FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4202

DATE FILMED 5-3-95 CAMERA NO. 4

CAMERAMAN S.G.G

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93L-55

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: August 11, 1993

ANALYST: DONALD L. AVERETT

I. COMMITTEE: African Americans for a Better America PAC (C00250696)
Alric B. Nembhard, Treasurer
366 Madison Avenue, 5th Floor
New York, NY 10017

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)
2 U.S.C. §441a(a)(1)(A)
2 U.S.C. §441b(a)
2 U.S.C. §441c

III. BACKGROUND:

African Americans for a Better America PAC ("the PAC") failed to file seven (7) reports in a timely manner for the 1991-1992 election cycle (see Late Filing History Chart). The reports were filed between sixty (60) and six hundred ten (610) calendar days late.

The PAC appears to be a non-connected committee which is sponsored by M.R. Beal & Co., a Virginia based limited partnership. M.R. Beal & Co. does not appear to be incorporated, however both of the partners in the company, MRB Securities (General Partner) and Prudential Insurance Company of America (Limited Partner), are incorporated entities. In addition, M.R. Beal & Co. appears to be a federal contractor. The PAC received contributions from MRB Securities which totalled $31,800 in direct contributions and $5,000 in in-kind contributions during calendar year 1991 and $5,310.79 in in-kind contributions during calendar year 1992. Between the period January 1, 1991 and December 31, 1992, M.R. Beal & Co., through MRB Securities, was the only source of contributions to the PAC.

On March 5, 1991 the PAC filed a Statement of Organization which indicated that the PAC is a non-connected committee, but also indicated that the PAC has a connected organization, which is a corporation (Attachment 2). A Request for Additional Information ("RFAI") was sent to the PAC on March 19, 1991 (Attachment 3). The PAC filed an amendment to the Statement of Organization on April 5, 1991, which indicated that the PAC did not have a connected organization (Attachment 4).

The PAC was notified on July 5, 1991 that the 1991 Mid-Year Report was due July 31, 1991 (Attachment 5). On December 27, 1991 the PAC was notified that the 1991 Year End Report was due January 31, 1992 (Attachment 6). On March 20, 1992 the PAC was notified that the 1992 April Quarterly Report was due April 15, 1992 (Attachment 7). On June 19, 1992 the PAC was notified that the 1992 July Quarterly Report was due July 15, 1992 (Attachment 8).

A Non-Filer Notice was went to the PAC on August 7, 1992 for failure to file the 1991 Mid-Year, 1991 Year End, 1992 April Quarterly and 1992 July Quarterly Reports (Attachment 9).

The PAC was notified on September 21, 1992 that the October Quarterly Report was due on October 15, 1992 (Attachment 10). On September 28, 1992 the PAC was notified that the 1992 30 Day Post-General Report was due on December 3, 1992 (Attachment 11).

On December 22, 1992, Mr. Scott Wilson, an attorney for the PAC, telephoned the Reports Analysis Division ("RAD") analyst and said that the PAC wished to satisfy its reporting requirements and then terminate. Mr. Wilson also indicated that the PAC may have received excessive contributions from its sponsoring organization, but that the PAC had insufficient cash on hand to refund the excess receipts. The RAD analyst advised Mr. Wilson to file reports disclosing the PAC's activities and to refund the excess receipts to the greatest extent possible (Attachment 12).

The PAC was notified on December 28, 1992 that the 1992 Year End Report was due on January 31, 1993 (Attachment 13).

Mr. Wilson telephoned the RAD analyst on January 6, 1993 and explained that his firm had been retained by the PAC's sponsoring organization to provide legal services to meet the PAC's compliance requirements. The RAD analyst advised Mr. Wilson that these legal services appeared to be in-kind contributions from the sponsor to the PAC. Mr. Wilson requested a meeting with the RAD analyst (Attachment 14).

On January 8, 1993, Mr. Wilson and Mr. Robert Plotkin, attorneys for the PAC, met with two RAD analysts. Mr. Wilson and Mr. Plotkin stated that the PAC is a non-connected committee which is sponsored by M.R. Beal & Co., a non-corporate partnership. They further stated that M.R. Beal & Co. had transferred approximately $33,000 to the PAC in 1991 and 1992. The RAD analysts advised that these transfers appeared to be excessive contributions from M.R. Beal & Co. to the PAC and should be refunded or transferred-out. Mr. Wilson and Mr. Plotkin informed the analysts that M.R. Beal & Co. might be a federal contractor due to its business relationship with the Resolution Trust Corporation. The RAD analysts advised Mr. Wilson and Mr. Plotkin to file all outstanding reports and a summarization of their questions and concerns (Attachment 15).

On April 1, 1993 the PAC filed a 1991 Year End Report, covering the period January 1, 1991 through December 31, 1991, a 1992 Year End Report, covering the period January 1, 1992 through December 31, 1992 and a cover letter. The cover letter included an explanation concerning the organization and funding of the PAC. It states that M.R. Beal & Co. is a Virginia limited liability partnership. MRB Securities is the sole general partner of M.R. Beal & Co. of which eighty percent (80%) is owned by Bernard B. Beal and twenty percent (20%) is owned by Thomas Monti. Prudential Insurance Company and Valeria Lancaster are the limited partners of M.R. Beal & Co. Furthermore, the cover letter states that each partner agreed to use firm funds toward PAC activities. The letter also indicated that M.R. Beal & Co. retained consultants, Mr. Alric Nembhard and Mr. Felipe Floresca to establish and operate the PAC, but that the PAC was unaware that this constituted an in-kind contribution from M.R. Beal & Co. One of the consultants advised that all deposits should be made to the PAC's federal account ("General Fund") and subsequently transferred to the PAC's state accounts. Based on this advice the PAC acted as a "conduit" for transferring funds to state and local elections. The cover letter stated that the receipts from M.R. Beal & Co. appeared to exceed the limitations on partnership contributions. The letter also referred to the PAC's business relationship with the Resolution Trust Corporation and Fannie Mae. The letter contended that M.R. Beal & Co. is not a federal contractor (Attachment 16).

The 1991 Year End Report, covering the period March 1, 1991 through December 31, 1991 disclosed receipts from M.R. Beal & Co. which totalled $31,800 in direct contributions and $5,000 in in-kind contributions as well as an apparent excessive contribution of $4,000 to the Liz Holtzman for Senate committee (Attachment 17).

On April 14, 1993 an RFAI for the 1991 Year End Report was sent to the PAC. The RFAI questioned the apparent excessive contribution from a partnership, requested a per partner attribution of the receipts and advised that any portion of the contribution which was attributed to Prudential Insurance Company of America, a corporation registered in New Jersey, would be a prohibited contribution. The PAC was advised to refund or transfer-out all excessive or prohibited contributions (Attachment 18).

The 1992 Year End Report, covering the period January 1, 1992 through December 31, 1992, disclosed an in-kind contribution of $5,310.79 from M.R. Beal & Co. and a refund of $5,000 from the Liz Holtzman for Senate committee (Attachment 19).

On April 14, 1993 an RFAI for the 1992 Year End Report was sent to the PAC. The RFAI questioned the apparent excessive contribution from a partnership, requested a per partner attribution of the receipts and advised that any portion of the contribution which was attributed to Prudential Insurance Company of America, would be a prohibited contribution. The PAC was advised to refund or transfer-out all excessive or prohibited contributions. The RFAI also noted the refund of the excessive contribution to the PAC from the Liz Holtzman for Senate committee (Attachment 20).

On April 20, 1993 Sandy Wilkinson, an attorney for the PAC, telephoned the RAD analyst and requested a meeting. The RAD analyst asked her to first provide responses to the RFAIs (Attachment 21).

On April 27, 1993, Ms. Wilkinson called the RAD analyst and said that the PAC would need additional time to respond to the RFAIs. The RAD analyst explained that he could not grant an extension (Attachment 22).

On May 6, 1993, a Second Notice was sent for failure to respond in writing to the RFAIs addressing the 1991 Year End Report and the 1992 Year End Report (Attachment 23).

On May 28, 1993, the PAC filed a letter via electronic facsimile. The letter acknowledged the receipt of the Second Notices and that a response was being prepared (Attachment 24).

On June 7, 1993 the PAC filed a cover letter and 1991 Mid-Year, 1991 Year End, 1992 April Quarterly, 1992 July Quarterly, 1992 October Quarterly and 1992 Year End Reports in response to the RFAIs addressing the 1991 Year End and 1992 Year End Reports. The reports covered all time periods addressed in the aforementioned RFAIs.

The 1991 Mid-Year, 1991 Year End and 1992 Year End Reports attributed the direct and in-kind contributions from the partnership, M.R. Beal & Co., to MRB Securities (Attachment 25).

The cover letter attributed the 1991 $31,800 direct contribution from M.R. Beal & Co. to MRB Securities. The cover letter also now identified MRB Securities as an incorporated entity and that there were only two partners. The letter further stated that the PAC has made a single federal contribution of $500 to the Tony Meeker for Congress Committee[1/] and that "virtually all" other funds were used for

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1/ The PAC neglects to address Holtzman contribution of December 31, 1991.

non-federal elections or transferred to non-federal accounts. The letter stated the PAC's intent to refund a total of $12,306.98 to M.R. Beal & Co. once the PAC's termination has been approved (Attachment 26).

Included in the June 7, 1993 filing was a photocopy of a letter requesting a refund from the Tony Meeker for Congress Committee and a copy of a letter to M.R. Beal & Co. which advised the company that its 1991 $31,800 direct contribution exceeded the contribution limit. The letter to M.R. Beal & Co. itemized those funds which had been transferred-out for use in non-federal elections and gave the company the option of authorizing the transfers, after the fact, or receiving a refund. The June 7, 1993 filing also included a photocopy of a check refunding $500 to M.R. Beal & Co. (Attachment 27).

On June 17, 1993 the RAD analyst telephoned Ms. Wilkinson and advised her that the PAC should refund all contributions from M.R. Beal & Co., as soon as possible, rather than await approval of the PAC's request for termination (Attachment 28).

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LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1991 Mid-Year (1/1/91-6/30/91)	7/5/91 (Attachment 5)	7/31/91	8/7/92 (Attachment 9)	4/1/93 (Attachment 17*)
1991 Year End (7/1/91-12/31/91)	12/27/91 (Attachment 6)	1/31/92	8/7/92 (Attachment 9)	4/1/93 (Attachment 17*)
1992 April Quarterly (1/1/92-3/31/92)	3/20/92 (Attachment 7)	4/15/92	8/7/92 (Attachment 9)	4/1/93 (Attachment 19**)
1992 July Quarterly (4/1/92-6/30/92)	6/19/92 (Attachment 8)	7/15/92	8/7/92 (Attachment 9)	4/1/93 (Attachment 19**)
1992 October Quarterly (7/1/92-9/30/92)	9/21/92 (Attachment 10)	10/15/92	N/A	4/1/93 (Attachment 19**)
1992 30 Day Post-General (10/1/92-11/23/92)	9/28/92 (Attachment 11)	12/3/92	N/A	4/1/93 (Attachment 19**)
1992 Year End (11/24/92-12/31/92)	12/28/92 (Attachment 13)	1/31/93	N/A	4/1/93 (Attachment 19**)

* - A 1991 Year End Report was filed which covered the period January 1, 1991 through December 31, 1991.

** - A 1992 Year End Report was filed which covered the period January 1, 1992 through December 31, 1992.

AFRICAN AMERICANS FOR A BETTER AMERICA PAC — ID #C00250696 NON-PARTY NON-QUALIFIED

CONNECTED ORGANIZATION:

COMMITTEE	DOCUMENT	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
1991	STATEMENT OF ORGANIZATION					5MAR91	10	91FEC/689/3382
	REQUEST FOR ADDITIONAL INFORMATION					19MAR91	1	91FEC/690/3435
	STATEMENT OF ORGANIZATION - AMENDMENT					5APR91	2	91FEC/691/4824
	MID-YEAR REPORT	20.200		20.156		1JAN91 -30JUN91	10	93FEC/841/5202
	NOTICE OF FAILURE TO FILE					5MAR91 -30JUN91	1	92FEC/772/4715
	YEAR-END	16.600		12.600		1JUL91 -31DEC91	6	93FEC/841/5212
	NOTICE OF FAILURE TO FILE					1JUL91 -31DEC91	1	92FEC/772/4714
	REQUEST FOR ADDITIONAL INFORMATION					1MAR91 -31DEC91	6	93FEC/834/1870
	REQUEST FOR ADDITIONAL INFORMATION 2ND					1MAR91 -31DEC91	7	93FEC/837/5212
	TERMINATION REPORT	-		-		1MAR91 -31DEC91	18	93FEC/833/1871
1992	APRIL QUARTERLY	0		500		1JAN92 -31MAR92	4	93FEC/841/5218
	NOTICE OF FAILURE TO FILE					1JAN92 -31MAR92	1	92FEC/772/4713
	JULY QUARTERLY	0		1.500		1APR92 -30JUN92	4	93FEC/841/5222
	NOTICE OF FAILURE TO FILE					1APR92 -30JUN92	1	92FEC/772/4712
	OCTOBER QUARTERLY	0		400		1JUL92 -30SEP92	4	93FEC/841/5226
	YEAR-END	10.769		5.355		1OCT92 -31DEC92	7	93FEC/841/5230
	REQUEST FOR ADDITIONAL INFORMATION					1JAN92 -31DEC92	6	93FEC/834/1863
	REQUEST FOR ADDITIONAL INFORMATION 2ND					1JAN92 -31DEC92	7	93FEC/837/5205
	TERMINATION REPORT	-		-		1JAN92 -31DEC92	17	93FEC/833/1854
	TOTAL	47.569	0	40.511	0		113	TOTAL PAGES

TYPE OF FILER: NON-PARTY NON-QUALIFIED

All reports listed have been reviewed.

Cash-on-Hand balance as of 12/31/92: $7056.98

Debts owed by committee as of 12/31/92: 0

Debts owed to committee as of 12/31/92: $6,000

9504363250

FEDERAL ELECTION COMMISSION
1993-1994
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 6AUG93

COMMITTEE DOCUMENT	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER	
AFRICAN AMERICANS FOR A BETTER AMERICA PAC					ID #C00250696	NON-PARTY NON-QUALIFIED	
CONNECTED ORGANIZATION:							
1993 TERMINATION REPORT	7,905		8,655		1JAN93 -31MAR93	17	93FEC/833/2172
TERMINATION REPORT - AMENDMENT	-		-		1JAN93 -31MAR93	3	93FEC/841/1317
TERMINATION REPORT - AMENDMENT	7,905		9,155		1JAN93 -31MAR93	10	93FEC/841/4944
REQUEST FOR ADDITIONAL INFORMATION					1JAN93 -31MAR93	5	93FEC/834/1857
REQUEST FOR ADDITIONAL INFORMATION 2ND					1JAN93 -31MAR93	6	93FEC/837/5199
TOTAL	7,905	0	9,155	0		41	TOTAL PAGES

All reports have been reviewed.

Cash-on-Hand balance as of 6/07/93: $5,806.98

Debts owed by/to committee as of 6/07/93: 0

95043635251

Attachment #2

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

FEDERAL ELECTION COMMISSION

1. (a) Name of Committee in Full ☐ (Check if name is changed)

AFRICAN AMERICANS FOR A BETTER AMERICA PAC

(b) Number and Street Address ☐ (Check if address is changed)

366 MADISON AVENUE NEW YORK, N.Y. 10017

(c) City, State and ZIP Code

5TH FLOOR

2. Date

JANUARY 1990

3. FEC Identification Number

4. Is this Statement an Amendment? ☐ YES ☑ NO

5. TYPE OF COMMITTEE (Check one):

☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)

☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

☐ (c) This committee supports/opposes only one candidate ____________ (name of candidate) and is NOT an authorized committee.

☐ (d) This committee is a ____________ (National, State or subordinate) committee of the ____________ (Democratic, Republican, etc.) Party.

☐ (e) This committee is a separate segregated fund.

☑ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

Type of Connected Organization:
☑ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number – optional) and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position
FELIPE M. FLORESCA	4000 MASSACUSETTS AVENUE, N.W. WASHINGTON, D.C. 20037 SUITE 1537	CUSTODIAN

8. Treasurer: List the name and address (phone number – optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position
ALRIC B. NEMBHARD	366 MADISON AVENUE 5TH FL. NEW YORK, NEW YORK 10017	TREASURER

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
CHASE MANHATTAN BANK	380 MADISON AVENUE NEW YORK, N.Y. 10017

I certify that I have examined this Statement 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
ALRIC B. NEMBHARD	Alric B. Nembhard	12/28/90

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

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

For further information contact:
Federal Election Commission
Toll-free 800-424-9530
Local 202-376-3120

FEC FORM 1 (revised 4/87)

9504369353252

91036933833

Attachment #3

FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

RQ-1

MAR 19 1991

Alric B. Nembhard
African Americans For a Better
America Political Action
Committee
366 Madison Avenue, 5th Floor
New York, NY 10017

Identification Number: C00250696

Reference: Statement of Organization

Dear Mr. Nembhard:

This letter is prompted by the Commission's preliminary review of your Statement of Organization. The review raised questions concerning certain information contained in the Statement. An itemization follows:

-Any affiliated or connected organization must be identified on your Statement of Organization. For further guidance, please refer to 11 CFR §§100.5(g) and 100.6. If there are no other committees or organizations with which you share control or financing, please indicate "None" on Line 6. If you do share control or financing with other committees or organizations, please list their names, addresses, and relationships on that line. 11 CFR §102.2

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Darlene Harris

Darlene Harris
Reports Analyst
Reports Analysis Division

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Attachment #4

RECEIVED

91 APR -5 AM 10:46

March 27, 1991

Ms. Darlene Harris
Report Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Identification Number: C00250696
Reference: Statement of Organization
African Americans For
A Better America PAC

Dear Ms. Harris:

In the above-captioned matter, I am responding as the custodian of record of the PAC.

After reviewing your letter to Mr. Alric B. Nembhard dated March 19, 1991, this letter serves as a written stipulation amending the Statement of Organization dated December 28, 1990.

This said PAC is not a connected organization. Due to clerical error, the box marked "corporation" on Item 6 of the Statement of Organization was checked.

Thank you for bringing this matter to our attention.

Sincerely yours,

Felipe M. Floresca
Custodian of Records

4000 Massachusetts Avenue, N.W.
Suite 1537
Washington, D.C. 20004

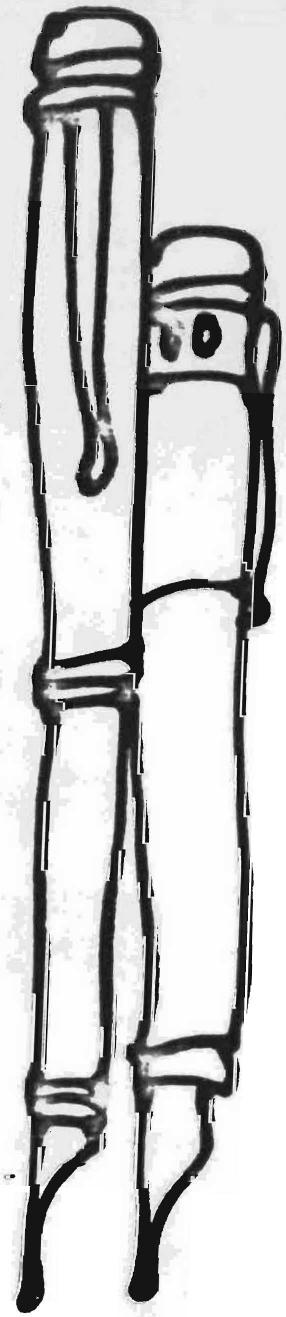
Attachment #5

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS July 5, 1991

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Mid-Year	01/01/91-06/30/91	07/31/91	07/31/91



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WHO MUST FILE
Party committees and PACs (nonconnected committees and separate segregated funds) which normally file on a quarterly basis must file a Mid-Year Report in July.

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

REPORTING FORMS
Party committees and PACs use newly revised Form 3X (enclosed). See Record Supplement on Allocation (November 1990) for a description of which committees must file Schedules H1 - H4.

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

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

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

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

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

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

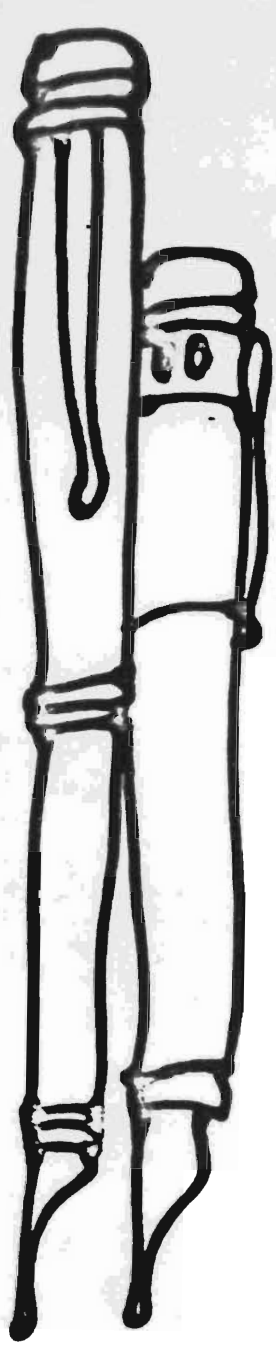
FOR INFORMATION, Call: 800/424-9530 or 202/376-3120

YEAR-END

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS December 27, 1991



WHO MUST FILE
Party committees and PACs (nonconnected committees and separate segregated funds) must file a Year-End Report on January 31, 1992.

REPORT CONTENT AND DATES

I. Semiannual Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	07/01/91 - 12/31/91	01/31/92	01/31/92

Semiannual filers must disclose financial activity that occurred from July 1 through December 31, 1991, on their Year-End Report.

II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	12/01/91 - 12/31/91	01/31/92	01/31/92

Monthly filers must disclose financial activity from December 1 through December 31, 1991, on their Year-End Report.

REPORTING FORMS
Party committees and PACs use revised Form 3X (enclosed). See the Record Supplement on Allocation (November 1990) for a description of which committees must file Schedules H1 - H4.

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

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

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

(over)

PARTIES AND PACS **YEAR-END**

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

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

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

1992 REPORTING
PARTIES AND PACS
Committees should refer to the January 1992 Record for primary election dates and further reporting information.

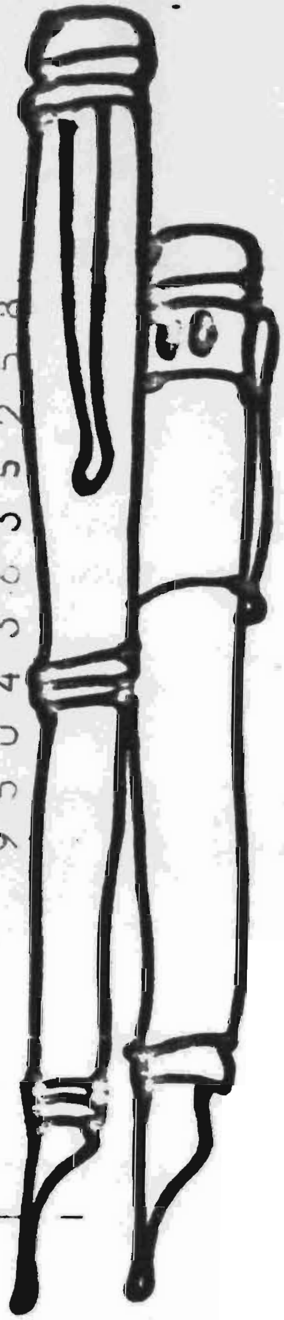
FOR INFORMATION, Call: 800/424-9530 or 202/219-3420

Attachment #7

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS March 20, 1992



REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April Quarterly	01/01/92-03/31/92	04/15/92	04/15/92

WHO MUST FILE
Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in April.

PRE-ELECTION REPORTING
Committees which make contributions or expenditures (including independent expenditures) in connection with an election, must also file a Pre-Election Report, if the activity was not previously reported. See January 1992 Record.

LAST-MINUTE INDEPENDENT EXPENDITURES
Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating $1,000 or more after the 20th day, but more than 24 hours, before the election.

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

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

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

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

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

FOR INFORMATION, Call: 800/424-9530 or 202/219-3420

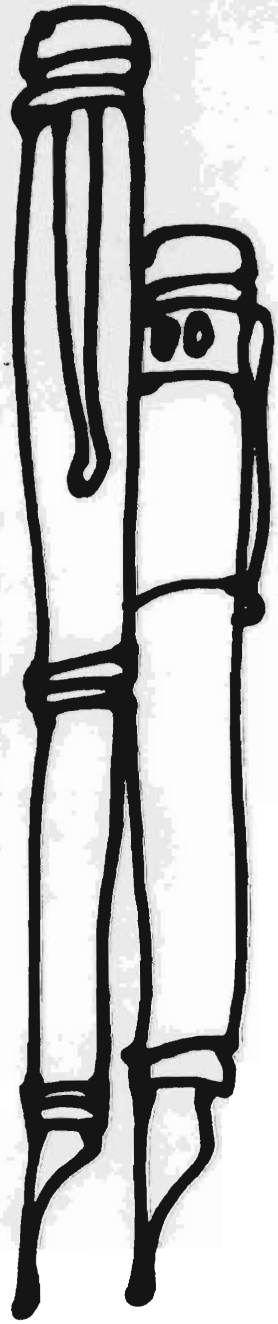
Attachment #8

QUARTERLY

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS June 19, 1992



REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
July Quarterly	04/01/92 - 06/30/92	07/15/92	07/15/92

WHO MUST FILE
Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in July.

PRE-ELECTION REPORTING
Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1992 Record.

LAST-MINUTE INDEPENDENT EXPENDITURES
Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating $1,000 or more after the 20th day, but more than 24 hours, before the election.

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

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

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

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

**Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filling date.

FOR INFORMATION. Call: 800/424-9530 or 202/219-3420

95043635259

Attachment #9

FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RQ-7

AUG 7 1992

Alric B. Hubbard, Treasurer
African Americans for a Better
America PAC
366 Madison Avenue, 5th Floor
New York, NY 10017

Identification Number: C00250696

Reference: Mid-Year (1/1/91-6/30/91), Year End (7/1/91-12/31/91), April Quarterly (1/1/92-3/31/92), and July Quarterly (4/1/92-6/30/92) Reports

Dear Treasurer:

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

It is important that you file these reports immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). Copies of the reports or the relevant portions should also be filed with the Secretary of State or equivalent state officer. See 2 U.S.C. §439.

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

If you have any questions regarding this matter, please contact Stephen Cohen on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

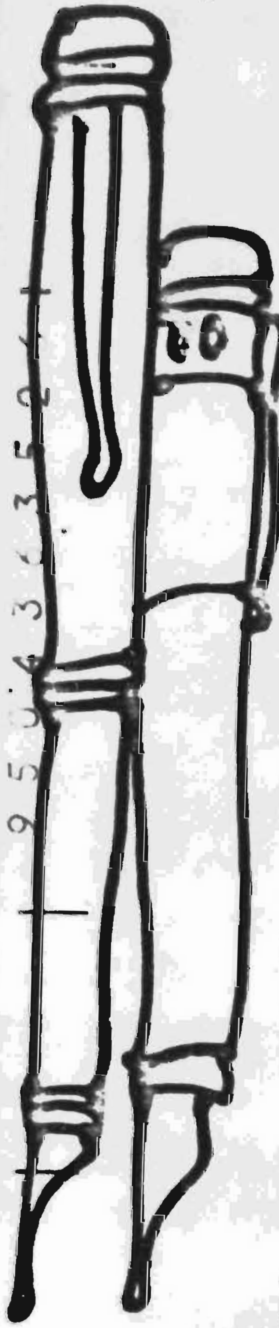
92037724712

QUARTERLY
REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS September 21, 1992

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
October Quarterly	07/01/92 - 09/30/92	10/15/92	10/15/92



WHO MUST FILE
Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in October.

PRE-ELECTION REPORTING
Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previousl reported. See the January 1992 Record.

LAST-MINUTE INDEPENDENT EXPENDITURES
Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating $1,000 or more after the 20th day, but more than 24 hours, before the election.

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

REPORTING BANK LOANS
Bank loans must be reported on Schedule C-1. Call the number below to request forms.

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

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

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

(over)

PARTIES AND PACS **OCTOBER QUARTERLY**

COMPLIANCE

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

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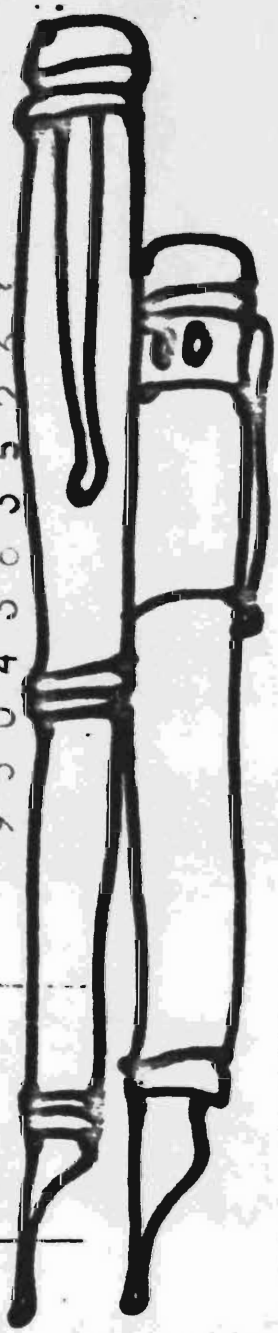
FOR INFORMATION, Call: 800/424-9530 or 202/219-3420

Attachment #11
Page 1 of 2

GENERAL ELECTION
REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS September 28, 1992



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I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/92 - 10/14/92	10/19/92	10/22/92
Post-General	10/15/92 - 11/23/92	12/03/92	12/03/92

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 14

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/92 - 10/14/92	10/19/92	10/22/92
Post-General	10/15/92 - 11/23/92	12/03/92	12/03/92

III. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 14***

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Post-General	10/01/92 - 11/23/92	12/03/92	12/03/92

WHO MUST FILE

Party committees and PACs must follow the above charts in order to determine whether they must file the Pre-General Election Report. All Party committees and PACs, regardless of financial activity, must file the Post-General Election Report.

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

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

***Committees that made general election contributions or expenditures before October 1 and that did not report them previously must also follow the Chart III reporting requirements.

(over)

PARTIES AND PACS **GENERAL ELECTION**

LAST-MINUTE INDEPENDENT EXPENDITURES
Any PAC that makes independent expenditures aggregating $1,000 or more during the period beginning October 15 and ending November 1 must report them within 24 hours.

REPORTING BANK LOANS
Bank loans must be reported on Schedule C-1. Call the number below to request forms.

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

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

FOR INFORMATION, Call: 800/424-9530 or 202/219-3420

TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: Scott Wilson, attorney

COMMITTEE: African Americans for a Better America PAC (C00250696)

DATE: 12/22/92

SUBJECT:

Mr. Scott Wilson telephoned the Commission. He said that the treasurer had failed to file several reports and asked what the committee must do to meet its filing obligations and terminate. I advised Mr. Wilson that no reports had been filed since the committee had registered and recommended that they file one report to cover the period March 5, 1991 through December 31, 1991 and one report for the period January 1, 1992 through December 31, 1992. I also informed him that in order to terminate the committee would have to extinguish all outstanding debts and either disburse all cash on hand or inform the Commission of how the funds would be used.

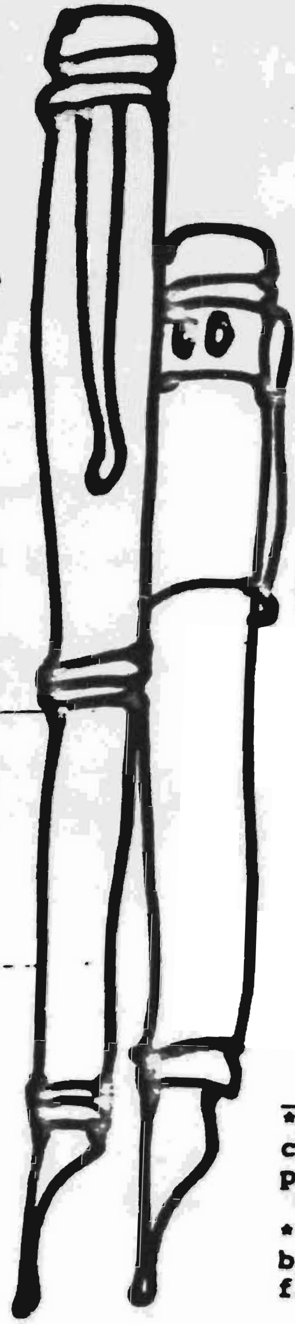
Mr. Wilson indicated that the committee may have had excessive receipts from its sponsoring organization, but that the committee had insufficient cash-on-hand to refund the receipts. I advised Mr. Wilson to refund the receipts to the greatest extent possible and file the required reports as soon as possible. I informed him that amendments to the reports and/or further refunds might be required before the committee could terminate.

YEAR-END

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS — **December 28, 1992**



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QUARTERLY AND MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	11/24/92 - 12/31/92	01/31/93	01/31/93

WHO MUST FILE
All party committees and PACs (nonconnected committees and separate segregated funds) must file a Year-End Report.

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

COMPLIANCE
Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms will be required to refile.

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

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

(over)

1993 REPORTING SCHEDULE
PACs AND PARTIES*

I. SEMIANNUAL FILERS**

REPORT	PERIOD COVERED	REG./CERT. MAILING DATE***	FILING DATE
Mid-Year	01/01/93 - 06/30/93	07/31/93	07/31/93
Year-End	07/01/93 - 12/31/93	01/31/94	01/31/94

II. MONTHLY FILERS

REPORT	PERIOD COVERED	REG./CERT. MAILING DATE***	FILING DATE
February	01/01/93 - 01/31/93	02/20/93	02/20/93
March	02/01/93 - 02/28/93	03/20/93	03/20/93
April	03/01/93 - 03/31/93	04/20/93	04/20/93
May	04/01/93 - 04/30/93	05/20/93	05/20/93
June	05/01/93 - 05/31/93	06/20/93	06/20/93
July	06/01/93 - 06/30/93	07/20/93	07/20/93
August	07/01/93 - 07/31/93	08/20/93	08/20/93
September	08/01/93 - 08/31/93	09/20/93	09/20/93
October	09/01/93 - 09/30/93	10/20/93	10/20/93
November	10/01/93 - 10/31/93	11/20/93	11/20/93
December	11/01/93 - 11/30/93	12/20/93	12/20/93
Year-End	12/01/93 - 12/31/93	01/31/94	01/31/94

*Committees that wish to change their filing status must notify the Commission in writing.

**Committees that filed quarterly reports in 1992 are only required to file semiannually in 1993.

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

FOR INFORMATION, Call: 800/424-9530 or 202/219-3420

TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: Scott Wilson, attorney

COMMITTEE: African Americans for a Better America PAC (C00250696)

DATE: 1/6/93

SUBJECT: Legal and Accounting Services as In-Kind Contributions

Mr. Scott Wilson telephoned the Commission. Mr. Wilson stated that his law firm had been retained by the committee's sponsoring organization to file reports and to terminate the committee. Mr. Wilson asked whether the legal services provided to meet compliance requirements would constitute an in-kind contribution from the sponsor to the committee. I explained that because Mr. Wilson was not a regular employee of the sponsor, the legal services he provided would constitute an in-kind contribution from the sponsor to the committee. I further advised Mr. Wilson that the sponsor would be bound by the $5,000 annual contribution limit. I referred Mr. Wilson to 11 CFR §§§100.7(b)(14), 100.8(b)(15) and 114.1(a)(2).

I asked Mr. Wilson whether the committee had made any contributions to federal candidates or committees. Mr. Wilson said that he believed that the only contribution to a federal candidate had been refunded, but that there were many contributions to state and local candidates.

Mr. Wilson requested to meet with me on January 8, 1993.

* TYPE AFRICMEET.16

NOTES ON MEETING

ANALYSTS: Donald L. Averett
Kelly Huff

CONVERSATION WITH: Robert Plotkin, attorney
Scott Wilson, attorney

COMMITTEE: African Americans for a Better America PAC
(C00250696)

DATE: 1/8/93

SUBJECTS:

Mr. Robert Plotkin and Mr. Scott Wilson provided the following information and requested guidance on these issues.

1. African Americans for a Better America PAC is a nonconnected committee, which is sponsored by M. R. Beal & Co., a noncorporate partnership. M. R. Beal & Co. has transferred approximately $33,000 to the committee, including transfers totalling $15,200 in April 1991 and $16,600 in October 1991. There are two partners in M. R. Beal & Co., however Mr. Plotkin and Mr. Wilson were not certain how any contributions from the partnership should be attributed.

2. M. R. Beal & Co. had retained a law firm to assist the committee in complying with the Federal Election Campaign Act.

3. M. R. Beal & Co. may be a federal contractor, because it sells securities for the Resolution Trust Corporation. Mr. Plotkin and Mr. Wilson indicated that they did not believe M. R. Beal & Co. is a federal contractor, because there was no written contract and the company does not receive direct payments from the federal government.

4. On December 31, 1991 the committee contributed $5000 to Liz Holtzman for Senate, the authorized committee of a candidate for a federal office. This contribution was refunded in December 1992.

5. Mr. Plotkin and Mr. Wilson stated that Mr. Alric Nembhard, who was referred to as the former treasurer, had made disbursements for purposes which remained unclear and that they felt that Mr. Nembhard owed the committee $6000.

Mr. Averett and Ms. Huff advised Mr. Plotkin and Mr. Wilson that the provision of legal services to the committee appeared to be an in-kind contribution from M. R. Beal & Co. to the committee. We also indicated that M. R. Beal & Co. had made excessive contributions to the committee and that the excess should be refunded or transferred-out. We advised Mr. Plotkin and Mr. Wilson to file all outstanding reports and to provide written clarification and complete information concerning the other matters they introduced.

95043635270

LAW OFFICES OF
PAUL, HASTINGS, JANOFSKY & WALKER
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
TWELFTH FLOOR
1050 CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20036-5331
TELEPHONE (202) 223-9000
TWX 710-822-0062
FACSIMILE (202) 452-8149

COUNSEL
LEE G. PAUL
ROBERT P. HASTINGS
LEONARD S. JANOFSKY
CHARLES M. WALKER

LOS ANGELES OFFICE
555 SOUTH FLOWER STREET
LOS ANGELES, CALIFORNIA 90071-2371
TELEPHONE (213) 683-6000

ORANGE COUNTY OFFICE
695 TOWN CENTER DRIVE
COSTA MESA, CALIFORNIA 92626-1924
TELEPHONE (714) 668-6200

WEST LOS ANGELES OFFICE
1299 OCEAN AVENUE
SANTA MONICA, CALIFORNIA 90401-1078
TELEPHONE (310) 319-3300

ATLANTA OFFICE
GEORGIA-PACIFIC CENTER
133 PEACHTREE STREET, N.E.
ATLANTA, GEORGIA 30303-1840
TELEPHONE (404) 588-9900

CONNECTICUT OFFICE
1055 WASHINGTON BOULEVARD
STAMFORD, CONNECTICUT 06901-2217
TELEPHONE (203) 961-7400

NEW YORK OFFICE
399 PARK AVENUE
NEW YORK, NEW YORK 10022-4697
TELEPHONE (212) 318-6000

TOKYO OFFICE
TORANOMON OHTORI BUILDING
4-3, TORANOMON 1-CHOME
MINATO-KU, TOKYO 105
TELEPHONE (03) 3507-0730

WRITER'S DIRECT DIAL NUMBER
(202) 457-9442

11:34

April 1, 1993

OUR FILE NO
20029.58609

VIA MESSENGER

Mr. Donald Averett
Reports Analyst
Federal Election Commission
999 E Street, N.W., 7th Floor
Washington, D.C. 20463

Re: M.R. Beal & Co. (Sponsoring Organization)/African Americans for a Better America (PAC)

Dear Mr. Averett:

This letter is sent in follow-up to our January 8, 1993 meeting regarding the above-referenced matter. As we discussed during the course of that meeting, our client, M. R. Beal & Co., recently learned that a number of technical violations may have occurred with respect to the above-referenced PAC's reporting responsibilities to the FEC and contribution limits set by the FEC. We hope to resolve those matters and to terminate the PAC in accordance with the governing rules and regulations.

You advised us at the conclusion of the January 8 meeting that the first step toward dissolution of the PAC would be to complete FEC Form 3X's for the PAC's activities during the years 1991 and 1992. Those forms have been executed and are attached now for your review.

You also suggested that we set forth in summary fashion any potential problems regarding the operation of the PAC.

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PAUL, HASTINGS, JANOFSKY & WALKER

93 APR -1 AM 11: 34

If you will recall, M.R. Beal & Co. is a Virginia limited liability partnership established to do business in New York in 1988. MRB Securities is the sole general partner of M.R. Beal & Co. of which eighty percent (80%) is owned by Bernard B. Beal and twenty percent (20%) is owned by Thomas Monti. Prudential Insurance Company of American and Valerie Lancaster are the limited partners of M.R. Beal & Co. We believe that each partner agreed to use firm funds toward PAC activities. For your information, MRB Securities is also one of the few minority-owned security firms in New York City.

In 1990, M.R. Beal & Co. retained a consultant to assist it in establishing and operating a PAC to be sponsored by M.R. Beal & Co. In this regard, the company appointed one of its consultants, Alric Nembhard, as treasurer of the newly created PAC, which was to be called "African Americans for a Better America." Subsequently, Mr. Nembhard, with the help of a second consultant, Mr. Felipe Floresca, registered the PAC with the FEC on March 5, 1991, and with several State authorities.

On August 31, 1992, Mr. Nembhard left M.R. Beal & Co. At the time of his departure, Mr. Nembhard left behind documents related to the operation of the PAC. The box was filled with unopened letters from the FEC and various state election commissions notifying Mr. Nembhard, as treasurer of the PAC, of the failure to file compulsory reports and of other possible violations of the election laws. It is clear from these files that Mr. Nembhard failed to comply with the advice of Mr. Floresca and, consequently, with the FEC regulations.

One of the problems regarding the PAC involves the operation of the General Fund account established at Chase Manhattan Bank in New York City. Mr. Floresca advised that all deposits should be made to the General Fund and subsequently transferred to the state accounts also established at Chase Manhattan Bank. Based on this advice, the PAC established a Michigan and New York fund for contributions to be made to state and local candidates, which received their money via transfers from the General Fund. For instance, of the initial $31,800 contributed to the General Fund from M. R. Beal & Co., $18,500 was transferred into other funds and used for non-federal

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PAUL, HASTINGS, JANOFSKY & WALKER

93 APR -1 AM 11:34

elections. As a consequence of this arrangement, it appears that the PAC was very active at the federal level, when in truth the federal account was simply a conduit for transferring funds to state and local elections. For your information, M.R. Beal & Co. has taken steps to formally dissolve the Michigan and New York funds.

Moreover, all the money paid to the PAC's general account was paid from the partnership account at M. R. Beal & Co. This appears to implicate, 11 C.F.R. § 110.1(c) and (e), which places limits on partnership contributions. However, because $18,500 of the $31,800 donated was used in non-federal elections, only $13,000 was available for federal use, over a two year period. The PAC has a current balance of $6,306.98, and is owed an additional $6,000 in an outstanding obligation. This suggests that virtually none of the $12,000 was actually used in any federal election, and appears to eliminate any possible violation of the regulations. We propose, as part of the PAC's dissolution, to refund M.R. Beal & Co. its $13,000 contribution.

Another issue regarding the PAC is M.R. Beal & Co.'s business relationship with two federal entities, the Resolution Trust Company ("RTC") and Fannie Mae. We do not believe the firm's work for the RTC and Fannie Mae make it a government contractor such that the statute governing the election activities of government contractors applies. Significantly, M.R. Beal & Co. participates only as co-managers or selling group members for certain bond transactions and we believe it is not paid as government contractors from agency funds. Nevertheless, we thought we should bring this issue to your attention in the interest of full disclosure.

With regard to applicable contribution limits, please note the disclosure of various in-kind contributions M.R. Beal & Co. made to the PAC via professional services rendered, including the retention of this law firm in 1992 to resolve these issues. Again, M.R. Beal & Co. did not intend to indirectly violate FEC spending limits via in-kind contributions, but was simply not aware of the applicable regulations.

Finally, as mentioned above, there is a 1991 obligation of Jan and Bragi Shut of $6,000. The purpose of

PAUL, HASTINGS, JANOFSKY & WALKER

93 APR -1 AM 11:34

this expenditure is unclear. We are in the process of collecting it and we anticipate that it will be returned to the General Fund in the near future.

It is our intention by this filing to remedy any technical violations of FEC law by the PAC. The PAC is eager to wholly comply with the law and to expedite its termination in a legal and appropriate manner. As set forth in the required forms attached with this letter, and with the explanations noted above, we believe that all funds have now been accounted for in these filings.

Please feel free to contact me directly with any questions or comments.

Yours truly,

Robert Plotkin

Robert Plotkin
for PAUL, HASTINGS, JANOFSKY & WALKER

Enclosures

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

FEDERAL ELECTION COMMISSION
REPORTS ANALYSIS

93 APR -1 AM 11:34

1. NAME OF COMMITTEE (in full)
African Americans for a Better America

ADDRESS (number and street) Check if different than previously reported
366 Madison Avenue, 5th Floor

CITY, STATE and ZIP CODE
New York, NY 10017

2. FEC IDENTIFICATION NUMBER
C00250886

3. The 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)

XX 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 XX NO

SUMMARY

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period March 1991 through December 1991		
6	(a) Cash on Hand January 1, 19__		$ -0-
	(b) Cash on Hand at Beginning of Reporting Period	$ -0-	
	(c) Total Receipts (from Line 19)	$ 36,800.00	$ 36,800.00
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 36,800.00	$ 36,800.00
7	Total Disbursements (from Line 30)	$ 32,756.85	$ 32,756.85
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 4,043.15	$ 4,043.15
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$ 6,000.00	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$ -0-	

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

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

Type or Print Name of Treasurer
ALEC HUBBARD

Signature of Treasurer
Alec B. Hubbard

Date
March 05, 1993

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

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

SCHEDULE A **ITEMIZED RECEIPTS**

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

Page 1 of 2

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) African Americans for a Better America, PAC

600250696

A. Full Name, Mailing Address and ZIP Code
M. R. Beal & Co.
366 Madison Avenue, 5th Floor
New York, NY 10017

Name of Employer: M. R. Beal Securities
Occupation: Securities Firm
Date (month, day, year): 4/3/91
Amount of Each Receipt this Period: $ 15,000.00

Receipt For: Primary / General / XX Other (specify) 2/8 for Michigan fund
Aggregate Year-to-Date > $

B. Full Name, Mailing Address and ZIP Code
M. R. Beal & Co.
366 Madison Avenue, 5th Floor
New York, NY 10017

Name of Employer: M. R. Beal Securities
Occupation: Securities Firm
Date (month, day, year): 4/19/91
Amount of Each Receipt this Period: $ 200.00

Receipt For: Primary / General / Other (specify)
Aggregate Year-to-Date > $

C. Full Name, Mailing Address and ZIP Code
M. R. Beal & Co.
366 Madison Avenue , 5th Floor
New York, NY 10017

Name of Employer: M. R. Beal Securities
Occupation: Securities Firm
Date (month, day, year): 7/24/91
Amount of Each Receipt this Period: $ 1,600.00

Receipt For: Primary / General / XX Other (specify) Transfer immediately to Michigan fund
Aggregate Year-to-Date > $

D. Full Name, Mailing Address and ZIP Code
M. R. Beal & Co.
366 Madison Avenue, 5th Floor
New York, NY 10017

Name of Employer: M. R. Beal Securities
Occupation: Securities Firm
Date (month, day, year): 10/30/91
Amount of Each Receipt this Period: $ 15,000.00

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) .... $ 31,800.0

TOTAL This Period (last page this line number only) .... $ 31,800.0

95043635276

SCHEDULE A — ITEMIZED RECEIPTS "In Kind" Contributions

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) African Americans for a Better America
600250696

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. M. R. Beal & Co. 366 Madison Avenue, 5th Floor New York, NY 10017 Receipt For: Primary / General / XX Other (specify) In-Kind-Payment for Consultant Felipe Floresca	Name of Employer: M. R. Beal Securities Occupation: Securities Firm Aggregate Year-to-Date > $	1991	$ 5,000.00
B. Full Name, Mailing Address and ZIP Code Receipt For: Primary / General / Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $		
C. Full Name, Mailing Address and ZIP Code Receipt For: Primary / General / Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $		
D. Full Name, Mailing Address and ZIP Code Receipt For: Primary / General / Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $		
E. Full Name, Mailing Address and ZIP Code Receipt For: Primary / General / Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $		
F. Full Name, Mailing Address and ZIP Code Receipt For: Primary / General / Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $		
G. Full Name, Mailing Address and ZIP Code Receipt For: Primary / General / Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $		

SUBTOTAL of Receipts This Page (optional) .... $ 5,000.00

TOTAL This Period (last page this line number only) .... $ 5,000.00

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SCHEDULE B — ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page	PAGE 2	OF 5

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): African Americans for a Better America PAC
[illegible]

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Liz Holtzman for Senate New York, NY (Newly refunded 11/30/92)	Federal Senate election Disbursement for: [X] Primary [ ] General [ ] Other (specify)	12/23/91	$ 5,000.00
B.	Disbursement for: [ ] Primary [ ] General [ ] Other (specify)		
C.	Disbursement for: [ ] Primary [ ] General [ ] Other (specify)		
D.	Disbursement for: [ ] Primary [ ] General [ ] Other (specify)		
E.	Disbursement for: [ ] Primary [ ] General [ ] Other (specify)		
F.	Disbursement for: [ ] Primary [ ] General [ ] Other (specify)		
G.	Disbursement for: [ ] Primary [ ] General [ ] Other (specify)		
H.	Disbursement for: [ ] Primary [ ] General [ ] Other (specify)		
I.	Disbursement for: [ ] Primary [ ] General [ ] Other (specify)		

SUBTOTAL of Disbursements This Page (optional)	
TOTAL This Period (last page this line number only)	$ 5,000.00

95043635278

FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

RQ-2

Alric B. Nembhard, Treasurer
African Americans for a Better
America PAC
366 Madison Avenue, 5th Floor
New York, NY 10017

APR 14 1993

Identification Number: C00250696

Reference: Year End Report (3/91-12/91)

Dear Mr. Nembhard:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-You have received a contribution from H.R. Beal & Co., which appears to be an unincorporated proprietorship or partnership. Generally, these types of contributions are to be attributed to each person based on their percentage of ownership in the firm. Each person who has contributed in excess of $200 since January 1 should be identified by name, address, occupation, name of employer, amount of contribution, and aggregate total on Schedule A. 11 CFR §110.1(k) Please amend your report by providing the omitted information.

-Schedule A of your report (pertinent portions attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from a person in excess of $5,000 per calendar year. (2 U.S.C. §441a(f)) For your information, a partnership is included in the definition of "person" under 2 U.S.C. §431(11). If you have received a contribution that exceeds the limits, the Commission recommends that you refund the amount in excess of $5,000 to the donor in accordance with 11 CFR §103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In the best interests of the committee, all refunds and transfers-out should be made within sixty (60) days of the treasurer's receipt of the contribution. See 11 CFR §103.3(b). Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 28 or 22 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps regarding the acceptance of an excessive contribution(s), your prompt refund or transfer-out of the excessive amount will be taken into consideration.

-Your report discloses contributions from M.R. Beal & Co. Your committee has indicated that Prudential Insurance Company of America, a corporation registered in the state of New Jersey, is a partner in the firm of M.R. Beal & Co. You are advised that a contribution from a corporation is prohibited by the Act, unless made from a separate segregated fund established by the corporation. (2 U.S.C. §441b(a)) If you have received a corporate contribution(s), the Commission recommends that you refund the full amount to the donor(s) in accordance with 11 CFR §103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In the best interests of the committee, all refunds and transfers-out should be made within thirty (30) days of the treasurer's receipt of the contribution. See 11 CFR §103.3(b). Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 28 or 22 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution,

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prompt action by your committee to refund or transfer-out the amount will be taken into consideration.

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of $200 in a calendar year must be disclosed on Schedule B, supporting Line 21 of the Detailed Summary Page. (2 U.S.C. §434(b)(5)) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is $500 or more, or outstanding for sixty (60) days or more. 11 CFR §104.11

If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2)

PLEASE NOTE: Should your committee have a non-federal account(s), these administrative expenses MUST be disclosed on Lines 18, 21(a)(i) and 21(a)(ii) of the Detailed Summary Page and Schedules H2, H3 and H4 (and possibly Schedule H1 if it has not previously been filed). (See 11 CFR §106.6(b)(2)(i).

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Please provide clarification regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations. Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on

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our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Donald L. Averett

Donald L. Averett
Reports Analyst
Reports Analysis Division

SCHEDULE A — ITEMIZED RECEIPTS

Attachment #18

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): African Americans for a Better America, PAC

600250696

Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. M. R. Beal & Co., 366 Madison Avenue, 5th Floor, New York, NY 10017. Receipt For: XX Other (specify): 278 for Michigan fund	M. R. Beal Securities	Securities Firm	4/3/91	$ 15,000.00
B. M. R. Beal & Co., 366 Madison Avenue, 5th Floor, New York, NY 10017	M. R. Beal Securities	Securities Firm	4/19/91	$ 200.00
C. M. R. Beal & Co., 366 Madison Avenue , 5th Floor, New York, NY 10017. Receipt For: XX Other (specify): Transfer immediately to Michigan fund	M. R. Beal Securities	Securities Firm	7/24/91	$ 1,600.00
D. M. R. Beal & Co., 366 Madison Avenue, 5th Floor, New York, NY 10017	M. R. Beal Securities	Securities Firm	10/30/91	$ 15,000.00
E.				
F.				
G.				

SUBTOTAL of Receipts This Page (optional) .... $ 31,800.00

TOTAL This Period (last page this line number only) .... $ 31,800.00

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ahr

ITEMIZED RECEIPTS

"In Kind" Contributions

Attachment #18

Page 6 of 6

African Americans for a Better America
600250696

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. M. R. Beal & Co. 366 Madison Avenue, 5th Floor New Gork, NY 10017. Receipt for: XX Other (specify): In-Kind-Payment for Consultant Felipe Floresca	M. R. Beal Securities / Securities Firm. Aggregate Year-to-Date > $	1991	$ 5,000.00
B. Receipt for: Primary / General / Other (specify)	Aggregate Year-to-Date > $		
C. Receipt for: Primary / General / Other (specify)	Aggregate Year-to-Date > $		
D. Receipt for: Primary / General / Other (specify)	Aggregate Year-to-Date > $		
E. Receipt for: Primary / General / Other (specify)	Aggregate Year-to-Date > $		
F. Receipt for: Primary / General / Other (specify)	Aggregate Year-to-Date > $		
G. Receipt for: Primary / General / Other (specify)	Aggregate Year-to-Date > $		

SUBTOTAL of Receipts This Page (optional) .... $ 5,000.00

TOTAL This Period (last page this line number only) .... $ 5,000.00

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EDULE A

ITEMIZED RECEIPTS

"In-Kind" Contibutions

[illegible] category [illegible] Detailed Summary Page

2 2

NAME OF COMMITTEE (in Full) African Americans for a Better America
600250695

A. Full Name, Mailing Address and ZIP Code
M. R. Beal & Co.
366 Madison Avenue, 5th Floor
New York, NY 10017

Name of Employer: Same

Occupation: Securities Firm

Date (month, day, year): 12/92

Amount of Each Receipt this Period: $ 5,310.79

Receipt For: ☐ Primary ☐ General ☒ Other (specify) In-Kind-Attorney Fees & Costs

Aggregate Year-to-Date > $

B. 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 > $

C. 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 > $

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) .... $ 5,310.79

TOTAL This Period (last page this line number only) .... $ 5,310.79

SCHEDULE A ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page | Page 1 of 3

Attachment #19 Page 2 of

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) **Africa Americans for A Better America**
600250696

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. Liz Holtzman for Senate New York, NY Receipt For: ☐ Primary ☐ General ☒ Other (specify): Refund	Campaign Committee Occupation: Aggregate Year-to-Date > $	11/30/92	$ 5,000.0[illegible]
B. Africa Americans for a Better America Michigan Fund (Account Closed) Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $	11/30/92	$ 458.83
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $		
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $		
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $		
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $		
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $		

SUBTOTAL of Receipts This Page (optional) .... $ 5,[illegible]

TOTAL This Period (last page this line number only) .... $ [illegible]

FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

RQ-2

Alric B. Hembhard, Treasurer
African Americans for a Better
America PAC
366 Madison Avenue, 5th Floor
New York, NY 10017

APR 14 [illegible]

Identification Number: C00250696

Reference: Year End Report (1/1/92-12/31/92)

Dear Mr. Hembhard:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-You have received a contribution from M.R. Beal & Co., which appears to be an unincorporated proprietorship or partnership. Generally, these types of contributions are to be attributed to each person based on their percentage of ownership in the firm. Each person who has contributed in excess of $200 since January 1 should be identified by name, address, occupation, name of employer, amount of contribution, and aggregate total on Schedule A. 11 CFR §110.1(k) Please amend your report by providing the omitted information.

-Schedule A of your report (pertinent portions attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from a person in excess of $5,000 per calendar year. (2 U.S.C. §441a(f)) For your information, a partnership is included in the definition of "person" under 2 U.S.C. §431(11). If you have received a contribution that exceeds the limits, the Commission recommends that you refund the amount in excess of $5,000 to the donor in accordance with 11 CFR §103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

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Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In the best interests of the committee, all refunds and transfers-out should be made within sixty (60) days of the treasurer's receipt of the contribution. See 11 CFR §103.3(b). Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 28 or 22 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps regarding the acceptance of an excessive contribution(s), your prompt refund or transfer-out of the excessive amount will be taken into consideration.

-Your report discloses contributions from H.R. Beal & Co. Your committee has indicated that Prudential Insurance Company of America, a corporation registered in the state of New Jersey, is a partner in the firm of H.R. Beal & Co. You are advised that a contribution from a corporation is prohibited by the Act, unless made from a separate segregated fund established by the corporation. (2 U.S.C. §441b(a)) If you have received a corporate contribution(s), the Commission recommends that you refund the full amount to the donor(s) in accordance with 11 CFR §103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In the best interests of the committee, all refunds and transfers-out should be made within thirty (30) days of the treasurer's receipt of the contribution. See 11 CFR §103.3(b). Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 28 or 22 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, prompt action by your committee to refund or transfer-out the amount will be taken into consideration.

-Schedule A of your report discloses a receipt of $458.83 from the African Americans for a Better America Michigan Fund (pertinent portion(s) attached). Please clarify whether this transfer is from an account maintained by your committee for non-federal activity. If so, be advised that such transfer is prohibited by 11 CFR §102.5(a)(1)(i) and the full amount of the transfer should be returned to the non-federal account. Please inform the Commission immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on a supporting Schedule B for Line 22 of your next report.

If, however, this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the funds in question, or clarification of the transaction, will be taken into consideration.

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of $200 in a calendar year must be disclosed on Schedule B, supporting Line 21 of the Detailed Summary Page. (2 U.S.C. §434(b)(5)) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is $500 or more, or outstanding for sixty (60) days or more. 11 CFR §104.11

If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2)

PLEASE NOTE: Should your committee have a non-federal account(s), these administrative expenses MUST be disclosed on Lines 18, 21(a)(i) and 21(a)(ii) of the

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Detailed Summary Page and Schedules H2, H3 and H4 (and possibly Schedule H1 if it has not previously been filed). (See 11 CFR §106.6(b)(2)(i).

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Please provide clarification regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations. Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year.

-Schedule A of your report (pertinent portion(s) attached) discloses a refund(s) of an excessive contribution(s) made to a federal candidate(s). The Act precludes a political committee, other than a multi-candidate committee, from making a contribution to a candidate for federal office in excess of $1,000 per election. 2 U.S.C. §441a(a)

The Commission notes the refund of the excessive contribution(s). Although the Commission may take further legal steps concerning the excessive contribution(s), your prompt action in obtaining a refund of the contribution(s) will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Donald L. Averett

Donald L. Averett
Reports Analyst
Reports Analysis Division

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"In-Kind" Contibutions

[illegible]

NAME OF COMMITTEE (in Full)
African Americans for a Better America
600250695

A. Full Name, Mailing Address and ZIP Code
M. R. Beal & Co.
366 Madison Avenue, 5th Floor
New York, NY 10017

Name of Employer: Same
Occupation: Securities Firm
Date (month, day, year): 12/92
Amount of Each Receipt this Period: $ 5,310.79
Receipt For: ☐ Primary ☐ General ☒ Other (specify): In-Kind-Attorney Fees & Costs
Aggregate Year-to-Date > $

B. 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 > $

C. 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 > $

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) .... $ 5,310.79

TOTAL This Period (last page this line number only) .... $ 5,310.79

TYPE AFRIC.13 Attachment #21

TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: Sandy Wilkinson, attorney

COMMITTEE: African Americans for a Better America PAC
(C00250696)

DATE: 4/20/93

SUBJECT: Request for Meeting

Ms. Sandy Wilkinson telephoned the Commission and requested a meeting to discuss the committee's responses to Requests for Additional Information. I asked that the committe first file the required amendments. I advised her that once the amendments had been reviewed we could meet to discuss any outstanding problems.

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$ TYPE AFRIC.;5

TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: Sandy Wilkinson, attorney

COMMITTEE: African Americans for a Better America PAC
(C00250696)

DATE: 4/27/93

SUBJECT: Request for Extension

Ms. Sandy Wilkinson telephoned the Commission and said that she was having trouble tracking down the partnership information needed to response to the Requests for Additional Information. She requested an extension on the deadline for responding to the Requests for Additional Information. I advised Ms. Wilkinson that I could not grant an extension and that the committe should respond as soon as possible.

Attachment #23

FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

RQ-3

May 6, 1993

Alric B. Nembhard, Treasurer
African Americans for a Better
America PAC
366 Madison Avenue, 5th Floor
New York, NY 10017

Identification Number: C00250696

Reference: Year End (3/1/91-12/31/91), Year End (1/1/92-12/31/92) and Termination (1/1/93-3/31/93) Reports

Dear Mr. Nembhard:

This letter is to inform you that as of May 5, 1993, the Commission has not received your response to our requests for additional information, dated April 14, 1993. Those notices requested information essential to full public disclosure of your federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). Copies of our original requests are enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Donald Averett on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

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LAW OFFICES OF
PAUL, HASTINGS, JANOFSKY & WALKER
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
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MINATO-KU, TOKYO [illegible]
TELEPHONE [illegible]

May 28, 1993

WRITER'S DIRECT DIAL NUMBER
(202)457-9442

OUR FILE NO.
20029.58609

95043635225

VIA FACSIMILE

John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
Washington D.C. 20463

Re: African Americans for a Better America
PAC: C00250696

Dear Mr. Gibson:

We are in receipt of your letter dated May 6, 1993 asking about the status of the response of the PAC to your requests for additional information dated April 14, 1993. As counsel for the PAC, we are in the process of preparing amended FEC forms and a written response and will file it with your office as soon as possible. Please contact me or my colleague, Sandra Wilkinson, if you have any further questions or comments. We apologize for any inconvenience caused by our delay.

Yours truly,

Robert Plotkin /sw

Robert Plotkin
For PAUL, HASTINGS, JANOFSKY & WALKER

SCHEDULE A

ITEMIZED RECEIPTS

(Contributions from Persons Other Than Political Committees)

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

PAGE 1 OF 1

FOR LINE NUMBER 11

NAME OF COMMITTEE (in Full)

African Americans for a Better America 600250696

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. M. R. Beal & Co, (Partnership) 366 Madison Avenue, 5th Floor New York, NY 10017 Receipt For: ☐ Primary ☐ General ☒ Other (specify):	Name of Employer: (See below for allocation) Occupation: Securities Firm Aggregate Year-to-Date > $ 15,200.00	4/03/91 4/19/91	$ 15,000.00 $ 200.00
B. M. R. Beal Securities 366 Madison Avenue, 5th Floor New York, NY 10017 Receipt For: ☐ Primary ☐ General ☒ Other (specify): Michigan Fund	Name of Employer: M. R. Beal & Co. Occupation: General Partner Aggregate Year-to-Date > $	4/03/91 4/19/91	$ 15,000.00 $ 200.00 (Memo)
C. M. R. Beal & Co. (Partnership) 366 Madison Avenue, 5th Floor New York, NY 10017 Receipt For: ☐ Primary ☐ General ☒ Other (specify):	Name of Employer: (See below for allocation) Occupation: Securities Firm Aggregate Year-to-Date > $ 20,200.00	3/91	$ 5,000.00 (In-Kind for fee)
D. M. R. Beal Securities 366 Madison Avenue New York, NY 10017 Receipt For: ☐ Primary ☐ General ☒ Other (specify): Consulting fees to Floresca	Name of Employer: M. R. Beal & Co. Occupation: General Partner Aggregate Year-to-Date > $	3/91	$ 5,000.00 (Memo)
E. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $		
F. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $		
G. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $		

SUBTOTAL of Receipts This Page (optional) .... $ 20,200.00

TOTAL This Period (last page this line number only) .... $ 20,200.00

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SCHEDULE A — ITEMIZED RECEIPTS
(Contributions from Persons Other Than Political Committees)

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

PAGE 1 OF 1

FOR LINE NUMBER 11

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)

African Americans for a Better America PAC 600250696

Attachment #25
Page 2 of 3

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. M. R. Beal & Co. (Partnership) 366 Madison Avenue, 5th Floor New York, NY 10017 Receipt For: ☐ Primary ☐ General ☒ Other (specify):	Name of Employer: (See below for allocation) Occupation: Securities Firm Aggregate Year-to-Date > $ 16,600.00	7/24/91 10/30/91	$ 1,600.00 $ 15,000.00
B. M. R. Beal Securities 366 Madison Avenue, 5th Floor New York, NY 10017 Receipt For: ☐ Primary ☐ General ☒ Other (specify):	Name of Employer: M. R. Beal & Co. Occupation: General Partner Aggregate Year-to-Date > $ 16,600.00	7/24/91 10/30/91	$ 1,600.00 $ 15,000.00 (Memo)
C. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $		
D. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $		
E. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $		
F. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $		
G. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $		

SUBTOTAL of Receipts This Page (optional) .... $ 16,600.00

TOTAL This Period (last page this line number only) .... $ 16,600.00

95043635297

SCHEDULE A ITEMIZED RECEIPTS (Contributions from Persons Other than Political Committee)

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

FOR LINE NUMBER 11

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)
African Americans for a Better America 600250696

Attachment #25
Page 3 of 3

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. M. R. Beal & Co. (Partnership) 366 Madison Avenue, 5th Floor New York, NY 10017 Receipt For: [ ] Primary [ ] General [X] Other (specify):	Name of Employer: (See below for allocation) Occupation: Securities Firm Aggregate Year-to-Date > $ 5,310.79	12/92	$ 5,310.79 (In-kind legal fee)
B. M. R. Beal Securities 366 Madison Avenue, 5th Floor New York, NY 10017 Receipt For: [ ] Primary [ ] General [X] Other (specify):	Name of Employer: M. R. Beal & Co. Occupation: General Partner Aggregate Year-to-Date > $	12/92	$ 5,310.79 (Memo)
C. Receipt For: [ ] Primary [ ] General [ ] Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $		
D. Receipt For: [ ] Primary [ ] General [ ] Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $		
E. Receipt For: [ ] Primary [ ] General [ ] Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $		
F. Receipt For: [ ] Primary [ ] General [ ] Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $		
G. Receipt For: [ ] Primary [ ] General [ ] Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > $		

SUBTOTAL of Receipts This Page (optional) .... $ 5,310.79

TOTAL This Period (last page this line number only) .... $ 5,310.79

95043635298

LAW OFFICES OF

PAUL, HASTINGS, JANOFSKY & WALKER JUN -7 PM 12:03

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WRITER'S DIRECT DIAL NUMBER
(202) 457-9493

June 7, 1993

OUR FILE NO.
20029.58609

VIA MESSENGER

Mr. Donald Averett
Reports Analyst
Federal Election Commission
999 E Street, N.W.
7th Floor
Washington, D.C. 20463

Re: African Americans for a Better America PAC

Dear Mr. Averett:

Pursuant to your letters dated April 14, 1989 in reference to the PAC Year End Reports (3/91-12/91; 1/92-12/92 and 1/93-3/93) of the African Americans for a Better America PAC, the attached FEC forms have been edited in response to each of your specific inquiries as follows:

1. As stated in our letter dated April 1, 1993, M. R. Beal & Co. is actually a Virginia limited partnership made up of MRB Securities, General Partner, and Prudential Insurance Company of America, a limited partner. You advised that contributions for partnerships must be allocated to each individual partner. Pursuant to 11 C.F.R. § 110.1(e)(2), none of the contributions were attributed to Prudential Insurance. Based on the amount of any federal contribution, MRB Securities' profits would typically be reduced by Prudential's share in the partnership. However, although M. R. Beal & Co. contributed a total of $31,800.00 for the three year period in question (all of it in 1991), only $500 was made to a federal candidate (in 1992). For the reasons set forth in ¶ 2 below, the entire contribution

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PAUL, HASTINGS, JANOFSKY & WALKER

is being refunded to the sponsoring organization and need not be allocated pursuant to the partnership rules.

2. As stated above, the entire $31,800 in campaign contributions from M. R. Beal & Co. have been allocated to the partner MRB Securities. This entity, however, is a corporation prohibited by law to make federal campaign contributions. Accordingly, the PAC has requested that the one federal contribution made ($500 in 1992) be refunded to the sponsoring organization (see attached letters to Tony Meeker campaign and M. R. Beal & Co.).

3. Of the total contribution amount made by M. R. Beal & Co., and attributed to MRB Securities, a Corporation, virtually all of it was either used for non-federal elections or transferred to an account not used to influence federal elections. Attached is a copy of a letter to M. R. Beal & Co. from the PAC, advising it of non-federal activity which provided the company with the option of receiving a refund of the entire amount ($18,550). The donors (both the sponsoring organization (M. R. Beal & Co.) and the contributing partner (MRB Securities) to which all contributions were allocated have authorized these funds to be "transferred-out" for non-federal activity and therefore a refund was not necessary.

4. There still remains $5,806.98 in the PAC account, as well as an anticipated refund of $500 from the Tony Meeker campaign (see attached letter). As disclosed in our April 1 submission, there is also an anticipated return of $6,000 from the unauthorized transfer of funds to Jan and Bragi Shut on April 19, 1991. There is absolutely no evidence that any of these monies went to federal election campaigns and the sole donor to the PAC, M. R. Beal & Co., is aware of the transfer. Any monies remaining in the PAC at the time of termination will be returned to the sponsoring organization upon your approval of the PAC's termination.

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PAUL, HASTINGS, JANOFSKY & WALKER

I trust that this answers all of your concerns and the Forms have been adequately amended to reflect all necessary information.

Very truly yours,

Sandra Wilkinson

Sandra Wilkinson
for PAUL, HASTINGS, JANOFSKY & WALKER

SW:js

Enclosures

REPORTS

93 JUN -7 PM 12:04

**AFRICAN AMERICANS FOR A BETTER AMERICA
POLITICAL ACTION COMMITTEE (PAC)**

May 29, 1993

Tony Meeker for Congress Committee
15405 Southwest 116th Street
Suite 201
P.O. Box 13282
Salem, OR 97309

Re: Contribution

Dear Sir/Madam:

On January 27, 1992, the African Americans for a Better America Political Action Committee (PAC) made a contribution to your campaign in the amount of $500.00. In the course of terminating the PAC, we have learned that PAC funds are traced directly to a corporate entity who, under federal law, is prohibited from making federal campaign contributions. Accordingly, we must request that the funds be returned to the PAC so that we can refund them to the contributor.

If you have any questions in this regard, please contact counsel for the PAC: Sandra Wilkinson, PAUL, HASTINGS, JANOFSKY & WALKER at (202)457-9493.

Yours Truly,

Alric B. Nembhard

Alric B. Nembhard
Treasurer

**AFRICAN AMERICANS FOR A BETTER AMERICA
POLITICAL ACTION COMMITTEE (PAC)**

May 29, 1993

Bernard Beal
President
M.R. Beal & Co.
366 Madison Avenue, 5th Floor
New York, NY 10017

Re: Contributions to PAC

Dear Mr. Beal:

In 1991, M.R. Beal & Co. made contributions totalling $31,800 to the above-referenced PAC. This amount prima facie exceeds the contribution limit that entities are permitted to contribute to federal campaigns. However, you should be aware that the bulk of these monies were "transferred out" to state and local elections and, thus, are not subject to the federal campaign contribution limits.

In the process of terminating the PAC, we learned that you must be advised of the use of your PAC contribution and that you can either authorize the use of the funds for the purpose for which they were used (state and local elections) or you may get a refund of the funds expended. If you chose to have the funds refunded, we must request a refund from the campaigns themselves.

In order for you to make a decision in this regard and, for your records, the state and local contributions made for the years 1991 through 1993 are as follows:

1991

Michigan Political Committee Fund	$9,050.00
Michigan Political Committee Fund	$1,600.00
Mayor's Committee, Cleveland, OH	$5,000.00
Citizens for Schoemehl, St. Louis, MO	$ 500.00
Michigan Political Committee Fund	$ 500.00

May 29, 1993
Page Two

1992

Michigan Fund Closed (Funds returned to PAC) ($ 458.83)

The total contributions were $16,650. If you chose to authorize the above expenditures, please indicate below and return this letter to counsel for the PAC: Sandra Wilkinson, PAUL, HASTINGS, JANOFSKY & WALKER, 1050 Connecticut Avenue, N.W., Washington, D.C. 20036.

As the sponsoring organization of the PAC, and the sole contributor, you will be receiving a refund of the $458.83 in addition to whatever funds remain in the PAC at the time of its termination (currently, this amount is $5,806.98.

The only federal campaign contribution made by the PAC was to the Tony Meeker for Congress Committee on or about January 27, 1992. This campaign contribution is not permitted under federal law because corporations are not permitted to make donations to the PAC. Accordingly, we are seeking a refund of the $500.00 contribution made to the Meeker Committee. In the interim, we are returning herewith the $500 contribution M.R. Beal & Co. inadvertently made to the PAC that was inadvertently used for federal campaign purposes.

If you have any questions, please contact Ms. Wilkinson at (202)457-9493.

Yours Truly,

Alric B. Nembhard

Alric B. Nembhard
Treasurer

114

AFRICAN AMERICANS FOR A BETTER AMERICA
GENERAL FUND

May 25 1993

PAY TO THE ORDER OF M R Beal & Company $ 500.00

five hundred dollars and 00/100 DOLLARS

CHASE The Chase Manhattan Bank, N.A.
Madison Avenue
New York, NY 10017

FOR Refund of Campaign Contribution

[redacted]

PRESIDENT

95043635305

● TYPE AFRIC.;6

TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: Sandy Wilkinson, attorney

COMMITTEE: African Americans for a Better America PAC
(C00250696)

DATE: 6/17/93

SUBJECT: Amended Termination Report (1/1/93-6/2/93)

I telephoned Ms. Sandy Wilkinson. I noted that her letter of June 7, 1993 indicated that the committee intended to make a refund to M. R. Beal & Co. once the Commission approves the committee's termination. I advised her to refund all impermissable contributions as soon as possible and to continue reporting until the termination had been approved.

LAW OFFICES OF

PAUL, HASTINGS, JANOFSKY & WALKER

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WRITER'S DIRECT DIAL NUMBER

(202)508-9542

January 13, 1995

OUR FILE NO.
20029.58609

93L-55

VIA FACSIMILE (202)219-3923

Ms. Lisa Klein, Esquire
Deputy General Counsel
Federal Election Commission
Washington, DC. 20463

Re: African Americans for a Better America PAC ("PAC")

Dear Ms. Klein:

I am writing further to our conversation yesterday. As I explained, this firm represents the above-referenced PAC and has dealt with the FEC consistently over the past 21 months on its behalf. Our client has become concerned about the delay in terminating the PAC, and has asked that I bring the matter to the attention of the appropriate individual. You advised me that you are the person with whom we should be in contact.

On August 30, 1993, Mr. Donald Averett of the FEC's Reports Analysis section told our associate, Sandra Wilkinson, that he had advised the General Counsel's office that all the forms in the file were in order, and that we should expect to hear from that office concerning our desire to close the PAC "very shortly." On November 5, 1993 Mr. Averett told Ms. Wilkinson that we were "supposed to get" a letter from the General Counsel's office, as he had a carbon copy of a communication dated September 27, 1993. No such letter from the General Counsel arrived here (although Mr. Averett ultimately was kind enough to provide us with a copy at a much later time). The only communications received by us or our client since August, 1993 have been two notices of failure to file reports (5/10/94, 1/4/95).

As the PAC was active for less than one year and made only several federal campaign donations in relatively small amounts, the delay in reviewing the requested termination has caused our client some obvious concern. The PAC came forward voluntarily and made full disclosure of its non-compliance with the Act. The time and expense of filing quarterly reports reflecting total inactivity has become an annoyance and a burden. As you can appreciate, the PAC exists in your records only, and has no staff or operating budget to monitor these requirements. Moreover, to the extent that the PAC may have some minor, residual liability regarding its operation, it seeks to reach clarification and closure. It may be of interest to you to know that the New York State Board of Elections was able to complete state termination activity within six months during 1993.

If there is anything we can do to expedite and assist your review we would be pleased to help. Our desire is to avoid further delay and reach closure, and not to turn this into a major controversy. I appreciate your taking the time to talk with me and hope that, with your attention, we can achieve a mutually satisfactory resolution.

Yours truly,

Robert Plotkin

Robert Plotkin
for PAUL, HASTINGS, JANOFSKY & WALKER

RP:vsb

LAW OFFICES OF

PAUL, HASTINGS, JANOFSKY & WALKER

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WRITER'S DIRECT DIAL NUMBER
(202) 508-9542

January 13, 1995

OUR FILE NO.
20029.58609

Mr. Donald Averett
Reports Analyst
Federal Election Commission
999 E Street, N.W., 7th Floor
Washington, D.C. 20463

Re: Africans for a Better America PAC (the "PAC")

Dear Mr. Averett:

Our client, the above-referenced PAC, recently received a notice to file a "30 Day Post-General Report (10/1/94 - 11/28/94)." As you will recall, we attempted to terminate this PAC in mid-1993. We were then advised that we needed to continue filing quarterly reports until the termination was approved, which we have done. To date we have received no information regarding that termination.

The PAC was not aware of any obligation to file the 30-day Report requested by your office. It has never before filed such a report, it has been inactive for two years and played no role whatsoever in the November 1994 elections.

We request the FEC to waive any further filing requirements for this inactive PAC pending its final termination. In the alternative, we ask you to accept a simple letter from the PAC confirming its continuing inactivity. The time and expense for this non-operational entity to comply with filing requirements for a non-functional PAC are burdensome and without logical justification.

95043635309

We look forward to your prompt reply.

Yours truly,

Robert Plotkin
for PAUL, HASTINGS, JANOFSKY & WALKER

RP:vsb

cc: Lisa Klein, Esquire

01-25-95 10:31AM FROM 2025089700 TO ##7005221933923# P001/002

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JAN 25 10 42 AM '95

Paul, Hastings, Janofsky & Walker

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1299 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, DC 20004
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Rad Refferal
93L-55

CONFIDENTIAL X RUSH X

RSP

DATE: 1/25/95 - 10:02am FROM: Robert S. Plotkin
DIRECT DIAL #: (202) 508-9542

TO: LISA KLEIN
OF: Federal Election Commission
FACSIMILE #: (202)219-3923 SWITCHBOARD #:

CLIENT NAME: Real/PAC CLIENT #: 20029.58609

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Total number of pages, including this cover sheet: 2

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X ORIGINAL WILL FOLLOW VIA: REGULAR MAIL

FAX OPERATOR'S NAME: DATE: TIME:

MESSAGE:

Attached please find the authorization you requested. I look forward to speaking with you.

Robert Plotkin

9 5 0 4 3 6 3 5 3 1 1

STATEMENT OF DESIGNATION OF COUNSEL

MUR ________________

NAME OF COUNSEL: Robert Plotkin

ADDRESS: Paul, Hastings, Janofsky & Walker
1299 Pennsylvania Avenue, N.W., Suite 1000
Washington, D.C. 20004

TELEPHONE: 202-508-9542

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.

1/23/95 DATE

SIGNATURE

RESPONDENT'S NAME: African Americans For A Better America PAC

ADDRESS: c/o M.R. Beal & Company
565 Fifth Avenue, 8th Floor
New York, NY 10017

HOME PHONE: Bernard Beal, President CEO

BUSINESS PHONE: 212-983-3930

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cc Lerner
Docket

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL & ETHICS OFFICER

FROM: SCOTT E. THOMAS
COMMISSIONER

SUBJECT: RECUSAL IN 93L-55

DATE: APRIL 7, 1995

I have recused myself from any Commission consideration or determination in connection with 93L-55 because it relates to Prudential Securities Incorporated. My wife, Elena W. King, has an account in Prudential Securities. One of the respondents in 93L-55, M. R. Beal and Company, has Prudential Insurance Company of America as a limited partner. Prudential Securities is a subsidiary of Prudential Insurance Company of America.

I am attaching a separate memorandum for inclusion in the file, should you deem it appropriate.

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral: 93L-55
Date Activated: 4/8/94
Staff Member: Elizabeth Stein

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

RESPONDENTS: African Americans for a Better America PAC and Alric B. Nembhard, as treasurer
M.R. Beal & Company
MRB Securities Corporation

RELEVANT STATUTES:
2 U.S.C. § 431(8)(A)
2 U.S.C. § 432(a)
2 U.S.C. § 434(a)(4)
2 U.S.C. § 441a(a)
2 U.S.C. § 441a(f)
2 U.S.C. § 441b
2 U.S.C. § 441c(a)
11 C.F.R. § 102.2(a)(2)
11 C.F.R. § 110.1(e)
11 C.F.R. § 115.4(a)

INTERNAL REPORTS CHECKED: Referral Material
Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Office of the General Counsel received a referral from the Reports Analysis Division ("RAD") on August 12, 1993. Attachment 1. The basis for the referral is the failure of the African Americans for a Better America PAC and Alric B. Nembhard, as treasurer, ("AABAPAC") to file timely seven disclosure reports during the 1991-1992 election cycle; the receipt of prohibited corporate contributions; and the receipt of prohibited contributions from a contractor with the federal government.

II. <u>FACTUAL AND LEGAL ANALYSIS</u>

A. Background

This Committee had a short-lived period of activity, originally registering with the Commission in March, 1991 and seeking termination in January, 1993. During this period, AABAPAC concentrated its activity on state and local races, making only two contributions to federal elections, a $500 contribution to the Tony Meeker for Congress Committee and a $5,000 excessive contribution to Liz Holtzman for Senate Committee.[1] Questions were initially raised by RAD regarding AABAPAC's failure to file disclosure reports and AABAPAC's status as a non-connected committee.[2] In January 1993, AABAPAC retained counsel who approached RAD regarding termination of the Committee. Counsel met with RAD representatives, agreed to file the delinquent reports, and outlined various problems with the Committee.[3]

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1. AABAPAC received a $5,000 refund from the Liz Holtzman for Senate committee on November 30, 1992 and sought a refund of the $500 contribution to the Tony Meeker for Congress Committee on May 29, 1993. <u>See</u> Attachment 1 at 44 and 60.

2. At the time of registration, AABAPAC was ambiguous in its description of the organization and operation of the PAC. In the Statement of Organization filed with the Commission, AABAPAC indicated that it was a non-connected political committee but also checked off the box indicating that the committee had a corporate connected organization. <u>See</u> Attachment 1 at 10.

3. In April 1993, counsel for AABAPAC wrote a letter to the Commission detailing problems with the operation of the PAC. <u>See</u> Attachment 1 at 29. At that time, AABAPAC also filed two comprehensive disclosure reports. One report covered activity from March 1 through December 31, 1991 while the second covered activity from January 1 through December 31, 1992.

According to counsel, AABAPAC is a non-connected political committee closely associated with a limited partnership, M.R. Beal & Co. See Attachment 1 at 50. The partnership is composed of a general partner, MRB Securities, and a limited partner, Prudential Insurance Company of America. See Attachment 1 at 57.[4] The partnership and AABAPAC share officers and consultants and the partnership was the sole contributor to AABAPAC during its period of activity. Information obtained from counsel and information provided in the disclosure reports ultimately filed by AABAPAC indicate that all funds received by AABAPAC were apparently received from prohibited sources. It appears that AABAPAC received contributions from a corporate partner and that the partnership may have been a federal contractor. The possible violations arising from the activities of AABAPAC are discussed below.

B. Prohibited Corporate Contributions

Under the Federal Election Campaign Act of 1971, as amended, ("the Act"), the term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office. 2 U.S.C. § 431(8)(A). Any goods or services provided to a political committee by a person, except volunteer activity, is considered an in-kind contribution from that person, and is subject to the disclosure requirements of

4. In previous correspondence, counsel for AABAPAC indicated that the partnership had an additional limited partner, Valerie Lancaster. See Attachment 1 at 30.

2 U.S.C. § 434(b)(3) and 11 CFR § 104.13, and the limitations of 2 U.S.C. § 441a. A partnership is defined as a "person" under 2 U.S.C. § 431(11).

The full amount of a contribution by a partnership must be attributed both to the partnership <u>and</u> to the individual partners, based either upon their percentage of ownership, or by agreement of the partners. 11 C.F.R. § 110.1(e). It is unlawful for corporations to make contributions or expenditures in connection with federal elections, and for political committees to knowingly accept or receive such contributions. 2 U.S.C. § 441b(a). A corporation which is a partner in a partnership may not make a contribution to a political committee, and no portion of a contribution made by the partnership may be attributed to a corporate partner. 11 C.F.R. § 110.1(e).[5]

Corporations are permitted to pay the cost of establishing and administering a separate segregated fund to solicit their members without such payments resulting in a contribution. 2 U.S.C. § 441b(b)(2)(C). However, because the Act imposes far fewer restrictions on partnerships than on corporations, partnerships are not similarly entitled to pay the costs of establishing or administering a political committee without such

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5. The Commission has further found that a partnership composed solely of partners which are incorporated entities may not make contributions to a federal election. <u>See</u> Advisory Opinions, 1981-54 and 1981-56. As noted in Advisory Opinion 1981-56, although the partnership as an entity is prohibited from making any direct contribution, its corporate members may establish and operate separate segregated funds. Additionally, employees of the partnership may establish a political committee separate from the partnership's treasury funds.

payments resulting in contributions subject to the limitations of the Act. See 2 U.S.C. § 441b(b)(2)(C), Advisory Opinions, 1981-54, 1981-56, 1982-63. See also, California Medical Association v. Federal Election Commission, 101 S. Ct. 2712, 2724 (1981).

Reports filed by AABAPAC in April 1993 disclose total payments of $42,110 from the M.R. Beal & Co. partnership to AABAPAC. The partnership contributed $31,800 in direct contributions and $5,000 in in-kind contributions in 1991, and $5,310 in in-kind contributions in 1992. M.R. Beal & Co. was the sole contributor disclosed in AABAPAC's reports and provided all funds for the establishment and administration costs of AABAPAC, as well as all funds contributed by AABAPAC to federal and non-federal elections. In response to RFAIs requesting a per-partner attribution of the receipts received from the M.R. Beal & Co. partnership, AABAPAC attributed all partnership contributions to the general partner, MRB Securities.

Counsel acknowledge that MRB Securities is a corporation. See Attachment 1 at 58. MRB Securities Corporation is incorporated in Delaware and has been authorized to do business in New York since 1988. MRB Securities is described by counsel as a minority owned securities firm with eighty percent held by Bernard B. Beal and twenty percent held by Thomas Monti. See Attachment 1 at 30. Because of the corporate status of MRB Securities Corporation, and because all partnership contributions are attributed to this corporate partner, this Office recommends the Commission find reason to believe that, pursuant to 11 C.F.R.

§ 110.1(e), MRB Securities Corporation partnership violated 2 U.S.C. § 441b(a) by making $42,110 in prohibited corporate contributions to AABAPAC, and that the M.R. Beal & Co. partnership additionally violated 2 U.S.C. § 441b(a) by making $42,110 in prohibited contributions from a corporate partner to AABAPAC.

Further, since Bernard B. Beal, the majority owner of MRB Securities Corporation is also listed as the chairman of AABAPAC in the Articles of Association filed with the Commission, and Alric B. Nembhard, the treasurer of the AABAPAC was, at the time of the activity, also employed as a consultant of the M.R. Beal & Co. partnership, it is likely that the AABAPAC knew that the contributions originated from MRB Securities Corporation. See Attachment 1 at 30 and Attachment 2 at 7. Thus, this Office further recommends that the Commission find reason to believe that AABAPAC and Alric B. Nembhard, as treasurer, violated 2 U.S.C. § 441b(a) by accepting the prohibited corporate contributions.[6]

C. **Prohibited Contributions from a Federal Contractor**

Pursuant to 2 U.S.C. § 441c(a)(1), it is unlawful for any person who enters into a contract with a department or agency of the United States to make any contribution of money or other thing of value to any political party, committee, or candidate for

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6. According to counsel, the treasurer of record of AABAPAC, Alric B. Nembhard left M.R. Beal & Co. on August 31, 1992. Counsel asserts that Mr. Nembhard had been charged with the operation of the PAC, and that it was not until his departure that a box filled with correspondence from the Commission was discovered notifying the AABAPAC of the failure to file the required disclosure reports and other violations of the Act. See Attachment 1 at 30. However, Mr. Nembhard remains the registered treasurer and reports filed as recently as February 5, 1995 still bear Mr. Nembhard's signature.

public office or to any person for any political purpose, if the contract is to be paid in whole or in part from funds appropriated by the Congress. The assets of a partnership which is a Federal contractor may not be used to make contributions or expenditures in connection with Federal elections. 11 C.F.R. § 115.4(a). It is also unlawful for any person to knowingly solicit funds from a federal contractor. 2 U.S.C. § 441c(a)(2).

Counsel for AABAPAC state that M.R. Beal & Co. maintains relationships with both the Resolution Trust Corporation ("RTC") and with the Federal Home Mortgage Association ("Fannie Mae"). See Attachment 1 at 31. Counsel states that the M.R. Beal & Co. partnership "is a co-manager or selling group member for certain bond transactions." Id. In Advisory Opinion 1990-20, the Commission found that a firm which contracts with the RTC may be a federal contractor because a portion of the RTC budget is comprised of U.S. Treasury funds appropriated by Congress. If M.R. Beal & Co. is compensated for its bond transactions out of RTC funds comprised of Congressional appropriations, or out of federally-appropriated Fannie Mae funds, then it is a federal contractor and would be prohibited from making contributions out of the general partnership funds. Given its business relationship with the Resolution Trust Corporation and with Fannie Mae, the M.R. Beal & Co. partnership appears to be a federal contractor. Because M.R. Beal & Co., a partnership which may be a federal contractor, made a total of $42,110 in contributions to a political committee, this Office recommends the Commission find reason to believe that M.R. Beal & Co.

violated 2 U.S.C. § 441c(a)(1).

Further, as discussed above, since the chairman of AABAPAC is also the majority owner of the general partner MRB Securities, and the treasurer of AABAPAC was also employed by the partnership, this Office also recommends the Commission find reason to believe that AABAPAC and Alric B. Nembhard, as treasurer, violated 2 U.S.C. § 441c(a)(2) by accepting $42,110 in contributions from a partnership that may be a federal contractor.

D. Late Filing

The Act requires that a political committee, other than a committee authorized by a candidate, file reports of receipts and disbursements on either a quarterly or monthly basis. 2 U.S.C. § 434(a)(4). Political committees choosing to file quarterly are required to file a report at the end of each calendar quarter in any year in which a regularly scheduled general election is held. Each report must be filed no later than 15 days after the end of the quarter, with the final quarterly report being filed no later than 30 days after the close of the quarter on December 31st. 2 U.S.C. § 434(a)(4)(A)(i). In addition to the filing of quarterly reports, the Act requires that political committees not authorized by a candidate file a post-election report no later than the 30th day after the general election. 2 U.S.C. § 434(a)(4)(A)(iii).

In calendar years in which no regularly scheduled general election is held, a political committee not authorized by a candidate is required to file reports on a semiannual basis at six month intervals. The first report covering activity between

January 1 and June 30 must be filed no later than July 31 of that year, and the second report, covering activity between July 1 and December 31, must be filed by January 31 of the following year. 2 U.S.C. § 434(a)(4)(A)(iv).

On March 5, 1991, AABAPAC registered as a political committee other than a committee authorized by a Federal candidate and opted to file quarterly. AABAPAC failed to file timely each of the seven (7) required disclosure reports for the 1991-1992 election cycle including the 1991 Mid-Year and Year-End Reports, the 1992 April Quarterly, July Quarterly, October Quarterly, 30 Day Post-General, and Year-End Reports. On April 1, 1993, AABAPAC filed two disclosure reports, one covering AABAPAC's activity between March 1 and December 31, 1991, and the other covering activity between January 1 and December 31, 1992. RFAIs were sent to AABAPAC and subsequently, on June 7, 1993, AABAPAC filed separate 1991 Mid-Year and Year-End Reports as well as 1992 April, July, October Quarterly Reports and a Year-End Report.

AABAPAC was required to file the 1991 Mid-Year Report no later than July 31, 1991, and the 1991 Year-End Report no later than January 31, 1992. AABAPAC eventually filed reports encompassing the 1991 Mid-Year and Year-End periods on April 1, 1993, which were respectively, 610 days late and 426 days late. The 1991 Mid-Year Report disclosed receipts totaling $20,200, and disbursements totaling $20,156, while the 1991 Year End Report disclosed receipts totaling $16,600 and disbursements totaling $12,600.

AABAPAC was required to file the 1992 April, July and

October Quarterly Reports no later than April 15, July 15, and October 15, 1992, respectively. AABAPAC did not file these reports until April 1, 1993. The 1992 April Quarterly Report was filed 351 days late disclosing zero ($0) receipts and $500 in disbursements; the 1992 July Quarterly Report was filed 260 days late, disclosing zero ($0) receipts and $1,500 in disbursements; and the 1992 October Quarterly Report was filed 168 days late, disclosing zero ($0) receipts and $400 in disbursements.

AABAPAC was required to file its 1992 30 Day Post-General Report no later than December 3, 1992. AABAPAC filed its 1992 30 Day Post-General Report 119 days late on April 1, 1993, disclosing $10,769 in receipts and $5,355 in disbursements.[7] Finally, AABAPAC was required to file its 1992 Year-End Report no later than January 31, 1993. AABAPAC filed its 1992 Year-End Report on April 1, 1993, 60 days late, disclosing zero ($0) receipts and zero ($0) disbursements.

Therefore, this Office recommends that the Commission find reason to believe that AABAPAC violated 2 U.S.C. §§ 434(a)(4)(A)(i), (iii) and (iv), by failing to file timely its 1991 Mid-Year and Year End Reports, and its 1992 April Quarterly, July Quarterly, October Quarterly, 30 Day Post-General and Year End Reports.

E. Conclusion

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7. AABAPAC filed a combined 1992 30 Day Post-General and Year End Report covering activity from October 1 through December 31, 1992. Consequently, this Office reviewed the report to determine the dates that the activity took place in order to ascertain the total receipts and disbursements for each of the reporting periods.

This Office recommends that the Commission find reason to believe the Respondents violated the Act as discussed above, but take no further action in this matter. This Office recommends this course of action in light of the limited amount of federal activity conducted by AABAPAC and because of the efforts made by AABAPAC to disclose and mitigate the problems with the operation of the Committee. AABAPAC was registered with the Commission for less than one full election cycle when the Committee began seeking administrative termination. During that time, AABAPAC made only two contributions to federal elections, a $5,000 contribution which was refunded in full, and a $500 contribution which AABAPAC attempted to have refunded. AABAPAC has been consistently forthcoming with the Commission since January 1993, disclosing both the corporate status of MRB Securities, and the relationship between the partnership and federal agencies. Additionally, AABAPAC filed all delinquent reports in April 1993, and has continued to file in a timely fashion since that time. For these reasons, this Office recommends that in the proper ordering of priorities and resources, Heckler v. Chaney, 470 U.S. 821 (1985), the Commission take no further action but include an admonishment in the appropriate notification letters.

III. RECOMMENDATIONS

1. Open a MUR.

2. Find reason to believe that African Americans for a Better America Political Action Committee and Alric B. Nembhard, as treasurer, violated 2 U.S.C. §§ 434(a), 441b(a), and 441c(a)(2), but take no further action with respect to the violations.

3. Find reason to believe that M.R. Beal & Company violated 2 U.S.C. §§ 441b(a) and 441c(a)(1), but take no further action with respect to the violations.

4. Find reason to believe that MRB Securities Corporation violated 2 U.S.C. §§ 441b(a), but take no further action with respect to the violation.

5. Close the file.

Lawrence M. Noble
General Counsel

3/29/96
Date

BY:
Lois G. Lerner
Associate General Counsel

Attachments:
1. Referral Materials
2. Articles of Association

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of African Americans for a Better America PAC and Alric B. Nembhard, as treasurer; M.R. Beal & Company; MRB Securities Corporation	)))))))	RAD Referral/MUR 4202 #93L-55

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on April 18, 1995, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions with respect to RAD Referral #93L-55:

1. Open a MUR.

2. Find reason to believe that African Americans for a Better America Political Action Committee and Alric B. Nembhard, as treasurer, violated 2 U.S.C. §§ 434(a), 441b(a), and 441c(a)(2), but take no further action with respect to the violations.

3. Find reason to believe that M.R. Beal & Company violated 2 U.S.C. §§ 441b(a) and 441c(a)(1), but take no further action with respect to the violations.

(continued)

4. Find reason to believe that MRB Securities Corporation violated 2 U.S.C. § 441b(a), but take no further action with respect to the violation.

5. Close the file.

Commissioners Aikens, Elliott, McDonald, McGarry, and Potter voted affirmatively for the decision. Commissioner Thomas recused himself with respect to this matter and was not present during its consideration.

Attest:

4-20-95
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 24, 1995

Robert Plotkin, Esq.
Paul, Hastings, Janofsky & Walker
1050 Connecticut Ave. N.W.
Washington, D.C. 20036

RE: MUR 4202
African Americans for a
Better America PAC

Dear Mr. Plotkin:

On April 18, 1995, the Federal Election Commission found reason to believe that your clients, African Americans for a Better America PAC and Alric B. Nembhard, as treasurer, violated 2 U.S.C. §§ 434(a), 441b(a) and 441c(a)(2), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act.")

The Commission also found reason to believe that your client M.R. Beal & Co. violated 2 U.S.C. §§ 441b(a) and 441c(a)(1), and that your client MRB Securities violated 2 U.S.C. § 441b(a).

However, after considering the circumstances of this matter, the Commission determined to take no further action in this matter and closed its file. The General Counsel's Report which formed a basis for the Commission's finding, is attached for your information. After certification of the Commission's vote, your clients, the African Americans for a Better America PAC and Alric B. Nembhard, as treasurer, may seek termination of the committee.

The Commission reminds you that the making of contributions by a corporation or by a federal contractor is a violation of the Act, as is the acceptance of such contributions, and the failure to file required disclosure reports. Your clients should take steps to ensure that this activity does not occur in the future.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact Elizabeth Stein, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Danny L. McDonald

Danny L. McDonald
Chairman

Enclosure
General Counsel's Report

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4202

DATE FILMED 5-3-95 CAMERA NO. 4

CAMERANAN S.E.G