



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

August 17 1999

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JAMES A. PEHRKON
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE FREEDOM LEADERSHIP POLITICAL ACTION
COMMITTEE

This is a referral of the Freedom Leadership Political Action Committee ("the Committee") for failing to file the 1997 Year End Report and the 1998 April Quarterly, July Quarterly, October Quarterly, 30 Day Post-General and Year End Reports within thirty (30) calendar days from the date of the Non-Filer Notices. In addition, the Committee failed to file the 1997 Mid-Year Report in a timely manner. According to the 1997-1998 Reports Analysis Division Review and Referral Procedures for Unauthorized Committees further examination is required by your office.

The Committee was referred July 31, 1997 for a possible 2 U.S.C. §438(b) audit covering the 1995-1996 election cycle. On August 5, 1997 the Commission voted not to put the Committee in the pool for possible audit (see RAD Referral A97-178).

If you have any questions regarding this matter, please contact Lucy Denny at 694-1130.

Attachment

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: August 17, 1999

ANALYST: Lucy J. Denny

- I. COMMITTEE: Freedom Leadership Political Action Committee
(C00274480)
James M. Newberry, Treasurer
PO Box 36
Beallsville, MD 20839¹
- II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)
11 CFR §104.5(c)(1) and (2)
- III. BACKGROUND:

Failure to Timely File Reports and Chronic Late Filing of Reports

The Freedom Leadership Political Action Committee ("the Committee") has failed to file the 1997 Year End Report and the 1998 April Quarterly, July Quarterly, October Quarterly, 30 Day Post-General and Year End Reports of Receipts and Disbursements. In addition, the Committee failed to file the 1997 Mid-Year Report in a timely manner (see chart on page 4). The report was filed fourteen (14) calendar days late.

The Committee was notified on December 30, 1996 and December 29, 1997 that the 1997 Year End Report was due on January 31, 1998. The December 29, 1997 Prior Notice also provided the filing dates for all of the 1998 reports (Attachment 5).

The Reports Analysis Division ("RAD") analyst attempted to call

¹ In a letter received February 17, 1998, the Committee stated that it had not received Commission correspondence because it had provided the wrong zip code for its new address on the 1997 Mid-Year Report. Another zip code was listed on the letter's masthead which was entered into the Commission's database on February 23, 1998. The Commission has no record of any correspondence being returned due to an incorrect address and all subsequent Non-Filer Notices were sent to the correct address.

FREEDOM LEADERSHIP POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

Mr. James Newberry, the Committee treasurer, on February 11, 1998, but was told that he was out of town. The RAD analyst called again on February 13, 1998 and left a message. The RAD analyst spoke to Mr. Newberry on February 17, 1998 and was told that the reports had been sent on January 28, 1998 (Attachment 6).

A Non-Filer Notice for the 1997 Year End Report was sent to the Committee via mailgram on February 23, 1998 (Attachment 7).

On March 20, 1998, a Chronic Late Filer Notice was sent to the Committee for failing to file the 1997 Mid-Year and Year End 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 sending of the Chronic Late Filer Notice, the Committee failed to file any of the required 1998 Reports.

On March 20, 1998, the Committee was notified that the 1998 April Quarterly Report was due on April 15, 1998 (Attachment 9).

A Non-Filer Notice for the 1998 April Quarterly Report was sent to the Committee via mailgram on May 7, 1998 (Attachment 10).

The Committee was notified on June 19, 1998 that the 1998 July Quarterly Report was due on July 15, 1998 (Attachment 11).

A Non-Filer Notice for the 1998 July Quarterly report was sent to the Committee via mailgram on August 7, 1998 (Attachment 12).

The Committee was notified on September 18, 1998 that the 1998 October Quarterly Report was due on October 15, 1998 (Attachment 13).

The Committee was notified on September 30, 1998 that the 1998 30 Day Post-General Report was due on December 30, 1998 (Attachment 14).

A Non-Filer Notice for the October Quarterly Report was sent to the Committee via mailgram on November 4, 1998 (Attachment 15).

FREEDOM LEADERSHIP POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 3

The Committee was notified on November 5, 1998 that the 30 Day Post-General Report was due on December 3, 1998 (Attachment 16).

On November 30, 1998, the RAD analyst attempted to call Mr. Newberry concerning the non-filing of the 1997 Year End, 1998 April Quarterly, 1998 July Quarterly and the 1998 October Quarterly Reports. The analyst was unable to speak with Mr. Newberry, but did leave a message on an answering machine (Attachment 17).

On December 3, 1998, the RAD analyst again tried to contact Mr. Newberry. Once more receiving the answering machine, the analyst left a more detailed message stating that by not filing, they are risking legal action and that the 30 Day Post-General Report was due on that day (Attachment 18).

The Committee was notified on December 30, 1998 that the 1998 Year End Report was due on January 31, 1999 (Attachment 19).

A Non-Filer Notice for the 30 Day Post-General Report was sent to the Committee via mailgram on January 6, 1999 (Attachment 20).

A Non-Filer Notice for the Year End Report was sent to the Committee via mailgram on March 2, 1999 (Attachment 21).

On April 20, 1999, the RAD analyst attempted to contact Mr. Newberry concerning the status of the referenced reports. The analyst left a message on the answering machine urging him to file the reports and to contact the analyst (Attachment 22).

As of this date, the 1997 Year End and 1998 April Quarterly, July Quarterly, October Quarterly, 30 Day Post-General and Year End Reports have not been filed.

LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1997 Mid-Year (01/01/97 - 06/30/97)	December 30, 1996 (Attachment 2) July 7, 1997 (Attachment 3)	July 31, 1997	None	August 14, 1997 (Attachment 4)
Year End (07/01/97 - 12/31/97)	December 30, 1996 (Attachment 2) December 29, 1997 (Attachment 5)	January 31, 1998	February 23, 1998 (Attachment 7)	Not Filed
1998 April Quarterly (01/01/98 - 03/31/98)	December 29, 1997 (Attachment 5) March 20, 1998 (Attachment 9)	April 15, 1998	May 7, 1998 (Attachment 10)	Not Filed
July Quarterly (04/01/98 - 06/30/98)	December 29, 1997 (Attachment 5) June 19, 1998 (Attachment 11)	July 15, 1998	August 7, 1998 (Attachment 12)	Not Filed
October Quarterly (07/01/98 - 09/30/98)	December 29, 1997 (Attachment 5) December 29, 1997 (Attachment 5) September 18, 1998 (Attachment 13)	October 15, 1998	November 4, 1998 (Attachment 15)	Not Filed
30 Day Post-General (10/01/98 - 11/23/98)	December 29, 1997 (Attachment 5) September 30, 1998 (Attachment 14) November 5, 1998 (Attachment 16)	December 3, 1998	January 6, 1999 (Attachment 20)	Not Filed
Year End (11/24/98 - 12/31/98)	December 29, 1997 (Attachment 5) December 30, 1998 (Attachment 19)	January 31, 1999	March 2, 1999 (Attachment 21)	Not Filed

1997-1998

Page 1 of 1

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	IMAGE LOCATION
				TYPE OF FILER		
FREEDOM LEADERSHIP POLITICAL ACTION COMMITTEE				ID #C00274480	NON-PARTY QUALIFIED	
CONNECTED ORGANIZATION:						
1997	MID-YEAR REPORT	33,985	26,592	1JAN97 -30JUN97	19	97FEC/233/3440
	REQUEST FOR ADDITIONAL INFORMATION			1JAN97 -30JUN97	3	97FEC/249/1963
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN97 -30JUN97	4	97FEC/253/3267
	NOTICE OF FAILURE TO FILE			1JUL97 -31DEC97	2	98FEC/285/0919
1998	MISCELLANEOUS REPORT TO FEC			17FEB98	2	98FEC/282/4023
	MISCELLANEOUS NOTICE FROM FEC			20MAR98	3	98FEC/288/2839
	MISCELLANEOUS REPORT TO FEC			23MAR98	2	98FEC/288/4950
	NOTICE OF FAILURE TO FILE			1JAN98 -31MAR98	2	98FEC/309/4214
	NOTICE OF FAILURE TO FILE			1APR98 -30JUN98	2	98FEC/344/0590
	NOTICE OF FAILURE TO FILE			1JUL98 -30SEP98	2	98FEC/391/2172
	NOTICE OF FAILURE TO FILE			1OCT98 -23NOV98	2	99FEC/416/0552
	NOTICE OF FAILURE TO FILE			24NOV98 -31DEC98	2	99FEC/436/1008
TOTAL		33,985	0 26,592 0	45 TOTAL PAGES		

All Reports Have Been Reviewed

Debts Owed to the Committee: \$0.00

Debts Owed by the Committee: \$15,672.99

Cash on Hand as of 6/30/97: \$8,619.22

YEAR-END REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 30, 1996

QUARTERLY AND MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT.	FILING
		MAILING DATE**	DATE
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

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 (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 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

1997 REPORTING SCHEDULE
PARTIES AND PACS*

I. SEMIANNUAL FILERS**

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE***	FILING DATE
Mid-Year	01/01/97 - 06/30/97	07/31/97	07/31/97
Year-End	07/01/97 - 12/31/97	01/31/98	01/31/98

II. MONTHLY FILERS

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE***	FILING DATE
February	01/01/97 - 01/31/97	02/20/97	02/20/97
March	02/01/97 - 02/28/97	03/20/97	03/20/97
April	03/01/97 - 03/31/97	04/20/97	04/20/97
May	04/01/97 - 04/30/97	05/20/97	05/20/97
June	05/01/97 - 05/31/97	06/20/97	06/20/97
July	06/01/97 - 06/30/97	07/20/97	07/20/97
August	07/01/97 - 07/31/97	08/20/97	08/20/97
September	08/01/97 - 08/31/97	09/20/97	09/20/97
October	09/01/97 - 09/30/97	10/20/97	10/20/97
November	10/01/97 - 10/31/97	11/20/97	11/20/97
December	11/01/97 - 11/30/97	12/20/97	12/20/97
Year-End	12/01/97 - 12/31/97	01/31/98	01/31/98

*Committees that wish to change their filing status must notify the Commission in writing when they file their next report due under their current reporting schedule.

**Committees that filed quarterly reports in 1996 are only required to file semiannually in 1997.

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

FOR MORE INFORMATION CALL: 800/424-9530 OR 202/219-3420

● MID-YEAR ●

REPORT NOTICE

Attachment #3
Page 1 of 2

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

July 7, 1997

WHO MUST FILE

All Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file either a mid-year or monthly report in July.

I. Quarterly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Mid-Year	01/01/97 - 06/30/97	07/31/97	07/31/97

II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
July Monthly	06/01/97 - 06/30/97	07/20/97	07/27/97

24 HOUR REPORT ON 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 day of the election.

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

(over)

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from monthly to semiannual) 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.

ELECTRONIC FILING

For reports covering activity occurring in 1997 (and later), political committees have the option of filing electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing Gets Underway at FEC," and call the Data Division at (800) 424-9530 or (202) 219-3730.

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.

REPORT OF RECEIPTS AND DISBURSEMENTSFor Other Than An Authorized Committee
(Summary Page)

Attachment #4

Page 1 of 1

R-----
FEDERAL ELECTION
COMMISSION, MAIL ROOM

Aug 14 1 53 PM '97

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Freedom Leadership PAC	
ADDRESS (number and street) P.O. Box 36	<input checked="" type="checkbox"/> Check if different than previously reported
CITY, STATE and ZIP CODE Beallsville, MD 20704	
2. FEC IDENTIFICATION NUMBER 200274480	
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:

<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

☐ 12-Day Pre-Election Report for the _____
(Type of Election)

election on _____ in the State of _____

☐ 30-Day Post-Election 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
1/1/97 through 6/30/97		
6. (a) Cash on Hand January 1, 1997		\$1,226.70
(b) Cash on Hand at Beginning of Reporting Period	\$1,226.70	
(c) Total Receipts (from Line 19)	\$33,985.00	\$33,985.00
(d) Subtotal (add Lines 6(b) and 8(c) for Column A and Lines 6(a) and 8(c) for Column B)	\$35,211.70	\$35,211.70
7. Total Disbursements (from Line 30)	\$26,592.48	\$26,592.48
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$8,619.22	\$8,619.22
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20483 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)	\$15,672.99	

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

Type or Print Name of Treasurer

James M. Newberry

Signature of Treasurer

James M. Newberry

Date

8/13/97

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)

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 29, 1997

WHO MUST FILE

Party committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file a Year-End Report on January 31, 1998.

I. Semi-annual Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	07/01/97 - 12/31/97	01/31/98	01/31/98

II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	12/01/97 - 12/31/97	01/31/98	01/31/98

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.

ELECTRONIC FILING

For reports covering activity occurring in 1997 (and later), political committees have the option of filing electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing Gets Underway at FEC," and call the Data Division at (800) 424-9530 or (202) 219-3730.

*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)

1998 FILING SCHEDULE

I. QUARTERLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April Quarterly	01/01/98 - 03/31/98	04/15/98	04/15/98
July Quarterly	04/01/98 - 06/30/98	07/15/98	07/15/98
October Quarterly	07/01/98 - 09/30/98	10/15/98	10/15/98
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98
Year-End	11/24/98 - 12/31/98	01/31/99	01/31/99

II. MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
February	01/01/98 - 01/31/98	02/20/98	02/20/98
March	02/01/98 - 02/28/98	03/20/98	03/20/98
April	03/01/98 - 03/31/98	04/20/98	04/20/98
May	04/01/98 - 04/30/98	05/20/98	05/20/98
June	05/01/98 - 05/31/98	06/20/98	06/20/98
July	06/01/98 - 06/30/98	07/20/98	07/20/98
August	07/01/98 - 07/31/98	08/20/98	08/20/98
September	08/01/98 - 08/31/98	09/20/98	09/20/98
October	09/01/98 - 09/30/98	10/20/98	10/20/98
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98
Year-End	11/24/98 - 12/31/98	01/31/99	01/31/99

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 is triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election.

*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.

TELECON

ANALYST:	Melissa Hurd Freedom Leadership Political Action Committee Non-Filer
COMMITTEE:	
SUBJECT(S):	

DATE:	February 11 - 17, 1998
CONVERSATION WITH:	

Analyst attempted to call Mr. James Newberry on February 11, 1998, but was told he was out of town. Analyst called back on February 13 and left a message. On February 17, 1998, Mr. Newberry told the analyst the reports had been sent on January 28, 1998.

98054939900001

1/05

973527

Attachment #7

Page 1 of 1

FEB 23 1998

**WESTERN
UNION**

CONFIRMATION OF MAILGRAM

WESTERN UNION COMMERCIAL SERVICES
TO: FREEDOM LEADERSHIP POLITICAL ACTION COMM
JAMES H NEWBERRY
PO BOX 36
BEALLSVILLE MD 20704

FEDERAL ELECTION COMMISSION
SHAWN WERTH
999 E ST. NW.
WASHINGTON DC 204630001

IDENTIFICATION NUMBER: C00274480

REFERENCE: YEAR-END (07/01/1997 - 12/31/1997)

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. 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, N.W., WASHINGTON, D.C., 20463. A COPY OF THE REPORT OR RELEVANT PORTIONS SHOULD ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER.

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 MELISSA HURD 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

**FEDERAL ELECTION COMMISSION**
WASHINGTON, D.C. 20463

MS-L

James M. Newberry, Treasurer
Freedom Leadership Political Action Committee
P.O. Box 36
Beallsville, MD 20839

MAR 20 1998

Identification Number: C00274480

Reference: 1997-1998 Election Cycle Reports

Dear Mr. Newberry:

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

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year (1/1/97-6/30/97)	7/31/97	8/14/97
Year End (7/1/97-12/31/97)	1/31/98	Not Filed

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Lisa J. Stolaruk", written over a faint circular stamp.

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

Attachment #9
Page 1 of 2

QUARTERLY

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 20, 1998

WHO MUST FILE

All Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) filing on a quarterly basis must file a Quarterly Report in April.

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April Quarterly	01/01/98 - 03/31/98	04/15/98	04/15/98

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

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

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 1998 Record.

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 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

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.

ELECTRONIC FILING

Political committees have the option of filing their reports electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing of Disclosure Reports," and call the Data Division at (800) 424-9530 or (202) 694-1250.

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.

**WESTERN
UNION**

WESTERN UNION COMMERCIAL SERVICES

CONFIRMATION OF MAILGRAM TO: JAMES M NEWBERRY
FREEDOM LEADERSHIP PAC
PO BOX 36
BEALLSVILLE MD 20839-0036

FEDERAL ELECTION COMMISSION
SHAWN WERTH
999 E ST. NW.
WASHINGTON DC 204630001

MAY 7, 1998

IDENTIFICATION NUMBER: C00274480

REFERENCE: APRIL QUARTERLY (01/01/1998 - 03/31/1998)

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. 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, N.W., WASHINGTON, D.C., 20463. A COPY OF THE REPORT OR RELEVANT PORTIONS SHOULD ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER.

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 MELISSA HURD ON OUR TOLL FREE NUMBER (800)424-9530. OUR LOCAL NUMBER IS (202)694-1130.

SINCERELY,

JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

QUARTERLY

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

June 19, 1998

WHO MUST FILE

All 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. MAILING DATE**	FILING DATE
July Quarterly	04/01/98 - 06/30/98	07/15/98	07/15/98

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

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

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 1998 Record.

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 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

July Quarterly

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.

ELECTRONIC FILING

Political committees have the option of filing their reports electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing of Disclosure Reports," and call the Data Division at (800) 424-9530 or (202) 694-1250.

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.

**WESTERN
UNION**

WESTERN UNION COMMERCIAL SERVICES

CONFIRMATION OF MAILGRAM

TO: JAMES M NEWBERRY
FREEDOM LEADERSHIP PAC
PO BOX 36
BEALLSVILLE MD 20839FEDERAL ELECTION COMMISSION
SHAWN WERTH
999 E ST. NW.
WASHINGTON DC 204630001

AUGUST 7, 1998

IDENTIFICATION NUMBER: C00274430

REFERENCE: JULY QUARTERLY (04/01/1998 - 06/30/1998)

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. 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, N.W., WASHINGTON, D.C., 20463. A COPY OF THE REPORT OR RELEVANT PORTIONS SHOULD ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER.

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 MELISSA HURD ON OUR TOLL FREE NUMBER (800)424-9530. OUR LOCAL NUMBER IS (202)694-1130.

SINCERELY,

JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

● **QUARTERLY** ●

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 18, 1998

WHO MUST FILE

Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) filing on a quarterly basis must file a Quarterly Report in October.

		REG./CERT. MAILING DATE**	FILING DATE
REPORT	REPORTING PERIOD*		
October Quarterly	07/01/98 - 09/30/98	10/15/98	10/15/98

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any Party Committee or 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 day of the election.

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 1998 Record.

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

(over)

PARTIES AND PACS**October Quarterly****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.

ELECTRONIC FILING

Political committees have the option of filing their reports electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing of Disclosure Reports," and call the Data Division at (800) 424-9530 or (202) 694-1250.

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.

FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100

Attachment #14
Page 1 of 2

GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 30, 1998

I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98

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

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98

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

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Post-General	10/01/98 - 11/23/98	12/03/98	12/03/98

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 3 (the Pre-General Report). All Party Committees and PACs, regardless of financial activity, must file a report 30 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 by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

(over)

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any Party Committee or PAC that makes independent expenditures aggregating \$1,000 or more during the period beginning October 15 and ending November 1 must report them within 24 hours.

LABEL

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

ELECTRONIC FILING

Political committees have the option of filing electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing of Disclosure Reports," and call the Data Division at (800) 424-9530 or (202) 694-1250.

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 rEC approved computer generated forms) will be required to refile.

**WESTERN
UNION**

CONFIRMATION OF MAILGRAM

TO: JAMES M NEWBERRY

FREEDOM LEADERSHIP POLITICAL ACTION CNTE

PO BOX 36

BEALLSVILLE MD 20839

FEDERAL ELECTION COMMISSION

SHAWN WERTH

999 E ST. NW.

WASHINGTON DC 204630001

NOVEMBER 4, 1998

IDENTIFICATION NUMBER: C00274480

REFERENCE: OCTOBER QUARTERLY (07/01/1998 - 09/30/1998)

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. 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, N.W., WASHINGTON, D.C., 20463. A COPY OF THE REPORT OR RELEVANT PORTIONS SHOULD ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER.

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 LUCY DENNY ON OUR TOLL FREE NUMBER (800)424-9530. OUR LOCAL NUMBER IS (202)694-1130.

SINCERELY,

JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

● GENERAL ELECTION ●
REPORT NOTICE

Attachment #16
Page 1 of 1

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

November 5, 1998

*****REMINDER REMINDER REMINDER*****

All party committees and PACs (nonconnected committees and separate segregated funds) must file a Post-General Election Report. Reports sent by registered or certified mail must be postmarked by the mailing date (December 3, 1998); otherwise, they must be received by the filing date (December 3, 1998). FEC Form 3X is enclosed.

FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100

TELECON

ANALYST:	Lucy J. Denny Freedom Leadership Political Action Committee Non-Filer
COMMITTEE:	
SUBJECT(S):	

DATE:	November 30, 1998 Answering Machine
CONVERSATION WITH:	

Analyst attempted to call James Newberry and received the answering machine. She left a message stating that she was calling for Mr. Newberry. Analyst left her name, where she was calling from, and her phone number.

TELECON

ANALYST:	Lucy J. Denny
COMMITTEE:	Freedom Leadership Political Action Committee
SUBJECT(S):	Non-Filer

DATE:	December 3, 1998
CONVERSATION WITH:	Answering Machine

Analyst called Mr. Newberry again and received the answering machine. Analyst left another message stating who she was and that the Commission needed him to file the 1997 Year-End, April Quarterly, July Quarterly, and the October Quarterly immediately. Analyst also stated that if the Commission does not receive these reports, there is a good possibility that they will be referred to the Office of General Counsel for legal action. She also reminded Mr. Newberry that the 30 Day Post General Report was due every day. Again, Analyst left her name and phone number urging him to contact her.

YEAR-END REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 30, 1998

WHO MUST FILE

Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file a Year-End Report.

QUARTERLY AND MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT.	FILING
		MAILING DATE**	DATE
Year-End	11/24/98 - 12/31/98	01/31/99	01/31/99

LABEL

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

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from monthly to quarterly) 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.

ELECTRONIC FILING

Political committees have the option of filing electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing of Disclosure Reports," and call the Data Division at (800) 424-9530 or (202) 694-1250.

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

I. SEMIANNUAL FILERS

REPORT	REPORTING PERIOD*	REG./CERT.	FILING
		MAILING	DATE
Mid-Year	01/01/99 - 06/30/99	07/31/99	07/31/99
Year-End	07/01/99 - 12/31/99	01/31/00	01/31/00

II. MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT.	FILING
		MAILING	DATE
February	01/01/99 - 01/31/99	02/20/99	02/20/99
March	02/01/99 - 02/28/99	03/20/99	03/20/99
April	03/01/99 - 03/31/99	04/20/99	04/20/99
May	04/01/99 - 04/30/99	05/20/99	05/20/99
June	05/01/99 - 05/31/99	06/20/99	06/20/99
July	06/01/99 - 06/30/99	07/20/99	07/20/99
August	07/01/99 - 07/31/99	08/20/99	08/20/99
September	08/01/99 - 08/31/99	09/20/99	09/20/99
October	09/01/99 - 09/30/99	10/20/99	10/20/99
November	10/01/99 - 10/31/99	11/20/99	11/20/99
December	11/01/99 - 11/30/99	12/20/99	12/20/99
Year-End	12/01/99 - 12/31/99	01/31/00	01/31/00

*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) 694-1100

**WESTERN
UNION**

CONFIRMATION OF MAILGRAM

WESTERN UNION COMMERCIAL SERVICES
TO: JAMES M NEWBERRY
FREEDOM LEADERSHIP POLITICAL ACTION CMTE
PO BOX 36
BEALLSVILLE MD 20839

FEDERAL ELECTION COMMISSION
SHAWN WERTH
999 E ST. NW.
WASHINGTON DC 204630001

JANUARY 6, 1999

IDENTIFICATION NUMBER: C00274480

REFERENCE: 30 DAY POST-GENERAL (10/01/1998 - 11/23/1998)

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT. PLEASE DISREGARD THE DECEMBER 26, 1998 MAILGRAM REGARDING THIS REPORT.

IT IS IMPORTANT THAT YOU FILE THIS REPORT IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION, 999 E STREET, N.W., WASHINGTON, D.C., 20463. A COPY OF THE REPORT OR RELEVANT PORTIONS SHOULD ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER.

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IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT LUCY DENNY ON OUR TOLL FREE NUMBER (800)424-9530. OUR LOCAL NUMBER IS (202)694-1130.

SINCERELY,

JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

**WESTERN
UNION**

CONFIRMATION OF MAILGRAM

WESTERN UNION COMMERCIAL SERVICES
TO: JAMES M NEWBERRY
FREEDOM LEADERSHIP PAC
PO BOX 36
BEALLSVILLE MD 20839**FEDERAL ELECTION COMMISSION**
SHAWN WERTH
999 E ST. NW.
WASHINGTON DC 204630001**MARCH 2, 1999****IDENTIFICATION NUMBER: C00274480****REFERENCE: YEAR-END (11/24/1998 - 12/31/1998)****DEAR TREASURER:**

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT.

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SINCERELY,**JOHN D. GIBSON**
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

TELECON

ANALYST:	Lucy J. Denny Freedom Leadership Political Action Committee Non-Filing of Reports
COMMITTEE:	
SUBJECT(S):	

DATE:	April 20, 1999 Answering Machine
CONVERSATION WITH:	

Analyst attempted to contact Mr. James Newberry concerning the status of the 1997 Year-End and the 1998 April Quarterly, July Quarterly, October Quarterly, and 30 Day Post General Reports. Analyst left a message on the answering machine stating that she needed to speak with Mr. Newberry to urge him to file the referenced reports because this matter would be referred to the Office of General Counsel for legal action.