



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

THIS IS THE BEGINNING OF MUR # 4760

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REPORTS ANALYSIS REFERRAL  
TO  
OFFICE OF GENERAL COUNSEL

DATE: June 13, 1997

ANALYST: Scott Francis

I. COMMITTEE: Crop Protection Political Action Committee  
(CPPAC) (C00248849)  
Jay J. Vroom, Treasurer  
(March 1995 - Present)  
Howard M. White, Treasurer  
(October 1990- March 1995)\*  
1156 15th Street NW, Suite 400  
Washington, DC 20005

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

III. BACKGROUND:

Failure to Timely File the 1995 Mid-Year, Year End and 1996 April Quarterly Reports

The Crop Protection Political Action Committee ("the Committee") failed to timely file the 1995 Mid-Year and Year End Reports and the 1996 April Quarterly Report. The Committee was first notified of the filing dates for the 1995 Mid-Year and Year End Reports in the Prior Notice mailed to the Committee on December 28, 1994 (Attachment 2). On July 7, 1995, a Prior Notice was mailed to the Committee notifying it that the filing date of the 1995 Mid-Year Report was

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\* The Committee changed its official name with the Commission on January 22, 1997 from American Crop Protection Association Political Action Committee to Crop Protection Political Action Committee; however, all reports were filed under the new name during the 1995-1996 election cycle. In addition, the Commission was not notified until December 11, 1996 that Jay J. Vroom was the Treasurer, even though Mr. Vroom signed all reports during the 1995-1996 election cycle.

July 31, 1995 (Attachment 3). On December 29, 1995, a Prior Notice was mailed to the Committee notifying it that the filing date for the 1995 Year End Report was January 31, 1996 (Attachment 4). This Prior Notice also disclosed that the 1996 April Quarterly Report was due on April 15, 1996.

On March 22, 1996, a Prior Notice was again mailed to the Committee notifying it of the filing date for the 1996 April Quarterly Report (Attachment 5).

On May 3, 1996, a Non-Filer Notice was sent to the Committee for failure to file the 1995 Mid-Year, Year End and 1996 April Quarterly Reports (Attachment 6).

The Committee filed two written explanations on January 3 and 8, 1997 for the delay in filing their 1995 Mid-Year, Year End and 1996 April Quarterly Reports (Attachment 7). The Committee states that the past Treasurer failed to respond to the Non-Filer notices and to alert the new Treasurer of the correspondence and failure to file the required reports. In addition, the Committee states that the holiday season and length of time since the November elections caused difficulty in reaching the campaign officials with whom they needed to speak.

The Committee hand delivered the 1995 Mid-Year, Year End and the 1996 April Quarterly Reports on January 22, 1997 (Attachment 8).

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	# OF COVERAGE DATES PAGES TYPE OF FILER	MICROFILM LOCATION
AMERICAN CROP PROTECTION ASSOCIATION POLITICAL ACTION COMMITTEE (CPAC)(FKA NACAPAC)				ID #C00248849	NON-PARTY QUALIFIED
CONNECTED ORGANIZATION: NATIONAL AGRICULTURAL CHEMICALS					
1995	STATEMENT OF ORGANIZATION - AMENDMENT			3APR95	2 95FEC/971/0206
	MID-YEAR REPORT	750	6,000	1JAN95 -30JUN95	7 97FEC/168/4315
	NOTICE OF FAILURE TO FILE			1JAN95 -30JUN95	2 96FEC/049/0326
	YEAR-END	23,750	5,500	1JUL95 -31DEC95	22 97FEC/168/4293
	NOTICE OF FAILURE TO FILE			1JUL95 -31DEC95	1 96FEC/049/0325
1996	STATEMENT OF ORGANIZATION - AMENDMENT			11DEC96	2 96FEC/159/4869
	MISCELLANEOUS NOTICE FROM FEC			13DEC96	3 96FEC/161/4593
	APRIL QUARTERLY	9,229	4,500	1JAN96 -31MAR96	8 97FEC/168/4276
	APRIL QUARTERLY - AMENDMENT	9,229	4,500	1JAN96 -31MAR96	9 97FEC/168/4284
	NOTICE OF FAILURE TO FILE			1JAN96 -31MAR96	1 96FEC/049/0324
	JULY QUARTERLY	14,435	12,750	1APR96 -30JUN96	10 96FEC/062/0003
	JULY QUARTERLY - AMENDMENT	-	-	1APR96 -30JUN96	2 97FEC/165/1877
	JULY QUARTERLY - AMENDMENT	14,435	12,750	1APR96 -30JUN96	11 97FEC/168/4265
	REQUEST FOR ADDITIONAL INFORMATION			1APR96 -30JUN96	3 96FEC/132/2762
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR96 -30JUN96	3 96FEC/164/1231
	OCTOBER QUARTERLY	12,850	19,000	1JUL96 -30SEP96	20 96FEC/085/0468
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL96 -30SEP96	1 97FEC/165/2875
	OCTOBER QUARTERLY - AMENDMENT	12,850	19,000	1JUL96 -30SEP96	20 97FEC/168/4245
	REQUEST FOR ADDITIONAL INFORMATION			1JUL96 -30SEP96	3 96FEC/132/2759
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL96 -30SEP96	4 96FEC/164/1234
	POST-GENERAL	16,702	29,500	1OCT96 -20NOV96	25 96FEC/129/1354
	POST-GENERAL - AMENDMENT	16,702	30,000	1OCT96 -25NOV96	25 97FEC/168/4220
	YEAR-END	6,050	0	26NOV96 -31DEC96	8 97FEC/171/3093
1997	MISCELLANEOUS REPORT TO FEC			23JAN97	2 97FEC/169/1546
TOTAL		83,766	0 77,750 0	194 TOTAL PAGES	

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	# OF COVERAGE DATES	MICROFILM PAGES	LOCATION TYPE OF FILER
CROP PROTECTION POLITICAL ACTION COMMITTEE (CPPAC)						ID #C00248849 NON-PARTY QUALIFIED
CONNECTED ORGANIZATION: AMERICAN CROP PROTECTION ASSOCIATION						
	1997 MISCELLANEOUS REPORT TO FEC			3JAN97	2	97FEC/164/3890
	STATEMENT OF ORGANIZATION - AMENDMENT			22JAN97	3	97FEC/168/4217
TOTAL		0	0	0	0	5 TOTAL PAGES

All reports have been reviewed.

Cash on Hand as of 12/31/96: \$14,337.10

Debts and obligations owed to the committee as of 12/31/96: \$0

Debts and obligations owed by the committee as of 12/31/96: \$0

# REPORT NOTICE

## 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)

**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



# SEMI-ANNUAL REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

July 7, 1995

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Mid-Year	01/01/95 - 06/30/95	07/31/95	07/31/95

**WHO MUST FILE**

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

**INDEPENDENT EXPENDITURES**

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

**CHANGE IN FILING FREQUENCY**

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

**LABEL**

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

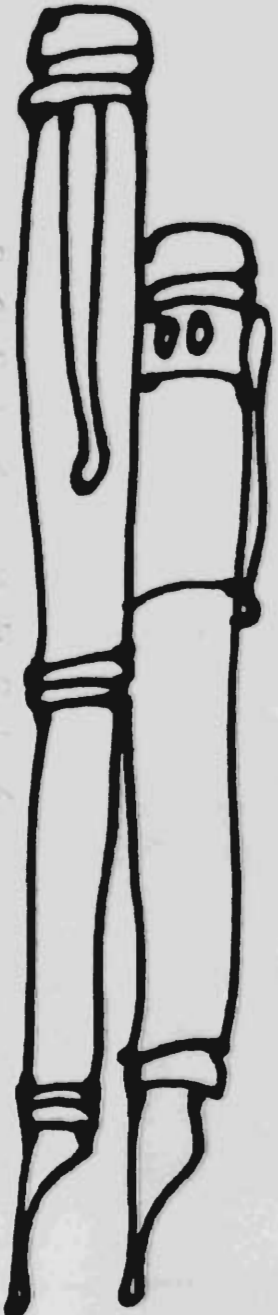
**COMPLIANCE**

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

FOR INFORMATION, CALL: 800/424-9530 or 202/419-3420





# 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.	FILING DATE
		MAILING 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.	FILING DATE
		MAILING 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.

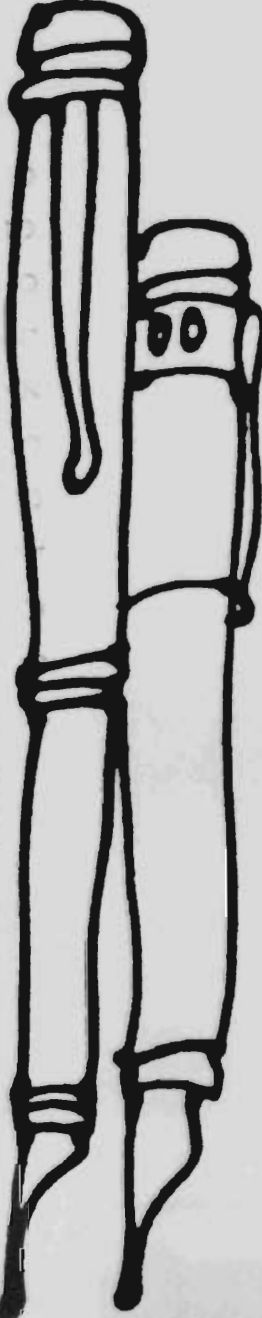
FOR INFORMATION, CALL: 800/424-9530 or 202/219-3420

# QUARTERLY REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 22, 1996



REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April Quarterly	01/01/96 - 03/31/96	04/15/96	04/15/96

### WHO MUST FILE

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

### PRE-ELECTION REPORTING

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

**APRIL 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.

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



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-7

MAY 3 1996

Howard M. White Jr., Treasurer  
American Crop Protection Association  
Political Action Committee (CPAC)  
(FKA NACAPAC)  
1156 15th Street NW, Suite 400  
Washington, DC 20005

Identification Number: C00248849

Reference: Mid-Year (1/1/95-6/30/95), Year End (7/1/95-12/31/95)  
and April Quarterly (1/1/96-3/31/96) Reports

Dear Mr. White:

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

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

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

If you have any questions regarding this matter, please contact Amy Reynolds 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





Dec 31 1 23 PM '96

Ms. Amy Suzanne Reynolds  
Reports Analyst  
Federal Election Commission  
999 E Street, N.W.  
Room 709  
Washington, DC 20463

Dear Ms. Reynolds:

Our meeting with you and Ken Davis the morning on December 18, 1996, was a very productive session for us and we appreciate your patience and understanding with our efforts to correct the reporting omissions with which we recently became aware.

Please allow me to summarize our action points associated with that meeting.

We will complete FEC Form 1 as supplemental notification of our change in Treasurer which we notified your office by letter last month.

We will amend our General Report for the period of Oct. 1 through Nov. 25 to update our reporting which covered Oct. 1-Nov. 20.

We will finalize our April Quarterly Report and submit it as soon as we review it.

We also will file our Year End '95 report and our Year End '96 report by Jan. 31, 1997.

Finally, we are still pursuing our review of 1996 contributions to ascertain whether the contributions applied to primary election, general election or debt retirement. As we mentioned to you, this is proving to be a very time-consuming process because of the Holiday Season and multiple calls necessary to reach the appropriate campaign officials. Nevertheless, we will continue to pursue this until the listing is complete.

If we can elaborate on any of the above matters, please give us a call. Meantime, please be assured that we are working diligently to resolve these areas of unfinished business and to bring our file up to date. Thank you again for your assistance.

  
A. Allan Roe



RECEIVED  
FEDERAL ELECTION  
COMMISSION  
REPORTS ANALYSIS  
DIVISION

JAN 9 10 24 AM '97

January 8, 1997

HAND DELIVERED

Mr. John D. Gibson  
Assistant Staff Director  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Dear Mr. Gibson:

This is to acknowledge receipt of your letter of December 27 and to bring you up to date with our progress in completing the July and October Quarterly reports and other filings.

We discovered these omissions via the letters you sent on December 4, 1996. This was the first knowledge we had of your interest in additional information. A former employee responsible for ACPA's Political Action Committee (CPPAC) record-keeping and FEC filings not only failed to respond to your requests but also failed to alert us to your correspondence.

This situation has prompted us to conduct a complete review of our CPPAC records for 1995 and 1996. Two of our staff, Lawrence Norton and Allan Noe, met on December 18 with Amy Suzanne Reynolds and Ken Davis of your staff to familiarize them with this matter and to outline the steps we were taking to correct the reports. Unfortunately, the holiday season and length of time since the November elections have caused difficulties in reaching all the campaign officials with whom we needed to talk.

Mr. Noe recently described these efforts in a letter to Mrs. Reynolds on January 3.

We are hopeful of having all the information in hand to enable us to respond by January 10 which is when the next 15 day extension is up. We also hope that this explanation is satisfactory to forego any audit or legal enforcement action should we be unable to keep that schedule.

We will call your office to see if the above explanation and response is satisfactory.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay J. Vroom".

Jay J. Vroom  
Treasurer

JJV:df

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

Attachment 8

Page 1 of 4

COMMISSION  
ELECTION  
REPORTS ANALYSIS  
DIVISION

JAN 22 11 17 AM '97

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <u>(CPPAC)</u> <u>Crip Protection Political Action Committee</u>		2. FEC IDENTIFICATION NUMBER <u>C00248849</u>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <u>1150 15th St NW Suite 400</u>		
CITY, STATE and ZIP CODE <u>Washington DC 20005</u>		
3. <input checked="" 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

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
1/1/95 through 6/30/95		
6. (a) Cash on Hand January 1, 19 <u>95</u>		\$ 8,320
(b) Cash on Hand at Beginning of Reporting Period	\$ 8,320	
(c) Total Receipts (from Line 16)	\$ 750	\$ 750
(d) Subtotal (add Lines 6(b) and 8(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 9,070	\$ 9,070
7. Total Disbursements (from Line 30)	\$ 6,000	\$ 6,000
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 3,070	\$ 3,070
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	

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

Type or Print Name of Treasurer

Signature of Treasurer

Date

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

FEC FORM 3X

(revised 9/93)

## REPORT OF RECEIPT AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

Attachment 8

Page 2 of 4

REPORTS ANALYSIS  
DIVISION

JAN 22 11 17 AM '97

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) (APPAC) <u>Crop Protection Political Action Committee</u>	
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <u>1156 15th St NW Suite 400</u>	2. FEC IDENTIFICATION NUMBER <u>C00248849</u>
CITY, STATE and ZIP CODE <u>Washington DC 20005</u>	3 <input checked="" 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

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
<u>7/1/95</u> through <u>12/31/95</u>		
6. (a) Cash on Hand January 1, 19 <u>95</u>		\$ <u>8,320</u>
(b) Cash on Hand at Beginning of Reporting Period	\$ <u>3,070</u>	
(c) Total Receipts (from Line 19)	\$ <u>23,750</u>	\$ <u>24,500</u>
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ <u>26,820</u>	\$ <u>32,820</u>
7. Total Disbursements (from Line 30)	\$ <u>5,500</u>	\$ <u>11,500</u>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ <u>21,320</u>	\$ <u>21,320</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 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)	\$ <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:

Signature of Treasurer

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 18 U.S.C. § 437g.

FEC FORM 3X

(revised 1/93)

## REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)Attachment 8  
Page 3 of 4FEDERAL ELECTION  
COMMISSION  
REPORTS ANALYSIS  
DIVISION

JAN 22 11 17 AM '97

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <b>(EPPAC)</b> <b>CROP PROTECTION POLITICAL ACTION COMMITTEE</b>		2. FEC IDENTIFICATION NUMBER <b>C 00248849</b>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <b>1156 15TH ST. NW, Suite 400</b>		
CITY, STATE and ZIP CODE <b>WASHINGTON, D.C. 20005</b>		
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:

<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	COLUMN A This Period	COLUMN B Calendar Year-to-Date
<b>1-1-96 through 3-31-96</b>		
6. (a) Cash on Hand January 1, 19		\$ 21,320. —
(b) Cash on Hand at Beginning of Reporting Period	\$ 21,320. —	
(c) Total Receipts (from Line 19)	\$ 9,229.50	\$ 9,229.50
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 30,549.50	\$ 30,549.50
7. Total Disbursements (from Line 30)	\$ (4,500. —)	\$ (4,500. —)
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 26,049.50	\$ 26,049.50
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

Jay J. Vroom

Signature of Treasurer

Date

4/10/96

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

1-22-97

☐ First Class Mail

POSTMARKED

☐ Registered/Certified Mail

POSTMARKED

☐ 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

SEB  
PREPARED

1-23-97

DATE PREPARED

FEDERAL ELECTION COMMISSION

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

FIRST GENERAL COUNSEL'S REPORT

**SENSITIVE**

RAD REFERRAL: 97NF-23  
DATE ACTIVATED: June 1, 1998

SOURCE: INTERNALLY GENERATED

RESPONDENTS: American Crop Protection Association Political Action Committee and Jay J. Vroom, as Treasurer<sup>1</sup>

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

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

**I. GENERATION OF MATTER**

The Reports Analysis Division ("RAD") referred the American Crop Protection Association Political Action Committee ("the Committee"), and Jay J. Vroom, as treasurer, to the Office of General Counsel on June 13, 1997. The basis of the RAD referral is the failure of the Committee to timely file the 1995 Mid-Year and Year End Reports and the 1996 April Quarterly Report.

**II. FACTUAL AND LEGAL ANALYSIS**

Based on the Factual and Legal Analysis, see Attachment I, this Office recommends the Commission find reason to believe the respondents violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv).

<sup>1</sup> Howard M. White was the treasurer from October 1990 to March 1995.



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IV. RECOMMENDATIONS


1. Open a MUR.
2. Find reason to believe American Crop Protection Association Political Action Committee and Jay J. Vroom, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) 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

Date

6/12/98

BY:

  
Lois G. Lerner  
Associate General Counsel

Attachments:

1. Factual and Legal Analysis
2. Proposed Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

American Crop Protection Association )  
Political Action Committee and )  
Jay J. Vroom, as Treasurer. )

RAD Referral  
#97NF-23

MUR 4760

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 18, 1998, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral #97NF-23:

1. Open a MUR.
2. Find reason to believe American Crop Protection Association Political Action Committee and Jay J. Vroom, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) 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 12, 1998.

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

Attest:

June 18, 1998  
Date

for Mary Th. Done  
Marjorie W. Emmons  
Secretary of the Commission

Received in the Secretariat: Fri., June 12, 1998 4:20 p.m.  
Circulated to the Commission: Mon., June 15, 1998 11:00 a.m.  
Deadline for vote: Thurs., June 18, 1998 4:00 p.m.

lrd



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

June 24, 1998

Jay J. Vroom, Treasurer  
American Crop Protection Association Political Action Committee  
1156 Fifteenth Street, N.W., Suite 400  
Washington, D.C. 20005

RE: MUR. 4760

Dear Mr. Vroom:

On June 18, 1998, the Federal Election Commission found that there is reason to believe the American Crop Protection Association Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) 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

Enclosures  
Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Conciliation Agreement

**FEDERAL ELECTION COMMISSION**  
**FACTUAL AND LEGAL ANALYSIS**

RESPONDENT: American Crop Protection  
Association Political Action Committee  
and Jay J. Vroom, as Treasurer

MUR: 4760

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

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The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that all political committees other than authorized committees of a candidate shall file quarterly reports in a calendar year in which a regularly scheduled general election is held, which 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 further requires that in any other calendar year, a report be filed covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31 and a report covering the period beginning July 1 and ending December 31, which shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv).

The American Crop Protection Association Political Action Committee ("the Committee") is a political committee that is not an authorized committee of a candidate.

Respondents failed to timely file the 1995 Mid-Year and Year End Reports and the 1996 April Quarterly Report. Respondents were required to file the Mid-Year report no later than July 31, 1995; the Year End report no later than January 31, 1996; and the April Quarterly report

no later than April 15, 1996. The 1995 Mid-Year report, which disclosed \$750.00 in receipts and \$6,000.00 in disbursements, was not filed until January 22, 1997, 541 days late. The 1995 Year End report, which disclosed \$23,750.00 in receipts and \$5,500.00 in disbursements, was not filed until January 22, 1997, 357 days late. The 1996 April Quarterly report, which disclosed \$9,229.50 in receipts and \$4,500.00 in disbursements, was not filed until January 22, 1997, 282 days late.

The Committee was first notified of the filing dates for the 1995 Mid-Year and Year End Reports in the Prior Notice mailed to the Committee on December 28, 1994. On July 7, 1995, a Prior Notice was mailed to the Committee notifying it that the filing date of the 1995 Mid-Year Report was July 31, 1995. On December 29, 1995, a Prior Notice was mailed to the Committee notifying it that the filing date for the 1995 Year End Report was January 31, 1996. This Prior Notice also disclosed that the 1996 April Quarterly Report was due on April 15, 1996. A Prior Notice was again mailed to the Committee on March 22, 1996, notifying it of the filing date for the 1996 April Quarterly Report.

Therefore, there is reason to believe Respondents violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv).





Douglas T. Nelson  
Senior Vice President  
& General Counsel

Ms. Anne M. Linnehan  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

July 1, 1998

Dear Ms. Linnehan:

We appreciated the opportunity to talk with you today, and discuss your June 24 letter to Jay Vroom regarding the FEC's findings on ACPA's CPPAC. Please allow us to offer some additional facts surrounding ACPA's delinquency in filing the quarterly reports on behalf of its political action committee. We take the management of our political action committee very seriously and it has always been our intent to comply with the letter and spirit of the law that governs PACs.

Our filing difficulties were traced to an administrative staff person in charge of completing and filing the quarterly reports with the FEC. Unfortunately, we were not aware that this job responsibility was not being carried out. We also were unaware that this employee deliberately intercepted the FEC's reminder notices sent on December 28, 1994, July 7, 1995, December 29, 1995, and March 22, 1996, and deliberately withheld these notices from his supervisor. As a result, we were unaware that the reports were not being filed or that the FEC was sending reminder notices to ACPA. In October 1996, this employee was terminated and ACPA first learned of this problem when the FEC sent two letters on December 4, 1996 questioning our 1995 reports.

Upon learning about the filing delinquency, ACPA immediately took steps to fully comply with the requirements of the law and met with Amy Suzanne Reynolds and Ken Davis in the Reports Analysis Division. We went to great lengths to completely reconstruct the records since we could not rely on any of the work completed by the discharged employee. Over the holiday season from December 1996 through January 1997, ACPA was in direct contact with 85 congressional offices to reconstruct and confirm that all of our filing information was complete and accurate. During this period, we stayed in close contact with Ms. Reynolds and Mr. Davis and provided them with a written status report on January 8. On January 21, 1997 we completed our findings and filed all of the outstanding reports with the FEC. As a result of this incident, ACPA recognized the need to change its internal controls system and steps have been taken to insure that this will not reoccur.

FED  
OFF

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FEDERAL ELECTION  
COMMISSION

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MUR 4760

page 2

Ms. Anne M. Linnehan  
Federal Election Commission

Of great concern to ACPA is the fact that this incident will go on the public record. Quite frankly, this has been an embarrassment to those of us who worked on correcting this situation. We have painstakingly rebuilt the records and have worked in close contact and coordination with Ms. Reynolds and Mr. Davis. While ACPA is ultimately responsible for the actions, or in this case, inactions of its employees, we respectfully request that these extenuating circumstances be considered in reevaluating this situation. We respectfully ask that you drop this violation in view of the circumstances and ACPA's good faith efforts to immediately comply with the filing rules. Thank you for your attention to this matter.

Sincerely:



Douglas T. Nelson

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

JUL 30 12:45 PM '98

July 30, 1998

**TWO WAY MEMORANDUM**

TO: OGC Docket  
FROM: Rosa E. Swinton *RES*  
Accounting Technician  
SUBJECT: Account Determination for Funds Received

We recently received a check from **American Crop Protection Association**, check number **3045**, dated **July 28, 1998**, for the amount of, **5500.00**. A copy of the check and any correspondence is being forwarded. Please indicate below which account the funds should be deposited and give the MUR/Case number and name associated with the deposit.

=====

TO: Rosa E. Swinton  
Accounting Technician  
FROM: OGC Docket  
SUBJECT: Disposition of Funds Received

In reference to the above check in the amount of \$5,500.00, the MUR Case number is 4769 and in the name of Crop Protection Assoc.. Place this deposit in the account indicated below:

- ☒ Budget Clearing Account (OGC), 95F3875.16  
☐ Civil Penalties Account, 95-1099.160  
☐ Other: \_\_\_\_\_

*Letha L. Nijon*  
Signature

7-30-98  
Date

AUG 4 10 21 AM '58

# SENSITIVE

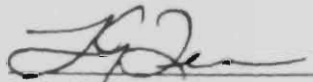
## I. BACKGROUND

II. RECOMMENDATIONS

1. Accept the attached conciliation counterproposal by the American Crop Protection Association Political Action Committee and Jay J. Vroom, as Treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble  
General Counsel

8/3/98  
Date

BY:   
Lois G. Lerner  
Associate General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
American Crop Protection Association ) MUR 4760  
Political Action Committee and )  
Jay J. Vroom, as Treasurer. )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 7, 1998, the Commission decided by a vote of 6-0 to take the following actions in MUR 4760:

1. Accept the conciliation counterproposal by the American Crop Protection Association Political Action Committee and Jay J. Vroom, as Treasurer, as recommended in the General Counsel's Report dated August 3, 1998.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated August 3, 1998.

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

Attest:

8-7-98  
Date

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

Received in the Secretariat: Tues., Aug. 04, 1998 10:27 a.m.  
Circulated to the Commission: Tues., Aug. 04, 1998 11:00 a.m.  
Deadline for vote: Fri., Aug. 07, 1998 4:00 p.m.

lrd

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Douglas T. Nelson, General Counsel  
American Crop Protection Association  
Political Action Committee  
1156 Fifteenth Street, N.W., Suite 400  
Washington, D.C. 20005

RE: MUR 4760

Dear Mr. Nelson:

On August 7, 1998, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on behalf of the American Crop Protection Association Political Action Committee and Jay J. Vroom, as treasurer, in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(i) and (iv), provisions of the Federal Election Campaign Act of 1971, as amended. 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. If you have any questions, please contact me at (202) 694-1650.

Sincerely,

A handwritten signature in cursive script that reads "Ann M. Linnehan".

Ann M. Linnehan  
Staff Member

Enclosure  
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR: 4760  
American Crop Protection Association )  
Political Action Committee and )  
Jay J. Vroom, 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 the American Crop Protection Association Political Action Committee and Jay J. Vroom, as treasurer ("Respondents"), violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv).

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 American Crop Protection Association Political Action Committee ("the Committee") is a political committee within the meaning of 2 U.S.C. § 431(4) and is not an authorized committee of any candidate.

2. Jay J. Vroom is the treasurer of the American Crop Protection Association Political Action Committee.

3. 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 general election is held, which 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 further requires that in any other calendar year, a report be filed covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31 and a report covering the period beginning July 1 and ending December 31, which shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv).

4. Respondents failed to timely file the 1995 Mid-Year and Year End reports, and the 1996 April Quarterly report. Respondents were required to file the Mid-Year report no later than July 31, 1995, and the Year End report no later than January 31, 1996. Respondents were required to file the 1996 April Quarterly report no later than April 15 of the same year.

5. The 1995 Mid-Year report, which disclosed \$750.00 in receipts and \$6,000 in disbursements, was not filed until January 22, 1997, 541 days late.

6. The 1995 Year End report, which disclosed \$23,750.00 in receipts and \$5,500.00 in disbursements, was not filed until January 22, 1997, 357 days late.

7. The 1996 April Quarterly report, which disclosed \$9,229.50 in receipts and \$4,500.00 in disbursements, was not filed until January 22, 1997, 282 days late.

8. Respondents contend that failure to timely file the 1995 Mid-Year and Year End reports and the 1996 April Quarterly report was the result of a former administrative staff person's error.

V. Respondents failed to timely file three reports with the Commission in violation of 2 U.S.C. § 434(a)(4)(A)(i) and (iv).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Five Thousand Five Hundred Dollars (\$5,500), 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.

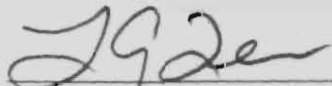
IX. Respondents will have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

Lawrence M. Noble  
General Counsel

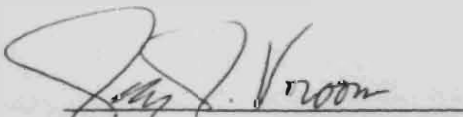
BY:

  
Lois G. Lerner  
Associate General Counsel

Date

8/14/98

FOR THE RESPONDENT(S):

  
(Name)  
(Position)

Date

7/21/98





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4760

DATE FILMED 9/3/98 CAMERA NO. 2

CAMERAMAN EES

98043894863