



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4343

DATE FILMED 11-18-96 CAMERA NO. 4

CAMERAMAN JM II

96043764845

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: May 3, 1995

ANALYST: DONALD AVERETT

I. COMMITTEE:

Natural Law Party of New York
 (C00273599)
 Andrew Mallon, Treasurer
 (5/17/93 - Present)
 Steven Herzog, Treasurer
 (Pre-1/1/93 - 5/16/93)
 c/o Sam Stelzner, CPA
 119 North Park Avenue, Suite 303
 Rockville Center, NY 11570*

II. RELEVANT STATUTE:

2 U.S.C. §434(a)(4)(A)(i) & (iii)
 11 CFR §104.5(c)(1)(i)(A) & (1)(iii)

III. BACKGROUND:

Failure to File the 1994 30 Day Post-General Election and
 1994 Year End Reports

The Natural Law Party of New York ("the Committee") has failed to file the 1994 30 Day Post-General Election Report of Receipts and Disbursements covering the period from October 1, 1994 to November 28, 1994 and the 1994 Year End Report of Receipts and Disbursements covering the period from November 29, 1994 to December 31, 1994.

The Committee was notified on October 3, 1994 that the 30 Day Post-General Election Report was due on December 8, 1994 (Attachment 2). On December 28, 1994 the Committee was notified that the Year End Report was due on January 31, 1995 (Attachment 3).

On January 4, 1995 the Committee was sent a Non-Filer Notice for failure to file the 1994 30 Day Post-General Election Report (Attachment 4).

*Non-Filer Notices were sent to the appropriate address of record.

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On January 30, 1995, the Reports Analysis Division ("RAD") analyst called and spoke to the treasurer, Mr. Andrew Mallon. The analyst told Mr. Mallon that the 1994 30 Day Post-General Election Report had not been received at the Commission (Attachment 5).

The Committee was sent a Non-Filer Notice for failure to file the 1994 Year End Report on February 17, 1995 (Attachment 6).

The RAD analyst called the Committee on March 13, 1995 and spoke to Mr. Mallon and the Committee's accountant, Mr. Sam Stelzner. The analyst advised Mr. Mallon and Mr. Stelzner that the 1994 30 Day Post-General Election and 1994 Year End Reports had not been received at the Commission (Attachment 7).

As of this date, the reports have not been filed.

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FEDERAL ELECTION COMMISSION
1995-1996

DATE 2MAR95

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	# OF COVERAGE DATES	PAGES	MICROFILM LOCATION TYPE OF FILER
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NATURAL LAW PARTY OF NEW YORK
CONNECTED ORGANIZATION: NATURAL LAW PARTY OF THE USA
1995 STATEMENT OF ORGANIZATION - AMENDMENT

ID #C00173599 PARTY NON-QUALIFIED

7MAR95

2 95FEC/968/1520

TOTAL

0 0 0 0

2 TOTAL PAGES

96043764818

FEDERAL ELECTION COMMISSION
1993-1994

DATE 2HAY95

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	# OF COVERAGE DATES PAGES TYPE OF FILER	MICROFILM LOCATION	
NATURAL LAW PARTY OF NEW YORK						
CONNECTED ORGANIZATION: NATURAL LAW PARTY OF THE USA						
1993 STATEMENT OF ORGANIZATION - AMENDMENT						
	JULY QUARTERLY	90	73	9JUN93	2 93PEC/842/0304	
	REQUEST FOR ADDITIONAL INFORMATION			16JUL93	3 93PEC/850/1891	
	REQUEST FOR ADDITIONAL INFORMATION 2ND			16JUL93	2 94PEC/889/0720	
	YEAR-END	0		16JUL93	3 94PEC/896/1352	
	YEAR-END - AMENDMENT			1JAN93 -31DEC93	2 94PEC/888/4834	
	YEAR-END - AMENDMENT	0		1JAN93 -31DEC93	3 94PEC/901/5142	
	YEAR-END - AMENDMENT	0		1JAN93 -31DEC93	3 95PEC/958/1095	
	NOTICE OF FAILURE TO FILE			17JUL93 -31DEC93	2 94PEC/885/5367	
	REQUEST FOR ADDITIONAL INFORMATION			1JAN93 -31DEC93	2 94PEC/900/4568	
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN93 -31DEC93	2 94PEC/903/0748	
1994 MISCELLANEOUS NOTICE FROM FEC						
	MISCELLANEOUS REPORT TO FEC			16DEC94	3 94PEC/954/1189	
	NOTICE OF FAILURE TO FILE			28DEC94	2 94PEC/954/4957	
	JULY QUARTERLY	160		1JAN94 -31MAR94	2 94PEC/915/3489	
	JULY QUARTERLY - AMENDMENT	90	73	10JUL94	4 94PEC/920/1959	
	NOTICE OF FAILURE TO FILE			1APR94 -30SEP94	5 95PEC/958/1098	
	REQUEST FOR ADDITIONAL INFORMATION			1APR94 -30JUN94	1 94PEC/915/3488	
	REQUEST FOR ADDITIONAL INFORMATION 2ND			10JUL94	2 94PEC/923/3248	
	OCTOBER QUARTERLY	425	563	10JUL94	3 94PEC/943/1318	
	OCTOBER QUARTERLY - AMENDMENT	160		10JUL94 -30SEP94	5 94PEC/946/5260	
	OCTOBER QUARTERLY - AMENDMENT	425	563	10JUL94 -30SEP94	4 95PEC/958/1103	
	OCTOBER QUARTERLY - AMENDMENT	425	563	10JUL94 -30SEP94	5 95PEC/964/2788	
	OCTOBER QUARTERLY - AMENDMENT	425	563	10JUL94 -30SEP94	5 95PEC/969/3576	
	NOTICE OF FAILURE TO FILE			11JUL94 -30SEP94	2 94PEC/943/0789	
	1ST LETTER INFORMATIONAL NOTICE			1JUL94 -30SEP94	2 94PEC/954/1099	
	NOTICE OF FAILURE TO FILE			1OCT94 -28NOV94	2 95PEC/955/0689	
	NOTICE OF FAILURE TO FILE			29NOV94 -31DEC94	2 95PEC/966/3720	
TOTAL		605	0	709	0	73 TOTAL PAGES

All reports listed have been reviewed.
Ending cash on hand as of 9/30/94:
Debts owed to/by the Committee:

\$305.71
\$ 0.00

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FEDERAL ELECTION COMMISSION
1991-1992

DATE 2MAY95

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	# OF COVERAGE DATES	PAGES	MICROFILM LOCATION
			TYPE OF FILER			
NATURAL LAW PARTY OF NEW YORK						
CONNECTED ORGANIZATION: NATURAL LAW PARTY OF THE USA						
1992 STATEMENT OF ORGANIZATION						
STATEMENT OF ORGANIZATION - AMENDMENT						
	OCTOBER QUARTERLY	1,305	1,273			
	REQUEST FOR ADDITIONAL INFORMATION					
	PRE-GENERAL	429	202			
	POST-GENERAL	70,271	61,018			
	REQUEST FOR ADDITIONAL INFORMATION					
	YEAR-END	0	636			
	YEAR-END - AMENDMENT	0	636			
	REQUEST FOR ADDITIONAL INFORMATION					
TOTAL		72,005	0	67	TOTAL PAGES	

ID #C00273599 PARTY NON-QUALIFIED

29JUL92	2	92FEC/772/1121
19NOV92	2	92FEC/801/0789
1AUG92 -30SEP92	6	92FEC/801/0795
1AUG92 -30SEP92	2	93FEC/832/5064
1OCT92 -14OCT92	4	92FEC/801/0791
15OCT92 -23NOV92	25	92FEC/812/3890
15OCT92 -23NOV92	2	93FEC/832/5061
24NOV92 -31DEC92	5	93FEC/826/5808
24NOV92 -31DEC92	18	93FEC/833/2497
24NOV92 -31DEC92	1	93FEC/832/5059

All reports listed have been reviewed.
Ending cash on hand as of 12/31/92:
Debts owed to/by the Committee:

\$8874.91
\$ 0.00

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REPORT NOTICE

Attachment 2

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

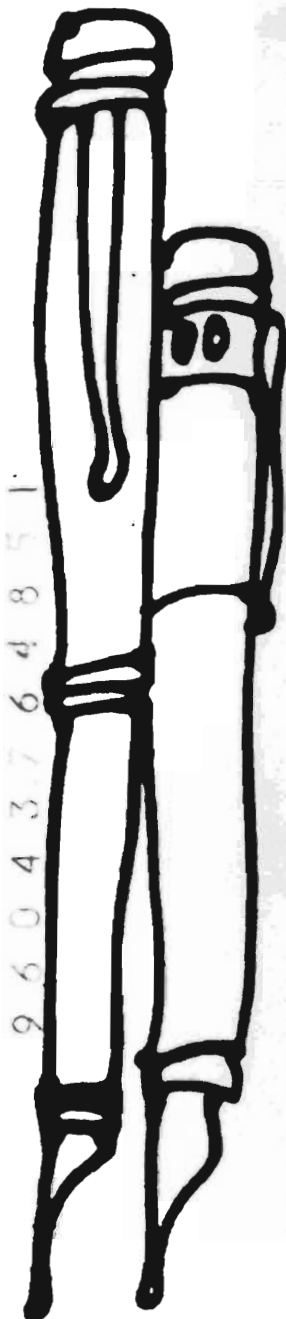
Party committees and PACs must follow the above charts in order to determine whether they must file the Pre-General Election Report. All Party committees and PACs, regardless of financial activity, must file the Post-General Election Report.

*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.

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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

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REPORT NOTICE

Attachment 3

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

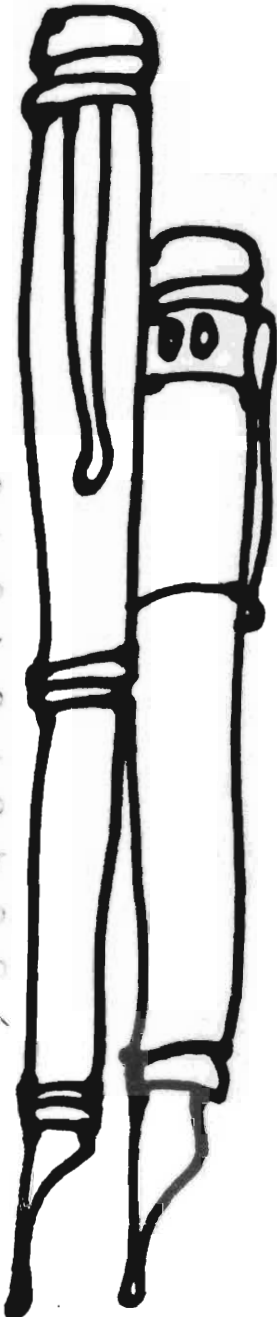
TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

*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)

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**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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachment 4

RQ-7

January 4, 1995

Andrew Mallon, Treasurer
Natural Law Party of New York
110-64 Queens Blvd. Suite 106
Forest Hills, NY 11375

Identification Number: C00273599

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

Dear Mr. Mallon:

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 Donald L. Averett 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

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TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: Andrew Mallon, treasurer

COMMITTEE: Natural Law Party of New York
(C00273599)

DATE: January 30, 1995

SUBJECT: Failure to File 1994 30 Day Post General Election Report

I telephoned Mr. Andrew Mallon and informed him that the Committee's 1994 30 Day Post General Election report had not been received by the Commission. Mr. Mallon said that he would contact his accountant and ensure that the report was filed as soon as possible.

Mr. Mallon asked whether it would be possible to have FEC correspondence mailed directly to his accountant. I advised him that all correspondence would be sent to the treasurer, but that he could designate the mailing address he preferred and indicate that correspondence be sent "in care of" his accountant.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-7

February 17, 1995

Andrew Mallon, Treasurer
Natural Law Party of New York
414 East 88th Street
New York, NY 10028

Identification Number: C00273599

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

Dear Mr. Mallon:

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

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

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

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

Sincerely,

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

John D. Gibson
Assistant Staff Director
Reports Analysis Division

9 8 5 0 4 3 2 1 0 8 7 6 5 4 3 2 1 0

TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: Andrew Mallon, treasurer
Sam Stelzner, accountant

COMMITTEE: Natural Law Party of New York
(C00273599)

DATE: March 13, 1995

SUBJECT: Failure to File 1994 30 Day Post General Election and 1994
Year End Report

9 6 0 4 3 7 6 4 8 5 8
I telephoned Mr. Andrew Mallon. Mr. Mallon phoned his accountant, Mr. Sam Stelzner and included him in a conference call. I informed Mr. Mallon and Mr. Stelzner that the Commission had received the Committee's request to change their mailing address, but that we had not received the Committee's 1994 30 Day Post General Election and Year End reports.

Mr. Stelzner said that he was certain that the reports had been submitted and asked me to verify the Commission's mailing address. When I informed him that the Commission is located at 999 E Street, NW, Washington, DC 20463, Mr. Stelzner stated that this was not the address he had sent the reports to. Mr. Stelzner and Mr. Mallon stated that they would resubmit the reports.

FEDERAL ELECTION COMMISSION

999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
FEB 10 1996
SECTION 7

MAR 10 4 02 PM '96

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD Referrals

95NF-06

95NF-18

95NF-29

Date Activated: March 08, 1996

Staff Member: Jeffrey D. Long

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Stephens for Congress Committee, Inc. and
Gary Shadid, as treasurer

Natural Law Party of New York and
Andrew Mallon, as treasurer

D.C. Republican Committee Federal Campaign Committee and
Roger Moffat, as treasurer

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Office of General Counsel received from the Reports Analysis Division three referrals on April 7, May 3 and October 17, 1995, which have been grouped together to be considered in this report

The basis for the three referrals is the respondents' failure to file reports of receipts and disbursements as required by the FECA.

Specifically, the Stephens for Congress Committee, Inc. failed to file the 1994 30 Day Post-

General Report; the Natural Law Party of New York failed to file the 1994 30 Day Post-General

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Report and Year End Report; and the D.C. Republican Committee Federal Campaign Committee failed to file 1995 Mid-Year Report. Subsequent to this Office receiving these RAD Referrals, the Stephens Committee filed its Post-General Report on May 12, 1995, and the D.C. Republican Committee filed its Mid-Year Report on September 26, 1995.

II. FACTUAL AND LEGAL ANALYSIS

Based on the Factual and Legal Analyses, see Attachments 3-5, this Office recommends that the Commission find reason to believe that: the Stephens for Congress Committee, Inc. and Gary Shadid, as treasurer, violated 2 U.S.C. § 434(a)(2)(A); the Natural Law Party of New York and Andrew Mallon, as treasurer, violated 2 U.S.C. § 434(a)(4)(A); and the D.C. Republican Committee Federal Campaign Committee and Roger Moffat, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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IV. RECOMMENDATIONS

1. Open MURs for 95NF-06, 95NF-18 and 95NF-29.
2. Find reason to believe that the Stephens for Congress Committee, Inc. and Gary Shadid, as treasurer, violated 2 U.S.C. § 434(a)(2)(A);
3. Find reason to believe that the Natural Law Party of New York and Andrew Mallon, as treasurer, violated 2 U.S.C. § 434(a)(4)(A);
4. Enter into conciliation with the above-named Respondents prior to a finding of probable cause to believe.
5. Find reason to believe that the D.C. Republican Committee Federal Campaign Committee and Roger Moffat, as treasurer, violated 2 U.S.C. § 434(a)(4)(A), send an admonishment letter, and close the file.
6. Approve the attached proposed Factual and Legal Analyses, conciliation agreements, and the appropriate letters.

Lawrence M. Noble
General Counsel

9 6 0 4 3 7 6 4 8 5 1
Date

4/11/96

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

- 1-2 Referral Materials
- 3-5 Factual and Legal Analyses (3)
- 6-7 Proposed agreements (2)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Stephens for Congress Committee,)
Inc. and Gary Shadid, as treasurer;)
Natural Law Party of New York and)
Andrew Mallon, as treasurer;)
D.C. Republican Committee Federal)
Campaign Committee and Roger Moffat,)
as treasurer.)

RAD Referrals
#95NF-06, MUR 4342
#95NF-18, and MUR 4343
#95NF-29 MUR 4344

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 18, 1996, the Commission decided by a vote of 5-0 to take the following actions in RAD Referrals #95NF-06, #95NF-18, and #95NF-29:

1. Open MURs for #95NF-06, #95NF-18, and #95NF-29.
2. Find reason to believe that the Stephens for Congress Committee, Inc. and Gary Shadid, as treasurer, violated 2 U.S.C. § 434(a)(2)(A).
3. Find reason to believe that the Natural Law Party of New York and Andrew Mallon, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).

(continued)

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Federal Election Commission
Certification for RAD Referrals #95NF-06,
#95NF-18, and #95NF-29
April 18, 1996

Page 2

4. Enter into conciliation with the above-named Respondents prior to a finding of probable cause to believe.
5. Find reason to believe that the D.C. Republican Committee Federal Campaign Committee and Roger Moffat, as treasurer, violated 2 U.S.C. § 434(a)(4)(A), send an admonishment letter, and close the file.
6. Approve the proposed Factual and Legal Analyses, conciliation agreements, and the appropriate letters, as recommended in the General Counsel's Report dated April 15, 1996.

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

Attest:

4/18/96
Date

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

Received in the Secretariat: Mon., April 15, 1996 4:32 p.m.
Circulated to the Commission: Tues., April 16, 1996 11:00 a.m.
Deadline for vote: Fri., April 19, 1996 4:00 p.m.

bjr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 24, 1996

**Andrew Mallon, Treasurer
Natural Law Party of New York
c/o Sam Stelzner, CPA
119 North Park Avenue, Suite 303
Rockville Center, NY 11570**

**RE: MUR 4343
Natural Law Party of New York
and Andrew Mallon, as treasurer**

Dear Mr. Mallon:

On April 18, 1996, the Federal Election Commission found that there is reason to believe the Natural Law Party of New York ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(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.

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

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

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

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

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

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

Sincerely,



Lee-Ann Elliott
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation Counsel Form
Conciliation Agreement

96043764845

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Natural Law Party of New York and
Andrew Mallon, as treasurer

MUR: 4343

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).

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that all political committees other than authorized committees of a candidate, shall file quarterly reports in a calendar year in which a regularly scheduled election is held. The report covering 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 committee shall also file a post-general election report, which shall be filed no later than the 30th day after any general election in which such candidate has sought election, and which shall be complete as of the 20th day after such election. 2 U.S.C. § 434(a)(4)(A)(iii).

According to its Statement of Organization filed with the Commission, the Natural Law Party of New York ("Respondents") is a state committee of the Natural Law Party of the United States of America. Andrew Mallon is the treasurer of record for the Natural Law Party of New York.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iii) the Respondents were required to file the 1994 30 Day Post-General Report no later than December 8, 1994, and according to 2 U.S.C.

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§ 434(a)(4)(A)(i) were required to file the 1994 Year End report by January 31, 1995. The Respondents were notified in writing on October 3, 1994, that the Post-General Report was due on December 8, 1994, and were notified on December 28, 1994, that the Year End Report was due on January 31, 1995.

The Commission sent to the Respondents on January 4 and February 17, 1995, non-filer notices for failing to file the Post-General and Year End Reports. The two notices informed the Respondents that failure to file the reports might result in audit or legal enforcement action. To date, the 1994 Post-General and Year End Reports have not been filed. Therefore, there is reason to believe the Natural Law Party of New York and Andrew Mallon, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
MAY 20 2 14 PM '96

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM
MAY 20 10 57 AM '96

May 16, 1996

Jeffrey Long
Federal Election Commission
Washington, DC 20463

re: MUR 4343

Response to your letter of April 24, 1996

Our records indicate the forms you note were sent on time by us. Our counteroffer is to provide the forms missing according to your files. In the past, if a form was late, we were called and duplicates were sent properly.

Your letter of April 24, 1996 was our first notice of any kind that paperwork was missing.

The Natural Law Party of New York is without funds as our reports to you have noted over the past two years.

We feel at this time it would be better to close out the party as we have no funds available.

Sincerely,



Andrew B. Mallon
Treasurer
Natural Law Party of New York
c/o Sam Stelzner, CPA
119 North Park Avenue, Suite 303
Rockville Centre, NY 11570

9604376488

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUN 3 1 54 PM '96

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

JUN 3 12 31 PM '96

May 30, 1996

Jeffrey Long
Federal Election Commission
Washington, DC 20463

re: MUR 4343

Response for Termination

The Natural Law Party of New York has ceased operations. We have not raised money in the past year, and there are no funds in our bank account.

For your records, The Natural Law Party of New York has no financial affiliation with The Natural Law Party, of Fairfield, Iowa.

According to our accountant, Mr. Sam Stelzner, the requested reports were sent to Mr. Averett two weeks ago. Mr. Averett said today he still did not have them. They are being sent again tomorrow, by certified mail.

Sincerely,



ANDREW D. HARRISON
Treasurer
Natural Law Party of New York
c/o Sam Stelzner, CPA
119 North Park Avenue, Suite 303
Rockville Centre, NY 11570

96043764869



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 13, 1996

Andrew Mallon, Treasurer
Natural Law Party of New York
c/o Sam Stelzner, CPA
119 North Park Avenue, Suite 303
Rockville Center, NY 11570

MUR 4343
Natural Law Party of New York
and Andrew Mallon, as treasurer

Dear Mr. Mallon;

On June 3, 1996, the Federal Election Commission received your committee's FEC reports covering financial activity for the period August 1, 1995 to March 31, 1996. However, those are not the reports at issue in this matter. The two reports which the Commission found reason to believe you have not filed are the 1994 Post-Election Report and the 1994 Year End Report, as stated in the Commission's Factual and Legal Analysis sent to you on April 24, 1996.

The Commission has also received your committee's response dated May 30, 1996, in which you state that the Natural Law Party of New York has ceased operations and has no financial affiliation with the Natural Law Party. You have not indicated a willingness to pay any civil penalty, but rather have suggested that your Committee's preference is to cease operations. While we can not guarantee that the Commission will agree not to continue to seek the civil penalties at issue in this matter, if your desire is to close the committee, all outstanding reports should be filed, residual debt and cash should be reconciled, and a formal request for termination should be made.

If this Office does not receive a reply from you by June 24, 1996, we will recommend to the Commission that this matter proceed to the next stage of the enforcement process. If you have any questions, please call me on (202) 219-3690 or (800) 424-9530.

Sincerely,

Jeffrey D. Long
Paralegal Specialist

9604376487C

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUN 25 11 54 AM '96

June 21, 1996

MUR 4343

Jeffrey D. Long
Paralegal Specialist
Federal Election Commission
Washington, DC 20463

Dear Mr. Long,

We are in response to your letter of June 13. I tried calling you today at 1:30 PM, but Ms. Hampton said you were out until Monday.

Please be advised that the information you are requesting has been sent to you two times already. Enclosed is a photocopy of the last registered mailing to you. I enclose the reports for a third time now.

As your letter states, you already have our formal request for termination of the Natural Law Party of New York. To my knowledge, you already have all the reports you require.

Sincerely,



Andrew B. Mallon

96043764871

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUN 25 11 54 AM '96

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
NATURAL LAW PARTY NEW YORK

ADDRESS (number and street) ☐ Check if different than previously reported
110-64 QUEENS BLVD

CITY, STATE and ZIP CODE
FOREST HILLS N.Y. 11375

2. FEC IDENTIFICATION NUMBER
C00273599

3. ☐ This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

4. TYPE OF REPORT

(a) ☒ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

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

☐ Termination Report

Monthly Report Due On:

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

☐ Twelfth day report preceding _____
(Type of Election)

election on _____ in the State of _____

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

(b) Is this Report an Amendment?

☐ YES ☒ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	1/1/96 through 3/31/96		
6. (a) Cash on Hand January 1, 19__			\$ 19.21
(b) Cash on Hand at Beginning of Reporting Period		\$ 19.21	
(c) Total Receipts (from Line 19)		\$ -0-	\$
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 19.21	\$ 19.21
7. Total Disbursements (from Line 30)		\$ 62.25	\$ 62.25
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ (43.04)	\$ (43.04)
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$ -0-	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$ -0-	
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.			
Type or Print Name of Treasurer ANDREW MALLOTT		Date 4/1/96	
Signature of Treasurer <i>[Signature]</i>			

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

FEC FORM 3X
(revised 9/93)

96043764872

SCHEDULE A

ITEMIZED RECEIPTS

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

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

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

NAME OF COMMITTEE (In Full)

NATURAL LAW PARTY OF N.Y.

A. Full Name, Mailing Address and ZIP Code BANK CHARLES Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer CITI BANK Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 1-1-96 to 3-31-96	Amount of Each Receipt this Period 68.75
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

96043764873

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
NATURAL LAW PARTY New York

ADDRESS (number and street) ☐ Check if different than previously reported
110-64 QUEENS BLVD

CITY, STATE and ZIP CODE
FOREST HILLS NY 11375

2. FEC IDENTIFICATION NUMBER
C 0027 5591

3. ☐ This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

4. TYPE OF REPORT

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

Monthly Report Due On:

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

- ☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____
in the State of _____

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

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 8/1/95 through 12/31/95		
6. (a) Cash on Hand January 1, 19__		\$ 164.45
(b) Cash on Hand at Beginning of Reporting Period	\$ 164.45	
(c) Total Receipts (from Line 19)	\$ -0-	\$
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$	\$ 164.45
7. Total Disbursements (from Line 30)	\$ 145.24	\$ 145.24
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 19.21	\$ 19.21
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ -0-	For further information contact: Federal Election Commission 600 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ -0-	

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

Type or Print Name of Treasurer

ANDREW MALLON

Signature of Treasurer

[Signature]

Date

1/16/96

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

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FEC FORM 3X

(revised 9/93)

96043764874

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 1 OF 1
FOR LINE NUMBER

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

NAME OF COMMITTEE (in Full)

NATURAL LAW PARTY OF New York

A. Full Name, Mailing Address and ZIP Code BANK CHARGES Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer C.I.T. BANK Occupation Aggregate Year-to-Date \$	Date (month, day, year) 8-1-95 1/31/96	Amount of Each Receipt this Period 145.24
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date \$	Date (month, day, year)	Amount of Each Receipt this Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date \$	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

96043764875

● SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address.

2. ☐ Restricted Delivery.

3. Article Addressed to:

Federal Election Commission

999 E Street NW

Washington, DC 20463

Attn: Don Everett

4. Article Number

P 449 207 968

Type of Service:

☒ Registered

☐ Certified

☐ Express Mail

☐ Insured

☐ COD

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee

X

6. Signature - Agent

X

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Feb. 1986

DOMESTIC RETURN RECEIPT

96043764876

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE
USE, \$300

RETURN
TO 

Print Sender's name, address, and ZIP Code in the space below.

Samuel Stelzner

119 No. Park Ave., Ste 303

Rockville Centre NY 11570

96043764877

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

BEFORE THE FEDERAL ELECTION COMMISSION

Jul 23 4 26 PM '96

In the Matter of)

Natural Law Party of New York and)
Andrew Mallon, as treasurer)

MUR 4343

SENSITIVE

GENERAL COUNSEL'S REPORT

On April 18, 1996, the Commission found reason to believe the Natural Law Party of New York and Andrew Mallon, as treasurer, violated 2 U.S.C. § 434(a)(4)(A) for failing to file the 1994 Post-General and Year End Reports. The Respondents were notified on April 24th of the violation and offered a pre-probable cause conciliation agreement which provided for a civil penalty.

On May 30, 1996, a letter was received from the Respondents wherein they stated that the Committee has ceased operations, has raised no money during the past year, and has no financial affiliation with the Natural Law Party, of Fairfield, Iowa. The letter did not address the proposed conciliation agreement.

In an attempt to clarify the Respondents' position, this Office responded by letter dated June 13, 1996. That letter first informed the Respondents that the reports that they filed on June 3rd were not the reports at issue in this matter and second, that although this Office can not guarantee that the Commission will agree to not seek a civil penalty, if it was their position to pay no civil penalty but to instead terminate the committee, they should file all outstanding

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reports and a formal request for termination. Finally, the letter notified the Respondents that if a reply was not received by June 24, 1996, this Office would recommend to the Commission that this matter proceed to the next stage of the enforcement process.

The treasurer responded with a second letter on June 25th which simply stated that the Committee has sent the outstanding reports two times already but has attached another copy, and that the Commission already has their formal request for termination. In two subsequent telephone calls on June 26 and 27, staff notified the Respondents that they had now submitted the incorrect reports three times and explained the importance of a timely and proper response. To date no further response has been received.

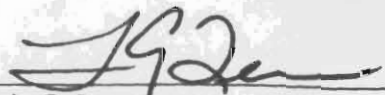
Because the period for pre-probable cause conciliation negotiations have now exceeded 60 days without a substantive counteroffer from the Respondents, this Office will move this matter forward to the next stage of the enforcement process.

Lawrence M. Noble
General Counsel

Date

7/23/96

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Respondents letter, dated May 30.
2. FEC response letter.
3. Respondents letter, dated June 21.

Staff assigned: Jeffrey Long

96043764879



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

SEP 3 10 50 AM '96

September 3, 1996

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

SENSITIVE

Andrew Mallon, Treasurer
Natural Law Party of New York
c/o Sam Stelzner, CPA
119 North Park Avenue, Suite 303
Rockville Center, NY 11570

MUR 4343
Natural Law Party of New York
and Andrew Mallon, as treasurer

Dear Mr. Mallon:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on April 18, 1996, the Federal Election Commission found reason to believe that Natural Law Party ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(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 a violation has 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.

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

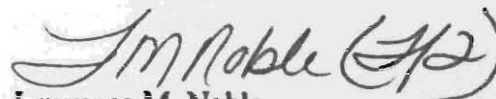
9604376483C

Letter to Andrew Mallon, Treasurer
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 Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

A handwritten signature in dark ink, appearing to read "L M Noble" followed by a stylized flourish or initials in parentheses.

Lawrence M. Noble
General Counsel

Enclosure
Brief

96043764891

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Natural Law Party of New York and
Andrew Mallon, as treasurer

)
)
) MUR 4343
)
)

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. On April 18, 1996, the Commission found reason to believe the Natural Law Party of New York and Andrew Mallon, as treasurer ("Respondents"), violated 2 U.S.C. § 434(a)(4)(A) for failing to file the 1994 Post-General and Year End Reports. The Respondents were notified of the finding on April 24th.

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that all political committees other than authorized committees of a candidate, shall file quarterly reports in a calendar year in which a regularly scheduled election is held. The report covering 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 election. 2 U.S.C. § 434(a)(4)(A)(iii).

According to its Statement of Organization filed with the Commission, the Natural Law Party of New York is a state committee of the Natural Law Party of the United States of America. Andrew Mallon is the treasurer of record for the Natural Law Party of New York.

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Pursuant to 2 U.S.C. § 434(a)(4)(A)(iii) the Respondents were required to file the 1994 30 Day Post-General Report no later than December 8, 1994, and according to 2 U.S.C. § 434(a)(4)(A)(i) were required to file the 1994 Year End report by January 31, 1995. The Respondents were notified in writing on October 3, 1994, that the Post-General Report was due on December 8, 1994, and were notified on December 28, 1994, that the Year End Report was due on January 31, 1995.

The Commission sent to the Respondents on January 4 and February 17, 1995, non-filer notices for failing to file the Post-General and Year End Reports. The two notices informed the Respondents that failure to file the reports might result in audit or legal enforcement action. To date, despite discussions and correspondence between this Office and the Respondents, the 1994 Post-General and Year End Reports have not been filed. Therefore, the Office of the General Counsel recommends that the Commission find probable cause to believe the Natural Law Party of New York and Andrew Mallon, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that Natural Law Party of New York and Andrew Mallon, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).

Date

8/30/96

Lawrence M. Noble
General Counsel

LM Noble (JH)

96043764833

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

SEP 27 10 08 AM '96

September 20, 1996

Jeff Long
FEC
999 E Street NW
Washington, DC 20463

MUR 4343

Dear Mr. Long,

In response to your brief and our conversation today

1) Enclosed please find copies of our:

- a) 1994 post general report
- b) 1994 year end report

2) It is our contention that these reports were mailed by first-class mail by the appropriate deadlines in the past. We do not have certified postal receipts because since the founding of The Natural Law Party of New York in 1992 we have not had problems with missing FEC reports. Andy Dodson in your reports analysis section told me earlier this week he has two copies of our 1995 year end report. One arrived in January, 1996 the other in June 1996. This was because we were told in June the FEC did not have a copy of our 1995 year end report. We mailed another copy and now your computers, according to Mr. Dodson show in fact we were in compliance. FEC was requesting records it already had.

3) The Natural Law Party of New York is an independent organization from the Natural Law Party of Fairfield, Iowa.

4) Termination: we agreed today there was a misunderstanding in June when we sent a separate letter requesting termination of the Natural Law Party of New York. We understand this can only be done by checking the appropriate box on the 3x form. This has been done. Therefore we will submit a report for the subsequent period(s) until Termination by the FEC is granted.

5) All these reports show that The Natural Law Party of New York has had no funds during this period.

At this point we ask again that the enclosed forms be accepted and this case closed

Sincerely,



Andrew B. Mallon

96043764834

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. **C00273599**
ANDREW MALLON
NATURAL LAW PARTY OF NEW YORK
1510 YORK AVENUE SUITE 101 414 E. 88TH ST
NEW YORK NY 10028

061493 PT250

2. FEC IDENTIFICATION NUMBER

3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on (date).

4. TYPE OF REPORT

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

Monthly Report Due On:

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

- ☐ Twelfth day report preceding (Type of Election) election on in the State of
☐ Thirtieth day report following the General Election on in the State of

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	4/1/94 through 6/30/94		
6. (a) Cash on Hand January 1, 19			\$ 428.23
(b) Cash on Hand at Beginning of Reporting Period		\$ 428.23	
(c) Total Receipts (from Line 19)		\$ 90.00	\$ 90.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 518.23	\$ 518.23
7. Total Disbursements (from Line 30)		\$ 73.59	\$ 73.59
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 444.64	\$ 444.64
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$ - 0 -	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$ - 0 -	

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

Type or Print Name of Treasurer
Andrew B. Mallon

Signature of Treasurer
[Signature]

Date
7-16-94

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

FEC FORM 3X
(revised 1/1/91)

96043764895

DETAILED SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS PAGE 2, FEC FORM 3X

(revised 1/1/91)

NAME OF COMMITTEE		REPORT COVERING PERIOD	
		FROM	TO:
		COLUMN A Total This Period	COLUMN B Calendar Year
I. Receipts			
11. Contributions (other than loans) From:			
a. Individual/Persons Other Than Political Committees			
i. Itemized (use Schedule A)		- 0 -	- 0 -
ii. Unitemized			
iii. Total (add i and ii) >			
b. Political Party Committees			
c. Other Political Committees (such as PACs)			
d. Total Contributions (add a iii, b and c) >			
12. Transfers From Affiliated/Other Party Committees			
13. All Loans Received			
14. Loan Repayments Received			
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)			
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees			
17. Other Federal Receipts (Dividends, Interest, etc.)			
18. Transfers from Nonfederal Account for Joint Activity			
19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) >		90.00	90.00
20. Total Federal Receipts (subtract line 18 from line 19) >			
II. Disbursements			
21. Operating Expenditures:			
a. Shared Federal/Non-Federal Activity (from Schedule H4)			
i. Federal Share			
ii. Non-Federal Share			
b. Other Federal Operating Expenditures			
c. Total Operating Expenditures (add a i, a ii, and b) >			
22. Transfers to Affiliated/Other Party Committees			
23. Contributions to Federal Candidates/Committees and Other Political Committees			
24. Independent Expenditures (use Schedule E)			
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F) ..			
26. Loan Repayments Made			
27. Loans Made			
28. Refunds of Contributions To:			
a. Individuals/Persons Other Than Political Committees			
b. Political Party Committees			
c. Other Political Committees (such as PACs)			
d. Total Contribution Refunds (add a, b and c) >			
29. Other Disbursements		73.59	73.59
30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >		73.59	73.59
31. Total Federal Disbursements (subtract line 21 a ii from line 30) >			
III. Net Contributions/Operating Expenditures			
32. Total Contributions (other than loans)/(from line 11d)			
33. Total Contribution Refunds (from line 28d)			
34. Net Contributions (other than loans)/(subtract line 33 from 32)			
35. Total Federal Operating Expenditures (add 21 a i and 21 b) >			
36. Offsets to Operating Expenditures (from line 15)			
37. Net Operating Expenditures (subtract line 36 from 35) >		73.59	73.59

96043764996

ITEMIZED INDEPENDENT EXPENDITURES

Page ____ of ____ Pages

(See Reverse Side for Instructions)

Name of Committee (in Full)				
Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
POSTMASTER	POSTAGE	4/12/94	75.00	☐ Support ☐ Oppose
BANK CHARGES	CHARGES	4/28/94	21.17	☐ Support ☐ Oppose
FEE FOR POSTAGE	FEE	4/7/94	1.95	☐ Support ☐ Oppose
BANK CHARGES	CHARGES	5/15/94	23.27	☐ Support ☐ Oppose
BANK CHARGES	CHARGES	6/15/94	20.75	☐ Support ☐ Oppose
TELEPHONE	CHARGES	6/28/94	87.00	☐ Support ☐ Oppose
(a) SUBTOTAL of Itemized Independent Expenditures			\$ 229.14	
(b) SUBTOTAL of Unitemized Independent Expenditures			\$ 279.14	
(c) TOTAL Independent Expenditures			\$ 508.28	

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

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

My Commission expires: _____

NOTARY PUBLIC

X

Signature

Date

96043764837

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) NATURAL LAW PARTY OF NEW YORK ^{06/14/93}

ADDRESS (number and street) ☐ Check if different than previously reported
110-64 QUEEN BLVD SUITE 106

CITY, STATE and ZIP CODE
FOREST HILLS NY 11375

2. FEC IDENTIFICATION NUMBER
C06Y73599

3. ☐ This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☒ October 15 Quarterly Report

☐ January 31 Year End Report

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

☐ Termination Report

Monthly Report Due On:

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

☐ Twelfth day report preceding _____
(Type of Election)

election on _____ in the State of _____

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

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>7/1/94</u> through <u>10/31/94</u>		
6. (a) Cash on Hand January 1, 19__			\$ <u>444.64</u>
(b) Cash on Hand at Beginning of Reporting Period		\$ <u>444.64</u>	
(c) Total Receipts (from Line 19)		\$ <u>425.00</u>	\$ <u>425.00</u>
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ <u>869.64</u>	\$ <u>869.64</u>
7. Total Disbursements (from Line 30)		\$ <u>563.93</u>	\$ <u>563.93</u>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ <u>305.71</u>	\$ <u>305.71</u>
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$ <u>-0-</u>	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$ <u>-0-</u>	

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

ANDREW B. MALLOW

Signature of Treasurer

[Signature]

Date

12/3/94

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

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FEC FORM 3X

(revised 9/93)

FECAN101

96043764888

DETAILED SUMMARY PAGE

OF RECEIPTS AND DISBURSEMENTS

PAGE 2, FEC FORM 3X

(revised 1/1/91)

NAME OF COMMITTEE

NATURAL LAW PARTY OF New York

REPORT COVERING PERIOD

FROM 7/1

TO:

9/30/94

I. Receipts

COLUMN A
Total This Period

COLUMN B
Calendar Year

11. Contributions (other than loans) From:

a. Individual/Persons Other Than Political Committees

i. Itemized (use Schedule A)

ii. Unitemized

iii. Total (add i and ii) >

b. Political Party Committees

c. Other Political Committees (such as PACs)

d. Total Contributions (add a iii, b and c) >

12. Transfers From Affiliated/Other Party Committees

13. All Loans Received

14. Loan Repayments Received

15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)

16. Refunds of Contributions Made to Federal Candidates and Other Political Committees

17. Other Federal Receipts (Dividends, Interest, etc.)

18. Transfers from Nonfederal Account for Joint Activity

19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) >

20. Total Federal Receipts (subtract line 18 from line 19) >

475.00

475.00

II. Disbursements

21. Operating Expenditures:

a. Shared Federal/Non-Federal Activity (from Schedule H4)

i. Federal Share

ii. Non-Federal Share

b. Other Federal Operating Expenditures

c. Total Operating Expenditures (add a i, a ii, and b) >

22. Transfers to Affiliated/Other Party Committees

23. Contributions to Federal Candidates/Committees and Other Political Committees

24. Independent Expenditures (use Schedule E)

25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F) ..

26. Loan Repayments Made

27. Loans Made

28. Refunds of Contributions To:

a. Individuals/Persons Other Than Political Committees

b. Political Party Committees

c. Other Political Committees (such as PACs)

d. Total Contribution Refunds (add a, b and c) >

29. Other Disbursements

30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >

31. Total Federal Disbursements (subtract line 21 a ii from line 30) >

563.93

563.93

III. Net Contributions/Operating Expenditures

32. Total Contributions (other than loans) (from line 11d)

33. Total Contribution Refunds (from line 28d)

34. Net Contributions (other than loans) (subtract line 33 from 32)

35. Total Federal Operating Expenditures (add 21 a i and 21 b) >

36. Offsets to Operating Expenditures (from line 15)

37. Net Operating Expenditures (subtract line 36 from 35) >

96043764889

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1
FOR LINE NUMBER

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

NAME OF COMMITTEE (In Full)

NATURAL LAW PARTY OF NEW YORK

A. Full Name, Mailing Address and ZIP Code DAVID KENNA	Purpose of Disbursement ADVERTISING Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 7/7/94	Amount of Each Disbursement This Period 100.00
B. Full Name, Mailing Address and ZIP Code GINA SANTAGADA	Purpose of Disbursement ADVERTISING Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 7/27/94	Amount of Each Disbursement This Period 325.00
C. Full Name, Mailing Address and ZIP Code GINA SANTAGADA	Purpose of Disbursement ADVERTISING Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 8/17/94	Amount of Each Disbursement This Period 35.00
D. Full Name, Mailing Address and ZIP Code LEONARD STUDIOS	Purpose of Disbursement ADVERTISING Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 8/16/94	Amount of Each Disbursement This Period 85.52
E. Full Name, Mailing Address and ZIP Code CITI BANK	Purpose of Disbursement BANK CHARGES Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/18/94	Amount of Each Disbursement This Period 18.41
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

563.92

TOTAL This Period (last page this line number only)

563.92

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) NATURAL LAW PARTY OF N.Y.		2. FEC IDENTIFICATION NUMBER C60873599
ADDRESS (number and street) ☐ Check if different than previously reported 110-64 QUEENS BLVD		
CITY, STATE and ZIP CODE FOREST HILLS N.Y. 11375		
3. ☐ This committee has qualified as a multicandidate committee. (see FEC FORM 1M)		

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☒ January 31 Year End Report

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

☐ Termination Report

Monthly Report Due On:

☐ February 20

☐ June 20

☐ October 20

☐ March 20

☐ July 20

☐ November 20

☐ April 20

☐ August 20

☐ December 20

☐ May 20

☐ September 20

☐ January 31

☐ Twelfth day report preceding _____
(Type of Election)
election on _____ in the State of _____

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

(b) Is this Report an Amendment?

☐ YES

☐ NO

SUMMARY

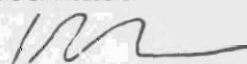
5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
10/1/94 through 12/31/94		
6. (a) Cash on Hand January 1, 19__		\$
(b) Cash on Hand at Beginning of Reporting Period	\$ 225.00	
(c) Total Receipts (from Line 19)	\$ 425.00	\$ 425.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 650.00	\$ 650.00
7. Total Disbursements (from Line 30)	\$ 650.00	\$ 650.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ -0-	\$ -0-
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ -0-	For further information contact: Federal Election Commission 990 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ -0-	

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

Type or Print Name of Treasurer

ANDREW MALLOW

Signature of Treasurer

X 

Date

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

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FEC FORM 3X
(revised 9/93)

96043764391

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 1 OF 1
FOR LINE NUMBER

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

NAME OF COMMITTEE (in Full)

NATURAL LAW PARTY OF NEW YORK

A. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period <i>4/25/00</i>
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

96043764802

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

OCT 23 4 55 PM '96

In the Matter of

Natural Law Party of New York and
Andrew Mallon, as treasurer

)
)
)
)

MUR 4343

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On April 18, 1996, the Commission found reason to believe the Natural Law Party of New York and Andrew Mallon, as treasurer ("Respondents"), violated 2 U.S.C. § 434(a)(4)(A) for failing to file the 1994 Post-General and Year End Reports. The General Counsel's Brief recommending probable cause was mailed to the Respondents on September 3, 1996, to which they responded on September 27, 1996.¹ This report, together with the General Counsel's Brief, sets forth the basis for the General Counsel's recommendation to find probable cause to believe the Respondents violated the Act, but to take no further action.

II. ANALYSIS

The Respondents maintain their position that the two 1994 reports were filed prior to the due dates. They were mailed by first class mail rather than certified mail because, they state, they have not had problems with missing reports since the committee's inception in 1992. Their response further states that the Committee is independent from the Natural Law Party in Fairfield, Iowa, and that the Committee has had no funds during the last reporting periods. The

¹ The Committee's response to the Brief included copies of three reports; the 1994 July Quarterly, October Quarterly and Year End. The filed Year End Report covers the 1994 post-general and year end reporting periods that are the subject of this matter.

96043764803

Respondents conclude their response by asking that the Commission accept their filed reports and close this case rather than impose a civil penalty.

The Respondents have offered no evidence to show that the subject reports were filed on time, and instead cite a problem free filing history that suggests that the subject reports were timely filed. In fact however, FEC records indicate that the Committee has had difficulty filing timely most of its required reports: Of the thirteen required reports since its inception, the Respondents filed eight of those after their due dates. Without evidence to the contrary, and given the Committee's filing history which further suggests that the reports were not timely, this Office recommends that the Commission find probable cause to believe the Natural Law Party of New York and Andrew Mallon, as treasurer, violated 2 U.S.C. § 434(a)(4)(A) for failing to timely file the 1994 Post-General and Year End Reports.

Although we would not ordinarily recommend declining to pursue such a matter, the Respondents have now filed the subject reports, and those reports confirm that Respondents have had no financial activity. Since Respondents also have initiated procedures to terminate as a political committee and, considering the current status of the Commission's resources, this Office recommends that the Commission take no further action, send an admonishment letter to the Respondents, and close the file.

III. RECOMMENDATIONS

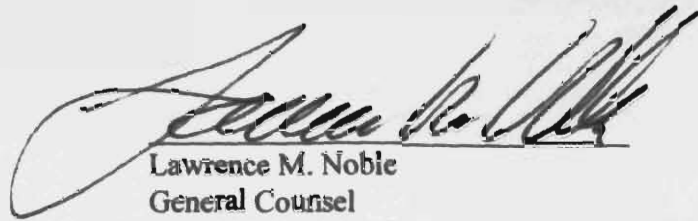
1. Find probable cause to believe that Natural Law Party of New York and Andrew Mallon, as treasurer, violated 2 U.S.C. § 434(a)(4)(A), and take no further action.

96043764804

2. Approve the appropriate admonishment letter.
3. Close the file.

Date

10/23/96


Lawrence M. Noble
General Counsel

Staff assigned: Jeffrey Long

96043764805

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Natural Law Party of New York and)
and Andrew Mallon, as treasurer.)

MUR 4343

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 29, 1996, the Commission decided by a vote of 5-0 to take the following actions in MUR 4343:

1. Find probable cause to believe that Natural Law Party of New York and Andrew Mallon, as treasurer, violated 2 U.S.C. § 434(a)(4)(A), and take no further action.
2. Approve the appropriate admonishment letter, as recommended in the General Counsel's Report dated October 23, 1996.
3. Close the file.

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

Attest:

10-29-96
Date

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

Received in the Secretariat: Wed., Oct. 23, 1996 4:55 p.m.
Circulated to the Commission: Thurs., Oct. 24, 1996 11:00 a.m.
Deadline for vote: Tues., Oct. 29, 1996 4:00 p.m.

lrd

96043764896



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 6, 1996

Andrew Mallon, Treasurer
Natural Law Party of New York
c/o Sam Stelzner, CPA
119 North Park Avenue, Suite 303
Rockville Center, NY 11570

MUR 4343
Natural Law Party of New York
and Andrew Mallon, as treasurer

Dear Mr. Mallon:

This is to advise you that on October 29, 1996, the Federal Election Commission found probable cause to believe that the Natural Law Party of New York and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A) by failing to file the 1994 Post-General and Year End Reports. After considering the circumstances of this matter, however, the Commission also determined to take no further action against the Committee and you, and closed its file in this matter.

The Commission reminds you that failing to publicly disclose a political committee's financial activity by not filing all required reports is a violation of the Federal Election Campaign Act of 1971, as amended. You should take steps to ensure that this activity does not occur in the future. Your request to terminate the Committee is noted, however, until you are notified that your request has been approved you must continue to file the required disclosure reports.

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

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

96043764897



FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20463

THIS IS THE END OF MUR # 4343

DATE FILMED 11-18-90 CAMERA NO. 4

CAMERAMAN JMB

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