



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4270

DATE FILMED 11-18-96 CAMERA NO. 7

CAMERAMAN JMN

96043764762

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: August 11, 1994

ANALYST: ANDREW DODSON

I. COMMITTEE: United Conservatives of America
(C00230565)
Robert G. Mills, Treasurer*
(9/23/92 to Present)
768 Walker Road, Suite 290
Great Falls, VA 22066

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

III. BACKGROUND:

Failure to Timely File the 1993 Mid-Year Report

The United Conservatives of America ("the Committee"), failed to timely file the 1993 Mid-Year Report. On July 5, 1993, the Committee was notified that the 1993 Mid-Year Report was due on July 31, 1993 (Attachment 2). On August 26, 1993, a Non-Filer Notice was sent to the Committee for failure to file the 1993 Mid-Year Report (Attachment 3).

On six (6) occasions, October 4, 5 and 6 of 1993 and on February 7, 8 and 9 of 1994 the Reports Analysis Division ("RAD") analyst called but was unable to reach Robert G. Mills, treasurer of the Committee.

On February 23, 1994 the Committee filed the 1993 Mid-Year Report (Attachment 4).

*Mr. Mills signed the 1994 April and July Quarterly Reports as Acting Treasurer.

96043764763

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

DATE 9AUG94

Attachment #1
Page 1 of 1

PAGE 3

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
UNITED CONSERVATIVES OF AMERICA				ID #C00230565	NON-PARTY QUALIFIED	
CONNECTED ORGANIZATION:	NONE					
1993	MID-YEAR REPORT	39,360	41,632	1JAN93 - 30JUN93	17	94FEC/885/3474
	NOTICE OF FAILURE TO FILE			1JAN93 - 30JUN93	1	93FEC/858/5403
	YEAR-END	1,250	1,490	1JUL93 - 31DEC93	13	94FEC/885/3461
1994	MISCELLANEOUS NOTICE FROM FEC			20MAY94	2	94FEC/900/0068
	APRIL QUARTERLY	0	0	1JAN94 - 31MAR94	13	94FEC/892/1209
	JULY QUARTERLY	0	0	1APR94 - 30JUN94	13	94FEC/907/3046
	TOTAL	40,610	43,122		59	TOTAL PAGES

All Reports Have Been Reviewed.

Ending Cash-On-Hand as of 06/30/94: \$42

Debts and Obligations Owed To/By the Committee as of 06/30/94: \$585,800

96043764

SEMI-ANNUAL

Attachment #2

Page 1 of 1

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

July 5, 1993

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Mid-Year	01/01/93 - 06/30/93	07/31/93	07/31/93

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.

INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with a special 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 semiannual to monthly) must notify the Commission in writing when filing a 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

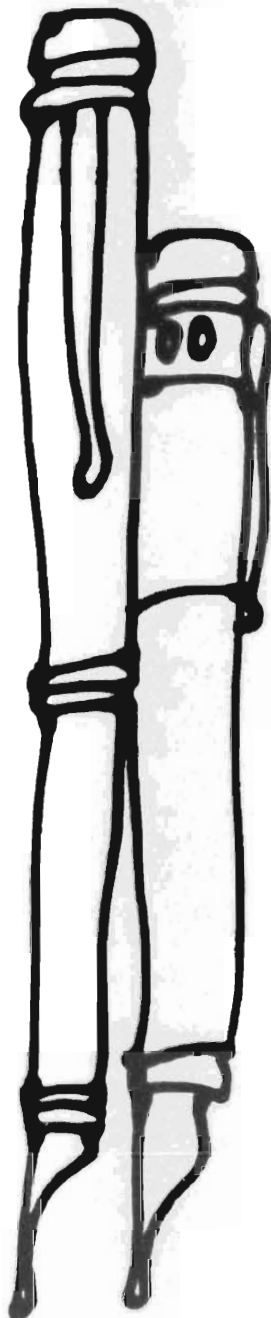
TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

*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

96043764755





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

Attachment #3
Page 1 of 1

RQ-7

August 26, 1993

Robert G. Mills, Treasurer
United Conservatives of America
768 Walker Road, Suite 290
Great Falls, VA 22066

Identification Number: C00230565

Reference: Mid-Year Report (1/1/93-6/30/93)

Dear Mr. Mills:

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. 4372(a) for failing to file the referenced Report of Receipts and Disbursements. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20543 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§100.2, 100.3, 100.4).

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

If you have any questions, please contact Andrew Dodson on our toll-free number (800) 424-9530. Our local number is (202) 219-3500.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

96043764743

REPORT OF RECEIPTS AND DISBURSEMENTS

DUPLICATE

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
REPORTS

1 COPY

USE FOR OTHER LAWS
FEDERAL ELECTION CAMPAIGN ACT

1. NAME OF COMMITTEE UNITED STATES DEPUTY ATTORNEYS GENERAL OF AMERICA		2. DATE FEB 23 PM 3:25
3. ADDRESS (Number, Street, City, State and Zip) ☐ Check if different than previously reported 268 VALLEY ROAD, SUITE 290 GREAT FALLS, VA 22066		4. IDENTIFICATION NUMBER C 00230565
5. CITY, STATE AND ZIP GREAT FALLS, VA 22066		6. ☐ This committee qualified as a multicandidate committee during this Reporting Period on (date)

4. TYPE OF REPORT

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

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 _____ in the State of _____

Attachment #4
Page 1 of 2

(b) Is this Report Amendment? YES NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	1-93 through 6-31-93		
6. (a) Cash on Hand	July 1, 1993		\$ 2,554.36
(b) Cash on Hand	Beginning of Reporting Period	\$ 2,554.36	
(c) Total Receipts	(Line 19)	\$ 39,360.50	\$ 39,360.50
(d) Subtotal (add Lines (a) & (c))	(Line 6(b) and (c) for Column A and (c) for Column B)	\$ 41,914.86	\$ 41,914.86
7. Total Disbursements	(Line 30)	\$ 41,632.78	\$ 41,632.78
8. Cash on Hand at End of Reporting Period	(subtract Line 7 from Line 6(d))	\$ 282.08	\$ 282.08
9. Debts and Obligations (Reported on Schedule C and/or Schedule D)		\$ 65	
10. Debts and Obligations (Reported on Schedule C and/or Schedule D)		\$ 585,800.76	

For further information contact:
Federal Election Commission
900 E Street, NW
Washington, DC 20540
Toll Free 800-424-9530
(Local) 202-376-7400

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

Type or Print Name of Officer: **Robert Mills**

Signature of Treasurer: **Robert S. Mills**

Date: **7-10-93**

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

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24038353474

96043764758

9403853490

The Commission on the Structure and Organization of the House of Representatives
has received the following information:

☒ First Class Mail	DATE OF RECEIPT
☐ Registered/Certified Mail	POSTMARKED
☐ No Postmark	
☐ Postmark legible	
☐ Received from the House Office of Records and Registration	DATE OF RECEIPT
☐ Received from the Senate Office of Public Records	DATE OF RECEIPT
☐ Other (Specify):	POSTMARKED
	DATE OF RECEIPT
<u>J.M.H.</u> PREPARED	<u>2-28-91</u> DATE PREPARED

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: April 21, 1995

ANALYST: Andrew Dodson

- I. COMMITTEE: United Conservatives of America
(C00230565)
Robert G. Mills, Treasurer
768 Walker Road, Suite 290
Great Falls, Va 22066
- II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(i),(iii) and (iv)
11 CFR §104.5(c)(1)(i), (iii) and (2)(i)

III. BACKGROUND:

Failure to File Reports and Chronic Late Filing of Reports

The United Conservatives of America ("the Committee") has failed to file five (5) Reports of Receipts and Disbursements in a timely manner for the 1993-1994 election cycle (see Late Filing History Chart). The reports were filed between twenty three (23) and two hundred and seven (207) calendar days late. In addition the Committee has failed to file the 1994 October Quarterly, 30 Day Post General and Year End Reports.

A Chronic Late Filer Notice was sent to the Committee on May 20, 1994 for failing to file the 1993 Mid Year and 1993 Year End Reports in a timely manner (Attachment 7). The Notice advised the Committee that any additional late filing of reports may result in legal enforcement action.

Subsequent to the sending of the Chronic Late Filing Notice, the Committee failed to file the 1994 October Quarterly, 30 Day Post General and Year End Reports.

Prior Notices were sent on September 21 and October 3, 1994 notifying the Committee that the October Quarterly and 30 Day-Post General Reports were due on October 15, 1994 and December 8, 1994, respectively (Attachments 8 and 9).

96043764739

UNITED CONSERVATIVES OF AMERICA
REPORTS ANALYSIS AUDIT REFERRAL
PAGE 2

On November 4, 1994 a Non-Filer Notice was sent to the Committee for failure to file the October Quarterly Report (Attachment 10).

Prior Notice was sent on December 28, 1994 reminding the Committee of the January 31, 1995 filing deadline for the Year-End Report (Attachment 11).

Non-Filer Notices were sent on January 4 and February 17, 1995 for failure to file the 30 Day Post-General and Year End Reports (Attachments 12 and 13).

On numerous occasions during the election cycle, the Reports Analysis Division ("RAD") analyst attempted unsuccessfully to contact the Committee and discuss the late filing and non-filing of reports (Attachment 14).

As of this date the Committee has failed to file the 1994 October, 30 Day Post General and Year End Reports.

9604376477C

LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1993 Mid Year (1/1/93-6/30/93)	7/5/93 (Attachment 2)	7/31/93	8/26/93 (Attachment 3)	2/23/93 (Attachment 5)
1993 Year End (7/31/94-12/31/94)	12/27/93 (Attachment 4)	1/31/94	N/A	2/23/94 (Attachment 6)
1994 October Quarterly (7/1/94-9/30/94)	9/21/94 (Attachment 8)	10/15/94	11/4/94 (Attachment 10)	Not Filed
1994 30 Day Post General (10/1/94-11/28/94)	10/3/94 (Attachment 9)	12/8/94	1/4/95 (Attachment 12)	Not Filed
1994 Year End (11/29/94-12/31/94)	12/26/94 (Attachment 11)	1/31/95	2/17/95 (Attachment 13)	Not Filed

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
UNITED CONSERVATIVES OF AMERICA				ID #C00230565	NON-PARTY QUALIFIED	
CONNECTED ORGANIZATION:	NONE					
1993	MID-YEAR REPORT	39,360	41,632	1JAN93 -30JUN93	17	94FEC/885/3474
	NOTICE OF FAILURE TO FILE			1JAN93 -30JUN93	1	93FEC/858/5403
	YEAR-END	1,250	1,490	1JUL93 -31DEC93	13	94FEC/885/3461
1994	MISCELLANEOUS NOTICE FROM FEC			20MAY94	2	94FEC/900/0068
	APRIL QUARTERLY	0	0	1JAN94 -31MAR94	13	94FEC/892/1209
	JULY QUARTERLY	0	0	1APR94 -30JUN94	13	94FEC/907/3046
	NOTICE OF FAILURE TO FILE			1JUL94 -30SEP94	2	94FEC/943/0825
	NOTICE OF FAILURE TO FILE			1OCT94 -28NOV94	2	95FEC/955/0673
	NOTICE OF FAILURE TO FILE			29NOV94 -31DEC94	2	95FEC/966/3710
	TOTAL	40,610	0	43,122	0	65 TOTAL PAGES

ALL REPORTS HAVE BEEN REVIEWED.

ENDING CASH-ON-HAND AS OF 6/30/94: \$42.58

OUTSTANDING DEBTS AND OBLIGATIONS: \$585,800.76

96043764772

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

July 5, 1993

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Mid-Year	01/01/93 - 06/30/93	07/31/93	07/31/93

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.

INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with a special 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 semiannual to monthly) must notify the Commission in writing when filing a 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

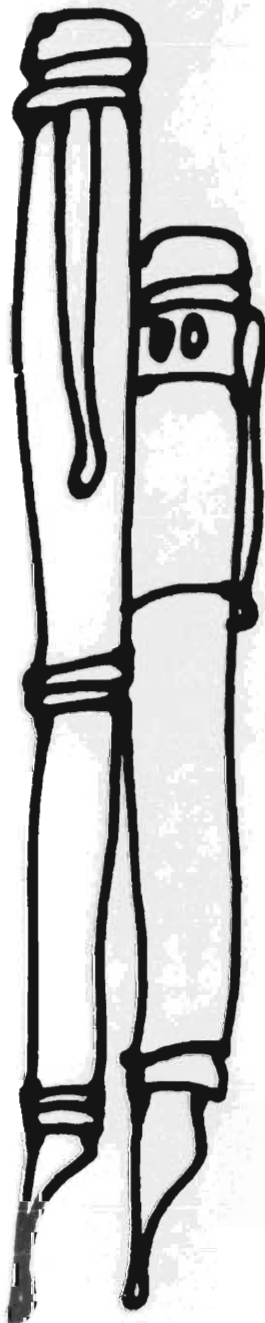
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*The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

**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

96043764773





FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20541

RQ-7

August 26, 1993

Robert G. Mills, Treasurer
United Conservatives of America
768 Walker Road, Suite 290
Great Falls, VA 22066

Identification Number: C00230565

Reference: Mid-Year Report (1/1/93-6/30/93)

Dear Mr. Mills:

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

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§108.2, 108.3, 108.4).

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

If you have any questions, please contact Andrew Dodson on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

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

John D. Gibson
Assistant Staff Director
Reports Analysis Division

95043764774
3338585403

ATTACHMENT 4
PAGE 1 of 2

YEAR-END REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 27, 1993

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) must file a Year-End Report on January 31, 1994.

REPORT CONTENT AND DATES

I. Semiannual Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	07/01/93 - 12/31/93	01/31/94	01/31/94

Semiannual filers must disclose financial activity that occurred from July 1 through December 31, 1993, on their Year-End Report.

II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	12/01/93 - 12/31/93	01/31/94	01/31/94

Monthly filers must disclose financial activity from December 1 through December 31, 1993, on their Year-End Report.

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.

LABEL

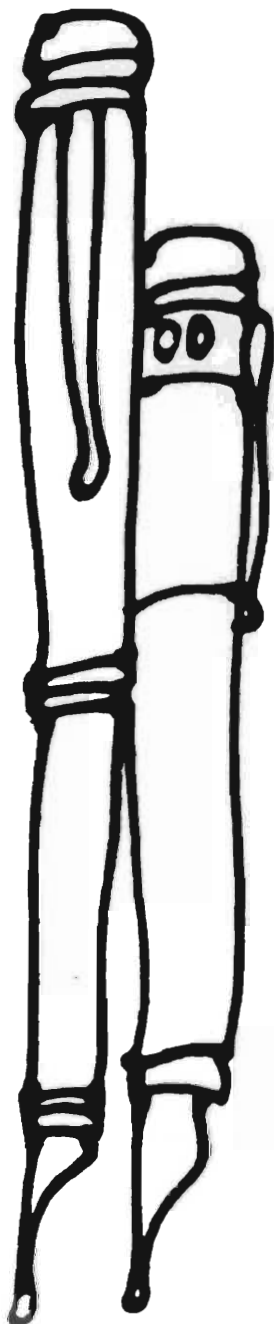
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(over)

9604376475



PARTIES AND PACS

YEAR-END

1994 FILING SCHEDULE

I. Quarterly Filers

REPORT	PERIOD COVERED*	REG./CERT. MAILING DATE**	FILING DATE
April	01/01/94 - 03/31/94	04/15/94	04/15/94
July	04/01/94 - 06/30/94	07/15/94	07/15/94
October	07/01/94 - 09/30/94	10/15/94	10/15/94
Pre-General	10/01/94 - 10/19/94	10/24/94	10/27/94
Post-General	10/20/94 - 11/28/94	12/08/94	12/08/94
Year-End	11/29/94 - 12/31/94	01/31/95	01/31/95

II. Monthly Filers

REPORT	PERIOD COVERED*	REG./CERT. MAILING DATE**	FILING DATE
February	01/01/94 - 01/31/94	02/20/94	02/20/94
March	02/01/94 - 02/28/94	03/20/94	03/20/94
April	03/01/94 - 03/31/94	04/20/94	04/20/94
May	04/01/94 - 04/30/94	05/20/94	05/20/94
June	05/01/94 - 05/31/94	06/20/94	06/20/94
July	06/01/94 - 06/30/94	07/20/94	07/20/94
August	07/01/94 - 07/31/94	08/20/94	08/20/94
September	08/01/94 - 08/31/94	09/20/94	09/20/94
October	09/01/94 - 09/30/94	10/20/94	10/20/94
Pre-General	10/01/94 - 10/19/94	10/24/94	10/27/94
Post-General	10/20/94 - 11/28/94	12/08/94	12/08/94
Year-End	11/29/94 - 12/31/94	01/31/95	01/31/95

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

96043764776

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

Summary Form

ATTACHMENT 5
1993 MID-YEAR REPORT

USE PRE-PAID LABEL
ON
THIS REPORT

NAME OF COMMITTEE (F-1A)		FEB 23 PM 3:25	
UNITED CONSERVATIVES OF AMERICA		FEC IDENTIFICATION NUMBER	
ADDRESS (number and street) Check if different from previous report		C 00230865	
768 WALKER ROAD, SUITE 200		☐ This committee collects and transmits contributions pursuant to the Federal Election Campaign Act	
CITY, STATE AND ZIP CODE			
GREAT FALLS, VA 22066			

4. TYPE OF REPORT

(a) April 15 Quarterly Report

July 15 Quarterly Report

October 15 Quarterly Report

January 31 Year-End Report

☒ July 31 Mid-Year Report (Non-election Year Only)

Termination Report

Monthly Report Due On

☐ February 20	☐ June 20	☐ October 20
☐ March 20	☐ July 20	☐ November 20
☐ April 20	☐ August 20	☐ December 20
☐ May 20	☐ September 20	☐ January 21

☐ Twelfth day report preceding _____ (Type of Election)

election or _____ in the State of _____

☐ Thirtieth day report following the General Election on _____

in the State of _____

(c) Is this Report an Amendment? YES NO

SUMMARY

	COVERING PERIOD	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period 1-1-93 through 6-31-93		
6	(a) Cash on Hand January 1, 1993		\$ 2,554.36
	(b) Cash on Hand at Beginning of Reporting Period	\$ 2,554.36	
	(c) Total Receipts (from Line 18)	\$ 39,360.50	\$ 39,360.50
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(b) and 6(c) for Column B)	\$ 41,914.86	\$ 41,914.86
	Total Disbursements (from Line 30)	\$ 41,632.78	\$ 41,632.78
7	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 282.08	\$ 282.08
9	Debits and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0	
10	Debits and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 585,800.76	

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

Robert Mills

Signature of Treasurer

Robert S. Mills

Date

7-10-93

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

FEC FORM 3X

(Rev. 10/91)

2438153414

REPORT OF RECEIPTS AND DISBURSEMENTS

(Other Than An Authorized Committee Summary Page)

ATTACHMENT 6
1993 YEAR-END REPORT

94 FEB 23 PM 3:25

USE REC MAILING LABEL ON TYPE OR PRINT

1. NAME OF COMMITTEE (or Filer):
UNITED CONSERVATIVES OF AMERICA

ADDRESS (number and street) (Check if different from previously reported):
768 WALKER ROAD, SUITE 290

CITY, STATE and ZIP CODE:
GREAT FALLS, VA. 22066

2. FEC IDENTIFICATION NUMBER:
C00230565

3. ☐ The committee qualified as a "ballot-qualified" committee under the Reporting Period of _____

4. TYPE OF REPORT

- 1a. April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- ☒ January 1 Year-End Report
- July 1 Mid-Year Report (for a "Year-Only" Year-Only)
- Termination Report

Monthly Report Due On:

February 20	June 20	October 20
March 20	July 20	November 20
April 20	August 20	December 20
May 20	September 20	January 31

1b. ☐ Day report preceding _____ (Type of Session)

1c. ☐ Day report following the General Election of _____ in the State of _____

1d. Is this Report an Amendment? YES NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covered Period: 7-1-93 through 12-31-93		
6a. Cash on Hand January 1, 1993		\$ 2,554.36
6b. Cash on Hand at Beginning of Reporting Period	\$ 282.08	
6c. Total Receipts (from Line 1b)	\$ 1,250.50	\$ 40,611.00
6d. Subtotal (add Lines 6b, and 6c for Column A and Lines 6a, and 6c for Column B)	\$ 1,532.58	\$ 43,165.36
7. Total Disbursements (from Line 2b)	\$ 1,490.00	\$ 43,122.38
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 42.58	\$ 42.58
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 585,800.76	

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

Type or Print Name of Treasurer: **James H. Ellis**

Signature of Treasurer: *[Signature]*

For further information contact:
Federal Election Commission
950 E Street NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3127

Date: **1-20-94**

NOTE: It is unlawful to knowingly furnish false or incomplete information may (subject the person signing this Report to the penalties of 2 U.S.C. §437g)

FEC FORM 31
Rev. 5-80 A-17

96043764778
24038353451



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20543

HE-1

Robert S. Mills, Treasurer
 United Conservatives of America
 768 Walker Road, Suite 290
 Great Falls, VA 22066

MAY 20 1994

Identification Number: C00230565

Reference: 1993-1994 Election Cycle Reports

Dear Mr. Mills:

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

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year (1/1/93-6/30/93)	7/31/93	2/23/94
Year End (7/1/93-12/31/93)	1/31/94	2/23/94

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

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Andrew Dodson on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

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

9-6-93 4-3-76-477950

QUARTERLY REPORT NOTICE

ATTACHMENT 8
PAGE 1 of 2

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 21, 1994

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
October Quarterly	07 01 94 - 09/30/94	10/15/94	10/15/94

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 previously reported. See the January 1994 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 day.

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.

*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

9604376479C

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.

96043764791

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

REPORT NOTICE

ATTACHMENT 9
PAGE 1 of 2

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

October 3, 1994

I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/94 - 10/19/94	10/24/94	10/27/94
Post-General	10/20/94 - 11/28/94	12/08/94	12/08/94

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 19

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/94 - 10/19/94	10/24/94	10/27/94
Post-General	10/20/94 - 11/28/94	12/08/94	12/08/94

III. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 19***

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Post-General	10/01/94 - 11/28/94	12/08/94	12/08/94

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 previously report them must also follow the Chart II reporting requirements.

(over)

96043764792

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 20 and ending November 6 must report them within 24 hours.

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

96043764783



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-7

November 4, 1994

Robert G. Mills, Treasurer
United Conservatives of America
768 Walker Road, Suite 290
Great Falls, VA 22066

Identification Number: C00230565

Reference: October Quarterly Report (7/1/94-9/30/94)

Dear Mr. Mills:

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

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§108.2, 108.3, 108.4).

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

If you have any questions, please contact Andrew Dodson on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson", is written over a rectangular stamp area.

John D. Gibson
Assistant Staff Director
Reports Analysis Division

96043764794

REPORT NOTICE

ATTACHMENT 11
PAGE 1 of 2

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 28, 1994

QUARTERLY AND MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	11/29/94 - 12/31/94	01/31/95	01/31/95

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)

96043764795

1995 REPORTING SCHEDULE
PACs AND PARTIES*

I. SEMIANNUAL FILERS**

REPORT	PERIOD COVERED	REG./CERT. MAILING DATE***	FILING DATE
Mid-Year	01/01/95 - 06/30/95	07/31/95	07/31/95
Year-End	07/01/95 - 12/31/95	01/31/96	01/31/96

II. MONTHLY FILERS

REPORT	PERIOD COVERED	REG./CERT. MAILING DATE***	FILING DATE
February	01/01/95 - 01/31/95	02/20/95	02/20/95
March	02/01/95 - 02/28/95	03/20/95	03/20/95
April	03/01/95 - 03/31/95	04/20/95	04/20/95
May	04/01/95 - 04/30/95	05/20/95	05/20/95
June	05/01/95 - 05/31/95	06/20/95	06/20/95
July	06/01/95 - 06/30/95	07/20/95	07/20/95
August	07/01/95 - 07/31/95	08/20/95	08/20/95
September	08/01/95 - 08/31/95	09/20/95	09/20/95
October	09/01/95 - 09/30/95	10/20/95	10/20/95
November	10/01/95 - 10/31/95	11/20/95	11/20/95
December	11/01/95 - 11/30/95	12/20/95	12/20/95
Year-End	12/01/95 - 12/31/95	01/31/96	01/31/96

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

**Committees that filed quarterly reports in 1994 are only required to file semiannually in 1995.

***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

96043764796



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

ATTACHMENT 12

RQ-7

January 4, 1995

Robert G. Mills, Treasurer
United Conservatives of America
768 Walker Road Suite 290
Great Falls, VA 22066

Identification Number: C00230565

Reference: 30 Day Post-General Report (10/1/94-11/28/94)

Dear Mr. Mills:

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

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer. 11 CFR §§108.2, 108.3, 108.4

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

If you have any questions, please contact Andrew J. Dodson 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

96043764787



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-7

February 17, 1995

Robert G. Mills, Treasurer
United Conservatives of America
768 Walker Road, Suite 290
Great Falls, VA 22066

Identification Number: C00230565

Reference: Year End Report (11/29/94-12/31/94)

Dear Mr. Mills:

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

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§108.2, 108.3, 108.4).

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

If you have any questions, please contact Andrew Dodson on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

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

John D. Gibson
Assistant Staff Director
Reports Analysis Division

96043764798

TELECON

ANALYST: Andrew Dodson
CONVERSATION WITH: Robert G. Mills
COMMITTEE: United Conservatives of America
DATE(S): September 13, 1993, November 29, 1994,
December 2, 1994, December 5, 1994,
January 25, 1995, March 3, 1995
SUBJECT: Failure to timely file the 1993 Mid Year,
1994 October Quarterly, 30 Day Post General
and Year End reports

9 6 0 4 3 7 6 4 7 8 9
On September 13, 1993 the Reports Analysis Division ("RAD") analyst attempted to contact the Committee treasurer, Mr Robert G. Mills, to discuss the Committee's failure to file the 1993 Mid Year Report. Analyst research disclosed that Mr Robert G. Mills became the treasurer of the United Conservatives of America on September 30, 1992. In addition, on January 13, 1993 the Committee changed its address to 766 Walker Road, Suite 290 Great Falls, Va 22066. Committee filings with the Commission failed to disclose a current phone number for the Committee or treasurer. Further analyst research disclosed an address and phone number for a Robert G. Mills in Great Falls VA. The RAD analyst made numerous phone calls on the dates listed above in order to discuss the Committee's failure to failure to timely file the 1993 Mid Year, 1994 October Quarterly, 1994 30 Day Post General and 1994 Year End Reports. All attempts to reach Robert G. Mills were unsuccessful.

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

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

SEP 23 4 21 PM '95

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD Referral: 94NF-05, 95NF-11
Date Activated: August 29, 1995
Staff Member: Lawrence L. Calvert Jr.

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

RESPONDENTS: United Conservatives of America and Robert G. Mills,
as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(i)
2 U.S.C. § 434(a)(4)(A)(iii)
2 U.S.C. § 434(a)(4)(A)(iv)
11 C.F.R. § 104.5(c)(1)(i)
11 C.F.R. § 104.5(c)(1)(iii)
11 C.F.R. § 104.5(c)(2)(i)

INTERNAL REPORTS CHECKED: Disclosure reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This matter was generated by two referrals from the Reports Analysis Division ("RAD"). On August 11, 1994, RAD referred United Conservatives of America and Robert G. Mills, as treasurer ("UCA"), to this Office based on UCA's filing the 1993 Mid-Year Report 207 days after the due date. Attachment 1. On April 21, 1995, RAD referred UCA to this Office for failure to file reports and for chronic late filing of reports. Attachment 2. The second referral was based not only on late filing of the 1993 Mid-Year Report, as detailed in the first referral, but additionally on late filing of the 1993 Year-End report and failure to file the 1994 October Quarterly Report, the 1994 30-day Post-General Report, or the 1994 Year End Report.

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II. FACTUAL AND LEGAL ANALYSIS

Based on the Factual and Legal Analysis, see Attachment 3, this Office recommends the Commission find reason to believe the respondents violated 2 U.S.C. § 434(a).

The Commission should be advised of certain additional facts about UCA.

Second, Mills signed the two most recent reports filed by UCA, the 1994 April Quarterly and the 1994 July Quarterly, as "Acting Treasurer." Third, as described in the referral materials, all of RAD's attempts to contact Mills prior to these referrals were unsuccessful. Attachment 1 at 2; Attachment 2 at 23. Finally, although not the subject of the RAD referrals on this report, UCA has not as of this writing filed its 1995 Mid Year Report, which was due July 31, 1995.

96043764791

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

This Office also recommends that the Commission offer to enter into conciliation with the respondents prior to a finding of probable cause to believe. Attached for the Commission's approval is a proposed conciliation agreement

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IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe United Conservatives of America and Robert G. Mills, as treasurer, violated 2 U.S.C. § 434(a), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached Factual and Legal Analysis and conciliation agreement, and the appropriate letter.

Lawrence M. Noble
General Counsel

Date

9/26/95

BY:


Lois G. Verner
Associate General Counsel

Attachments:

1. Referral Materials, 94NF-05
2. Referral Materials, 95NF-11
3. Factual and Legal Analysis
4. Proposed agreement

96043764794

Calvert

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

United Conservatives of America and
Robert G. Mills, as treasurer.

)
) RAD Referrals
) #94NF-05 and
) #95NF-11

MUR 4270

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 2, 1995, the Commission decided by a vote of 6-0 to take the following actions in RAD Referrals #94NF-05 and #95NF-11:

1. Open a MUR.
2. Find reason to believe United Conservatives of America and Robert G. Mills, as treasurer, violated 2 U.S.C. § 434(a), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the Factual and Legal Analysis and conciliation agreement, and the appropriate letter, as recommended in the General Counsel's Report dated September 26, 1995.

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

Attest:

10-3-95
Date

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

Received in the Secretariat: Tues., Sept. 26, 1995 4:21 p.m.
Circulated to the Commission: Wed., Sept. 27, 1995 11:00 a.m.
Deadline for vote: Mon., Oct. 02, 1995 4:00 p.m.

bjr

96043764795



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 18, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert G. Mills, Treasurer
United Conservatives of America
768 Walker Road, Suite 290
Great Falls, Virginia 22066

RE: MUR 4270
United Conservatives of America
and Robert G. Mills, as treasurer

Dear Mr. Mills:

On October 2, 1995, the Federal Election Commission found that there is reason to believe United Conservatives of America (the "Committee") and you, as treasurer, violated 2 U.S.C. § 434(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath. In the absence of additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

96043764796

Robert G. Mills, Treasurer
MUR 4270
Page Two

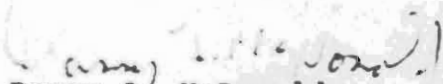
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Lawrence L. Calvert Jr., the attorney assigned to this matter, at (202) 219-3690.

Sincerely,


Danny L. McDonald
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

cc: Robert G. Mills
1008 Harriman Street
Great Falls, Virginia 22066

96043764707

**FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS**

MUR 4270

RESPONDENTS: United Conservatives of America
and Robert G. Mills, as treasurer

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2).

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The Federal Election Campaign Act of 1971, as amended ("the Act") requires each treasurer of a political committee to file reports of receipts and disbursements in accordance with the provisions of 2 U.S.C. § 434(a). 2 U.S.C. § 434(a)(1). Unauthorized committees filing quarterly shall file quarterly reports, in a calendar year in which a regularly scheduled general election is held, no later than the 15th day after the last day of each calendar quarter; except that the report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(i). Such committees shall also file a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election. 2 U.S.C. § 434(a)(4)(A)(iii). In a calendar year in which a regularly scheduled general election is not held, such committees shall file a report covering the period beginning January 1 and ending

June 30, which shall be filed no later than July 31, and a report covering the period beginning July 1 and ending December 31, which shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv).

The Respondents' 1993 Mid Year Report, which was required to be filed by July 31, 1993, was filed February 23, 1994. The Respondents' 1993 Year-End Report, which was required to be filed by January 31, 1994, was filed February 23, 1994. The Respondents failed to file the 1994 October Quarterly Report, which was required to be filed by October 15, 1994; the 1994 30 Day Post General Report, which was required to be filed by December 8, 1994; and the 1994 Year End Report, which was required to be filed by January 31, 1995.

Therefore, there is reason to believe that United Conservatives of America and Robert G. Mills, as treasurer, violated 2 U.S.C. § 434(a).

96043764709



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert G. Mills, Treasurer
United Conservatives of America
768 Walker Road, Suite 290
Great Falls, Virginia 22066

RE: MUR 4270
United Conservatives of America
and Robert G. Mills, as treasurer

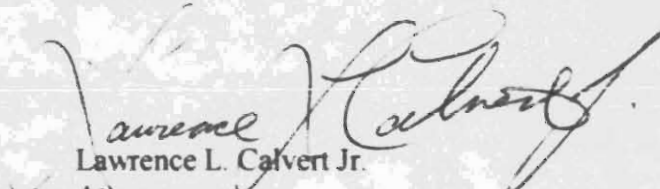
Dear Mr. Mills:

On October 18, 1995, you were notified that the Federal Election Commission determined to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. On that same date you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that conciliation negotiations entered into prior to a finding of probable cause to believe are limited to a maximum of 30 days. To date, you have not responded to the proposed agreement. The 30 day period for negotiations will soon expire. Unless we receive a response from you within five days, this Office will consider these negotiations terminated and will proceed to the next stage of the enforcement process.

Should you have any questions, please contact me at (202) 219-3690.

Sincerely,


Lawrence L. Calvert Jr.
Attorney

Celebrating the Commission's 20th Anniversary

YESTERDAY. TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

96043764800



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 8, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert G. Mills, Treasurer
United Conservatives of America
768 Walker Road, Suite 290
Great Falls, Virginia 22066

RE: MUR 4270
United Conservatives of America
and Robert G. Mills, as treasurer

Dear Mr. Mills:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on October 2, 1995, the Federal Election Commission found reason to believe that United Conservatives of America (the "Committee") and you, as treasurer, violated 2 U.S.C. § 434(a), and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that violations have occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

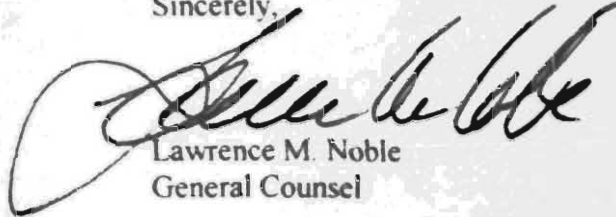
96043764801

Robert G. Mills, Treasurer
MUR 4270
Page 2

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Lawrence L. Calvert Jr., the attorney assigned to this matter, at (202) 219-3690.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

96043764802

BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of)

United Conservatives of America)
and Robert G. Mills, as treasurer)

MUR 4270

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). On October 2, 1995, the Commission found reason to believe that United Conservatives of America and Robert G. Mills, as treasurer, violated 2 U.S.C. § 434(a).

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act") requires each treasurer of a political committee to file reports of receipts and disbursements in accordance with the provisions of 2 U.S.C. § 434(a). 2 U.S.C. § 434(a)(1). Unauthorized committees filing quarterly shall file quarterly reports, in a calendar year in which a regularly scheduled general election is held, no later than the 15th day after the last day of each calendar quarter, except that the report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(i). Such committees

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shall also file a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election. 2 U.S.C. § 434(a)(4)(A)(iii). In a calendar year in which a regularly scheduled general election is not held, such committees shall file a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31, and a report covering the period beginning July 1 and ending December 31, which shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv).

The Respondents' 1993 Mid Year Report reflected receipts of \$39,360 and disbursements of \$41,632. The report, which was required to be filed by July 31, 1993, was filed February 23, 1994. The Respondents' 1993 Year-End Report reflected receipts of \$1,250 and disbursements of \$1,490. The report, which was required to be filed by January 31, 1994, was filed February 23, 1994. The Respondents failed to file the 1994 October Quarterly Report, which was required to be filed by October 15, 1994; the 1994 30 Day Post General Report, which was required to be filed by December 8, 1994; and the 1994 Year End Report, which was required to be filed by January 31, 1995.

Therefore, there is probable cause to believe that United Conservatives of America and Robert G. Mills, as treasurer, violated 2 U.S.C. § 434(a).

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that United Conservatives of America and Robert G. Mills, as treasurer, violated 2 U.S.C. § 434(a).

Date

12/2/95

Lawrence M. Noble
General Counsel

January 18, 1996

Federal Election Commission
Office of General Counsel
Mr. Lawrence L. Calvert Jr.
999 E. Street, NW
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUN 23 2 33 PM '96

Dear Mr. Calvert,

In response to our telephone conversation of last week I have found the certified letter sent to United Conservatives of America, (UCA) MUR 4270.

As stated over the telephone, due to the crushing debt and pressure from vendors as well as the inability to pre-pay printing and operating costs up front, the United Conservatives of America was forced to close its doors in mid 1993.

At that time I sent a letter informing the vendors and FEC of the unfortunate circumstances. I cannot locate the letter I sent to the FEC or the vendors since the computer I used to write the letter on was borrowed and that computer no longer exists. I do recall communicating to a Mr. Costa or De Costa at the Commission, other than that I have no further record of the communication.

Additionally, I also stated the I had resigned form the organization (UCA) in all capacities, i.e. President and Treasurer. Again, that letter cannot be found.

To that end, the organization was dissolved and the vendor who maintained the only asset, the organization's list of supporters, was not returned. I believe the list was kept by DirecTech for payment toward the past due bills. As such UCA has no assets, no bank accounts, no cash, no furniture or office equipment of any kind.

Since the activity of the organization has stopped, and having resigned in 1993, I was no longer under the assumption that any new filings where needed. I had come to understand that I had notified the Commission and that I was no longer under any obligation to continue to submit reports on a defunct PAC.

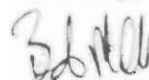
As for going back and re-filing, that can be done in a short period of time since there has been no activity in 1994 or 1995 as well as 1996.

With no list of supporters and no cash on hand there is no activity to report.

I would like to properly put this entire entity behind me and move on with my life. Currently I am looking for work again and can be reached at my home number (703) 759-7442.

Please advise as to what to do next. Thank you.

Sincerely,



Robert G. Mills

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

MAR 11 10 43 AM '96

In the Matter of

United Conservatives of America
and Robert G. Mills, as treasurer

MUR 4270

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter was generated by two referrals from the Reports Analysis Division ("RAD").

On October 2, 1995, the Commission found reason to believe that United Conservatives of America ("UCA") and Robert G. Mills, as treasurer (collectively, "Respondents"), violated 2 U.S.C. § 434(a) by failing to timely file the 1993 Mid Year and Year End Reports and by failing to file the 1994 October Quarterly, 30-Day Post General, and Year End Reports. The Commission also entered into conciliation with Respondents prior to a finding of probable cause to believe, and approved a proposed conciliation agreement and a factual and legal analysis.

Notification of the Commission's reason to believe finding was transmitted to Respondents, along with the factual and legal analysis and the proposed conciliation agreement, by certified letter dated October 18, 1995. The return receipt indicated that Respondents received the notification package on October 25, 1995. Attachment 1. Respondents did not respond to the reason to believe notification or the Commission's conciliation proposal.

By certified letter dated November 21, 1995, staff of this Office reminded Respondents that pre-probable cause conciliation negotiations are limited to 30 days, and advised Respondents that if they did not respond within five days this Office would consider the negotiations terminated and would proceed to the next stage of the enforcement process.

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Attachment 2. The return receipt indicated Respondents received this letter on November 27, 1995. Attachment 3. Respondents still did not respond.

By certified letter dated December 8, 1995, this Office transmitted to Respondents a General Counsel's Brief dated December 7, 1995. The letter accompanying the brief informed Respondents that they had 15 days from receipt of the notice to file with the Secretary of the Commission a brief stating their position on the factual and legal issues of the case. The return receipt indicated that Respondents received the letter and brief on December 15, 1995.

Attachment 4. Respondents filed no responsive brief. Accordingly, this Office circulated a report to the Commission, dated January 4, 1996, recommending that the Commission find probable cause to believe Respondents violated 2 U.S.C. § 434(a).

On January 16, 1996, while the report was before the Commission on tally vote circulation, staff of this Office communicated by telephone with treasurer Mills. Mills averred that some years ago, he had communicated his resignation as treasurer to the Commission and possibly to other persons associated with UCA. He also stated that he was unaware of the Commission's prior notifications to him in this matter.¹

A "criss-cross" directory for Northern Virginia indicated that UCA's address of record was a commercial mail receiving firm. Staff contacted this firm and asked if Mills was a customer. The person answering the telephone immediately recognized Mills's name and stated that Mills picked up mail at the facility at least once a week.

¹ On the same day, this Office submitted to the Commission a memorandum noting the confusion over whether Mills was in fact treasurer of the Committee and withdrawing the report dated January 4, 1996.

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Staff then contacted Mills again by telephone. Mills asserted that he had not personally signed for the Commission's notifications in this matter. He also said that because he was currently unemployed and was busy looking for work, he had been throwing mail in a box in hopes of reviewing it later. Staff briefly reiterated for Mills the substance and procedural history of this matter, and granted Mills one week to review the Commission's prior notifications and to provide a written submission concerning his status as treasurer and the status of the Committee, along with pertinent documentation.

Subsequently, this Office received a letter from Mills dated January 18, 1996. Attachment 5. In it, Mills asserted that UCA ceased operations in 1993 when it found itself with no assets and no cash on hand. Mills stated that he sent a letter to the Commission and to UCA's vendors informing them that UCA was going out of business, and that he was resigning as treasurer. However, he stated he could not locate any copy of that letter. He also wrote that he could file any missing reports in a short period of time because the committee had engaged in no activity since it ceased reporting, and that he "would like to properly put this entire entity behind me and move on with my life." He concluded by asking for advice as to what he should do next.

II. ANALYSIS

(General Counsel's Brief dated December 7, 1995 incorporated herein by reference.)

There is no dispute that Respondents failed to timely file the 1993 Mid Year or Year End reports, and there is no dispute that Respondents still have not filed any of the other reports that are the subjects of this matter. As noted, Mills's oral representations and his January 18 letter raise questions concerning his status as treasurer of UCA and UCA's current level of activity. We turn now to those questions.

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Commission records continue to list Mills as UCA's treasurer. As noted, Mills asserted both over the telephone and in his January 18 letter that he was no longer treasurer. However, he was unable to document this assertion. He also did not identify any successor. In the letter, Mills wrote that he remembered communicating with a "Mr. Costa or De Costa at the Commission [but] other than that I have no further record of the communication."

Attachment 5. Because UCA had previously been the subject of an audit pursuant to 2 U.S.C. § 438(b), staff of this Office asked Audit Division staff who had worked on the audit whether the Audit Division had any such communication on file; it did not.

In light of Mills's failure to acknowledge receiving the Commission's notifications in this matter, and because he was unable to document his claims that UCA was defunct and he was no longer its treasurer, staff attempted to independently verify Mills's representations regarding UCA's current status. As part of this effort, staff reviewed UCA's reports from 1991 to the present and the Final Audit Report on the Section 438(b) audit of UCA's activities in the 1989-90 election cycle. Staff also gathered information from other sources. The information gathered in this review indicates that UCA is no longer active in the political process.

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According to reports on the public record, UCA commenced operations in August, 1988. Its receipts peaked in the last half of 1989, when it received approximately \$1.13 million. By contrast, receipts for all of calendar 1990 dropped to approximately \$554,000, but rose again to \$426,672.72 for just the first six months of 1991. However, receipts tailed off thereafter, dropping to \$62,184.64 in the last half of 1992, \$39,360.50 in the first six months of 1993, and \$1,250.50 in the last six months of 1993. Mills filed the first two quarterly reports for 1994; these showed no activity. He then stopped filing.

Even when the committee's receipts were relatively high, much of its activity -- and virtually all of its activity from 1991 through 1993 -- was devoted to fundraising and operating expenses. For the 18 months between January 1, 1991 and June 30, 1992, UCA reported roughly \$825,000 in receipts and a similar amount of disbursements, but reported making only \$3,600 in combined state and Federal political contributions.

Additionally, in its last several reports, the committee appeared to be struggling not merely with large direct mail debts but with debts for ordinary overhead expenses, as well. For example, UCA's Schedule D reports indicate that in some reporting periods, it was unable to pay, or able to pay only a portion of, its copier bill. Moreover, the public record shows that a new treasurer, replacing Mills, was named in September 1992, only to resign and be replaced by Mills after a board meeting nine days later. This information indicates some disarray in UCA's operations.

Information from other sources also tends to support Mills's assertions about UCA's status. In his January 18, 1996 letter, Mills wrote that "the organization was dissolved and the vendor who maintained the only asset, the organization's list of supporters, was not returned

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[sic]." Attachment 5. This appears to mean that when UCA could not pay its debt to the vendor, identified by Mills as "DirecTech",³ the vendor retained possession of the list, and as a consequence UCA ceased operations.

Moreover, in the initial telephone conversation between Mills and staff regarding this matter, Mills represented that UCA had been incorporated, and that he took steps to dissolve it as a Virginia corporation when it became defunct. According to the Virginia State Corporations Commission, UCA lost its corporate charter in September, 1994.⁴

Finally, staff of this Office again contacted Mail Services 'N' More, the Great Falls, Virginia firm located at the address to which the Commission sent its communications to UCA regarding this matter. Lynn Satina, the co-owner of the business, stated that she was familiar with Mills, and that his mail box at the firm was registered in his own name, not that of UCA or any other organization. She also stated that Mills paid for the box by personal check or with cash, and never by credit card.

In summary, the information available at this time indicates that UCA no longer receives contributions or makes expenditures. Because, as noted, there is no dispute concerning Respondents' late filing and non-filing of reports, this Office recommends that the Commission find probable cause to believe that United Conservatives of America and Robert G. Mills, as treasurer, violated 2 U.S.C. § 434(a).

³ The vendor's name is actually spelled "direcTech"

⁴ However, in potential contrast to Mills's representation that he affirmatively acted to dissolve UCA, the State Corporations Commission reported that UCA lost its charter involuntarily in September 1994 -- more than a year after the time when Mills stated UCA ceased operations.

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IV. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

Even though UCA is no longer active in the political process, this Office recommends that the Commission initiate post-probable cause conciliation in this matter. Respondents' most recently filed report, the 1994 July Quarterly, showed more than \$585,000 in outstanding debts to 40 creditors.

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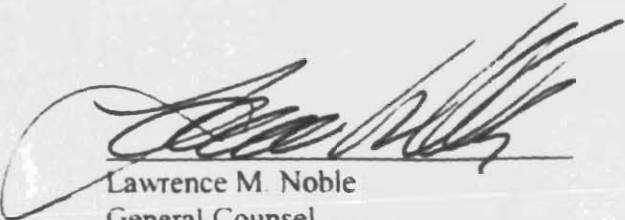
Accordingly, we recommend the Commission approve the attached proposed conciliation agreement with Mills and UCA. Attachment 7.

IV. RECOMMENDATIONS

- 1 Find probable cause to believe that United Conservatives of America and Robert G. Mills, as treasurer, violated 2 U.S.C. § 434(a).
- 2 Approve the attached conciliation agreement and appropriate letter

Date

3/8/96


Lawrence M. Noble
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/ BONNIE J. ROSS 
COMMISSION SECRETARY

DATE: MARCH 14, 1996

SUBJECT: MUR 4270 - GENERAL COUNSEL'S REPORT
DATED MARCH 8, 1996.

The above-captioned document was circulated to the Commission
on: Monday, March 11, 1996 at 4:00 p.m.

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

Commissioner Aikens	<u>XX</u>
Commissioner Elliott	<u> </u>
Commissioner McDonald	<u> </u>
Commissioner McGarry	<u> </u>
Commissioner Potter	<u> </u>
Commissioner Thomas	<u> </u>

This matter will be placed on the meeting agenda for:
Tuesday, March 19, 1996.

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

96043764814

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
United Conservatives of America) MUR 4270
and Robert G. Mills, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on March 19, 1996, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 4270:

1. Find probable cause to believe that United Conservatives of America and Robert G. Mills, as treasurer, violated 2 U.S.C. § 434(a).
2. Approve the conciliation agreement and appropriate letter as recommended in the General Counsel's March 8, 1996 report.

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

Attest:

3/19/96
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert G. Mills, Treasurer
United Conservatives of America
1008 Harriman Street
Great Falls, VA 22066

RE: MUR 4270
United Conservatives of America
and Robert G. Mills, as treasurer

Dear Mr. Mills:

On March 19, 1996, the Federal Election Commission found that there is probable cause to believe United Conservatives of America ("the Committee") and you, as treasurer, violated 2 U.S.C. § 434(a), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with the late filing and non-filing of certain disclosure reports.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make the check for the civil penalty payable to the Federal Election Commission.

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

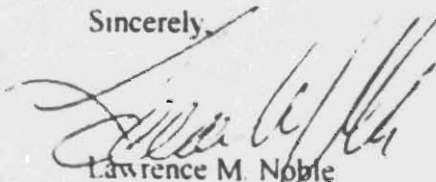
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Robert G. Mills
MUR 4270
Page 2

Please be aware that if you choose to file the Committee's missing reports and enter debt settlement

you will still be obligated to file periodic disclosure reports on behalf of the Committee, even though they might show no financial activity. Pursuant to 11 C.F.R. §§ 102.3, 102.4, 116.1(a), and 116.7

Sincerely,



Lawrence M. Noble
General Counsel

Enclosures
Conciliation Agreement
Excerpts from Campaign Guide

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 15, 1996

Mr. Robert G. Mills, Treasurer
United Conservatives of America
1008 Harriman Street
Great Falls, VA 22066

RE: MUR 4270

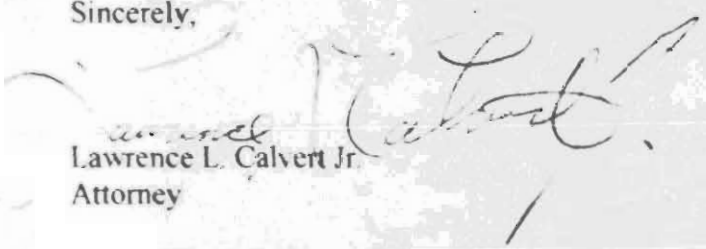
United Conservatives of America
and Robert G. Mills, as treasurer

Dear Mr. Mills:

This confirms our telephone conversations of Thursday, April 11, 1996 and Monday, April 15, 1996. You have received the Commission's probable cause notification dated March 27, 1996. Pursuant to that notification, you informed me that you have elected to file United Conservatives of America's ("the Committee's") outstanding disclosure reports, including the 1996 April Quarterly Report, and a debt settlement plan. You represented to me that you will file all of the Committee's outstanding reports not later than Monday, April 22, 1996. You and I also agreed that you will attempt to file a debt settlement plan by May 15, 1996, and that you will provide me with an update not later than Thursday, April 25, 1996, or ten days after our last conversation, on the progress you are making in locating and obtaining information from the Committee's creditors.

I look forward to hearing from you. In the meantime, please do not hesitate to contact me at (202) 219-3690 if you have any questions.

Sincerely,


Lawrence L. Calvert Jr.
Attorney

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

96043764818

June 6, 1996

JUN 14 3 22 PM '96

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

mur 4270

Dear Mr. Calvert,

Enclosed please find all of the current copies from the over 40 vendors I contacted regarding the status of the UCA debt. As you can see, a majority of them have not responded to date. I have sent a second letter, similar to the first, as well as a copy of the first, to those who have not responded.

I will follow up again as I receive additional vendor reply. As mentioned in May, I will follow up again by certified return receipt and by telephone should some of the vendors continue to ignore my letter(s).

Please advise should you think I need to follow a different approach.

Thanks again for the assistance.

Sincerely,

Robert G. Mills

Robert G. Mills

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June 1, 1996

ProTech, Inc.
7777 Leesburg Pike
Falls Church, VA 22043

Dear Sirs:

On April 24th I sent you a letter (copy enclosed) which referenced an outstanding debt incurred by a non-profit, United Conservatives of America, which has closed its doors due to financial problems.

As the first letter points out, UCA no longer exists, has no assets and is no longer registered as a corporation. The file was confiscated by one of the vendors over two years ago and the only item left is the status of the debt to your company.

Again I would like to respond to the Federal Election Commission regarding the status of that debt, has it been written off or due you still have it on your books?

Please respond by letter as to the status.

Thank you.

Sincerely,

Robert Mill
Registered Agent

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MAIL MANAGEMENT OF AMERICA, INC.

RT. 5 AT GREGORY DRIVE
LEONARDTOWN, MARYLAND 20650

May 6, 1996

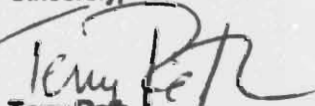
UCA
768 Walker Road Ste. 290
Great Falls, VA 22066

To Whom It May Concern:

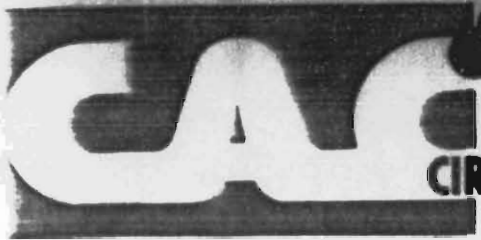
In response to your letter on April 24, 1996, concerning the outstanding balance of \$2000.00 due to Mail Management of America, we are also showing the same balance of \$2000.00. As of this date it has not been written off our records.

I would appreciate hearing from you as to when we can expect to receive payment.

Sincerely,



Terry Roth
President,
Mail Management of America, Inc.



CIRCULAR ADVERTISING CO. INC.

1500 S. MONROE STREET • BALTIMORE, MARYLAND 21230-1789

(410) 752-3869 • FAX (410) 752-0627

Distributors of: Circulars • Samples • Direct Mail • Premium Fulfillment

United Conservatives of America
768 Walker Road
Suite 290
Great Falls, VA 22066

May 22, 1996

Dear Mr. Regent,

The current amount due Circular Advertising by UCA is \$7,984.08. This amount has not been written off of our books. In order for us to write this account off we would need at minimum \$1,000.00. If this is not received our attorney will take whatever action is necessary to proceed in this case.

Sincerely,


Robert Campitelli
Accounting Manager

96043764802



K & K Enterprises, Inc.

P.O. BOX 4000 • 4000 GRAVES MILL ROAD • LYNCHBURG, VA 24502

TELEPHONE: (804) 237-4000 • FAX: (804) 832-1146

May 1, 1996

Mr. Robert G. Mills
Registered Agent
UCA
768 Walker Road, Suite 290
Great Falls, VA 22066

Dear Mr. Mills:

In reference to your letter dated April 24, 1996, we have not written off the balance.
The current balance is \$10,230.39.

We are willing to accept a copy of UCA's mailing list as payment in full.

Please feel free to contact the undersigned at your convenience.

Sincerely,

K&K ENTERPRISES, INC.


Sam K. Pate
President

SKP:aro

96043764823

CAPITAL MAILING SERVICES, INC.

1133 TAFT STREET
ROCKVILLE, MARYLAND 20850
(301) 838-0877
FAX: (301) 838-0876

May 3, 1996

Mr. Robert G Mills
UCA
768 Walker Road, Suite 290
Great Falls, VA 22066

Dear Mr. Mills:

I am in receipt of your letter dated 4/24/96, we have, unfortunately, written off the \$2,032.07.

Sincerely,



Julian H Kasten
President

960437664804

EU SERVICES

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DIRECT MAIL PACKAGES

649 NORTH HORNS LANE
ROCKVILLE, MD 20850-1299
301-424-3300
301-424-3696 (FAX)

April 29, 1996

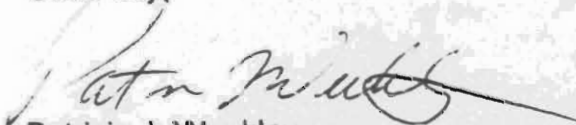
Robert G. Mills
Registered Agent
United Conservatives of Am.,
768 Walker Rd., Suite 290
Great Falls VA 22066

Mr. Mills:

In answer to your letter of April 24, 1996 - can you provide more information on UCA. Do you have the account number or invoice numbers that we billed to it would help me look the account up?

You can call me on 301-424-3300, extension 321.

Good day,


Patricia J. Weekley
Manager of Credit and
Accounts Receivable

96043764825

the printing STORE

262-B Cedar Lane
Vienna, Virginia 22180
703-641-5422
Fax: 703-641-5425

**ONE STOP SHOP
FOR ALL YOUR
PRINTING NEEDS**

May 13, 1996

Mr. Robert G. Mills
Registered Agent
United Conservatives of America
768 Walker Road, Suite 290
Great Falls, VA 22066

Dear Mr. Mills:

In response to your letter of April 24, 1996, regarding the status of our account with the UCA in the amount of \$5,375.26, we wish to advise you that this amount has not been written off.

It is the intent of The Printing Store to pursue this account until collection is accomplished.

Sincerely yours,


Leon A. Benikas
President

96043764826

April 24, 1996

Mark Data Inc.
Mark Data Plaza
Pittoton, PA 18640

Dear Sirs:

I am contacting you on behalf of a defunct organization known as United Conservatives of America (UCA). A non-profit political action committee.

According to the last available financial records, UCA shows an outstanding balance of \$27,587.34 due your company.

Since the organization has been shut down for over three years, has no assets and is no longer incorporated, the only remaining business is to terminate the committee with the Federal Election Commission.

To do so, I need to know if the outstanding payable has been written off on your records. As the registered agent for the committee, I would appreciate a letter which states the current status on this matter.

Please forward your correspondence to: UCA, 768 Walker Road, Suite 290, Great Falls, VA 22066. Thank you.

Sincerely,

Robert G. Mills

Robert G. Mills
Registered Agent

96043764827

Dear Mr. Mills,
MarkDATA has NOT written off the
27,587.34 due to our company.
Please forward payment at once
Sincerely,
T. J. [Signature]

April 24, 1996

Walt Longyear & Associates
P.O. Box 124
Washington, VA 22747

Dear Sirs:

I am contacting you on behalf of a defunct organization known as United Conservatives of America (UCA). A non-profit political action committee.

According to the last available financial records, UCA shows an outstanding balance of \$18,264.83 due your company.

Since the organization has been shut down for over three years, has no assets and in no longer incorporated, the only remaining business is to terminate the committee with the Federal Election Commission.

To do so, I need to know if the outstanding payable has been written off on your records. As the registered agent for the committee, I would appreciate a letter which states the current status on this matter.

Please forward your correspondence to: UCA, 768 Walker Road, Suite 290, Great Falls, VA 22066. Thank you.

Sincerely,

Robert G. Mills

Robert G. Mills
Registered Agent

*I have not written off
this debt.*

Walt Longyear
4/29/96

96043764898



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 1, 1996

Mr. Robert G. Mills, Treasurer
United Conservatives of America
1008 Harriman Street
Great Falls, VA 22066

RE: MUR 4270
United Conservatives of America
and Robert G. Mills, as treasurer

Dear Mr. Mills:

This is in response to your letter of June 6, 1996, and in confirmation of our telephone conversation of June 19, 1996. In your letter, you provided an update on your efforts to contact the creditors of United Conservatives of America ("UCA") in preparation for filing a Debt Settlement Plan ("DSP"). You have made these efforts in light of the Commission's determination to consider taking no further action in MUR 4270 if you take steps to terminate UCA in an orderly manner, as evidenced by the filing of a DSP.

Your letter indicates that eight of UCA's 40-plus creditors have responded to an initial inquiry you made by mail, dated April 24, 1996. Of these, only one creditor indicated in response to your inquiry that it had written UCA's debt off of its books. Of the other seven, several asked you when they could expect to be paid. You stated that you sent a follow-up letter, dated June 1, 1996, to the creditors who did not reply to your April 24 letter. You also stated that you "will follow up again by certified return receipt and by telephone should some of the vendors continue to ignore my letter(s)." You also requested that we "advise should you think I need to follow a different approach."

As we discussed on the telephone, your letter raises a number of issues. First, we note that the great majority of UCA's creditors did not respond to your first letter. This raises the question of what you should do if they continue not to respond.

If you cannot locate a creditor, or if you discover that it has gone out of business, you may request that the Commission determine the debt to that creditor to be unpayable -- provided that the debt has been outstanding for at least 24 months. Such action by the Commission would terminate UCA's obligation to continue reporting the debt as outstanding. 11 C.F.R. § 116.9.

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

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In order to do this, however, you must provide certain information. First, you must document what you did to attempt to locate the creditor; using the addresses on UCA's old reports would not be sufficient. Second, you must document that you made at least one attempt to contact the creditor by registered or certified mail at its current address. Third, you must document -- and, for this item, by "document" I mean with a log or some other contemporaneous record -- that, in addition to your attempts by mail, you made at least one attempt to contact the creditor in person or by telephone. 11 C.F.R. § 116.9(a)(2). Alternatively, you may present other, affirmative evidence that the creditor has gone out of business and that no other entity has a right to be paid the amount owed. 11 C.F.R. § 116.9(a)(1).

You should present this information, and your request that the Commission determine the debt to be unpayable, along with your DSP. At that point, you should also provide the same information you would provide on Part II of FEC Form 8 if the debt was being settled, i.e., the terms of the initial extension of credit, the nature of the debt, the efforts made by UCA to pay the debt, and the steps taken by the creditor to collect the debt. See 11 C.F.R. § 116.9(b).

Second, as noted, all but one of the eight creditors who have responded to you have informed you that they have not written off UCA's debt to them, and several inquired as to when they can expect payment.

As we discussed on the phone, because I represent the Commission and not you, I cannot ethically provide you any advice on how to respond to those creditors. Whatever arrangements are to be worked out must be worked out between you and each creditor. However, I can tell you that the Commission may not force a creditor to settle a debt for less than the full amount owed. 11 C.F.R. §§ 116.4(e), 116.5(d), 116.6(b).

Moreover, as I mentioned on the telephone, you may file a DSP even while some debts remain unsettled. If you did this, you would report the unsettled debts on Part III of FEC Form 8, and Commission review of settled debts could proceed. Assuming that the plan was otherwise complete, and depending on the progress you had made, this might also allow our office to recommend to the Commission that it take no further action in MUR 4270. However, you would have to pay in full or continue to attempt to settle the unsettled debts; you would have to continue to report the full amount of the unsettled debts on your disclosure reports until they were paid or settled; and, if they were eventually settled, you would have to file a new DSP presenting the settlement(s) for the Commission's review.

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Finally, let me reiterate some reminders I gave you in our telephone conversation. The first reminder is that it is not enough to let us know a creditor, such as Capital Mailing Services in the attachment to your letter of June 6, has written off a debt. When you get a response that a creditor has written off or is willing to write off a debt, you must fill out an FEC Form 8, Part II for the creditor, transmit it to them, and have them answer the last two questions on the form, sign it, and return it to you for inclusion in your DSP. (You might save time by filling out your portion of the Form 8, Part II for each creditor as soon as possible and transmitting it to them at the same time you inquire about the status of the debt.)

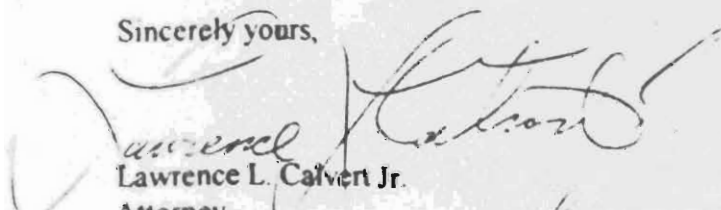
The second reminder is that you must include in your DSP individual persons, as well as commercial vendors, who are creditors of UCA. This might include, for example, persons who made some sort of advance to UCA or UCA staff who are still owed salary. Therefore, if you have not done so already, you should contact these persons.

The final reminder is that, as we've discussed on a number of occasions, your obligation to file disclosure reports – even if they show zero activity – remains in effect until all outstanding debts are settled, all the settlements are reviewed by the Commission, and UCA is no longer a respondent in MUR 4270. At that time, you may request termination. UCA's next quarterly report, disclosing activity through June 30, 1996, is due on July 15, 1996.

At the time you file that report, please also send to my attention another letter, similar to your letter of June 6, providing a progress report on your debt settlement efforts. We expect you to have contacted all creditors, or to have taken the steps outlined above to locate them, by that time.

Please contact me at (202) 219-3690 if you have any questions.

Sincerely yours,


Lawrence L. Calvert Jr.
Attorney

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August 15, 1996

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

AUG 23 12 07 PM '96

Federal Election Commission

Larry Calvert

999 E Street, NW

Washington, D.C. 20463

MUR 4270

AUG 23 1 51 PM '96

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Dear Mr. Calvert,

Just a note to give you an update on the progress regarding the UCA debt situation. To date the 40 some vendors have been contacted by mail twice (both copies of the mailing have been forwarded) and I have only received a had full of responses which I have forwarded to you.

The second mailing was mailed First Class with an "Address Correction Requested" printed on the carrier envelope.

I plan to contact those who have not responded to the two mailings with a certified mailing after Labor Day. By Sept. 20th, if I do not hear from the remaining vendors at that time, I will attempt to reach them by telephone, and proceed towards a settlement at that time.

Should you have any questions, please feel free to contact me by telephone.

Sincerely,

Robert G. Mills

Robert G. Mills

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 27, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert G. Mills, Treasurer
United Conservatives of America
1008 Harriman Street
Great Falls, Virginia 22066

RE: MUR 4270
United Conservatives of America
and Robert G. Mills, as treasurer

Dear Mr. Mills:

We have received your letter dated August 15, 1996, in which you report on your attempts to contact the creditors of United Conservatives of America ("UCA") in preparation for filing a Debt Settlement Plan ("DSP"). Specifically, you report that you have made two attempts to contact the creditors by mail, neither of which was by certified mail. You also state that you will resume efforts to contact the creditors after Labor Day.

It appears from your letter that you have made no efforts to contact the creditors since you sent a second mailing dated June 1, 1996. By letter to you dated July 1, 1996, I noted that most of UCA's creditors had not responded to your mailings. I also informed you that, as part of your DSP, you could request that the Commission give you permission to stop reporting debts owed to creditors who cannot be found. However, I also informed you that you would have to take certain prescribed steps to locate the creditors before the Commission could grant any such request, and I described what those steps were. I closed the letter by stating that we expected you to complete those steps not later than July 15, 1996. Nevertheless, you do not appear to have taken any further action.

I remind you that in this matter the Commission has determined that there is probable cause to believe that UCA, and you, as treasurer, violated Federal law by failing to file, or failing to timely file, disclosure reports.

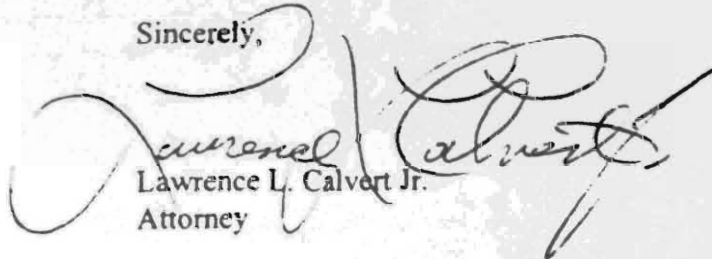
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Mr. Robert G. Mills
MUR 4270
Page Two

If, at the close of the 21-day period, we have received from you neither a DSP nor a signed conciliation agreement, this Office may recommend that the Commission file a civil law enforcement suit in United States District Court against UCA and you, as treasurer.

Please contact me at (202) 219-3690 if you have any questions.

Sincerely,


Lawrence L. Calvert Jr.
Attorney

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARY

SEP 23 2 23 PM '96

In the matter of

United Conservatives of America
and Robert G. Mills, as treasurer

)
) MUR 4270
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SENSITIVE

OCT 1 1996

GENERAL COUNSEL'S REPORT

EXECUTIVE SESSION

I. BACKGROUND

This matter was generated by two referrals from the Reports Analysis Division ("RAD"). On March 19, 1996, the Commission found probable cause to believe that United Conservatives of America and Robert G. Mills, as treasurer ("the Committee"), violated 2 U.S.C. § 434(a) by failing to timely file the 1993 Mid Year and Year End Reports and by failing to file the 1994 October Quarterly, 30-Day Post General, and Year End Reports. The Commission also approved a proposed conciliation agreement

Mills represented that he would file the outstanding reports not later than April 22, 1996. Staff and Mills also agreed that Mills would

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attempt to file a debt settlement plan by May 15, 1996, and that he would provide staff with an update on his efforts not later than April 25, 1996. These conversations were memorialized by a letter from staff to Mills dated April 15, 1996. Attachment 1.

Mills filed all of the Committee's missing reports on April 22, 1996.¹ On April 26, 1996, Mills telephoned staff to provide the promised update on his preparations for debt settlement. Mills informed staff that he had sent a letter to the Committee's creditors requesting the information he needed to file a debt settlement plan. Mills represented that he mailed these letters to the addresses listed for the creditors on the Committee's disclosure reports. He stated that he planned to resend the letter via certified mail, after checking the telephone directory for addresses, to each creditor who did not respond within "ten days or so" to his first letter. Staff suggested Mills might want to check addresses in a Dun & Bradstreet directory or a similar publication if it was available at his local public library.

May 15 passed, and no debt settlement plan was filed. After staff attempted to contact Mills by telephone, Mills returned staff's calls on May 30, 1996. In that conversation, Mills reported that he had made some, but not much, progress toward filing a debt settlement plan. Staff requested that Mills provide a letter indicating what progress he had made and what obstacles he faced, and Mills agreed to do so.

By letter dated June 6, 1996, Mills reported that only eight of the Committee's more than 40 creditors had responded to his April letter. Attachment 2. The letter had not requested all of the information necessary to enable Mills to submit a debt settlement plan; instead, it merely

¹ The reports showed no activity except for a reduction of the Committee's debt by \$3,479.34, beginning on the 1994 Year End Report. Mills reported that he paid one of the Committee's debts in that amount from his own funds after the creditor sued him personally.

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inquired of creditors whether "the outstanding payable has been written off on your records." Id. at 9. Of the eight creditors who responded, only one indicated that it had written off the Committee's debt. Of the other seven, some asked when they could expect to be paid. Mills also included a copy of a follow-up letter, dated June 1, 1996, to the creditors that had not responded. Id. at 2. He had not sent this letter by certified mail. Mills stated in his letter to staff that he would "follow up again by certified return receipt and by telephone should some of the vendors continue to ignore my letter," and requested that this Office "advise should you think I need to follow a different approach." Id. at 1.

Staff responded to Mills's letter in a telephone conversation on June 19, 1996 and by letter dated July 1, 1996. Attachment 3. Staff's July 1 letter noted a number of issues raised by Mills's submission, including the procedures required for locating creditors before the Commission could declare debts to them unpayable; the procedures for filing a debt settlement plan for some debts, while continuing to report others as outstanding; and the need for Mills to submit for each debt the information requested on Part II of FEC Form 8, rather than merely reporting that a creditor had agreed to write off a debt. The letter advised Mills how to proceed in light of these issues, stated that this Office expected him to complete the requisite attempts to locate creditors by July 15, and requested a progress report on that date. Attachment 3 at 2.

July 15 passed with no progress report from Mills. Staff tried twice to reach Mills by telephone during the week of July 22, but was unsuccessful; staff left messages on Mills's voice mail. Mills returned staff's calls on August 6, and staff reiterated the request for a progress report. Mills responded by letter dated August 15, 1996. Attachment 4. It was apparent from the letter that Mills had made no further attempts to locate or contact creditors since his mailing

of June 1. In the August 15 letter, Mills stated that he "plan[ned] to contact those who have not responded to the two mailings with a certified mailing after Labor Day."

On August 27, 1996, four days after receiving Mills's August 15 letter, staff sent Mills a certified letter. Attachment 5. In the letter, staff reminded Mills that the Commission had found probable cause to believe that he and the Committee had violated Federal law by not filing, or not filing in a timely manner, required disclosure reports.

It further stated that if he did not either file a debt settlement plan or sign and submit the Commission's original conciliation proposal within 21 days of his receipt of the letter, this Office would make a recommendation to the Commission concerning civil suit.

On September 13, 1996, the U.S. Postal Service returned to this Office as unclaimed mail staff's August 27 letter to Mills. According to markings on the envelope, the Postal Service notified Mills on August 29 and September 3, 1996 that the letter was available for pick-up. However, Mills never claimed the letter. Attachment 6.

II. ANALYSIS

This matter involves a lay treasurer and an essentially defunct committee with very large debts. The treasurer apparently assumed, erroneously, that once the Committee ceased operations its reporting obligations also ceased. Under the circumstances, it appeared the real issue in this matter was the Committee's need to terminate in an orderly fashion, rather than its late filing and non-filing of reports.

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As noted, Mills has now filed the missing disclosure reports that generated this matter. However, he filed them between 14 and 18 months late, and then only after the Commission made a probable cause finding. Mills and the Committee have paid no penalty for the lateness. Mills has rebuffed every attempt this Office has made to assist him in appropriately resolving this matter. This Office, and the Commission, have been patient enough.

Accordingly, we recommend that the Commission authorize a civil suit to enforce the Act against United Conservatives of America and Robert G. Mills, as treasurer.

III. **RECOMMENDATIONS**

I. Authorize a civil suit to enforce the Act against United Conservatives of America and Robert G. Mills, as treasurer.

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2. Approve the appropriate letter.

Date

9/26/96

Lawrence M. Noble
General Counsel

Lawrence M. Noble (2/2)

Staff assigned: Lawrence L. Calvert Jr.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 4270
United Conservatives of America)
and Robert G. Mills, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on October 1, 1996, do hereby certify that the Commission decided by a vote of 5-0 to reject the recommendations in the General Counsel's September 26, 1996 report on MUR 4270, and instead take the following actions:

1. Close the file.
2. Send an appropriate letter, including strong admonishment language and requesting them to file a debt settlement report.

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

Attest:

10-1-96
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

October 9, 1996

Mr. Robert G. Mills, Treasurer
United Conservatives of America
1008 Harriman Street
Great Falls, Virginia 22066

RE: MUR 4270
United Conservatives of America
and Robert G. Mills, as treasurer

Dear Mr. Mills:

By letter dated March 27, 1996, you were advised that the Federal Election Commission found probable cause to believe that United Conservatives of America ("UCA"), and you, as treasurer, violated 2 U.S.C. § 434(a) in connection with the late filing and non-filing of certain disclosure reports. This is to advise you that on October 1, 1996, after further considering the circumstances of this matter, the Commission determined to close its file in this matter. On the same date, the Commission specifically voted to request that you file a Debt Settlement Plan on FEC Form 8.

As you have been reminded on several occasions in the course of this matter, until you are notified by the Commission that UCA's reporting obligation is terminated, you must continue to file regularly scheduled disclosure reports with the Commission -- even if those reports show zero activity. You are admonished that failure to do so is a serious violation of Federal law. In light of the circumstances of MUR 4270, further failure on your part to file required disclosure reports could lead to new enforcement action, which in turn could result in substantial civil penalties.

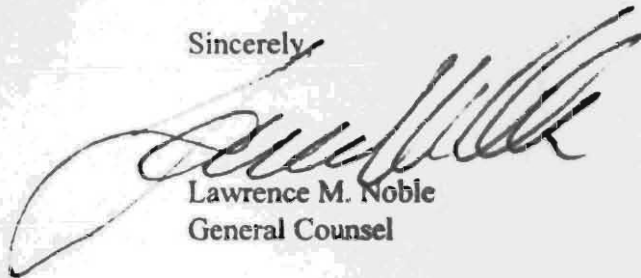
The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any 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.

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Robert G. Mills, Treasurer
MUR 3670
Page Two

If you have any questions, please contact Lawrence L. Calvert Jr., the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lawrence M. Noble", is written over the typed name and title.

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE END OF MUR # 4270

DATE FILMED 11-18-96 CAMERA NO. 1

CAMERAMAN JM18

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