

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

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**FIRST GENERAL COUNSEL'S REPORT**

**SENSITIVE**

RAD REFERRAL: 99NF-15  
DATE ACTIVATED: August 25, 1999

EXPIRATION OF STATUTE  
OF LIMITATIONS: January 31, 2003<sup>1</sup>  
STAFF MEMBER: Clinett Short  
Lawrence Calvert

SOURCE: INTERNALLY GENERATED

RESPONDENTS: The Composition Roofers Local Union # 30 Political Action  
& Education Fund and Tom Pedrick, as Treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(i),(iii)&(iv)

INTERNAL REPORTS CHECKED: Disclosure Reports  
Referral Material

FEDERAL AGENCIES CHECKED: None

**I. GENERATION OF MATTER**

The Reports Analysis Division ("RAD") referred the Composition Roofers Local Union # 30 Political Action & Education Fund ("Committee"), and Tom Pedrick, as treasurer, to the Office of the General Counsel on July 19, 1999. The basis of the RAD referral is the failure of the Committee to timely file their 1997 Year End Report, 1998 April Quarterly Report, 1998 July Quarterly Report, and the 1998 30-Day Post General Report.

<sup>1</sup> The statute of limitations date for the earliest violative activity in this matter is January 31, 2003 for the Committee's first report which it failed to timely file by its January 31, 1998 due date. In addition to this report, the Committee filed three more reports late. The statute of limitations date for the last report filed late in this matter is December 3, 2003.

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## II. FACTUAL AND LEGAL ANALYSIS

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

See Attachment 1.

## III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

This Office also recommends that the Commission offer to enter into conciliation with the respondents prior to a finding of probable cause to believe. Attached for the Commission's approval is a proposed conciliation agreement. See Attachment 2.

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20.04.338.0709

**IV. RECOMMENDATIONS**

1. Open a MUR.
2. Find reason to believe the Composition Roofers Local Union # 30 Political Action & Education Fund and Tom Pedrick, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i),(iii)&(iv), and enter into conciliation prior to a finding of probable cause to believe.

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3. Approve the attached Factual and Legal Analysis and conciliation agreement, and the appropriate letter.

Lawrence M. Noble  
General Counsel

Date

10/18/99

BY:

  
Lois G. Lerner  
Associate General Counsel

Attachments:

1. Factual and Legal Analysis
2. Proposed agreement

20.04.398.0711