



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2209

Date Filmed 11/25/86 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

blue routing cards, assignment memorandum, 12 day  
report w/ comments, materials pertaining to coordination,  
and miscellaneous internal memoranda.

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- |                                     |   |                          |  |
|-------------------------------------|---|--------------------------|--|
| <input type="checkbox"/>            | (1) Classified Information                                | <input type="checkbox"/> | (6) Personal privacy                             |
| <input checked="" type="checkbox"/> | (2) Internal rules and practices                          | <input type="checkbox"/> | (7) Investigatory files                          |
| <input checked="" type="checkbox"/> | (3) Exempted by other statute                             | <input type="checkbox"/> | (8) Banking Information                          |
| <input type="checkbox"/>            | (4) Trade secrets and commercial or financial information | <input type="checkbox"/> | (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> | (5) Internal Documents                                    |                          |  |

Signed Samuel E. Tobe  
date November 15, 1986

FEC 9-21-77

*Handwritten signature and date: Tobe 11/15/86*

86040520877

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Mississippi Republican ) MUR 2209  
Party Campaign Committee, )  
and Stephen A. Dickson, )  
as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 5, 1986, the Commission decided by a vote of 5-0 to take the following actions in MUR 2209:

1. Accept the conciliation agreement and civil penalty submitted by the Mississippi Republican Party Campaign Committee, and Stephen A. Dickson, as treasurer, as recommended in the General Counsel's Report signed October 31, 1986.
2. Approve and send the letter, as recommended in the General Counsel's Report signed October 31, 1986.
3. Close the file.

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

Attest:

11-5-86  
Date

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

Received in Office of Commission Secretary:	Fri.,	10-31-86,	3:15
Circulated on 48 hour tally basis:	Mon.,	11-3-86,	11:00
Deadline for vote:	Wed.,	11-5-86,	11:00

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Mississippi Republican Party ) MUR 2209  
Campaign Committee, and )  
Stephen A. Dickson, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of September 23, 1986, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2209:

1. Enter into pre-probable cause conciliation with the Mississippi Republican Party Campaign Committee and Stephen A. Dickson, as treasurer.
2. Find reason to believe that the Mississippi Republican Party Campaign Committee, and Stephen A. Dickson, as treasurer, violated 2 U.S.C. § 433(c) but take no further action in this matter.
3. Approve and send the proposed conciliation agreement attached to the General Counsel's report dated September 11, 1986.
4. Approve and send the letter attached to the General Counsel's report dated September 11, 1986.

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

Attest:

9-23-86  
Date

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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Mississippi Republican Party Campaign )  
Committee (aka Victory '86) and )  
Steven M. Dickson, as treasurer )

RAD Ref. 86NF-10 (MUR 2209)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 22, 1986, the Commission decided by a vote of 5-0 to take the following actions in RAD Ref. 86NF-10:

1. Open a MUR.
2. Find reason to believe that the Mississippi Republican Party Campaign Committee (aka Victory '86) and Steven M. Dickson, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i).
3. Approve and send the Factual and Legal Analysis as recommended in the First General Counsel's Report signed July 17, 1986.
4. Approve and send the letter, as recommended in the First General Counsel's Report signed July 17, 1986.

Commissioners Aikens, Elliott, Harris, Josefiak and McDonald voted affirmatively for this decision; Commissioner McGarry did not cast a vote.

Attest:

7-22-86

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:	Thurs.,	7-17-86,	2:14
Circulated on 48 hour tally basis:	Fri.,	7-18-86,	2:00
Deadline for vote:	Tues.,	7-22-86,	4:00

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

*plm*

November 10, 1986

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Stephen A. Dickson, Treasurer  
Mississippi Republican Party Campaign  
Committee  
Post Office Box 1178  
Jackson, MS 39205-1178

RE: MUR 2209

Dear Mr. Dickson:

On November 5, 1986, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(i), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days.

However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele  
General Counsel

*[Signature]*  
By: Lawrence H. Noble  
Deputy General Counsel

Enclosure  
Conciliation Agreement

86040520881

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 )  
Mississippi Republican Party ) MUR 2209  
Campaign Committee, and )  
Stephen A. Dickson, as treasurer )

**CONCILIATION AGREEMENT**

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Mississippi Republican Party Campaign Committee, and Stephen A. Dickson, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i) by failing to file their April 1986 Quarterly Report.

NOW, THEREFORE, the Commission and 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. Respondent Mississippi Republican Party Campaign Committee is a party-related multicandidate political committee

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within the meaning of 2 U.S.C. § 434(a)(4)(A), which is registered with the Commission.

2. Respondent Stephen A. Dickson is the treasurer of MRPCC.

3. MRPCC failed to file its April 1986 Quarterly Report which was due on April 15, 1986.

4. The Commission found reason to believe that MRPCC failed to file its April 1986 Quarterly Report on July 22, 1986.

5. MRPCC filed its April 1986 Quarterly Report on August 22, 1986, after the Commission's finding of reason to believe.

V. WHEREFORE, Respondents agree:

1. The Federal Election Campaign Act of 1971, as amended (hereinafter, "the Act") requires that political committees which elect to file quarterly reports shall file their reports no later than the fifteenth day after the last day of each calendar quarter. 2 U.S.C. § 434(a)(4)(A)(i).

2. Respondents failed to file their April 1986 Quarterly Report until after being notified that the Commission had found reason to believe that Respondents had violated the Act, in violation of 2 U.S.C. § 434(a)(4)(A)(i).

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of Two Thousand Two Hundred and Fifty dollars (\$2,250), 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

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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.

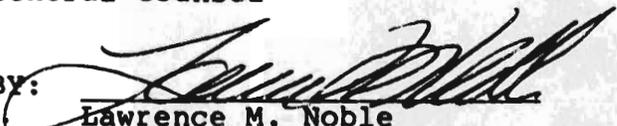
VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than thirty (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 valid.

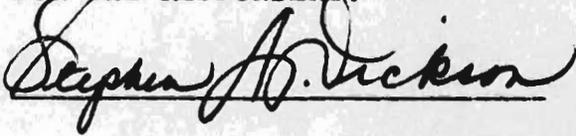
FOR THE COMMISSION:

Charles N. Steele  
General Counsel

BY:   
Lawrence M. Noble  
Deputy General Counsel

Date 11/7/86

FOR THE RESPONDENT:



Date Oct 21, 1986

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# Capital Foundation

## Mississippi Republican Party

RECEIVED AT THE FEC  
**HAND DELIVERED**  
86 OCT 22 AIO: 08  
GCC#1834

**Executive Committee**  
James B. Purvis, Jr. Chairman  
Ralph H. Lord Vice Chairman  
Jerry E. Zable Secretary  
J.W. King  
Julius M. Ridgway

**Board of Directors**  
Harry R. Allen  
Mrs. Rick J. Calhoun  
Cecil J. Cartwright  
W.M. Caste, Jr.

Thomas C. Gendron  
Hunter H. Gholson  
W.W. Gresham, Jr.  
Mrs. Robbie Hughes  
Lester Hyde  
Charles L. Inby  
J.P. Mills  
Paul Anthony Radabaugh  
Alvin C. Smith  
Victor P. Smith  
James T. Speed  
Wm. Roberts Wilson, Jr.

October 21, 1986

Mr. Laurence E. Tobey  
Federal Election Commission  
Washington, D.C. 20463

Dear Mr. Tobey:

Enclosed please find the conciliation agreement proposed by the Commission in regard to MUR 2209.

Also enclosed is our check in the amount of \$2,250.00 in payment of the civil penalty imposed by this agreement.

Once again, I appreciate the courtesy and cooperation you extended me during this process.

Sincerely,

  
Stephen A. Dickson, Treasurer

Enclosures

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RECEIVED  
GENERAL INVESTIGATIVE  
DIVISION

*plm*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 25, 1986

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mississippi Republican Party Campaign  
Committee

Attn: Stephen A. Dickson, treasurer  
Post Office Box 1178  
Jackson, MS 39205-1178

RE: MUR 2209

Dear Mr. Dickson:

On July 22, 1986, the Commission found reason to believe that the Mississippi Republican Party Campaign Committee, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i). At your request, the Commission determined on September 23, 1986, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

In addition to the violation of 2 U.S.C. § 434(a)(4)(A)(i) referred to above, the Federal Election Campaign Act of 1971, as amended (hereinafter, "the Act") requires that political committees file a statement of organization which includes the name and address of the committee's treasurer. 2 U.S.C. § 433(a) and (b). The Act further provides that changes in information previously submitted in a statement of organization shall be reported within ten days of the date of the change. 2 U.S.C. § 433(c). The Commission received an amendment to your committee's statement of organization on August 22, 1986. This amendment stated that you became treasurer on March 1, 1986. By its terms, the amendment makes clear that it was not filed with the Commission within ten days of the date of the change, as required.

Accordingly, on September 23, 1986, the Commission found reason to believe that the Mississippi Republican Party Campaign Committee, and you, as treasurer, violated 2 U.S.C. § 433(c). However, after considering the fact that the amendment has been filed, the Commission decided to take no further action in this matter.

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Enclosed is a conciliation agreement that the Commission has approved in settlement of the violation of 2 U.S.C. § 434 (a)(4)(A)(i). If you agree with the provisions of the enclosed agreement, please sign and return it, 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.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Laurence E. Tobey, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele  
General Counsel

*Laurence M. Noble (L/N)*  
By: Laurence M. Noble  
Deputy General Counsel

Enclosure  
Conciliation agreement

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**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

In the Matter of )  
 )  
Mississippi Republican Party ) MUR 2209  
Campaign Committee, and )  
Stephen A. Dickson, as )  
treasurer )

86 SEP 11 P 3:23

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On July 22, 1986, the Commission determined that there is reason to believe that the Mississippi Republican Party Campaign Committee, and Stephen A. Dickson, as treasurer (hereinafter, "MRPCC" or "Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i) by failing to file their 1986 April Quarterly Report. By letter received August 18, 1986, Mr. Dickson requested pre-probable cause conciliation in this matter. Attachment I. On August 22, 1986, Respondents filed an amendment to their statement of organization. Attachment II. On the same date, Respondents also filed their 1986 April Quarterly Report.

**II. LEGAL ANALYSIS**

The Federal Election Campaign Act of 1971, as amended (hereinafter, "the Act") provides that political committees which elect to file quarterly reports shall file those reports no later than the fifteenth day after the last day of each calendar quarter. 2 U.S.C. § 434(a)(4)(A)(i). Thus, the quarterly report for the first quarter of 1986 was due on April 15, 1986. This report was not filed as required, and therefore, Respondents have violated 2 U.S.C. § 434(a)(4)(A)(i).

The Act also provides that political committees shall file a

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statement of organization within 10 days after becoming a political committee. 2 U.S.C. § 433(a). The statement of organization shall include the name and address of the treasurer. 2 U.S.C. § 433(b). Any change in information previously submitted in a statement of organization shall be reported no later than 10 days after the date of the change. 2 U.S.C. § 433(c).

On August 22, 1986, Respondent filed an amendment to their statement of organization which stated that Stephen A. Dickson had become the treasurer of MRPC on March 1, 1986. Such a filing constitutes a violation of 2 U.S.C. § 433(c) on its face because it contains an admission that MRPC did not amend its statement of organization within ten days of the change. Therefore, this Office recommends that the Commission find reason to believe that the Mississippi Republican Party Campaign Committee and Stephen A. Dickson, as treasurer, violated 2 U.S.C. § 433(c). However, consistently with the handling of similar matters, this Office recommends that the Commission take no further action on this issue.

**III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY**

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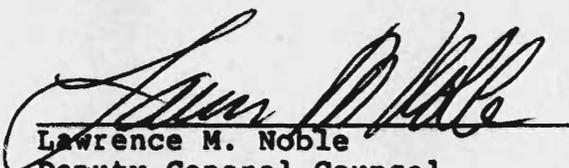
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**IV. RECOMMENDATIONS**

1. Enter into pre-probable cause conciliation with the Mississippi Republican Party Campaign Committee and Stephen A. Dickson, as treasurer.
2. Find reason to believe that the Mississippi Republican Party Campaign Committee, and Stephen A. Dickson, as treasurer, violated 2 U.S.C. § 433(c), but take no further action in this matter.
3. Approve and send the attached proposed conciliation agreement.
4. Approve and send the attached letter.

Charles N. Steele  
General Counsel

9/11/86  
Date \_\_\_\_\_

BY:   
Lawrence M. Noble  
Deputy General Counsel

**Attachments**

- I. Respondents' letter received August 18, 1986
- II. Amended statement of organization filed August 22, 1986
- III. Proposed conciliation agreement
- IV. Proposed letter to respondents

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# the Mississippi Republican Party

RE.  
OFFICE  
COMMISS

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FEC  
TARY

Rec 8-18-86  
Aikens  
DOCH 1254  
Tobey

State Headquarters

86 AUG 18 P 3:49

16 AUG 18 P 4:40

GENERAL COUNSEL

August 15, 1986

Joan D. Aikens, Chairman  
Federal Election Commission  
Washington D.C. 20463

Dear Chairman Aikens:

Review of your July 29 correspondence, and the internal records of the Mississippi Republican Party Campaign Committee, indicate that the Committee and I, as Treasurer, stand in violation of the Federal Election Act of 1971 by failing to file a 1986 April Quarterly Report.

This matter has been assigned MUR number 2209, and has been assigned to Laurence E. Tobey in the Commission's Enforcement Division of the Office of General Counsel.

By this letter, I request that pre-probable cause conciliation activities be initiated to resolve this failure on our part.

While the Committee and I stand in violation of the Act, I want to assure you and the Commission that this violation was committed with no intention on our part to conceal any act of illegal expenditure or intentional subversion of the Act, its expenditure provisions, or its intentions.

As our April Quarterly Report (which has been sent to the Commission under separate cover) reveals, the Committee made no reportable expenditures in the first quarter of this year.

Our failure to report is the result of administrative staff changes within this office, and should not be construed by the Commission as an expression on our part not to comply with the provisions of the Act.

Since assuming my position with the Committee in February, 1986, a complete replacement of our office staff has occurred. The staff position responsible for recording Committee expenditures and filing its reports has, since February, been filled by three different employees--none of whom are still employed in this office. It was my belief and understanding that the April Quarterly Report had been filed

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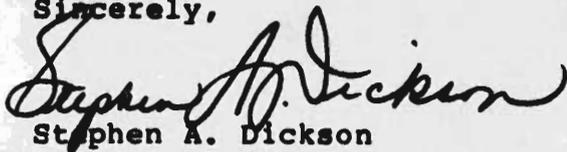
promptly after my phone conversation with a representative of the Commission in May.

As Treasurer of the Committee, I assume full responsibility for this failure to report.

I respect and appreciate the Commission's provision that this investigation will be conducted on a confidential basis, and do not feel the need, at this time, to be represented by counsel. You may consider this correspondence submitted under oath.

In requesting pre-probable cause conciliation, I request that the Office of General Counsel propose to the Commission an agreement in settlement of this matter.

Sincerely,

  
Stephen A. Dickson

SD/sd

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**HAND DELIVERED**

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**Capital  
Foundation  
Mississippi  
Republican  
Party**

**Executive Committee**  
George W. ...  
John A. ...  
John A. ...  
John A. ...  
John A. ...

**Board of Directors**  
John A. ...  
John A. ...  
John A. ...  
John A. ...  
John A. ...

**Trustees & Officers**  
George W. ...  
John A. ...

August 15, 1986

Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Dear Sir or Madame:

Please be advised by this correspondence that, effective March 1, 1986, I became Treasurer of the Mississippi Republican Party Capital Foundation Campaign Committee, FEC identification number C000843368.

Sincerely,

*Stephen A. Dickson*  
Stephen A. Dickson

SAD/sd



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mississippi Republican Party Campaign Committee

Attn: Stephen A. Dickson, treasurer  
Post Office Box 1178  
Jackson, MS 39215-1178

RE: MUR 2209

Dear Mr. Dickson:

On July 22, 1986, the Commission found reason to believe that the Mississippi Republican Party Campaign Committee, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i). At your request, the Commission determined on \_\_\_\_\_, 1986, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

In addition to the violation of 2 U.S.C. § 434(a)(4)(A)(i) referred to above, the Federal Election Campaign Act of 1971, as amended (hereinafter, "the Act") requires that political committees file a statement of organization which includes the name and address of the committee's treasurer. 2 U.S.C. § 433(a) and (b). The Act further provides that changes in information previously submitted in a statement of organization shall be reported within ten days of the date of the change. 2 U.S.C. § 433(c). The Commission received an amendment to your committee's statement of organization on August 22, 1986. This amendment stated that you became treasurer on March 1, 1986. By its terms, the amendment makes clear that it was not filed with the Commission within ten days of the date of the change, as required.

Accordingly, on \_\_\_\_\_, 1986, the Commission found reason to believe that the Mississippi Republican Party Campaign Committee, and you, as treasurer, violated 2 U.S.C. § 433(c). However, after considering the fact that the amendment has been filed, the Commission decided to take no further action in this matter.

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Enclosed is a conciliation agreement that the Commission has approved in settlement of the violation of 2 U.S.C. §434 (a)(4)(A)(i). If you agree with the provisions of the enclosed agreement, please sign and return it, 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.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Laurence E. Tobey, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele  
General Counsel

By: Lawrence M. Noble  
Deputy General Counsel

Enclosure  
Conciliation agreement

86040620896

# the Mississippi Republican Party

CCC# 1251  
RECEIVED AT THE FEC

06 AUG 18 10:35  
State Headquarters

MUR NO. 2209

06 AUG 18 P 2: 59

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

August 15, 1986

Joan D. Aikens, Chairman  
Federal Election Commission  
Washington D.C. 20463

Dear Chairman Aikens:

Review of your July 29 correspondence, and the internal records of the Mississippi Republican Party Campaign Committee, indicate that the Committee and I, as Treasurer, stand in violation of the Federal Election Act of 1971 by failing to file a 1986 April Quarterly Report.

This matter has been assigned MUR number 2209, and has been assigned to Laurence E. Tobey in the Commission's Enforcement Division of the Office of General Counsel.

By this letter, I request that pre-probable cause conciliation activities be initiated to resolve this failure on our part.

While the Committee and I stand in violation of the Act, I want to assure you and the Commission that this violation was committed with no intention on our part to conceal any act of illegal expenditure or intentional subversion of the Act, its expenditure provisions, or its intentions.

As our April Quarterly Report (which has been sent to the Commission under separate cover) reveals, the Committee made no reportable expenditures in the first quarter of this year.

Our failure to report is the result of administrative staff changes within this office, and should not be construed by the Commission as an expression on our part not to comply with the provisions of the Act.

Since assuming my position with the Committee in February, 1986, a complete replacement of our office staff has occurred. The staff position responsible for recording Committee expenditures and filing its reports has, since February, been filled by three different employees--none of whom are still employed in this office. It was my belief and understanding that the April Quarterly Report had been filed

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promptly after my phone conversation with a representative of the Commission in May.

As Treasurer of the Committee, I assume full responsibility for this failure to report.

I respect and appreciate the Commission's provision that this investigation will be conducted on a confidential basis, and do not feel the need, at this time, to be represented by counsel. You may consider this correspondence submitted under oath.

In requesting pre-probable cause conciliation, I request that the Office of General Counsel propose to the Commission an agreement in settlement of this matter.

Sincerely,



Stephen A. Dickson

SD/sd

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# the Mississippi Republican Party

REC'D  
OFFICE  
COMMISSIONER

REC'D  
FEDERAL  
SECRETARY

State Headquarters

86 AUG 18 P 3:49

86 AUG 18 P 4:40

RECEIVED  
GENERAL COUNSEL

Rec 8-18-86  
Aikens  
ACC# 1254

August 15, 1986

Joan D. Aikens, Chairman  
Federal Election Commission  
Washington D.C. 20463

Dear Chairman Aikens:

Review of your July 29 correspondence, and the internal records of the Mississippi Republican Party Campaign Committee, indicate that the Committee and I, as Treasurer, stand in violation of the Federal Election Act of 1971 by failing to file a 1986 April Quarterly Report.

This matter has been assigned MUR number 2209, and has been assigned to Laurence E. Tobey in the Commission's Enforcement Division of the Office of General Counsel.

By this letter, I request that pre-probable cause conciliation activities be initiated to resolve this failure on our part.

While the Committee and I stand in violation of the Act, I want to assure you and the Commission that this violation was committed with no intention on our part to conceal any act of illegal expenditure or intentional subversion of the Act, its expenditure provisions, or its intentions.

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Since assuming my position with the Committee in February, 1986, a complete replacement of our office staff has occurred. The staff position responsible for recording Committee expenditures and filing its reports has, since February, been filled by three different employees--none of whom are still employed in this office. It was my belief and understanding that the April Quarterly Report had been filed

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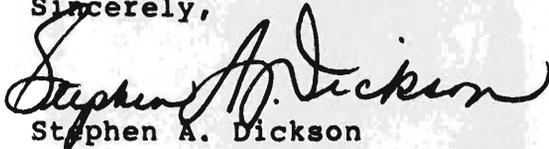
promptly after my phone conversation with a representative of the Commission in May.

As Treasurer of the Committee, I assume full responsibility for this failure to report.

I respect and appreciate the Commission's provision that this investigation will be conducted on a confidential basis, and do not feel the need, at this time, to be represented by counsel. You may consider this correspondence submitted under oath.

In requesting pre-probable cause conciliation, I request that the Office of General Counsel propose to the Commission an agreement in settlement of this matter.

Sincerely,



Stephen A. Dickson

SD/sd

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7/29/86



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 29, 1986

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
Mississippi Republican Party Campaign Committee  
Attn: Steven M. Dickson, Treasurer  
P.O. Box 1178  
516 East Capitol Street  
Jackson, MS 39205

RE: MUR 2209

Dear Mr. Dickson:

On July 22, 1986, the Federal Election Commission determined that there is reason to believe that the Mississippi Republican Party Campaign Committee, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further,

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requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

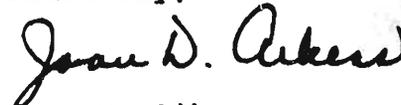
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Laurence E. Tobey, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Joan D. Aikens  
Chairman

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

9 6 0 4 0 5 2 0 9 0 2

**SENSITIVE**

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

**FIRST GENERAL COUNSEL'S REPORT**

**DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION:**

**RAD REFERRAL: 86NF-10  
STAFF MEMBER: L. Tobey**

05 JUL 17 P 2:14  
RECEIVED  
GENERAL COUNSEL'S OFFICE

**SOURCE OF MUR: INTERNALLY GENERATED**

**RESPONDENT'S NAME:** Mississippi Republican Party Campaign Committee (aka Victory '86) and Steven M. Dickson, as treasurer

**RELEVANT STATUTE:** 2 U.S.C. § 434(a)(4)(A)(i)

**INTERNAL REPORTS CHECKED:** 1985-86 election cycle reports

**FEDERAL AGENCIES CHECKED:** None

**GENERATION OF MATTER**

This matter was referred to the Office of General Counsel by the Reports Analysis Division (hereinafter, "RAD").

**SUMMARY OF ALLEGATIONS**

RAD indicated that the Mississippi Republican Party Campaign Committee (also known as "Victory '86"; hereinafter, "MRPCC" or "the Committee") failed to file its 1986 April Quarterly Report.

**FACTUAL AND LEGAL ANALYSIS**

The Federal Election Campaign Act of 1971, as amended (hereinafter, "the Act") requires that political committees which elect to file quarterly reports shall file their reports no later than the fifteenth day after the last day of each calendar quarter. 2 U.S.C. § 434(a)(4)(A)(i). Thus, the quarterly report for the first quarter of 1986 was due on April 15, 1986. This report has not been filed as required.

86040620903

RAD sent a Non-Filer Notice to the Committee on May 7, 1986. On May 28, 1986, RAD telephoned Steven M. Dickson, the acting treasurer, <sup>1/</sup> and informed him that the report had not been filed. The acting treasurer stated that the report would be filed promptly. However, RAD had not received the report as of June 23, 1986. Therefore, there appears to be reason to believe that MRPC has violated 2 U.S.C. § 434(a)(4)(A)(i).

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Mississippi Republican Party Campaign Committee (aka Victory '86) and Steven M. Dickson, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i).
3. Approve and send the attached Factual and Legal Analysis.
4. Approve and send the attached letter.

Charles N. Steele  
General Counsel

7/17/86  
Date

BY: *Lawrence M. Noble*  
Lawrence M. Noble  
Deputy General Counsel

Attachments

- I. RAD Referral
- II. Proposed Factual and Legal Analysis
- III. Proposed letter to Respondent

1/. RAD reported that in a telephone conversation on May 28, 1986, Mr. Dickson stated that the treasurer of record, Ms. Ebbie Spivey, had resigned and that he was the "acting treasurer". Therefore, his name is used in all references to the treasurer.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 23, 1986

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH: JOHN C. SURINA 151  
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF THE MISSISSIPPI REPUBLICAN PARTY  
CAMPAIGN COMMITTEE (AKA CAMPAIGN 80)

This is a referral of the Mississippi Republican Party Campaign Committee (AKA Campaign 80) ("the Committee"). The Committee has failed to file the 1986 April Quarterly Report of Receipts and Disbursements within thirty (30) calendar days from the date of the Non-Filer Notice.

If you have any questions on this matter, please contact Andrew J. Dodson at 376-2480.

Attachment

86040320905

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: June 23, 1986

ANALYST: Andrew J. Dodson

I. COMMITTEE:

Mississippi Republican Party Campaign  
Committee (AKA Campaign 80)  
(C00084368)  
Mrs. Ebbie Spivey, Treasurer<sup>1/</sup>  
(December 6, 1985 to Present)  
B. Keith Hill, Treasurer  
(February 1, 1985 to December 5, 1985)  
R. Andrew Taggart, Treasurer  
(January 1, 1985 to January 31, 1985)  
P.O. Box 1178  
516 East Capitol Street  
Jackson, MS 39205

II. RELEVANT STATUTE:

2 U.S.C. §434(a)(4)(A)(i)  
11 CFR 104.5(c)(1)(i)(A)

III. BACKGROUND:

Failure to File the 1986 April Quarterly Report

The Mississippi Republican Party Campaign Committee (AKA Campaign 80) ("the Committee") failed to file the 1986 April Quarterly Report of Receipts and Disbursements covering the period from January 1, 1986 through March 31, 1986. The Committee was notified on March 21, 1986 that the report was due on April 15, 1986 (Attachment 2). A Non-Filer Notice was sent to the Committee on May 7, 1986 (Attachment 3).

On May 28, 1986, the Reports Analysis Division ("RAD") analyst called the Committee and informed Mr. Dickson, acting treasurer, that the 1986 April Quarterly Report had not been filed. The RAD analyst advised Mr. Dickson to file the report as soon as possible. Mr. Dickson replied that the Committee's treasurer, Mrs. Ebbie Spivey, had resigned and as acting treasurer he was not aware that the 1986 April Quarterly Report was due. Mr. Dickson then stated that the report would be filed promptly (Attachment 4).

<sup>1/</sup> In a telephone conversation with Mr. Dickson on May 28, 1986, he stated that Mrs. Ebbie Spivey had resigned and he was now the acting treasurer (Attachment 4).

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**MISSISSIPPI REPUBLICAN PARTY CAMPAIGN  
COMMITTEE (AKA CAMPAIGN 80)  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2**

As of this date, the Committee has not filed the 1986 April Quarterly Report.

**IV. OTHER PENDING MATTERS INITIATED BY RAD:**

None.

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FEDERAL ELECTION COMMISSION  
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 13JUN86  
 PAGE 1

PARTY RELATED						
COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILES COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
MISSISSIPPI REPUBLICAN PARTY CAMPAIGN COMMITTEE (AKA CAMPAIGN 86)				PARTY QUALIFIED		ID 000004300
1985	STATEMENT OF ORGANIZATION - AMENDMENT			31JUL85	1	06FEC/303/1930
	STATEMENT OF ORGANIZATION - AMENDMENT			30DEC85	2	06FEC/392/2140
	MID-YEAR REPORT	29,475	21,469	1JAN86 -30JUN86	10	06FEC/303/1930
	YEAR-END	36,032	54,222	1JUL86 -31DEC86	36	06FEC/400/2350
1986	STATEMENT OF ORGANIZATION - AMENDMENT			30JAN86	1	06FEC/400/2350
	NOTICE OF FAILURE TO FILE			1JAN86 -31MAR86	1	06FEC/419/3004
	TOTAL	66,307	0	75,691	0	89 TOTAL PAGES

ALL REPORTS LISTED ABOVE HAVE BEEN REVIEWED.

Ending cash-on-hand as of 12/31/85: \$18293.54

Debts and obligations owed to the committee as of 12/31/85: \$0.00

Debts and obligations owed by the committee as of 12/31/85: \$0.00

# QUARTERLY REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PAGE

March 31, 1986

**WHO MUST FILE**

ALL Party Committees, Non-connected Committees and Separate Segregated Funds, except those filing monthly (see below), must file a quarterly report by April 15, 1986.

**WHAT MUST BE REPORTED**

The report must disclose all financial activity that occurred from the close of books for last report filed through March 31, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through March 31, 1986.\* For more detailed instructions, consult your campaign guide.

**WHEN TO FILE**

Reports sent by registered or certified mail must be postmarked no later than midnight April 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business April 15, 1986.

**WHERE AND HOW TO FILE**

Committees should consult the instructions on the enclosed FEC Form 3X for details.

**MONTHLY FILERS**

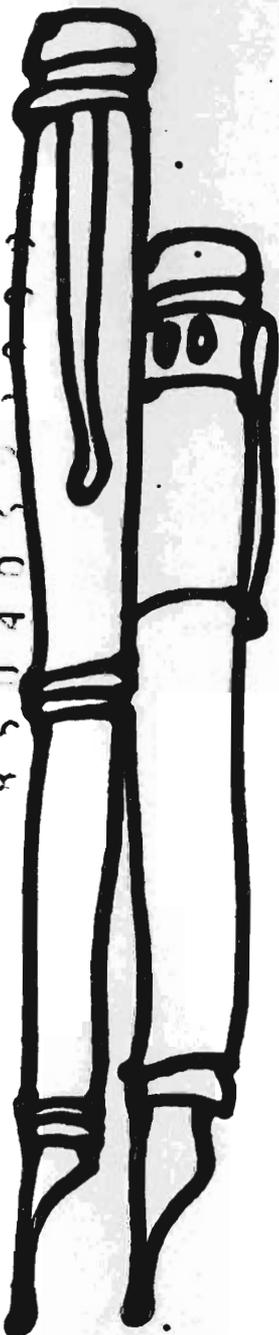
Committees that file on a monthly schedule must file their next report by April 30, 1986, and disclose all financial activity of their committee from March 1 through March 31, 1986. (See the schedule of monthly reports on the reverse side.)

**COMPLIANCE**

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible reports and reports submitted on non-FEC forms will not be accepted, and committees filing such documents will be required to refile.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received or disbursed during the current reporting period. See 11 CFR 104.3(a) and (b).

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**REQUIREMENTS**

**QUARTERLY FILINGS**

Committees that make contributions or expenditures (including independent expenditures) in connection with an election, must file a pre-election report if this activity has not been previously disclosed. See the January 1986 issue of the Federal Election Commission Record for primary election filing requirements.

**MONTHLY FILINGS**

Committees that file monthly must follow the schedule below. Pre-general election reports sent by registered or certified mail must be postmarked no later than midnight October 30, 1986. All other reports sent by registered or certified mail must be postmarked no later than midnight on the filing date in order to be timely. Reports hand delivered or mailed first class must be received by close of business on the filing date.

REPORT	PERIOD COVERED	FILING DATE
February	01/01 - 01/31	02/20/86
March	02/01 - 02/28	03/20/86
April	03/01 - 03/31	04/20/86
May	04/01 - 04/30	05/20/86
June	05/01 - 05/31	06/20/86
July	06/01 - 06/30	07/20/86
August	07/01 - 07/31	08/20/86
September	08/01 - 08/31	09/20/86
October	09/01 - 09/30	10/20/86
Pre-election	10/01 - 10/15	10/23/86
Post-election	10/26 - 11/24	12/04/86
Year-End	11/25 - 12/31	01/31/87

**INDEPENDENT EXPENDITURES**

Any independent expenditure aggregating \$1,000 or more and made between 2 and 30 days before an election must be reported within 24 hours after the expenditure is made. See 11 CFR 104.4(c)(2) and (3) for information concerning where to file.

FOR INFORMATION CALL: Information Services Division  
800/424-9530 or 202/376-3120

86040520910



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20541

EG-7

May 7, 1986

Ebbie Spivey, Treasurer  
Mississippi Republican Party  
Campaign Committee (MSA  
Campaign 80)  
P.O. Box 1178  
316 East Capitol Street  
Jackson, MS 39205

Identification Number: C00004368

Reference: April Quarterly Report (1/1/86-3/31/86)

Dear Ms. Spivey:

It has come to the attention of the Federal Election Commission ("the Commission") that you may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report 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, please contact Alva Smith on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

3 5 8 2 1 9 3 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50

TELECON

**ANALYST:** Andrew J. Dodson  
**CONVERSATION WITH:** Mr. Dickson  
**COMMITTEE:** Mississippi Republican Party Campaign Committee  
(AKA Campaign 80) C00084368  
**DATE:** May 28, 1986  
**SUBJECT(S):** Failure to file April Quarterly Report

I telephoned Mr. Dickson, the acting treasurer of the committee, in order to tell him that the Commission had not yet recieved his committee's 1986 April Quarterly Report. I stressed the importance of timely filing and added that the report should be filed as soon as possible in order to avoid the possibility of legal action.

Mr. Dickson stated that the treasurer, Mrs. Ebbie Spivey, had resigned and that he was not aware that the 1986 April Quarterly Report was due. Mr. Dickson then stated that he would file the report promptly.

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**FEDERAL ELECTION COMMISSION**  
**GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

MUR NO.  
STAFF MEMBER & TELEPHONE NO.  
Laurence E. Tobey (202) 376-8200

RESPONDENT: Mississippi Republican Party Campaign Committee, and  
Steven M. Dickson, as treasurer

**SUMMARY OF ALLEGATIONS**

The Mississippi Republican Party Campaign Committee and Steven M. Dickson, as treasurer (hereinafter, "MRPCC") violated 2 U.S.C. § 434(a)(4)(A)(i) by failing to file their 1986 April Quarterly Report.

**FACTUAL AND LEGAL ANALYSIS**

The Federal Election Campaign Act of 1971, as amended (hereinafter, "the Act") requires that political committees which elect to file quarterly reports shall file their reports no later than the fifteenth day after the last day of each calendar quarter. 2 U.S.C. § 434(a)(4)(A)(i). Thus, the quarterly report for the first quarter of 1986 was due on April 15, 1986.

MRPCC is a political committee registered with the Commission. The Reports Analysis Division (hereinafter, "RAD") indicated that it did not receive MRPCC's April 1986 Quarterly Report as required. RAD sent a Non-Filer Notice to MRPCC on May 7, 1986. On May 28, 1986, RAD telephoned the acting treasurer, Steven M. Dickson, and informed him that the report had not been filed. The acting treasurer stated that the report would be filed promptly. However, RAD had not received the report as of June 23, 1986.

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Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the Mississippi Republican Party Campaign Committee and Steven M. Dickson, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i).

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mississippi Republican Party Campaign Committee

Attn: Steven M. Dickson, Treasurer

P.O. Box 1178

516 East Capitol Street

Jackson, MS 39205

RE: MUR

Dear Mr. Dickson:

On , 198 , the Federal Election Commission determined that there is reason to believe that the Mississippi Republican Party Campaign Committee, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further,

8 6 0 4 0 5 2 0 9 1 5

requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

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 General Counsel is not authorized to give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Laurence E. Tobey, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens  
Chairman

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

86040620916



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 23, 1986

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH: JOHN C. SURINA  
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF THE MISSISSIPPI REPUBLICAN PARTY  
CAMPAIGN COMMITTEE (AKA CAMPAIGN 80)

This is a referral of the Mississippi Republican Party Campaign Committee (AKA Campaign 80) ("the Committee"). The Committee has failed to file the 1986 April Quarterly Report of Receipts and Disbursements within thirty (30) calendar days from the date of the Non-Filer Notice.

If you have any questions on this matter, please contact Andrew J. Dodson at 376-2480.

Attachment

86040520917

**REPORTS ANALYSIS REFERRAL**

**TO**

**OFFICE OF GENERAL COUNSEL**

DATE: June 23, 1986

ANALYST: Andrew J. Dodson

**I. COMMITTEE:**

Mississippi Republican Party Campaign  
Committee (AKA Campaign 80)  
(C00084368)

Mrs. Ebbie Spivey, Treasurer<sup>1/</sup>  
(December 6, 1985 to Present)

B. Keith Hill, Treasurer  
(February 1, 1985 to December 5, 1985)

R. Andrew Taggart, Treasurer  
(January 1, 1985 to January 31, 1985)

P.O. Box 1178  
516 East Capitol Street  
Jackson, MS 39205

**II. RELEVANT STATUTE:** 2 U.S.C. §434(a)(4)(A)(i)  
11 CFR 104.5(c)(1)(i)(A)

**III. BACKGROUND:**

**Failure to File the 1986 April Quarterly Report**

The Mississippi Republican Party Campaign Committee (AKA Campaign 80) ("the Committee") failed to file the 1986 April Quarterly Report of Receipts and Disbursements covering the period from January 1, 1986 through March 31, 1986. The Committee was notified on March 21, 1986 that the report was due on April 15, 1986 (Attachment 2). A Non-Filer Notice was sent to the Committee on May 7, 1986 (Attachment 3).

On May 28, 1986, the Reports Analysis Division ("RAD") analyst called the Committee and informed Mr. Dickson, acting treasurer, that the 1986 April Quarterly Report had not been filed. The RAD analyst advised Mr. Dickson to file the report as soon as possible. Mr. Dickson replied that the Committee's treasurer, Mrs. Ebbie Spivey, had resigned and as acting treasurer he was not aware that the 1986 April Quarterly Report was due. Mr. Dickson then stated that the report would be filed promptly (Attachment 4).

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<sup>1/</sup> In a telephone conversation with Mr. Dickson on May 28, 1986, he stated that Mrs. Ebbie Spivey had resigned and he was now the acting treasurer (Attachment 4).

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MISSISSIPPI REPUBLICAN PARTY CAMPAIGN  
COMMITTEE (AKA CAMPAIGN 80)  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2

As of this date, the Committee has not filed the 1986  
April Quarterly Report.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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2881

FEDERAL ELECTION COMMISSION  
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 13JUN86  
 PAGE 1

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
MISSISSIPPI REPUBLICAN PARTY CAMPAIGN COMMITTEE (AKA CAMPAIGN 80)				PARTY QUALIFIED	ID 0C00004368	
	1985 STATEMENT OF ORGANIZATION - AMENDMENT			31JUL85	1	86FEC/383/4938
	STATEMENT OF ORGANIZATION - AMENDMENT			9DEC85	2	86FEC/392/2140
	MID-YEAR REPORT	29,475	21,469	1JAN85 -30JUN85	18	86FEC/383/4939
	YEAR-END	36,832	54,222	1JUL85 -31DEC85	36	86FEC/400/2359
	1986 STATEMENT OF ORGANIZATION - AMENDMENT			30JAN86	1	86FEC/400/2358
	NOTICE OF FAILURE TO FILE			1JAN86 -31MAR86	1	86FEC/413/3004
	TOTAL	66,307	0	75,691	0	89 TOTAL PAGES

ALL REPORTS LISTED ABOVE HAVE BEEN REVIEWED.

Ending cash-on-hand as of 12/31/85: \$18293.54

Debts and obligations owed to the committee as of 12/31/85: \$0.00

Debts and obligations owed by the committee as of 12/31/85: \$0.00

# QUARTERLY REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PAGES

March 31, 1986

**WHO MUST FILE**

ALL Party Committees, Non-connected Committees and Separate Segregated Funds, except those filing monthly (see below), must file a quarterly report by April 15, 1986.

**WHAT MUST BE REPORTED**

The report must disclose all financial activity that occurred from the close of books for last report filed through March 31, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through March 31, 1986.\* For more detailed instructions, consult your campaign guide.

**WHEN TO FILE**

Reports sent by registered or certified mail must be postmarked no later than midnight April 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business April 15, 1986.

**WHERE AND HOW TO FILE**

Committees should consult the instructions on the enclosed FEC Form 3X for details.

**MONTHLY FILERS**

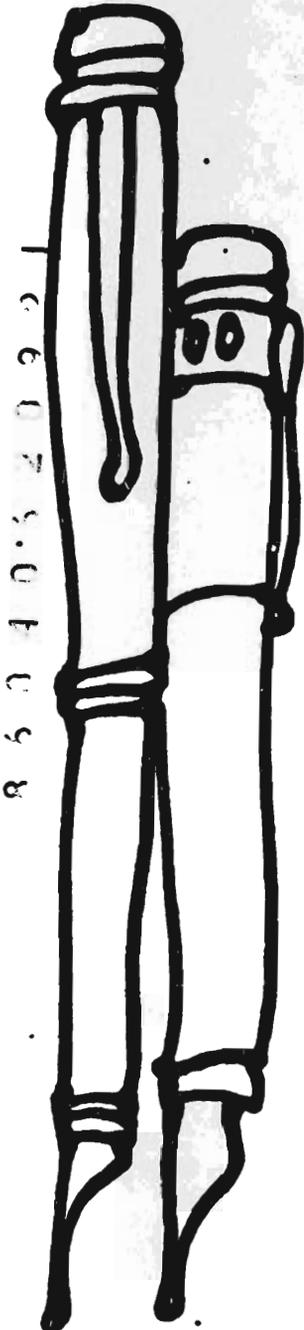
Committees that file on a monthly schedule must file their next report by April 20, 1986, and disclose all financial activity of their committee from March 1 through March 31, 1986. (See the schedule of monthly reports on the reverse side.)

**COMPLIANCE**

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible reports and reports submitted on non-FEC forms will not be accepted, and committees filing such documents will be required to refile.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received or disbursed during the current reporting period. See 11 CFR 104.3(a) and (b).

-over-



**REQUIREMENTS**

**QUARTERLY FILINGS**

Committees that make contributions or expenditures (including independent expenditures) in connection with an election, must file a pre-election report if this activity has not been previously disclosed. See the January 1986 issue of the Federal Election Commission Record for primary election filing requirements.

**MONTHLY FILINGS**

Committees that file monthly must follow the schedule below. Pre-general election reports sent by registered or certified mail must be postmarked no later than midnight October 20, 1986. All other reports sent by registered or certified mail must be postmarked no later than midnight on the filing date in order to be timely. Reports hand delivered or mailed first class must be received by close of business on the filing date.

REPORT	PERIOD COVERED	FILING DATE
February	01/01 - 01/31	02/20/86
March	02/01 - 02/28	03/20/86
April	03/01 - 03/31	04/20/86
May	04/01 - 04/30	05/20/86
June	05/01 - 05/31	06/20/86
July	06/01 - 06/30	07/20/86
August	07/01 - 07/31	08/20/86
September	08/01 - 08/31	09/20/86
October	09/01 - 09/30	10/20/86
Pre-election	10/01 - 10/15	10/23/86
Post-election	10/16 - 11/24	12/04/86
Year-End	11/25 - 12/31	01/31/87

**INDEPENDENT EXPENDITURES**

Any independent expenditure aggregating \$1,000 or more and made between 2 and 20 days before an election must be reported within 24 hours after the expenditure is made. See 11 CFR 104.4(c)(2) and (3) for information concerning where to file.

**FOR INFORMATION CALL: Information Services Division  
800/424-9530 or 202/376-3120**

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

EO-7

May 7, 1986

Ebbie Spivey, Treasurer  
Mississippi Republican Party  
Campaign Committee (AKA  
Campaign 80)  
P.O. Box 1178  
516 East Capitol Street  
Jackson, MS 39205

Identification Number: C00084368

Reference: April Quarterly Report (1/1/86-3/31/86)

Dear Ms. Spivey.

It has come to the attention of the Federal Election Commission ("the Commission") that you may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report 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, please contact Alva Smith on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

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

957341:509123

TELECON

**ANALYST:** Andrew J. Dodson  
**CONVERSATION WITH:** Mr. Dickson  
**COMMITTEE:** Mississippi Republican Party Campaign Committee  
(AKA Campaign 80) C00084368  
**DATE:** May 28, 1986  
**SUBJECT(S):** Failure to file April Quarterly Report

8 6 0 4 0 5 2 0 9 2 4  
I telephoned Mr. Dickson, the acting treasurer of the committee, in order to tell him that the Commission had not yet recieved his committee's 1986 April Quarterly Report. I stressed the importance of timely filing and added that the report should be filed as soon as possible in order to avoid the possibility of legal action.

Mr. Dickson stated that the treasurer, Mrs. Ebbie Spivey, had resigned and that he was not aware that the 1986 April Quarterly Report was due. Mr. Dickson then stated that he would file the report promptly.



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2209

Date Filmed 11/25/86 Camera No. --- 2

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC FILE OF CLOSED MUR 2209 .

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Form 3811, Dec 1980

● **SENDER:** Complete items 1, 2, 3, and 4.  
Add your address in the "RETURN TO" space on reverse.

**(CONSULT POSTMASTER FOR FEES)**

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2.  **RESTRICTED DELIVERY**  
(The restricted delivery fee is charged in addition to the return receipt fee.)

3. **ARTICLE ADDRESSED TO:**  
 MISSISSIPPI REPUBLICAN PARTY  
 Attn: Stephen H. Jackson  
 PO Box 1174  
 Jackson, MS 39205

4. **TYPE OF SERVICE:** **ARTICLE NUMBER**  
 REGISTERED  INSURED  
 CERTIFIED  COD  
 EXPRESS MAIL  
 3-1874-5

**(Always obtain signature of addressee or agent)**

I have received the article described above.  
**SIGNATURE**  Addressee  Authorized agent  
*J. Kelly*

5. **DATE OF DELIVERY** **POSTMARK**  
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6. **ADDRESSEE'S ADDRESS** (Only if requested)

7. **UNABLE TO DELIVER BECAUSE:** 7a. **EMPLOYEE'S INITIALS**

2209 - 247

RECEIVED NOV 21 1986

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL