



FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20463

September 22, 2000

William J. Farah, Esq.
Akin, Gump, Strauss, Hauer & Feld, L.L.P.
1333 New Hampshire Avenue, NW
Suite 400
Washington, DC 20036

RE: MURs 5028 and 5054
Arab American Leadership PAC
and James Joseph Zogby, treasurer

Dear Mr. Farah:

On September 18, 2000, the Federal Election Commission accepted the signed conciliation agreement submitted on your clients' behalf in settlement of violations of 2 U.S.C. §§ 434(a)(4)(A)(i) and 434(a)(4)(A)(iv), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the files have been closed in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and these matters are now public. In addition, although the complete files 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 files 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 respondents 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.

William J. Farah, Esq.
Page 2
MURs 5028 and 5054

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 694-1650.

Sincerely,



Mary Beth deBeau
Paralegal Specialist

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Arab American Leadership)	MURs 5028 and 5054
Political Action Committee and)	
James Joseph Zogby, as Treasurer)	

CONCILIATION AGREEMENT

These matters were 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 Arab American Leadership Political Action Committee and James Joseph Zogby, as treasurer (collectively, "the Respondents"), violated 2 U.S.C. §§ 434(a)(4)(A)(i) and 434(a)(4)(A)(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 these proceedings, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. The Respondents have had a reasonable opportunity to demonstrate that no action should be taken in these matters.

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

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

1. The Arab American Leadership Political Action 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. James Joseph Zogby is the treasurer of the Arab American Leadership 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 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).

4. The Respondents failed to timely file the 1998 July Quarterly Report of Receipts and Disbursements covering the period from April 1, 1998 to June 30, 1998. The Respondents were required to file the 1998 July Quarterly Report no later than July 15, 1998.

5. The 1998 July Quarterly Report, which disclosed \$22,791.00 in receipts and \$13,500.00 disbursements, was not filed until November 18, 1999, 491 days late.

6. The Respondents failed to timely file the 1998 Year End Report of Receipts and Disbursements covering the period from November 24, 1998 to December 31, 1998. The Respondents were required to file the 1998 Year End Report no later than January 31, 1999.

7. The 1998 Year End Report, which disclosed \$150.00 in receipts and \$6,500.00 in expenditures, was not filed until November 15, 1999, 288 days late.

8. The Act further requires that all political committees other than authorized committees of a candidate shall file, in any calendar year, a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31. 2 U.S.C. § 434(a)(4)(A)(iv).

9. The Respondents failed to timely file the 1999 Mid-Year Report of Receipts and Disbursements covering the period from January 1, 1999 to June 30, 1999. The Respondents were required to file the 1999 Mid-Year Report no later than July 31, 1999.

10. The 1999 Mid-Year Report, which disclosed \$165.00 in receipts and \$5,500.00 in disbursements, was not filed until November 18, 1999, 110 days late.

V. The Respondents failed to timely file their 1998 July Quarterly Report and 1998 Year End Report in violation of 2 U.S.C. § 434(a)(4)(A)(i), and their 1999 Mid-Year Report in violation of 2 U.S.C. § 434(a)(4)(A)(iv).

VI. The Respondents will pay a civil penalty to the Federal Election Commission in the amount of Four Thousand Five Hundred Dollars (\$4,500.00), 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. The Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement 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

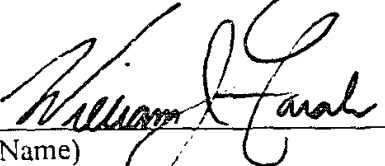
BY:


Lois G. Lerner
Associate General Counsel

Date

9/22/00

FOR THE RESPONDENTS:


(Name)
(Position)
WILLIAM J. FARAH
COUNSEL

Date

September 5, 2000

2000.09.05 14:00:00