



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4659

DATE FILMED 11-24-97 CAMERA NO. 2

CAMERAMAN Jm10

97043845031

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: **APR 3 1997**

ANALYST: Neil Evans

I. COMMITTEE: Pakistani Physicians Public Affairs Committee
(C00238204)
Arif Toor, M.D., Treasurer
(1/1/96-Present)
Ikram Khan, M.D., Treasurer
(10/1/95-1/1/96)¹
Hassan Bukhari, M.D., Treasurer
(prior to 1/1/95-10/1/95)
981 East Street²
Middletown, CT 06547

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

III. BACKGROUND:

Chronic Late Filing of Reports

Pakistani Physicians Public Affairs Committee ("the Committee") has failed to file four (4) Reports of Receipts and Disbursements in a timely manner for the 1995-1996 election cycle (see Chart on Page 2). The reports were filed between seventeen (17) and one hundred two (102) calendar days late.

¹ It appears that Dr. Khan was acting as treasurer.

² In a letter filed March 26, 1997, the treasurer notified the Commission that his temporary mailing address is c/o Kimberly J. Sweeney, 55 Country Lane, Meriden, CT 06451.

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On February 28, 1996, the Committee responded to the Nonfiler Notice sent February 23, 1996, by stating that the Committee's records were in the possession of its president, Dr. Ikram Khan. Notification that the 1995 Year End Report was late was forwarded to the new treasurer, Dr. Arif Toor, on February 27, 1996. The Committee's response included the address of the new treasurer (Attachment 4).

On March 12, 1996, the Committee filed an additional response to the Nonfiler Notice sent February 23, 1996. The Committee requested information regarding filing dates and corrected the previously submitted address for the current treasurer (Attachment 4).

On September 13, 1996, a Chronic Late Filer Notice was sent to the Committee for failing to file the 1995 Year End and 1996 July Quarterly Reports in a timely manner (Attachment 8). The Notice advised the Committee that any additional late filing of reports may result in legal enforcement action. Subsequent to the mailing of the Chronic Late Filer Notice, the Committee failed to file the 1996 12 Day Pre-General and 30 Day Post-General Reports in a timely manner.

On January 31, 1997, the analyst called and left a message for the Committee to inform them of their non-filing of the 30 Day Post-General Report. The same day, the Committee returned the call, and stated that the report would be sent by Federal Express on February 1, 1997 (Attachment 11).

On February 3, 1997, the Committee filed the 1996 30 Day Post-General Report (Attachment 12). This report contained activity covering the 12 Day Pre-General reporting period. This report disclosed \$6,000 in contributions to two (2) federal candidates for the General Election on October 10, 1996. This activity indicates that the Committee was also required to timely file the 12 Day Pre-General (10/1/96-10/16/96) Report.

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LATE FILING HISTORY

<u>REPORT TYPE</u>	<u>PRIOR NOTICE</u>	<u>DATE DUE</u>	<u>NON-FILER NOTICE</u>	<u>DATE FILED</u>
1995 Year End (7/1/95-12/31/95)	12/29/95 (Attachment 2)	1/31/96	2/23/96 (Attachment 3)	3/22/96 (Attachment 5)
1996 July Quarterly (4/1/96-6/30/96)	6/21/96 (Attachment 6)	7/15/96	None	8/01/96 (Attachment 7)
1996 12 Day Pre-General ¹ (10/1/96-10/16/96)	9/30/96 (Attachment 9)	10/24/96	None	2/03/97 (Attachment 12)
1996 30 Day Post-General ¹ (10/17/96-11/25/96)	9/30/96 (Attachment 9)	12/05/96	1/06/97 (Attachment 10) ²	2/03/97 (Attachment 12)

¹ The Committee filed the 30 Day Post-General Report which included the 12 Day Pre-General reporting period.

² The Nonfiler Notice was sent via email.

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	# OF COVERAGE DATES	# OF PAGES	MICROFILM LOCATION	TYPE OF FILER
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PAKISTANI PHYSICIANS PUBLIC AFFAIRS COMMITTEE
CONNECTED ORGANIZATION: NONE

IG #C00238204 NON-PARTY QUALIFIED

TOTAL

TOTAL PAGES

All reports have been reviewed, with the exception of the 1996 Amended October Quarterly Report.

Cash-On-Hand as of 12/31/96: \$12,819.62

Debts and Obligations owed to/by the Committee as of 12/31/96: \$0.00

27043845035

FEDERAL ELECTION COMMISSION
1995-1996
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 2APR97
At Document #1, page 2 of 2
PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
PAKISTANI PHYSICIANS PUBLIC AFFAIRS COMMITTEE						ID #C00238204 NON-PARTY QUALIFIED
CONNECTED ORGANIZATION:	NONE					
1995	STATEMENT OF ORGANIZATION - AMENDMENT			15OCT95	2	95FEC/002/1321
	MID-YEAR REPORT	4,407	5,079	31JAN95 -30JUN95	6	95FEC/986/1938
	MID-YEAR REPORT - AMENDMENT	-	-	31JAN95 -30JUN95	2	95FEC/011/1920
	MID-YEAR REPORT - AMENDMENT	-	-	31JAN95 -30JUN95	5	96FEC/014/4819
	REQUEST FOR ADDITIONAL INFORMATION			31JAN95 -30JUN95	3	95FEC/009/5026
	REQUEST FOR ADDITIONAL INFORMATION 2ND			31JAN95 -30JUN95	2	95FEC/012/5374
	YEAR-END	30,925	23,714	1JUL95 -31DEC95	27	96FEC/037/1055
	YEAR-END - AMENDMENT	30,925	23,714	1JUL95 -31DEC95	9	96FEC/049/5225
	NOTICE OF FAILURE TO FILE			1JUL95 -31DEC95	2	96FEC/032/0971
	REQUEST FOR ADDITIONAL INFORMATION			1JUL95 -31DEC95	4	96FEC/048/4870
1996	STATEMENT OF ORGANIZATION - AMENDMENT			8FEB96	2	96FEC/029/1888
	MISCELLANEOUS REPORT TO FEC			28FEB96	4	96FEC/032/5047
	STATEMENT OF ORGANIZATION - AMENDMENT			12MAR96	2	96FEC/033/4244
	MISCELLANEOUS REPORT TO FEC			12MAR96	2	96FEC/033/3356
	MISCELLANEOUS NOTICE FROM FEC			13SEP96	2	96FEC/077/5082
	APRIL QUARTERLY	7,167	13,070	1JAN96 -31MAR96	11	96FEC/039/0237
	1'ST LETTER INFORMATIONAL NOTICE			1JAN96 -31MAR96	2	96FEC/050/0359
	JULY QUARTERLY	12,250	13,707	1APR96 -30JUN96	9	96FEC/070/5483
	JULY QUARTERLY - AMENDMENT	12,250	13,707	1APR96 -30JUN96	5	96FEC/087/3295
	JULY QUARTERLY - AMENDMENT	12,250	13,707	1APR96 -30JUN96	5	96FEC/098/0826
	REQUEST FOR ADDITIONAL INFORMATION			1APR96 -30JUN96	2	96FEC/078/3536
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR96 -30JUN96	3	96FEC/084/3863
	OCTOBER QUARTERLY	14,625	5,768	1JUL96 -30SEP96	8	96FEC/087/3287
	OCTOBER QUARTERLY - AMENDMENT	14,625	5,768	1JUL96 -30SEP96	8	96FEC/098/0831
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL96 -30SEP96	6	97FEC/193/0954
	1'ST LETTER INFORMATIONAL NOTICE			1JUL96 -30SEP96	4	97FEC/185/2921
	POST-GENERAL	12,183	13,589	1OCT96 -25NOV96	9	97FEC/177/0772
	NOTICE OF FAILURE TO FILE			1OCT96 -25NOV96	2	97FEC/185/0939
	YEAR-END	627	1,841	26NOV96 -31DEC96	5	97FEC/177/0781
	TOTAL	82,184	0 76,768 0		153	TOTAL PAGES

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YEAR-END REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 29, 1995

WHO MUST FILE,
Party committees and PACs (nonconnected committees and separate segregated funds) must file a Year-End Report on January 31, 1996.

REPORT CONTENT AND DATES

I. Semiannual Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	07/01/95 - 12/31/95	01/31/96	01/31/96

Semiannual filers must disclose financial activity that occurred from July 1 through December 31, 1995, on their Year-End Report.

II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	12/01/95 - 12/31/95	01/31/96	01/31/96

Monthly filers must disclose financial activity from December 1 through December 31, 1995, 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

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

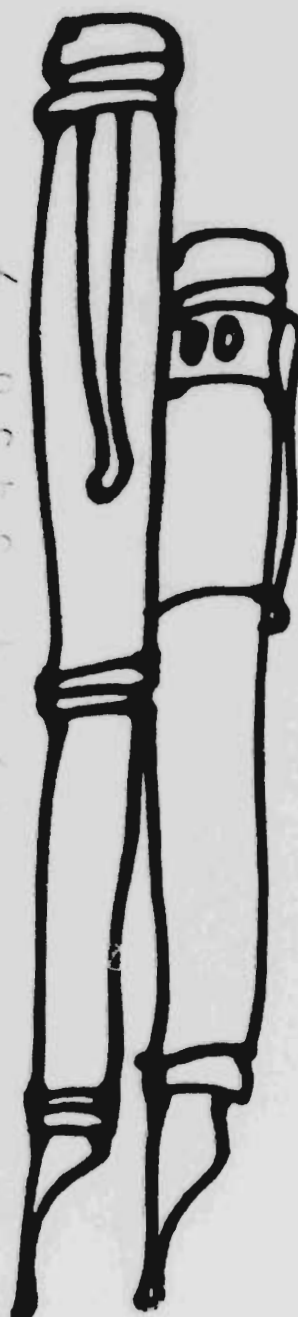
COMPLIANCE

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 (except for FEC approved computer generated forms) will be required to refile.

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)



PARTIES AND PACS

YEAR-END

1996 FILING SCHEDULE

I. Quarterly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April	01/01/96 - 03/31/96	04/15/96	04/15/96
July	04/01/96 - 06/30/96	07/15/96	07/15/96
October	07/01/96 - 09/30/96	10/15/96	10/15/96
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
-----24 Hour Reports***-----			
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
February	01/01/96 - 01/31/96	02/20/96	02/20/96
March	02/01/96 - 02/29/96	03/20/96	03/20/96
April	03/01/96 - 03/31/96	04/20/96	04/20/96
May	04/01/96 - 04/30/96	05/20/96	05/20/96
June	05/01/96 - 05/31/96	06/20/96	06/20/96
July	06/01/96 - 06/30/96	07/20/96	07/20/96
August	07/01/96 - 07/31/96	08/20/96	08/20/96
September	08/01/96 - 08/31/96	09/20/96	09/20/96
October	09/01/96 - 09/30/96	10/20/96	10/20/96
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
-----24 Hour Reports***-----			
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

***PACs that make independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours before the election must file 24 Hour Reports. Party committees may not make independent expenditures.

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

2704384508

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

February 23, 1996

Arif Toor MD, Treasurer
Pakistani Physicians Public Affairs
Committee
3006 South Maryland Parkway, Suite 465
Las Vegas, NV 89109

Identification Number: C00238204

Reference: Year End Report (7/1/95-12/31/95)

Dear Dr. Toor:

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 Secretary of the Senate). 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 Neil Evans 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

9750543082425009 991



PAK PAC

Board of DirectorsPresident

Ikram U Khan, M.D.
3006 S. Maryland Pkwy.
Suite 465
Las Vegas, NV 89109
(702) 734-1800
fax (702) 734-0548

Secretary/Treasurer

Hassan Bukhari, M.D.
Texas
(214) 826-2114

Members

Nasim Ashraf, M.D.
Oregon
(503) 673-5177

Murtaza Arain, M.D.
Illinois
(708) 968-2700

Javaid Anwar, M.D.
Nevada
(702) 364-5582

Arif Murtalin, M.D.
New York
(914) 562-0740

Mr. Akram Choudhry
New Jersey
(201) 744-8572

Amran Khan, M.D.
Texas
(214) 905-1300

Parvez Shah, M.D.
Maryland
(301) 384-9203

Arif Toor, M.D.
Connecticut
(203) 639-3134

PAKISTANI PHYSICIANS PUBLIC AFFAIRS COMMITTEE

PAK PAC Attachment #4, page 1 of 4

3006 S. Maryland Parkway, Suite 465 • Las Vegas, Nevada 89109 • (702) 734-1800

February 27, 1996

Federal Election Commission
Reports Analysis Division
Washington, D.C. 20463

Attention: Mr. Neil Evans

I.D. C00238204

Reference: Year End Report (7/1/95-12/31/95)

Dear Neil:

Again we have a problem that needs your assistance. As we have discussed previously, the prior PAK PAC treasurer suffered a heart attack in September /October, 1995. The records were all shipped to Dr. Ikram Khan as President of PAK PAC, as you know. As his surgical practice secretary, I then disbursed expenses from the account and, after Dr. Arif Toor was elected treasurer I notified you of the change, however, the change didn't occur until the end of January, although it was made effective January 1, 1996. Dr. Toor did not receive the records until last week. Obviously, when I had these records all I did was write checks and keep receipts. Dr. Toor will need time to sort out these records and fill out whatever paperwork you require. Would it be possible for you to "walk him through" this year end report as notification did not even go to him, it came under his name but to our address here in Las Vegas. I really want to stress that Dr. Toor did not receive any previous notification.

We deeply appreciate any assistance you may render, thank you Neil.

Sincerely,

Betty M. Goode

cc: FEC letter dated 2/23/96 rec'd 2/26/96

MAR 4 12 20 PM '96



PAK PAC

Board of Directors**President**

Ikram U Khan, M.D.
3006 S. Maryland Pkwy.
Suite 465
Las Vegas, NV 89109
(702) 734-1800
fax (702) 734-0548

Secretary/Treasurer

Hassan Bukhari, M.D.
Texas
(214) 826-2114

Members

Nasim Ashraf, M.D.
Oregon
(503) 673-5177

Murtaza Azam, M.D.
Illinois
(708) 968-2700

Amjad Anwar, M.D.
Nevada
(702) 369-5582

Arif Muslim, M.D.
New York
(914) 562-0740

Mr. Akram Choudhary
New Jersey
(201) 744-8572

Aman Khan, M.D.
Texas
(214) 905-1300

Paveez Shah, M.D.
Maryland
(301) 384-9203

Arif Toor, M.D.
Connecticut
(203) 632-2134

PAKISTANI PHYSICIANS PUBLIC AFFAIRS COMMITTEE

PAK PAC Attachment #4, page 2 of 4

3006 S. Maryland Parkway, Suite 465 • Las Vegas, Nevada 89109 • (702) 734-1800

January 31, 1996

Federal Election Commission
Reports Analysis Division
Washington, D.C. 20463

Attention: Mr. Neil Evans**I.D. C00238204****Re: Change of Name & Address for Treasurer****Dear Mr. Evans:**

Please be advised that as of January 1, 1996 the Treasurer for PAK PAC
(Pakistani Physicians Public Affairs Committee) is as follows:

Arif Toor, M.D.
29 Park Place
New Britain, CT 06052

If there is anything else required, or other notification needed, please let us know.

Sincerely,

Ikram U. Khan, M.D.
President PAK PAC

IUK:bmg



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

RQ-7

February 23, 1996

Arif Toor MD, Treasurer
Pakistani Physicians Public Affairs
Committee
3006 South Maryland Parkway, Suite 465
Las Vegas, NV 89109

Identification Number: C00238204

Reference: Year End Report (7/1/95-12/31/95)

Dear Dr. Toor:

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 Secretary of the Senate). 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 Neil Evans on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson
John D. Gibson
Assistant Staff Director
Reports Analysis Division

7980304525029

Handwritten notes:
[Mailed signed for Dr. Toor
2/27/96
C
S.H.]



PAKISTANI PHYSICIANS PUBLIC AFFAIRS COMMITTEE PAK PAC

Attachment #4, page 4 of 4

3006 S. Maryland Parkway, Suite 465 • Las Vegas, Nevada 89109 • (702) 734-1800

Board of DirectorsPresident

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- ✓ Arif Muslim, M.D.
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- ✓ Mr. Akram Choudhry
New Jersey
(201) 744-8572
- ✓ Aman Khan, M.D.
Texas
(214) 905-1300
- ✓ Parvez Shah, M.D.
Maryland
(301) 384-9203
- ✓ Arif Toor, M.D.
Connecticut
(203) 639-3134

March 1, 1996

Federal Election Commission
Reports Analysis Division
Washington, D.C.

Attention: John D. Gibson

I.D. # C00238204

Reference: Year End Report (7/1/95-12/31/95)

Dear Mr. Gibson:

In response to your letter dated February 23, 1996, I don't think that there is any doubt that we have incurred penalties from non-filing the above report due to our abysmal ignorance of the procedures to follow. If there is a packet of instructions for committees such as ours, with tax declaration forms for the specified dates for filing, we, represented by our new treasurer, will be only too happy to comply. I compounded your error of sending the notification to our address by inadvertently also supplying you with the wrong address for our new treasurer. As an error has already occurred, whereby we had to pay a penalty, we wish to do our utmost to conform in the future by being advised on exactly how we are to proceed. Our new treasurer needs all of the above information to proceed as quickly as possible. He has assured me that he, upon being given the correct information, can file reports as necessary in a timely fashion, personally.

The correct information on our treasurer is as follows:

Arif Toor, M.D.
981 East Street
Middletown, CT 06547 (203) 639-3134

Please accept our appreciation for your anticipated assistance.

Sincerely,

Betty M. Goode
Betty M. Goode
Office Manager to Dr. Ikram U. Khan, President

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

ATTACHMENT # 5

PAGE 1 of 2

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

MAR 28 1 05 PM '96

USE FEC MA
3 LABEL
C
PRINT
TYPE C

1. NAME OF COMMITTEE (in full) <i>Parkinson Physicians Political Action Committee</i>		2. FEC IDENTIFICATION NUMBER <i>8204</i>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <i>4001 W. WILSON STREET</i>		
CITY, STATE and ZIP CODE <i>Dallas Tx 75240</i>		
3. <input type="checkbox"/> 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 <i>7-1-95</i> through <i>12-31-95</i>		
6. (a) Cash on Hand January 1, 19 <i>95</i>		\$ 7406.11
(b) Cash on Hand at Beginning of Reporting Period	\$ 6,733.62	
(c) Total Receipts (from Line 19)	\$ 30,925.00	\$ 35,332.34
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 37,658.62	\$ 42,738.45
7. Total Disbursements (from Line 30)	\$ 23,714.79	\$ 28,794.62
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 13,943.83	\$ 13,943.83
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 900 E Street, NW Washington, DC 20463 Toll Free 800-424-6630 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

ARIF A. A. TOOR MD

Signature of Treasurer

Date

3/22/96

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)

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

Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

☐ Hand Delivered

DATE OF RECEIPT

☐ First Class Mail

POSTMARKED

☒ Registered/Certified Mail

POSTMARKED

3-22-96

☐ No Postmark

☐ Postmark Illegible

☐ 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

and/or DATE OF RECEIPT

SES
PREPARER

3-28-96
DATE PREPARED

96030371081

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

June 21, 1996

WHO MUST FILE

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

REPORT	REPORTING PERIOD*	REG./CERT.	FILING DATE
		MAILING DATE**	
July Quarterly	04/01/96 - 06/30/96	07/15/96	07/15/96

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 1996 Record.

24 HOUR REPORT ON 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.

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)

PARTIES AND PACS

JULY 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 (except for FEC approved computer generated forms) will be required to refile.

27043845047

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

REPORT OF RECEIPTS AND DISBURSEMENTS

ATTACHMENT # 7

PAGE 1 of 2

For Other Than An Authorized Committee
(Summary Page)RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

AUG 5 12 27 PM '96

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full)

Ballard Physicians Political Action Committee

ADDRESS (number and street)

☐ Check if different than previously reported

4001 Worth Street

CITY, STATE and ZIP CODE

Dallas Tx 75246

2. FEC IDENTIFICATION NUMBER

C-00238204

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:

<input type="checkbox"/> February 20	<input type="checkbox"/> June 20	<input type="checkbox"/> October 20
<input type="checkbox"/> March 20	<input type="checkbox"/> July 20	<input type="checkbox"/> November 20
<input type="checkbox"/> April 20	<input type="checkbox"/> August 20	<input type="checkbox"/> December 20
<input type="checkbox"/> May 20	<input type="checkbox"/> September 20	<input type="checkbox"/> 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 April 1 through June 30, 96

COLUMN A
This PeriodCOLUMN B
Calendar Year-to-Date

6. (a) Cash on Hand January 1, 1996

\$ 13,943.83

(b) Cash on Hand at Beginning of Reporting Period

\$ 8040.40

(c) Total Receipts (from Line 19)

\$ 12,250.07

\$ 19417.61

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

\$ 20,290.47

\$ 33,361.44

7. Total Disbursements (from Line 30)

\$ 13,707.74

\$ 26,778.71

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

\$ 6582.73

\$ 6582.73

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

\$ 0

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

\$ 0

For further information contact:
Federal Election Commission
900 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-219-3420

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

Arlene A. Toor, MD

Signature of Treasurer

Date

7/31/96

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

--	--	--	--	--	--	--	--	--	--

FEC FORM 3X

(revised 9/93)

Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

☐ Hand Delivered

DATE OF RECEIPT

☐ First Class Mail

POSTMARKED

☒ Registered/Certified Mail

POSTMARKED

8-1-96

☐ No Postmark☐ Postmark Illegible☐ 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

and/or DATE OF RECEIPT

Feb

PREPARER

8-5-96

DATE PREPARED

27043845049

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MS-L

Arif Toor, M.D.
Pakistani Physicians Public
Affairs Committee
981 East Street
Middletown, CT 06547

SEP 13 1996

Identification Number: C00238204

Reference: 1995-1996 Election Cycle Reports

Dear Mr. Toor:

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>
Year End (7/1/95-12/31/95)	1/31/96	3/22/96
July Quarterly (4/1/96-6/30/96)	7/15/96	8/1/96

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

Sincerely,

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

GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 30, 1996

I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96

III. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16***

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Post-General	10/01/96 - 11/25/96	12/05/96	12/05/96

WHO MUST FILE

Party committees and PACs must follow the above charts in order to determine whether they must file a report 12 days before the general election on November 5 (the Pre-General Report). All Party committees and PACs, regardless of financial activity, must file a report 36 days after the general election (the Post-General Election Report).

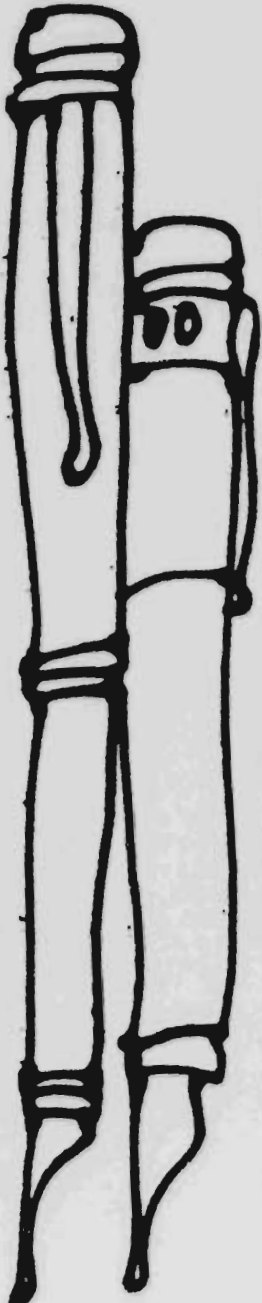
*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

**Reports sent 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 did not previously report them must also follow Chart II reporting requirements.

(over)

370434501



PARTIES AND PACS

PRE/POST GENERAL ELECTION

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures aggregating \$1,000 or more during the period beginning October 17 and ending November 3 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 (except for FEC approved computer generated forms) will be required to refile.

27943845052

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

RQ-7

(This is a copy of the text of a mailgram sent to the committee listed below on January 6, 1997.)

Arif Toor, M.D., Treasurer
Pakistani Physicians Public Affairs
Committee
981 East Street
Middletown, CT 06547

Identification Number: C00238204

Reference: 30 Day Post-General Report (10/1/96-11/25/96)

Dear Dr. Toor:

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 Secretary of the Senate). 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 Neil Evans 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

TELECON

Attachment # 11
Page 1 of 1

ANALYST:	Neil Evans
COMMITTEE:	Pakistani Physicians Public Affairs Committee (C00238204)
DATE:	Friday, January 31, 1997
SUBJECT(S):	30G Non-Filer

I called the committee and left a message regarding their non-filing of the 30 Day Post-General Report. The same day, an assistant to the treasurer returned my call, stating that the 30 Day Post-General Report would be sent to the Commission via Federal Express on February 1, 1997.

27043845054

REPORT OF RECEIPTS AND DISBURSEMENTS

Attachment # 12

For Other Than An Authorized Committee
(Summary Page)

Page 1 of 3

FEDERAL ELECTION
COMMISSION
WASHINGTON, D.C.

FEB 3 11 36 AM '97

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
American Pakistani Physicians Public Affairs Committee

ADDRESS (number and street) ☐ Check if different than previously reported
980 East Street

CITY, STATE and ZIP CODE
Middleton CT 06457

2. FEC IDENTIFICATION NUMBER

*C-00-238204*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
<i>Oct 1 96 through Nov 25, 96</i>		
6. (a) Cash on Hand January 1, 19 <i>96</i>		\$ 13,943.83
(b) Cash on Hand at Beginning of Reporting Period	\$ 15,440.05	
(c) Total Receipts (from Line 19)	\$ 13,783.87	\$ 46,227.08
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 27,623.92	\$ 60,770.91
7. Total Disbursements (from Line 30)	\$ 13,589.68	\$ 46,936.67
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 14,034.24	\$ 14,034.24
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

ARIF A. A. TOOR MD

Signature of Treasurer

Date

12/18/96

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

FEC FORM 3X

(revised 9/93)

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

 PAGE 1 OF 1
FOR LINE NUMBER
23

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)

Pakistanian Physicians Public Affairs Committee

A. Full Name, Mailing Address and ZIP Code

 Winston Bryant for Senak
P.O. Box 34083
Little Rock AR 72203

Purpose of Disbursement

Contribution

 Disbursement for: ☐ Primary ☒ General
☐ Other (specify)

Date (month, day, year)

10.10.96

Amount of Each Disbursement This Period

3,500.00

B. Full Name, Mailing Address and ZIP Code

 Friends of Dick Durbin
P.O. Box 7949
Springfield IL 62705

Purpose of Disbursement

Contribution

 Disbursement for: ☐ Primary ☒ General
☐ Other (specify)

Date (month, day, year)

10.10.96

Amount of Each Disbursement This Period

2500.00

C. Full Name, Mailing Address and ZIP Code

 Bill Dixon for Congress
1 Cambridge Place
Rochester NY 14534

Purpose of Disbursement

Contribution

 Disbursement for: ☐ Primary ☒ General
☐ Other (specify)

Date (month, day, year)

10.23.96

Amount of Each Disbursement This Period

2600.00

D. Full Name, Mailing Address and ZIP Code

 Kathy Karpin for Senate
1807 Capitol #100
Cheyenne WY 82003

Purpose of Disbursement

Contribution

 Disbursement for: ☐ Primary ☒ General
☐ Other (specify)

Date (month, day, year)

10.30.96

Amount of Each Disbursement This Period

1500.00

E. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

 Disbursement for: ☐ Primary ☐ General
☐ Other (specify)

Date (month, day, year)

Amount of Each Disbursement This Period

F. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

 Disbursement for: ☐ Primary ☐ General
☐ Other (specify)

Date (month, day, year)

Amount of Each Disbursement This Period

G. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

 Disbursement for: ☐ Primary ☐ General
☐ Other (specify)

Date (month, day, year)

Amount of Each Disbursement This Period

H. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

 Disbursement for: ☐ Primary ☐ General
☐ Other (specify)

Date (month, day, year)

Amount of Each Disbursement This Period

I. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

 Disbursement for: ☐ Primary ☐ General
☐ Other (specify)

Date (month, day, year)

Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

10,100

TOTAL This Period (last page this line number only)

10,100

Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

<input checked="" type="checkbox"/>	Hand Delivered	DATE OF RECEIPT <i>2-3-97</i>
<input type="checkbox"/>	First Class Mail	POSTMARKED
<input type="checkbox"/>	Registered/Certified Mail	POSTMARKED
<input type="checkbox"/>	No Postmark	
<input type="checkbox"/>	Postmark Illegible	
<input checked="" type="checkbox"/>	Received from the House Office of Records and Registration	DATE OF RECEIPT <i>2-3-97</i>
<input type="checkbox"/>	Received from the Senate Office of Public Records	DATE OF RECEIPT
<input type="checkbox"/>	Other (Specify):	POSTMARKED
		and/or DATE OF RECEIPT
<i>SES</i> PREPARER		<i>2-3-97</i> DATE PREPARED

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

Jul 1 11 30 AM '97

SENSITIVE

STAFF MEMBER: Larry Calvert
Stephanie King

RESPONDENTS: Pakistani Physicians Public Affairs Committee
Arif Toor, M.D., as treasurer

FEDERAL AGENCIES CHECKED: None

The Reports Analysis Division ("RAD") referred the Pakistani Physicians Public Affairs Committee and its treasurer ("Committee") to the Office of the General Counsel on April 3, 1997. The basis for the RAD referral is the failure of the Committee to timely file the 1995 Year End Report, 1996 July Quarterly Report, 1996 12 Day Pre-General Report, and the 1996 30 Day Post-General Report.

Based on the Factual and Legal Analysis, see Attachment 1, this Office recommends that the Federal Election Commission ("Commission") find reason to believe the Respondents violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii), and (iv).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

27043845059

IV. RECOMMENDATIONS


1. Open a MUR.
2. Find reason to believe that Pakistani Physicians Public Affairs Committee and Arif Toor, M.D., as treasurer, violated § 434(a)(4)(A)(i), (ii), (iii), and (iv) 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

2704384500
Date

6/30/97

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

1. Factual and Legal Analysis
2. Proposed agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Pakistani Physicians Public Affairs
Committee and Arif Toor, M.D., as
treasurer.

)
)
) RAD Referral
) #97NF-05
)

MUR 4659

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 8, 1997, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral #97NF-05:

1. Open a MUR.
2. Find reason to believe that Pakistani Physicians Public Affairs Committee and Arif Toor, M.D., as treasurer, violated § 434(a)(4)(A)(i), (ii), (iii), and (iv) 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 June 30, 1997.

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

Attest:

7-8-97

Date

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

Received in the Secretariat: Tues., July 01, 1997 11:20 a.m.
Circulated to the Commission: Wed., July 02, 1997 11:00 a.m.
Deadline for vote: Tues., July 08, 1997 4:00 p.m.

bjr



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1997

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

BY: Lois G. Lerner *ZGL by AAS*
Associate General Counsel

RE: MUR 4659 (formerly RAD Referral #97NF-05)
Additional Recommendation To Correct Citation Error

I. BACKGROUND

On July 8, 1997, the Commission made reason to believe findings with respect to the Pakistani Physicians Public Affairs Committee and Arif Toor, M.D., as treasurer ("the Committee"). Due to an error in the recommendation submitted by this Office, the Commission found reason to believe that the Committee violated "§ 434(a)(i), (ii), (iii) and (iv)," without specifying that the provisions violated were in Title 2, United States Code. Accordingly, this Office submits the following recommendations to correct the error. The Commission's determination to enter into conciliation with the Committee prior to a finding of probable cause to believe, and its approval of a Factual and Legal Analysis, a proposed conciliation agreement, and the appropriate letter, would remain unchanged by these recommendations.

II. RECOMMENDATIONS

1. Rescind the July 8, 1997 finding of reason to believe that Pakistani Physicians Public Affairs Committee and Arif Toor, M.D., as treasurer, violated § 434(a)(i), (ii), (iii) and (iv).
2. Find reason to believe that Pakistani Physicians Public Affairs Committee and Arif Toor, M.D., as treasurer, violated 2 U.S.C. § 434(a)(i), (ii), (iii) and (iv).

Staff assigned: Lawrence L. Calvert Jr.
Stephanie King



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

JUL 10 4 10 PM '97

July 10, 1997

SENSITIVE

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

BY: Lois G. Lerner *JGL by AAS*
Associate General Counsel

RE: Shorter Voting Deadline for General Counsel's Memorandum
in MUR 4659

The Commission originally approved the findings in this matter on July 8, 1997. As the attached memorandum indicates, however, there was a citation error in the findings due to an error in the recommendation originally submitted by this Office. Therefore, this Office is circulating the attached memorandum on a 24 hour tally vote basis so that respondents will be afforded the most expeditious notice under the circumstances.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Pakistani Physicians Public Affairs) MUR 4659 (formerly
Committee and Arif Toor, M.D., as) RAD Referral #97NF-05)
treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 14, 1997, the Commission decided by a vote of 5-0 to take the following actions in MUR 4659 (formerly RAD Referral #97NF-05):

1. Rescind the July 8, 1997 finding of reason to believe that Pakistani Physicians Public Affairs Committee and Arif Toor, M.D., as treasurer, violated § 434(a)(i), (ii), (iii) and (iv).
2. Find reason to believe that Pakistani Physicians Public Affairs Committee and Arif Toor, M.D., as treasurer, violated 2 U.S.C. § 434(a)(i), (ii), (iii) and (iv).

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

Attest:

7-14-97
Date

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

Received in the Secretariat: Thurs., July 10, 1997 4:18 p.m.
Circulated to the Commission: Fri., July 11, 1997 12:00 p.m.
Deadline for vote: Mon., July 14, 1997 4:00 p.m.

bjr



FEDERAL ELECTION COMMISSION
Washington, DC 20463

July 21, 1997

Arif Toor, M.D., Treasurer
Pakistani Physicians Public Affairs Committee
981 East Street
Middletown, CT 06547

RE: MUR 4659
Pakistani Physicians Public Affairs Committee
and Arif Toor, M.D., as Treasurer

Dear Dr. Toor:

On July 14, 1997, the Federal Election Commission found that there is reason to believe Pakistani Physicians Public Affairs Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(i), (ii), (iii) and (iv), provisions 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 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 Stephanie King, the paralegal assigned to this matter, at (202) 219-3690.

Sincerely,



John Warren McGarry
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

27043845066

**FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS**

RESPONDENTS: Pakistani Physicians Public Affairs Committee MUR: 4659
 and Arif Toor, M.D., as Treasurer

I. GENERATION OF MATTER

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).

II. FACTUAL AND LEGAL ANALYSIS

A. The Law

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that all political committees other than authorized committees of a candidate file either quarterly or monthly reports. In a calendar year in which a regularly scheduled general election is held, quarterly reports shall be filed 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). The Act requires the committee to file a pre-election report no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) any election in which the committee makes a contribution. 2 U.S.C. § 434(a)(4)(A)(ii). The Act also requires the

27043845067

committee to file a post-general election report no later than the 30th day after the general election which shall be complete as of the 20th day after the general election.

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

Pursuant to Section 434(a)(1), the treasurer of a political committee shall file reports of receipts and disbursements in accordance with the provisions of that subsection.

B. The Facts

The Pakistani Physicians Public Affairs Committee ("the Committee") is a political committee that is not an authorized committee of a candidate. The Committee is required to file reports on a quarterly basis.

The respondents were required to file the 1995 Year End Report no later than January 31, 1996. Respondents were also required to file the 1996 July Quarterly Report no later than July 15, 1996. In addition, respondents were required to file the 1996 Pre General Report no later than October 24, 1996 and the 1996 Post General Report no later than December 5, 1996. Each of these reports were filed between 17 and 102 days late.

Prior notices were mailed to the committee informing it of the due dates for filing each of the reports at issue. Moreover, separate non-filer notices were sent with respect to the 1995 Year End and 1996 Post General Reports, stating that the Committee failed to file the reports at issue and advising it to file the reports immediately. Although the Committee was given prior notice of when to file reports, it continued to submit reports after their due dates during the 1995-1996 election cycle.

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Therefore, there is reason to believe that the Pakistani Physicians Public Affairs Committee and Arif Toor, M.D., as treasurer, violated 2 U.S.C.

§ 434(a)(4)(A)(i), (ii), (iii), and (iv).

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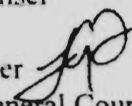
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 24, 1997

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

BY: Lois G. Lerner 
Associate General Counsel

RE: MUR 4659 -- Pakistani Physicians Public Affairs Committee
and Arif Toor, M.D., as treasurer

I. BACKGROUND

On July 14, 1997, the Commission made reason to believe findings in the above-captioned matter in correction of an omission in prior reason to believe findings. Unfortunately, this Office's recommendations, on which the corrected findings were based, themselves contained an error. This Office recommends the Commission adopt the recommendations below in order to finally correct both errors.

II. RECOMMENDATIONS

1. Rescind the July 8 and July 14, 1997 reason to believe findings in MUR 4659.
2. Find reason to believe that Pakistani Physicians Public Affairs Committee and Arif Toor, M.D., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii) and (iv).
3. Approve the appropriate letter.

Staff assigned: Lawrence L. Calvert Jr.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

JUL 24 1 04 PM '97

July 24, 1997

SENSITIVE

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

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

RE: Shorter Voting Deadline for General Counsel's Memorandum
in MUR 4659

This Office requests that the attached memorandum, concerning a correction of error, be circulated on a 24-hour tally vote basis in order to provide respondents with the most expeditious notice possible under the circumstances.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Pakistani Physicians Public Affairs) MUR 4659
Committee and Arif Toor, M.D., as)
treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 25, 1997, the Commission decided by a vote of 4-0 to take the following actions in MUR 4659:

1. Rescind the July 8 and July 14, 1997 reason to believe findings in MUR 4659.
2. Find reason to believe that Pakistani Physicians Public Affairs Committee and Arif Toor, M.D., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii) and (iv).
3. Approve the appropriate letter, as recommended in the General Counsel's Memorandum dated July 24, 1997.

Commissioners Aikens, Elliott, McDonald, and McGarry voted affirmatively for the decision; Commissioner Thomas did not cast a vote.

Attest:

7-28-97
Date

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

Received in the Secretariat: Thurs., July 24, 1997 1:04 p.m.
Circulated to the Commission: Thurs., July 24, 1997 4:00 p.m.
Deadline for vote: Fri., July 25, 1997 4:00 p.m.

bjr



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 1, 1997

Arif Toor, M.D., Treasurer
Pakistani Physicians Public Affairs Committee
981 East Street
Middletown, CT 06547

RE: MUR 4659
Pakistani Physicians Public Affairs Committee
and Arif Toor, M.D., as treasurer

Dear Dr. Toor:

On July 21, 1997, you were notified that the Federal Election Commission ("Commission") had found reason to believe that the Pakistani Physicians Public Affairs Committee ("Committee") and you, as treasurer, had violated 2 U.S.C. § 434(a)(i), (ii), (iii) and (iv).

Please be advised that the statutory citation provided in your previous notification letter is incorrect. On July 25, 1997, the Commission corrected the error by rescinding its prior findings and finding reason to believe that the Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii) and (iv).

The citation was stated correctly in the Factual and Legal Analysis and proposed conciliation agreement provided to you on July 21. However, in order to ensure that you have received proper notice, we will consider your 15-day period to respond to the Factual and Legal Analysis and the 30-day pre-probable cause conciliation period, both of which were described in detail in Chairman McGarry's July 21 letter, to run from your receipt of this letter.

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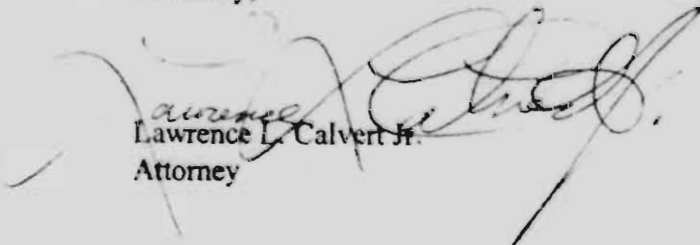
Arif Toor, M.D.

MUR 4659

Page 2

If you have any questions, please contact me or Stephanie King, another staff member assigned to this matter, at (202) 219-3690.

Sincerely,


Lawrence L. Calvert Jr.
Attorney

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PAKISTANI AMERICAN PHYSICIANS PUBLIC AFFAIRS COMMITTEE
PAK PAC

981 East Street Middletown, Connecticut 06457

Board of Directors
(1996-1997)

President

Mr. Akram Choudhry
874-A2
Pompton Ave
Cedar Grove, NJ 07009
(201) 744-8572
Fax(201) 857-7976

Secretary/Treasurer

Arif A.A. Toor, MD
Connecticut
(203) 639-3134

Javaid Anwar, MD

Nevada
(702) 369-5582

Murtaza / in, MD

Illinois
(708) 968-2700

Nasim Ashraf, MD

Oregon
(541) 673-5177

S. Amjad Hussain, MD

Ohio
(419) 698-7770

Amanullah Khan, MD

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Aram U. Khan, MD

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Shahnaz Khan, MD

Florida
(813) 788-7651

Arif Muslim, MD

New York
(914) 562-0740

Parvez Shah, MD

Maryland
(301) 490-0500

August 18, 1996

Ms. Stephanie King
Para Legal
Federal Election Commission
Washington DC 20463.

Dear Ms. King:

I am personally grateful for your kind and sympathetic guidance and assistance in helping me understand the appeals and consent settlement process. Enclosed is the letter addressed to the commission explaining our situation.

Yours Sincerely

Arif A.A. Toor M.D.
Secretary / Treasurer
Pakistani American Physicians
Public Affairs Committee.

Aug 19 12 03 PM '96



Board of Directors
(1996-1997)

President:

Mr. Akram Chondhry
874-A2
Pompton Ave
Cedar Grove, NJ 07009
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Fax(201) 857-7976

Secretary/Treasurer

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Ikram U. Khan, MD
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Shahnaz Khan, MD
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(813) 788-7651

Arif Muslim, MD
New York
(914) 562-0740

Parvez Shah, MD
Maryland
(301) 490-0500

PAKISTANI AMERICAN PHYSICIANS PUBLIC AFFAIRS COMMITTEE
PAK PAC

981 East Street Middletown, Connecticut 06457

August 18, 1997

Federal Election Commission,
Washington DC 20463.

RE: MUR 4659

Dear Sir:

I have reviewed the factual statement as well as the consent settlement agreement and the above referenced letter. I contacted Ms. Stephanie King the Paralegal person assigned to this case by telephone immediately after receiving the information and informed her that I would respond to your letter as soon as I collect all the facts.

Pakistani American Physicians Public Affairs Committee (PAK PAC) is a very small organization with meager income. In October 1995 our previous Secretary/Treasurer had to leave due to a sudden and serious illness. I was asked to fill the void created by the sudden departure and two months latter I became the Secretary/ Treasurer of the committee at the end of December 1995. This is a volunteer position but we do have a part time paid book-keeper who documents all the income/expense, fills out the reports and mails these to FEC.

My investigations of the problem at our end has revealed the following facts:

- 1) I and our book keeper both were not aware of our responsibility of making pre and post election filing.
- 2) We erroneously although honestly understood that during an election year the reports have to be made every quarter and during a non election year every six months. **I do realize that ignorance of law or the rules is no excuse** but I do want to demonstrate that **the infarction was not deliberate but an honest mistake** for which I am extremely sorry and I assure you that it will not be repeated.

Aug 19 12:03 PM '97



PAKISTANI AMERICAN PHYSICIANS PUBLIC AFFAIRS COMMITTEE
PAK PAC

981 East Street Middletown, Connecticut 06457

Board of Directors
(1996-1997)

President

Mr. Akram Choudhry
87-A-2
Pompton Ave
Cedar Grove, NJ 07009
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Fax (201) 857-7976

Secretary/Treasurer

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Arif Muslim MD
New York
(914) 862-1174

Parvez Shah MD
Maryland
(301) 490-0500

- 3) These errors are further compounded by another dilemma, our book keeper was on vacation in July 1996 and missed the filing date. I realized the problem and fixed the mistake but the report was already 15 days past the due date.
- 4) Our records show that the reports were submitted on the following dates:
 - a) 1st Quarter, January 1, 1996 through March 31, 1996 report was filed on 4/2/96. Filed on time.
 - b) 2nd quarter, April 1, 1996 through June 30 1996 report was filed on 7/31/96. Filed two weeks late.
 - c) 3rd quarter, July 1, 1996 through September 30, 1996 report was filed on 10/14/96. Filed on time.
 - d) 4th quarter, October 1, 1996 through November 25, 1996 report was filed on 12/12/96. Filed on time.
 - e) A report was filed on 1/31/1996, for the period November 26, 1996 to December 31, 1996. This was necessary because the bank statement for December 1996 got lost and to be on time we had filed the 4th quarter report up to November 25, 1995 without the interest income information and the supplemental report was filed to complete full quarter information.

Please note that three out of four quarterly reports were filed on time. However since we did not realize the need for pre and post election filing the pre-election report was late by 49 days and post election report was late by 7 days. At no time a delay of 102 days occurred as stated under the "Factual analysis" "section B" "The Facts".



PAKISTANI AMERICAN PHYSICIANS PUBLIC AFFAIRS COMMITTEE
PAK PAC

981 East Street Middletown, Connecticut 06457

Board of Directors
(1996-1997)

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Parvez Shah, MD
Maryland
(301) 490-0500

In the end I once again apologize for our past mistakes and request your indulgence in this matter. I assure you that I would personally see to it the no such incident occurs in the future.

Yours Sincerely

Arif A. A. Toor, M.D.
Secretary/Treasure
Pakistani American Physicians
Public Affairs Committee.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Pakistani Physicians Public Affairs
Committee and Arif A.A. Toor, M.D.,
as treasurer

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)
)
)

MUR 4659

SENSITIVE

GENERAL COUNSEL'S REPORT

I. **BACKGROUND**

Attached is a revised conciliation agreement which has been submitted on behalf of Pakistani Physicians Public Affairs Committee and Arif A.A. Toor, M.D., as treasurer. On July 1, 1997, the Commission found reason to believe that Respondents violated 2 U.S.C. § 434(a)(4)(A) by failing to file reports in a timely manner. The Commission simultaneously entered into conciliation prior to a finding of probable cause to believe and approved a conciliation agreement containing a civil penalty

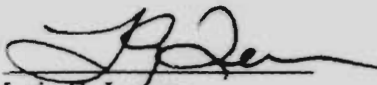
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II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Pakistani Physicians Public Affairs Committee and Arif Toor, M.D., as treasurer.
2. Approve the appropriate letter.
3. Close the file.

Lawrence M. Noble
General Counsel

11/4/97
Date


BY: Lois G. Lerner
Associate General Counsel

Attachment:

1. Conciliation Agreement

Staff Assigned: Stephanie King
Lawrence Calvert

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Pakistani Physicians Public Affairs) MUR 4659
Committee and Arif A.A. Toor, M.D.,)
as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 10, 1997, the Commission decided by a vote of 5-0 to take the following actions in MUR 4659:

1. Accept the conciliation agreement with Pakistani Physicians Public Affairs Committee and Arif Toor, M.D., as treasurer, as recommended in the General Counsel's Report dated November 4, 1997.
2. Approve the appropriate letter, as recommended in the General Counsel's Report dated November 4, 1997.
3. Close the file.

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

Attest:

11-10-97
Date

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

Received in the Secretariat: Wed., Nov. 05, 1997 10:00 a.m.
Circulated to the Commission: Wed., Nov. 05, 1997 11:00 a.m.
Deadline for vote: Mon., Nov. 10, 1997 4:00 p.m.

lrd



FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 17, 1997

Arif A.A. Toor, M.D., Treasurer
Pakistani Physicians Public Affairs Committee
South Ridge Lane
Cromwell, CT 06416

RE: MUR 4659

Dear Dr. Toor:

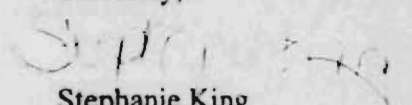
On November 10, 1997, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(A), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

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.

Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Stephanie King
Paralegal Specialist

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 4659
Pakistani Physicians Public Affairs)	
Committee and Arif Toor, M.D.,)	
as Treasurer)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Pakistani Physicians Public Affairs Committee and Arif Toor, M.D., as treasurer ("Respondents"), violated 2 U.S.C. § 434(a).

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

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

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

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

1. The Pakistani Physicians Public Affairs Committee ("Committee") is a political committee within the meaning of 2 U.S.C. § 431(4) and is not an authorized committee of any candidate. The Committee elected to file its reports with the Commission on a quarterly basis.

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2. Arif Toor, M.D., is the treasurer of the Pakistani Physicians Public Affairs Committee.

3. The Federal Election Campaign Act of 1971, as amended ("the Act"), requires all political committees other than authorized committees of a candidate to file either quarterly or monthly reports. The relevant provisions for quarterly report filing are as follows: in a calendar year in which a regularly scheduled general election is held, quarterly reports must be filed 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). A pre-election report must be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election, and shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii). The Act also requires that the committee file a post-general election report no later than the 30th day after the general election which shall be complete as of the 20th day after the general election. 2 U.S.C. § 434(a)(4)(A)(iii). In any other calendar year, reports covering the period beginning January 1 and ending June 30, must be filed no later than July 31, and reports covering the period beginning July 1 and ending December 31, must be filed no later than January 31 of the following calendar year.

2 U.S.C. § 434(a)(4)(A)(iv).

4. Pursuant to Section 434(a)(1), the treasurer of a political committee shall file reports of receipts and disbursements in accordance with the provisions of that subsection.

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5. On January 3, 1996, in a prior matter, the committee entered into a conciliation agreement for violation of 2 U.S.C. § 434(a)(4)(A)(i), (ii), and (iv).

6. The respondents were required to file the 1995 Year-End Report no later than January 31, 1996. Respondents were also required to file the 1996 July Quarterly Report no later than July 15, 1996. In addition, respondents were required to file the 1996 Pre-General Report no later than October 24, 1996 and the 1996 Post General Report no later than December 5, 1996.

7. On March 22, 1996, Respondents filed their 1995 Year End Report of Receipts and Disbursements, which disclosed \$30,925 in receipts and \$23,174 in disbursements. This report, which should have been filed on January 31, 1996 was 51 days late. On August 1, 1996, Respondents filed their 1996 July Quarterly Report of Receipts and Disbursements, which disclosed \$12,250 in receipts and \$13,707 in disbursements. This report which should have been filed on July 15, 1996 was 17 days late. Respondents filed their 1996 Post-General Report which also included the activity that took place during the 1996 Pre-General reporting period. Respondents filed the 1996 Post-General Report containing the 1996 Pre-General Report activity on February 3, 1996, which disclosed \$12,183 in receipts and \$6,000 in disbursements. This report which should have been filed on December 5, 1996 was 60 days late. Respondents filed their 1996 Post-General Report of Receipts and Disbursements, which disclosed \$12,183 in receipts and \$7,589 in disbursements. This report which should have been filed on December 5, 1996 was 60 days late.

8. The Commission mailed prior notices to the respondents informing them of the due dates for filing each of the reports at issue. In addition, shortly following the passage of each

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of the due dates, the Commission mailed separate notices to the respondents for each of the reports advising that the respondents had failed to file the reports at issue and instructing the respondents of file the reports immediately.

V. The Respondents failed to timely file the 1995 Year-End Report, 1996 July Quarterly Report, 1996 Pre-General Report, and the 1996 Post-General Report in violation of 2 U.S.C. § 434(a)(4)(A).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of nine thousand dollars (\$9,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.


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X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:


Lawrence M. Noble
General Counsel

BY:


Lois G. Zerner
Associate General Counsel

11/14/97
Date

FOR THE RESPONDENT(S):


ARIF A. A. FOR
TREASURER / SECRETARY
(Name)
(Position)

10/20/97
Date

21041345087



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4659

DATE FILMED 11-24-97 CAMERA NO. 2

CAMERAMAN JmU

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