Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 6/12/91	Amount of Each Disbursement This Period \$ 150.00
I. Full Name, Mailing Address and ZIP Code Re-Elect Don Sundquist Committee c/o Tucker & Associates - Ste. 1000 1701 Pennsylvania Ave., NW Washington, D.C. 20006	Purpose of Disbursement Donald K. Sundquist R-TN-7th Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 6/26/91	Amount of Each Disbursement This Period \$ 500.00

SUBTOTAL of Disbursements This Page (optional)

\$5,025.00

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use this schedule(s)
to report disbursements by category of the
Detailed Summary Page

PAGE 3 OF 3
FOR LINE NUMBER 7

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NAME OF COMMITTEE (in Full)

Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)

A. Full Name, Mailing Address and ZIP Code Zimmer For Congress 39 Mine Street P.O. Box 107 Flemington, NJ 08822-9922	Purpose of Disbursement Richard Zimmer R-NJ-12th Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 6/26/91	Amount of Each Disbursement This Period \$ 500.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) \$ 500.00

TOTAL This Period (last page this line number only) \$11,525.00

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Name of Committee (in Full) Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)			
A. Full Name, Mailing Address and ZIP Code of Loan Source NO LOANS THIS PERIOD	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Election: ☐ Primary ☐ General ☐ Other (specify): _____			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$ _____		
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$ _____		
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$ _____		
B. Full Name, Mailing Address and ZIP Code of Loan Source			
Election: ☐ Primary ☐ General ☐ Other (specify): _____			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$ _____		
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$ _____		
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$ _____		
SUBTOTALS This Period This Page (optional)			
TOTALS This Period (last page in this line only)			

21040881755

91 NOV 21 PM 3:35

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

STERLPAC-Sterling Drug Inc.
Employees Political Action
Committee for Improved Government
and Sal J. Rubino, as treasurer

MUR 3412

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached for Commission approval is a conciliation agreement signed by Sal J. Rubino, treasurer of STERLPAC-Sterling Drug Inc. Employees Political Action Committee for Improved Government. The attached agreement was previously approved by the Commission on November 1, 1991. Respondents had previously submitted a check in payment of the civil penalty.

II. RECOMMENDATIONS

1. Accept the signed conciliation agreement with STERLPAC-Sterling Drug Inc. Employees Political Action Committee for Improved Government and Sal J. Rubino, as treasurer.
2. Approve the appropriate letter.
3. Close the file in this matter.

Lawrence M. Noble
General Counsel

Date

11-21-91

BY:


Lois G. Lerner
Associate General Counsel

Attachment
Conciliation Agreement

21040881756

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
STERLPAC-Sterling Drug Inc.) MUR 3412
Employees Political Action)
Committee for Improved Government)
and Sal J. Rubino, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 26, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 3212:

1. Accept the signed conciliation agreement with STERLPAC-Sterling Drug Inc. Employees Political Action Committee for Improved Government and Sal J. Rubino, as treasurer, as recommended in the General Counsel's Report dated November 21, 1991.
2. Approve the appropriate letter, as recommended in the General Counsel's Report dated November 21, 1991.
3. Close the file in this matter.

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

Attest:

11-26-91
Date

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

Received in the Secretariat: Thurs., Nov. 21, 1991 3:35 p.m.
Circulated to the Commission: Fri., Nov. 22, 1991 12:00 p.m.
Deadline for vote: Tues., Nov. 26, 1991 4:00 p.m.

dr

21040881757



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 29, 1991

CLOSED

Jeffery J. Freedman, Esquire
90 Park Avenue, 37th Floor
New York, NY 10016

RE: MUR 3412
STERLPAC-Sterling Drug Inc.
Employees Political Action
Committee for Improved Government
and Sal J. Rubino, as treasurer

Dear Mr. Freedman:

On November 26, 1991, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

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

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any

8 5 7 1 8 8 0 4 1 0 2

Jeffery J. Freedman, Esq.
Page 2

questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner
BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

21040881759

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
STERLPAC-Sterling Drug Inc.)
Employees Political Action) MUR 3412
Committee for Improved Government)
and Sal J. Rubino, as treasurer)
)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that STERLPAC-Sterling Drug Inc. Employees Political Action Committee for Improved Government and Sal J. Rubino, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(ii).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C.

§ 437g(a)(4)(A)(i).

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

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

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

1. STERLPAC-Sterling Drug Inc. Employees Political Action Committee for Improved Government is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Sal J. Rubino is the treasurer of STERLPAC-Sterling Drug Inc. Employees Political Action Committee for Improved Government.

3. The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that all unauthorized committees filing quarterly reports, shall file a pre-election report before any election in which the committee makes a contribution or expenditure on behalf of a candidate in such election. According to 2 U.S.C. § 434(a)(4)(A)(ii), the pre-election report shall be filed no later than the 12th day before the election and which shall be complete as of the 20th day before the election.

4. Respondents disclosed on their 30 Day Post-General Report contributions or expenditures for the period between October 1 and October 17, 1990, indicating that the 12 Day Pre-General Reports should have been filed.

5. Respondents were required to file the 12 Day Pre-General Report, covering the period of October 1 through October 17, by October 25, 1990. Respondents failed to file the 1990 Pre-General Report. Respondents instead filed a 30-day Post General Election Report which included the pre- and post-election reporting periods. The 30-day Post General Election Report was filed timely. The pre-general election report, attached, indicates \$0 receipts and \$3,350 in disbursements.

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V. Respondents failed to file the 1990 12 Day Pre-General Report in a timely manner in violation of 2 U.S.C. § 434(a)(4)(A)(ii).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of five hundred dollars (\$500.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the 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

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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
Lois G. Lerner
Associate General Counsel

11/29/91
Date

FOR THE RESPONDENTS:

[Signature]
(Name)
(Position) Steel PAC

11/15/91
Date

21040881763

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterIPAC)		2. FEC IDENTIFICATION NUMBER C00107599
ADDRESS (number and street) ☐ Check if different than previously reported 90 Park Avenue		3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).
CITY, STATE and ZIP CODE New York, New York 10016		

4. TYPE OF REPORT

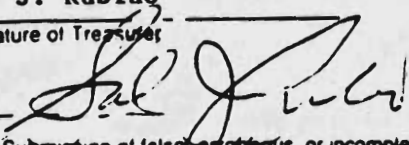
- (a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

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 General Election
(Type of Election)
election on 11/6/90 in the State of New York
☐ 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>10/1/90</u> through <u>10/17/90</u>		
6.	(a) Cash on Hand January 1, 19 <u>90</u>		\$41,549.93
	(b) Cash on Hand at Beginning of Reporting Period	\$ 39,955.35	
	(c) Total Receipts (from Line 18)	\$ 0	\$18,905.42
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 39,955.35	\$60,455.35
7.	Total Disbursements (from Line 28)	\$ 3,350.00	\$23,850.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 36,605.35	\$36,605.35
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 800-424-9530 Local 202-376-3120
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 Sal J. Rubino			
Signature of Treasurer 			Date 9/30/91

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

FEC FORM 3X
(revised 4/87)

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in full) Sterling Drug Inc. Employee Political Action Committee for Improved Government		Report Covering the Period From: 10/1/90 To: 10/17/90	
		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)		0	\$ 5,527.62
(ii) Unitemized		0	11,453.20
(iii) Total of contributions from individuals		0	16,980.82
(b) Political Party Committees			
(c) Other Political Committees (such as PACs)			
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))		0	16,980.82
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			
13. ALL LOANS RECEIVED			
14. LOAN REPAYMENTS RECEIVED			
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			
17. OTHER RECEIPTS (Dividends, Interest, etc.)		0	1,924.60
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)		0	18,905.42
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES			
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		\$3,350.00	23,850.00
22. INDEPENDENT EXPENDITURES (use Schedule E)			
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			
24. LOAN REPAYMENTS MADE			
25. LOANS MADE			
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			
(b) Political Party Committees			
(c) Other Political Committees (such as PACs)			
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			
27. OTHER DISBURSEMENTS			
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		3,350.00	23,850.00
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))		0	16,980.82
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))			
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)		0	16,980.82
32. TOTAL OPERATING EXPENDITURES (from Line 19)			
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)			
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)			

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ITEMIZED DISBURSEMENTS

PAGE	OF
1	1
FOR LINE NUMBER	
7	

NAME OF COMMITTEE (in Full)

21040881766

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

\$3,350.00

LOANS

Use separate schedules
for each numbered line

Name of Committee (in Full) **Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterlPAC)**

A. Full Name, Mailing Address and ZIP Code of Loan Source

Original Amount
of Loan

Cumulative Payment
To Date

Balance Outstanding at
Close of This Period

NO ACTIVITY THIS REPORTING PERIOD

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (april) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

B. Full Name, Mailing Address and ZIP Code of Loan Source

Original Amount
of Loan

Cumulative Payment
To Date

Balance Outstanding at
Close of This Period

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (april) ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

SUBTOTALS This Period This Page (optional)

TOTALS This Period (last page in this line only)

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

21040881767

excluding Loans

(Use separate schedules for each numbered line)

Name of Committee (in Full) Sterling Drug Inc. Employee Political Action Committee (SterlPAC)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor: NO ACTIVITY THIS REPORTING PERIOD				
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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ITEMIZED INDEPENDENT EXPENDITURES

Page _____ of _____ Pages

(See Reverse Side for Instructions)

Name of Committee (in Full) Sterling Drug Inc. Employee Political Action Committee for Improved Government (SterIPAC)				ID No C 00107599
Full Name, Mailing Address & ZIP Code of Each Payer	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
NO ACTIVITY THIS REPORTING PERIOD				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
(a) SUBTOTAL of Itemized Independent Expenditures			\$ _____	
(b) SUBTOTAL of Unitemized Independent Expenditures			\$ _____	
(c) TOTAL Independent Expenditures			\$ _____	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, concert with or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of a dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this _____ day of _____, 19____

My Commission expires _____

NOTARY PUBLIC

Signature

Date

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FINANCIAL COORDINATED EXPENDITURE MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. §441a(d))

Page ____ of ____ for
LINE NUMBER ____

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full)
**Sterling Drug Inc. Employee Political Action Committee for Improved Government
(SterlPAC)**

Has your Committee been designated to make coordinated expenditures by a political party committee? ☐ YES ☐ NO
If YES, name the designating committee:

Full Name, Mailing Address and ZIP Code of Subordinate Committee

NO ACTIVITY THIS REPORTING PERIOD

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—\$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—\$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—\$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—\$			
SUBTOTAL of Expenditures This Page (optional)				
TOTAL This Period (last page this line number only)				

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3412

DATE FILMED 12/12/91 CAMERA NO. 2

CAMERAMAN AS

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