



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2797

DATE FILMED 5/21/92 CAMERA NO. 1

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Washington, D.C. 20530

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RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE GENERAL COUNSEL

The Honorable Thomas Josefiak  
Chairman  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Dear Mr. Chairman:

Re: Joseph Perkins, et al.; 2 U.S.C. §§ 441a, 441b and 441f

This will refer to, and confirm, our conversation of August 11, 1988, with Associate General Counsel Lois Lerner concerning the captioned matter.

In early 1986, this Department initiated a criminal investigation into an alleged pattern of illegal corporate political contributions, which were made through conduits by Alabama businessman Joseph Perkins. This investigation determined that approximately \$8,000 was given by Mr. Perkins to the 1986 Alabama congressional campaign of Roy Johnson in the names of several of his (Perkins') employees. However, this investigation has also determined that, contrary to our original belief, these illegal contributions were made in 1985, rather than in 1986. As such, the special three-year statute of limitations applicable to criminal violations of the Federal Election Campaign Act (2 U.S.C. § 455) has run on this matter, and we are barred from prosecuting it under 2 U.S.C. § 437g(d).

We are referring this matter to the Commission for whatever action it considers appropriate under the administrative provisions of 2 U.S.C. § 437g(a). This matter is closed in the Department of Justice, and we do not plan to take further criminal investigative or enforcement action in it.

2040901170

Enclosed herewith is a copy of pertinent investigative material developed by the Federal Bureau of Investigation in this matter.

Sincerely,

Gerald E. McDowell  
Chief, Public Integrity Section  
Criminal Division

By:



Craig C. Donsanto  
Director, Election Crimes Branch  
Public Integrity Section  
Criminal Division

Enclosure

cc: Frank W. Donaldson  
United States Attorney  
Middle District of Alabama  
Birmingham, Alabama 35203

Dennis Aiken  
Headquarters  
Federal Bureau of Investigation

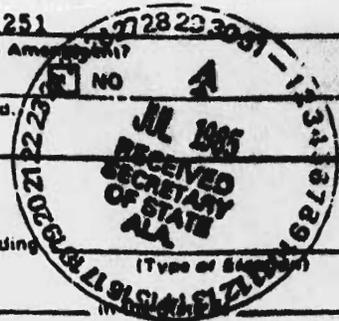
2040901171



**REPORTS OF RECEIPTS AND DISBURSEMENTS  
For Authorized Committee**

(Summary Page)

1. Name of Committee (in Full) <b>ROY JOHNSON FOR CONGRESS</b> Address (Number and Street) <b>7103 - 63rd Avenue, East</b> City, State and Zip Code <b>Tuscaloosa, AL 35405</b>	2. FEC Identification Number <b>114251</b> 3. Is this Report an Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> Check if address is different than previously reported.
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4. TYPE OF REPORT

<input type="checkbox"/> April 15 Quarterly Report	<input type="checkbox"/> Twelfth day report preceding election on _____
<input type="checkbox"/> July 15 Quarterly Report	<input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____
<input type="checkbox"/> October 15 Quarterly Report	<input type="checkbox"/> Termination Report
<input type="checkbox"/> January 31 Year End Report	
<input checked="" type="checkbox"/> July 31 Mid Year Report (Non-election Year Only)	

This report contains activity for -  Primary Election  General Election  Special Election  Runoff Election

2040901173

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>1/1/85</u> through <u>6/30/85</u>		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (e))	\$153,361.29	\$153,361.29
(b) Total Contribution Refunds (from Line 20 (d))	-0-	-0-
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	\$153,361.29	\$153,361.29
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	\$ 3,572.56	\$ 3,572.56
(b) Total Offsets to Operating Expenditures (from Line 14)	-0-	-0-
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	\$ 3,572.56	\$ 3,572.56
8. Cash on Hand at Close of Reporting Period (from Line 27)	\$151,421.87	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	-0-	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	\$ 1,712.70	

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

For further information, contact:  
 Federal Election Commission  
 Toll Free 800-424-9630  
 Local 202-523-4068

Dana T. Clements  
 Type or Print Name of Treasurer  
  
 SIGNATURE OF TREASURER

7-29-85  
 Date

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3)**

Name of Committee (in Full)		Report Covering the Period:	
Roy Johnson for Congress 114251		From: 1/1/85	To: 6/30/85
I. RECEIPTS		COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>			
(a) Individuals/Persons Other Than Political Committees . . . . .	\$113,961.29	\$113,961.29	11 (a)
(Memo Entry Unitemized \$ <u>13,760.00</u> )			
(b) Political Party Committees . . . . .	-0-	-0-	11 (b)
(c) Other Political Committees . . . . .	39,400.00	39,400.00	11 (c)
(d) The Candidate . . . . .	-0-	-0-	11 (d)
(e) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d)).	\$153,361.29	\$153,361.29	11 (e)
<b>12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES . . . . .</b>	-0-	-0-	12
<b>13. LOANS:</b>			
(a) Made or Guaranteed by the Candidate . . . . .	-0-	-0-	13 (a)
(b) All Other Loans . . . . .	-0-	-0-	13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b)). . . . .	-0-	-0-	13 (c)
<b>14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) . . . . .</b>	-0-	-0-	14
<b>15. OTHER RECEIPTS (Dividends, Interest, etc.) . . . . .</b>	1,633.14	1,633.14	15
<b>16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15) . . . . .</b>	\$154,994.43	\$154,994.43	16
<b>II. DISBURSEMENTS</b>			
<b>17. OPERATING EXPENDITURES . . . . .</b>	3,572.56	3,572.56	17
<b>18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES . . . . .</b>	-0-	-0-	18
<b>19. LOAN REPAYMENTS:</b>			
(a) Of Loans Made or Guaranteed by the Candidate . . . . .	-0-	-0-	19 (a)
(b) Of All Other Loans . . . . .	-0-	-0-	19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b)). . . . .	-0-	-0-	19 (c)
<b>20. REFUNDS OF CONTRIBUTIONS TO:</b>			
(a) Individuals/Persons Other Than Political Committees . . . . .	-0-	-0-	20 (a)
(b) Political Party Committees . . . . .	-0-	-0-	20 (b)
(c) Other Political Committees . . . . .	-0-	-0-	20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c)) . . . . .	-0-	-0-	20 (d)
<b>21. OTHER DISBURSEMENTS . . . . .</b>	-0-	-0-	21
<b>22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21) . . . . .</b>	\$ 3,572.56	\$ 3,572.56	22
<b>III. CASH SUMMARY</b>			
<b>23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD . . . . .</b>	\$	-0-	23
<b>24. TOTAL RECEIPTS THIS PERIOD (From Line 16) . . . . .</b>	\$	154,994.43	24
<b>25. SUBTOTAL (Add Line 23 and Line 24) . . . . .</b>	\$	154,994.43	25
<b>26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22) . . . . .</b>	\$	3,572.56	26
<b>27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25) \$</b>		151,421.87	27

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

(Use separate schedule for each category of the Detailed Summary Page)

**(Contributions from Persons Other Than Political Committees)**

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for  
 merical purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Roy Johnson for Congress 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Charles Allison 9214 Halsey Circle, NE Tuscaloosa, AL 35406	Gulf States Paper Corporation	4/12/85	\$250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney Aggregate Year-to-Date—\$ 250.00		
B. Full Name, Mailing Address and ZIP Code Sandra Anderson 3025 Green Grove Drive, NE Tuscaloosa, AL 35404	Tuscaloosa County Board of Education	6/28/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Assistant High School Principal Aggregate Year-to-Date—\$1,000.00		
C. Full Name, Mailing Address and ZIP Code Ramona M. Andrews P. O. Box 2692 Tuscaloosa, AL 35403	Racon, Inc.	3/22/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Secretary Aggregate Year-to-Date—\$ 500.00		
D. Full Name, Mailing Address and ZIP Code aron Aronov P. O. Box 1951 Montgomery, AL 36103	Aronov Realty	2/20/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner Aggregate Year-to-Date—\$ 500.00		
E. Full Name, Mailing Address and ZIP Code Jackie F. Ayers P. O. Box 609 Decatur, AL 35602	Security Mutual Financial Corporation	3/23/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Sr. Vice President Aggregate Year-to-Date—\$ 500.00		
F. Full Name, Mailing Address and ZIP Code David W. Badham 300 Rutgers Road Dothan, AL 36303	Self-Employed	2/9/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist Aggregate Year-to-Date—\$ 1,000.00		
G. Full Name, Mailing Address and ZIP Code George F. Bailey P. O. Box 21 Montgomery, AL 36101	Alabama Railroad Association	2/20/85	\$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Government Affairs Director Aggregate Year-to-Date—\$ 250.00		
<b>SUBTOTAL of Receipts This Page (optional)</b> . . . . .			<b>\$4,000.00</b>
<b>TOTAL This Period (last page this line number only)</b> . . . . .			

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

(Use address scheduled for each category of the Donor - Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for general purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
**Roy Johnson for Congress 114251**

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A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Omer A. Baker 400-C 10th Street, East Tuscaloosa, AL 35401	Self-Employed  Occupation Doctor	4/8/85	\$ 300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 300.00		
B. Full Name, Mailing Address and ZIP Code T. H. Benners, Jr. P. O. Box 30086 Birmingham, AL 35222	Name of Employer IMC-Benners  Occupation Consultant	Date (month, day, year) 6/11/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 250.00		
C. Full Name, Mailing Address and ZIP Code Rose M. Betz 2105 Bridge Avenue Northport, AL 35476	Name of Employer Self-Employed  Occupation Optometrist	Date (month, day, year) 2/9/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 250.00		
D. Full Name, Mailing Address and ZIP Code Jack Biddle, III 256 Pinehurst Drive Gardendale, AL 35071	Name of Employer Self-Employed  Occupation Real Estate Agent	Date (month, day, year) 4/8/85	Amount of Each Receipt This Period \$ 750.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 750.00		
E. Full Name, Mailing Address and ZIP Code Mrs. Jack Biddle, III 2256 Pinehurst Drive Gardendale, AL 35071	Name of Employer Gardendale City Schools  Occupation Teacher	Date (month, day, year) 4/8/85	Amount of Each Receipt This Period \$ 750.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 750.00		
F. Full Name, Mailing Address and ZIP Code John C. Blackenburg 900 Church Street Selma, AL 36702	Name of Employer Self-Employed  Occupation Optometrist	Date (month, day, year) 2/9/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 500.00		
G. Full Name, Mailing Address and ZIP Code W. H. Blount P. O. Box 7497 Birmingham, AL 35253	Name of Employer Vulcan Materials  Occupation Chief Executive Officer	Date (month, day, year) 6/11/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 250.00		
<b>---SUBTOTAL of Receipts This Page (optional) . . . . .</b>			<b>\$3,050.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>			

**SCHEDULE A**

**ITEMIZED RECEIPTS**

THIS SCHEDULE IS SUPPLEMENTAL TO THE SUMMARY OF THE DONATED SUMMARY PAGE

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full) **Roy Johnson for Congress 114251**

<b>A. Full Name, Mailing Address and ZIP Code</b> David Boles 1036 Normandale Circle Hueytown, AL 35023	Name of Employer Self-Employed	Date (month, day, year) 6/27/85	Amount of Each Receipt This Period \$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Accountant	Aggregate Year-to-Date—\$1,000.00	
<b>B. Full Name, Mailing Address and ZIP Code</b> H. Hampton Boles 3577 Spring Valley Road Birmingham, AL 35223	Name of Employer Balch & Bingham	Date (month, day, year) 6/11/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney	Aggregate Year-to-Date—\$ 250.00	
<b>C. Full Name, Mailing Address and ZIP Code</b> Hugh C. Boles 1036 Normandale Circle Hueytown, AL 35023	Name of Employer Jefferson State Junior College	Date (month, day, year) 6/27/85	Amount of Each Receipt This Period \$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Education Administrator	Aggregate Year-to-Date—\$ 1,000.00	
<b>D. Full Name, Mailing Address and ZIP Code</b> Laverne C. Boles 1036 Normandale Circle Hueytown, AL 35023	Name of Employer Jefferson County Board of Education	Date (month, day, year) 6/27/85	Amount of Each Receipt This Period \$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Teacher/Counselor	Aggregate Year-to-Date—\$ 1,000.00	
<b>E. Full Name, Mailing Address and ZIP Code</b> James B. Boone, Jr. P. O. Box AA Natchez, MS 39120	Name of Employer Boone Newspapers, Inc.	Date (month, day, year) 4/4/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner	Aggregate Year-to-Date—\$ 250.00	
<b>F. Full Name, Mailing Address and ZIP Code</b> H. A. Bowron, Jr. P. O. Box 306 Birmingham, AL 35203	Name of Employer Balch & Bingham	Date (month, day, year) 6/11/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney	Aggregate Year-to-Date—\$ 250.00	
<b>G. Full Name, Mailing Address and ZIP Code</b> Debra Hill Brown 3108 Cahaba Heights Village Birmingham, AL 35243	Name of Employer Cahaba Eye Associates	Date (month, day, year) 2/15/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist	Aggregate Year-to-Date—\$ 250.00	
<b>SUBTOTAL of Receipts This Page (optional) .....</b>			<b>\$4,000.00</b>
<b>TOTAL This Period (last page this line number only) .....</b>			

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

(Use separate schedules for each category of the Detailed Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for general purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full) **Hoy Johnson for Congress** 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
R. Frank Brown P. O. Box 190 Cullman, AL 35055	Cullman Health Care Center	4/19/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner	Aggregate Year-to-Date-\$ 1,000.00	
B. Full Name, Mailing Address and ZIP Code Kay Bunn Route 3, Box 296 Cottdale, AL 35453	S. T. Bunn Construction Company	3/22/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Secretary	Aggregate Year-to-Date-\$ 500.00	
C. Full Name, Mailing Address and ZIP Code Mrs. S. T. Bunn P. O. Box 30 Cottdale, AL 35453	S. T. Bunn Construction Company	3/22/85	\$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Secretary	Aggregate Year-to-Date-\$ 250.00	
D. Full Name, Mailing Address and ZIP Code S. T. Bunn, Jr. Route 3, Box 296 Cottdale, AL 35453	S. T. Bunn Construction Company	3/22/85	\$ 700.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation President	Aggregate Year-to-Date-\$ 700.00	
E. Full Name, Mailing Address and ZIP Code Suzanne Burnett 3401 Cahaba River Estates Bessemer, AL 35023	N/A	6/27/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Housewife	Aggregate Year-to-Date-\$ 1,000.00	
F. Full Name, Mailing Address and ZIP Code Sheri Bushery 3706 - 12th Street, East Tuscaloosa, AL 35404	Perkins & Associates, Inc.	3/29/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Production Manager	Aggregate Year-to-Date-\$ 1,000.00	
G. Full Name, Mailing Address and ZIP Code J. Frank Caldwell 2100 Pawnee Circle Jasper, AL 35501	Self-Employed	2/9/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Health Care Executive	Aggregate Year-to-Date-\$ 1,000.00	
<b>SUBTOTAL of Receipts This Page (optional)</b> .....			<b>\$5,450.00</b>
<b>TOTAL This Period (last page this line number only)</b> .....			

2040901178

**SCHEDULE A**

**ITEMIZED RECEIPTS**

(Use separate schedule for each company of the Donor Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Roy Johnson for Congress 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Louis C. Cardinal, III 2100 - 16th Avenue, South, STE 101 Birmingham, AL 35205	Howard, Weil, Labouisse, Friedrichs, Inc.	1/22/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Investment Specialist Aggregate Year-to-Date-\$1,000.00		
B. Full Name, Mailing Address and ZIP Code Larry D. Carter Box 7 Hamilton, AL 35570	Name of Employer Self-Employed	Date (month, day, year) 2/9/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist Aggregate Year-to-Date-\$ 500.00		
C. Full Name, Mailing Address and ZIP Code David G. Chandler Richelieu North, Apt. 2 Jacksonville, AL 36265	Name of Employer Self-Employed	Date (month, day, year) 2/15/85	Amount of Each Receipt This Period \$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist Aggregate Year-to-Date-\$ 1,000.00		
D. Full Name, Mailing Address and ZIP Code George N. Clark P. O. Box 6 Eutaw, AL 35462	Name of Employer Self-Employed	Date (month, day, year) 2/21/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney Aggregate Year-to-Date-\$ 500.00		
E. Full Name, Mailing Address and ZIP Code James H. Clary Route 1, Box 154 Akron, AL 35441	Name of Employer N/A	Date (month, day, year) 6/28/85	Amount of Each Receipt This Period \$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Retired Aggregate Year-to-Date-\$ 1,000.00		
F. Full Name, Mailing Address and ZIP Code Irma Coker Drawer F Collinsville, AL 35961	Name of Employer Collinsville Nursing Home, Inc.	Date (month, day, year) 3/23/85	Amount of Each Receipt This Period \$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Health Care Executive Aggregate Year-to-Date-\$ 1,000.00		
G. Full Name, Mailing Address and ZIP Code Audrey Cole Route 6 Albertville, AL 35950	Name of Employer Self-Employed	Date (month, day, year) 2/28/85	Amount of Each Receipt This Period \$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Health Care Executive Aggregate Year-to-Date-\$ 1,000.00		
JUBTOTAL of Receipts This Page (optional) .....			\$6,000.00
TOTAL This Period (last page this line number only) .....			

2040901179

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

of Committee (in Full) **oy Johnson for Congress** 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
T. Loyd Coleman P. O. Box 67 Arab, AL 35016	Self-Employed	2/26/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Real Estate Agent Aggregate Year-to-Date-\$500.00		
B. Full Name, Mailing Address and ZIP Code Ted H. Cook 607 South Third Street Gadsden, AL 35901	Name of Employer Atalla Health Care	Date (month, day, year) 3/23/85	Amount of Each Receipt This Period \$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Health Care Executive Aggregate Year-to-Date-\$1,000.00		
C. Full Name, Mailing Address and ZIP Code Louis E. Cottrell, Jr. P. O., Box 756 Sheffield, AL 35660	Name of Employer Lauderdale Christian Nursing Home	Date (month, day, year) 3/23/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Health Care Executive Aggregate Year-to-Date-\$500.00		
D. Full Name, Mailing Address and ZIP Code C. T. Crooks, III 007 Fourth Terrace Pleasant Grove, AL 35127	Name of Employer Self-Employed	Date (month, day, year) 2/15/85	Amount of Each Receipt This Period \$ 300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist Aggregate Year-to-Date-\$300.00		
E. Full Name, Mailing Address and ZIP Code Warren B. Crow, III 37 Randolph Road Birmingham, AL 35213	Name of Employer Self-Employed	Date (month, day, year) 2/21/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Insurance Agent Aggregate Year-to-Date-\$250.00		
F. Full Name, Mailing Address and ZIP Code Walter P. Crownover 3401 - 15th Street, East Tuscaloosa, AL 35404	Name of Employer Self-Employed	Date (month, day, year) 3/5/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney Aggregate Year-to-Date-\$		
G. Full Name, Mailing Address and ZIP Code Ron E. Dachelet 210 East 12th Street Anniston, AL 36201	Name of Employer Self-Employed	Date (month, day, year) 2/9/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist Aggregate Year-to-Date-\$ 250.00		
.TOTAL of Receipts This Page (optional) . . . . .			\$3,300.00
TOTAL This Period (last page this line number only) . . . . .			

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Name of Committee (in Full) **Ray Johnson for Congress** 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
<b>Milo Dakin</b> 660 Adams Avenue, Suite 339 Montgomery, AL 36104 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Alabama Consumer Finance Association, Inc.</b> Occupation <b>Executive Vice President</b> Aggregate Year-to-Date—\$ 500.00	6/11/85	\$ 500.00
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>V. Julian Davis</b> P. O. Box 218 Moundville, AL 35474 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Moundville Mercantile</b> Occupation <b>Owner</b> Aggregate Year-to-Date—\$ 1,000.00	6/28/85	\$1,000.00
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Jim H. Day, Jr.</b> P. O. Box 947 Gardendale, AL 35071 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Self-Employed</b> Occupation <b>Optometrist</b> Aggregate Year-to-Date—\$ 500.00	2/9/85	\$ 500.00
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>J. H. Day, Sr.</b> O. Box 947 Gardendale, AL 35071 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Self-Employed</b> Occupation <b>Optometrist</b> Aggregate Year-to-Date—\$ 500.00	2/9/85	\$ 500.00
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Fred DeLoach</b> Beacon Point Northport, AL 35476 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Trans-Video, Inc.</b> Occupation <b>Owner</b> Aggregate Year-to-Date—\$ 1,000.00	3/29/85	\$1,000.00
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>W. B. DeLoach</b> 1017 Greensboro Avenue Tuscaloosa, AL 35401 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>W. B. DeLoach Rentals</b> Occupation <b>Owner</b> Aggregate Year-to-Date—\$ 250.00	4/12/85	\$ 250.00
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Kendall P. Dexter</b> 9 Country Club Road Mobile, AL 36608 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>McMillan-Bloedel</b> Occupation <b>Governmental Affairs</b> Aggregate Year-to-Date—\$ 300.00	4/16/85 6/11/85	\$ 100.00 \$ 200.00
<b>TOTAL of Receipts This Page (optional)</b>			<b>\$4,050.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

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Name of Committee (in Full) Roy Johnson for Congress 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Jack Drake P. O. Box 86 Tuscaloosa, AL 35402	Self-Employed	4/18/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney	Aggregate Year-to-Date-\$ 500.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Fred Draper Route 1, Box 10 Mathews, AL 36052	Self-Employed	1/21/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Association Executive	Aggregate Year-to-Date-\$ 1,000.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
E. A. Drummond P. O. Box 1549 Jasper, AL 35501	Drummond Coal Company	6/11/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner	Aggregate Year-to-Date-\$ 500.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Garry N. Drummond P. O. Box 1549 Jasper, AL 35501	Drummond Coal Co.	6/11/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner	Aggregate Year-to-Date-\$ 500.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Clyde G. Echols 2244 Center Point Road Birmingham, AL 35215	Self-Employed	2/9/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist	Aggregate Year-to-Date-\$ 500.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Robert E. Edge P. O. Box 187 Jackson, AL 36545	Self-Employed	2/9/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist	Aggregate Year-to-Date-\$ 1,000.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Richard Ellis 1641 N. McFarland Blvd., Suite A-1 Tuscaloosa, AL 35406	Advantage Realty	3/5/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Realtor	Aggregate Year-to-Date-\$ 500.00	
JUSTOTAL of Receipts This Page (optional) .....			\$4,500.00
TOTAL This Period (last page this line number only) .....			

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no of Committees (in Full)

Roy Johnson for Congress 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Laurie Enslin Indian Lake Northport, AL 35476	Perkins & Associates, Inc.	3/29/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Media Buyer	Aggregate Year-to-Date—\$ 1,000.00	
B. Full Name, Mailing Address and ZIP Code Norman Estes 43 Cherokee Shore Northport, AL 35476	Northport Health Services	1/21/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Health Care Executive	Aggregate Year-to-Date—\$ 1,000.00	
C. Full Name, Mailing Address and ZIP Code Ronald Exell P. O. Box 11065 Macon, GA 31212	All American Self-Storage	3/27/85	\$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner	Aggregate Year-to-Date—\$ 250.00	
D. Full Name, Mailing Address and ZIP Code William H. Feagin Rt. 12, Box 32 West Whatley Drive Dothan, AL 36501	Self-Employed	2/9/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist	Aggregate Year-to-Date—\$ 1,000.00	
E. Full Name, Mailing Address and ZIP Code Harry Ferguson 1604 Bellingrath Drive Tuscaloosa, AL 35406	Perkins & Associates, Inc.	3/29/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Business Manager	Aggregate Year-to-Date—\$ 1,000.00	
F. Full Name, Mailing Address and ZIP Code Hilliard N. Fletcher P. O. Box 1350 Tuscaloosa, AL 35401	Duckworth-Morris Insurance Co.	5/9/85	\$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Insurance Agent	Aggregate Year-to-Date—\$ 250.00	
G. Full Name, Mailing Address and ZIP Code Wayne B. Fuller Suite 105, Downtown Plaza Cullman, AL 35055	Self-Employed	2/15/85	\$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist	Aggregate Year-to-Date—\$ 250.00	
SUBTOTAL of Receipts This Page (optional) .....			\$4,750.00
TOTAL This Period (last page this line number only) .....			

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

(Use separate schedule for each category of the Detailed Summary Page)

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Committee (in Full)			
Jay Johnson for Congress 114251			
<b>A. Full Name, Mailing Address and ZIP Code</b> Ann Galloway Skipperville, AL 36374	<b>Name of Employer</b> Self-Employed	<b>Date (month, day, year)</b> 2/28/85	<b>Amount of Each Receipt This Period</b> \$1,000.00
	<b>Occupation</b> Health Care Executive	<b>Aggregate Year-to-Date—\$</b> 1,000.00	
	<b>Receipt For:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
<b>B. Full Name, Mailing Address and ZIP Code</b> E. Burdette Gatten, III 117 East Washington Street P. O. Box 277 Demopolis, AL 36732	<b>Name of Employer</b> Self-Employed	<b>Date (month, day, year)</b> 2/9/85	<b>Amount of Each Receipt This Period</b> \$ 250.00
	<b>Occupation</b> Optometrist	<b>Aggregate Year-to-Date—\$</b> 250.00	
	<b>Receipt For:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
<b>C. Full Name, Mailing Address and ZIP Code</b> Robert B. Geddie, Jr. Suite 2, 418 Scott Street Montgomery, AL 36104	<b>Name of Employer</b> Fine, Geddie & Assoc.	<b>Date (month, day, year)</b> 2/20/85	<b>Amount of Each Receipt This Period</b> \$ 250.00
	<b>Occupation</b> Owner	<b>Aggregate Year-to-Date—\$</b> 250.00	
	<b>Receipt For:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
<b>D. Full Name, Mailing Address and ZIP Code</b> George R. Golson 1 Thomas Court Prattville, AL 36067	<b>Name of Employer</b> Self-Employed	<b>Date (month, day, year)</b> 2/9/85	<b>Amount of Each Receipt This Period</b> \$ 500.00
	<b>Occupation</b> Optometrist	<b>Aggregate Year-to-Date—\$</b> 500.00	
	<b>Receipt For:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
<b>E. Full Name, Mailing Address and ZIP Code</b> James A. Gray 1518 Pine Ridge Road Montgomery, AL 36109	<b>Name of Employer</b> Alabama Road Builders Association	<b>Date (month, day, year)</b> 6/11/85	<b>Amount of Each Receipt This Period</b> \$1,000.00
	<b>Occupation</b> Executive Secretary	<b>Aggregate Year-to-Date—\$</b> 1,000.00	
	<b>Receipt For:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
<b>F. Full Name, Mailing Address and ZIP Code</b> B. F. Grimmitt Box 647 Tuscumbia, AL 35674	<b>Name of Employer</b> Oak Crest Nursing Home	<b>Date (month, day, year)</b> 3/23/85	<b>Amount of Each Receipt This Period</b> \$1,000.00
	<b>Occupation</b> Health Care Executive	<b>Aggregate Year-to-Date—\$</b>	
	<b>Receipt For:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
<b>G. Full Name, Mailing Address and ZIP Code</b> P. F. Hahn P. O. Box 2708 Tuscaloosa, AL 35403	<b>Name of Employer</b> Indec, Inc.	<b>Date (month, day, year)</b> 3/22/85	<b>Amount of Each Receipt This Period</b> \$1,000.00
	<b>Occupation</b> Owner	<b>Aggregate Year-to-Date—\$</b> 1,000.00	
	<b>Receipt For:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
<b>TOTAL of Receipts This Page (optional)</b> .....			<b>\$5,000.00</b>
<b>TOTAL This Period (last page this line number only)</b> .....			

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Roy Johnson for Congress 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Richard Hanan 2771 Fernway Drive Montgomery, AL 36111	Self-Employed	1/21/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Real Estate Investments	Aggregate Year-to-Date-\$500.00	
B. Full Name, Mailing Address and ZIP Code James C. Harris 400 Joseph Drive Ozark, AL 36360	Self-Employed	2/28/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Pharmacist	Aggregate Year-to-Date-\$1,000.00	
C. Full Name, Mailing Address and ZIP Code James I. Harrison, Jr. 29 Arcadia Tuscaloosa, AL 35401	Harco Drugs, Inc.	5/10/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner	Aggregate Year-to-Date-\$500.00	
D. Full Name, Mailing Address and ZIP Code C. J. Hartley 1005 Morayshire Tuscaloosa, AL 35405	Southside B. F. Goodrich Store	3/5/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner	Aggregate Year-to-Date-\$	
E. Full Name, Mailing Address and ZIP Code Weston Hartley Route 7, Box 180 Northport, AL 35476	Tuscaloosa County Courthouse	3/22/85	\$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Bailiff	Aggregate Year-to-Date-\$ 250.00	
F. Full Name, Mailing Address and ZIP Code Emily G. Hartzog P. O. Box 519 Clayton, AL 36016	N/A	2/15/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Housewife	Aggregate Year-to-Date-\$ 500.00	
G. Full Name, Mailing Address and ZIP Code Judy B. Haymon Route 2 Fyffe, AL 35971	Scottsboro Nursing Home	3/23/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Health Care Executive	Aggregate Year-to-Date-\$1,000.00	
JUSTTOTAL of Receipts This Page (optional) .....			\$4,250.00
TOTAL This Period (last page this line number only) .....			

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Name of Committee (in Full) Roy Johnson for Congress 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Grover Gene Hill 33 Essex Square Northport, AL 35476	B. F. Goodrich	6/28/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Machinist Aggregate Year-to-Date-\$ 1,000.00		
B. Full Name, Mailing Address and ZIP Code Jimmy W. Holley Route 3 Elba, AL	Name of Employer Troy State University	Date (month, day, year) 4/1/85	Amount of Each Receipt This Period \$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Administrative Assistant Aggregate Year-to-Date-\$ 1,000.00		
C. Full Name, Mailing Address and ZIP Code Lee Hudson 54 Claymont Tuscaloosa, AL 35404	Name of Employer Perkins & Associates, Inc.	Date (month, day, year) 3/29/85	Amount of Each Receipt This Period \$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Account Executive Aggregate Year-to-Date-\$ 1,000.00		
D. Full Name, Mailing Address and ZIP Code John T. Huff P. O. Box 2740 Auburn, AL 36831-2740	Name of Employer Huff Investment Co.	Date (month, day, year) 2/9/85	Amount of Each Receipt This Period \$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner Aggregate Year-to-Date-\$1,000.00		
E. Full Name, Mailing Address and ZIP Code Reginald Hug P. O. Box 43547 Birmingham, AL 35243-0547	Name of Employer Self-Employed	Date (month, day, year) 2/20/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Chiropractor Aggregate Year-to-Date-\$250.00		
F. Full Name, Mailing Address and ZIP Code Fred Hunter 33 Lake Wildwood Cottondale, AL 35453	Name of Employer Perkins & Associates, Inc.	Date (month, day, year) 3/29/85	Amount of Each Receipt This Period \$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Sales Manager Aggregate Year-to-Date-\$ 1,000.00		
G. Full Name, Mailing Address and ZIP Code Ivy Hunter 33 Lake Wildwood Cottondale, AL 35453	Name of Employer Perkins & Associates, Inc.	Date (month, day, year) 3/29/85	Amount of Each Receipt This Period \$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Assistant Business Manager Aggregate Year-to-Date-\$1,000.00		
TOTAL of Receipts This Page (optional) .....			\$6,250.00
TOTAL This Period (last page this line number only) .....			

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of Committee (in Full)  
 Roy Johnson for Congress 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Durward W. Jackson P. O. Box 9069 Montgomery, AL 36108	Self-Employed  Occupation Waste Management	3/22/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$500.00		
B. Full Name, Mailing Address and ZIP Code  George L. Jackson No. 7 Twin Lakes Northport, AL 35476	Self-Employed  Occupation Health Care Executive	2/9/85	\$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$250.00		
C. Full Name, Mailing Address and ZIP Code  Mildred M. Jobe 1540 Katrina Place Montgomery, AL 36117	Self-Employed  Occupation Health Care Executive	4/18/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 500.00		
D. Full Name, Mailing Address and ZIP Code  Etta B. Johnson 2 Country Oaks Tuscaloosa, AL 35405	N/A  Occupation Retired (Housewife)	6/28/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$1,000.00		
E. Full Name, Mailing Address and ZIP Code  Norman C. Johnson 828 South Broad Street Scottsboro, AL 35768	Self-Employed  Occupation Optometrist	2/9/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 500.00		
F. Full Name, Mailing Address and ZIP Code  Thomas J. Joiner 16 Pinemont Drive Tuscaloosa, AL 35401	University of Alabama  Occupation Geologist	4/12/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 500.00		
G. Full Name, Mailing Address and ZIP Code  Fred R. Jones 3513 Dresden Drive Montgomery, AL 36111	Alabama Manufactured Housing Institute  Occupation Attorney and Real Estate Agent	6/22/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 500.00		
TOTAL of Receipts This Page (optional) . . . . .			\$3,750.00
TOTAL This Period (last page this line number only) . . . . .			

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**SCHEDULE A**

Summary Page

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of Committee (in Full)

y Johnson for Congress 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
William M. Kelce 2647 Swiss Lane Birmingham, AL 35226	Alabama Coal Association	6/27/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Executive Director Aggregate Year-to-Date—\$ 500.00		
B. Full Name, Mailing Address and ZIP Code William R. Lester, Jr. 328 Wildwood Road Gadsden, AL 35901	Name of Employer Gadsden Health Care	Date (month, day, year) 3/23/85	Amount of Each Receipt This Period \$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Health Care Executive Aggregate Year-to-Date—\$1,000.00		
C. Full Name, Mailing Address and ZIP Code James W. Marbourg P. O. Box 40 Oneonta, AL 35121	Name of Employer Self-Employed	Date (month, day, year) 2/15/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist Aggregate Year-to-Date—\$ 500.00		
D. Full Name, Mailing Address and ZIP Code Bill A. Mason 2 Highland Woods Drive, East Mobile, AL 36608	Name of Employer Southern American Medical International	Date (month, day, year) 5/18/85	Amount of Each Receipt This Period \$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation President Aggregate Year-to-Date—\$ 1,000.00		
E. Full Name, Mailing Address and ZIP Code A. Wayne May 3509 Greensboro Avenue Tuscaloosa, AL 35401	Name of Employer May Veterinary Hospital	Date (month, day, year) 4/26/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Veterinarian Aggregate Year-to-Date—\$ 500.00		
F. Full Name, Mailing Address and ZIP Code Harold McAbee P. O. Box 1460 Tuscaloosa, AL 35403	Name of Employer McAbee Construction Company	Date (month, day, year) 3/23/85	Amount of Each Receipt This Period \$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner Aggregate Year-to-Date—\$ 1,000.00		
G. Full Name, Mailing Address and ZIP Code Leroy McAbee P. O. Box 1460 Tuscaloosa, AL 35403	Name of Employer McAbee Construction Company	Date (month, day, year) 3/23/85	Amount of Each Receipt This Period \$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner Aggregate Year-to-Date—\$ 1,000.00		
TOTAL of Receipts This Page (optional) . . . . .			\$5,500.00
TOTAL This Period (last page this line number only) . . . . .			

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Use separate schedule for each category of the Detailed Summary Page

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Committee (in Full)  
**Johnson for Congress 114251**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Sarah J. McKinney 7755 - 4th Avenue, South Birmingham, AL 35206 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Rose Manor Health Care Occupation Health Care Executive Aggregate Year-to-Date-\$ 500.00	3/23/85	\$ 500.00
Barry J. McNamara 2 Palomina Drive Montgomery, AL 36117 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Self-Employed Occupation Optometrist Aggregate Year-to-Date-\$500.00	2/9/85	\$ 500.00
Craig R. McNamara 5805 Hyde Park Drive Montgomery, AL 36117 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Self-Employed Occupation Optometrist Aggregate Year-to-Date-\$500.00	2/9/85	\$ 500.00
Thomas A. Niklic Country Oaks Tuscaloosa, AL 35405 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Craig Auto Supply Co. Occupation Owner Aggregate Year-to-Date-\$ 300.00	5/18/85	\$ 300.00
Joyce Miller 520 Forest Gardens Tuscaloosa, AL 35405 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Perkins & Associates, Inc. Occupation Receptionist Aggregate Year-to-Date-\$ 1,000.00	3/29/85	\$1,000.00
Wendell W. Mitchell Box 225 Luverne, AL 36049 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Self-Employed Occupation Attorney Aggregate Year-to-Date-\$ 250.00	3/7/85	\$ 250.00
Marlin D. Moore, Jr. P. O. Box 2086 Tuscaloosa, AL 35401 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Pritchett-Moore, Inc. Occupation Owner Aggregate Year-to-Date-\$250.00	3/22/85	\$ 250.00
TOTAL of Receipts This Page (optional) . . . . .			\$3,300.00
TOTAL This Period (last page this line number only) . . . . .			

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule for each category of the Detailed Summary Page

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Committee (in Full)  
Johnson for Congress 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Thomas W. Moore 809 Canyon Road North Tuscaloosa, AL 35406	Pritchett-Moore, Inc.	3/22/85	\$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner Aggregate Year-to-Date-\$ 250.00		
B. Full Name, Mailing Address and ZIP Code Neil C. Morgan 2430 - 15th Street, East Tuscaloosa, AL 35404	Name of Employer N. C. Morgan Construction Co.	Date (month, day, year) 4/26/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner Aggregate Year-to-Date-\$ 500.00		
C. Full Name, Mailing Address and ZIP Code Robert H. Morris P. O. Drawer 7425-A Birmingham, AL 35253	Name of Employer Engineering Service Associates, Inc.	Date (month, day, year) 6/11/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation General Manager Aggregate Year-to-Date-\$ 250.00		
D. Full Name, Mailing Address and ZIP Code Robert C. Morrow P. O. Box 168 Tuscaloosa, AL 35402	Name of Employer The Morrow Companies	Date (month, day, year) 5/9/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner Aggregate Year-to-Date-\$ 500.00		
E. Full Name, Mailing Address and ZIP Code Frederick C. Moses 101 2nd Street, NE Fayette, AL 35555	Name of Employer Self-Employed	Date (month, day, year) 2/15/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist Aggregate Year-to-Date-\$ 250.00		
F. Full Name, Mailing Address and ZIP Code C. Delaine Mountain P. O. Box 2155 Tuscaloosa, AL 35403	Name of Employer Self-Employed	Date (month, day, year) 3/5/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney Aggregate Year-to-Date-\$500.00		
G. Full Name, Mailing Address and ZIP Code Michael Onderdonk P. O. Box 130 Chatom, AL 36518	Name of Employer Onderdonk Quarter Horse Farms	Date (month, day, year) 2/15/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner Aggregate Year-to-Date-\$250.00		
S. (AL of Receipts This Page (optional) . . . . .			\$2,500.00
TOTAL This Period (last page this line number only) . . . . .			

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of Committee (in Full)

oy, Johnson for Congress 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Ruth L. Osborne 212 East Way Birmingham, AL 35228	Self-Employed	2/28/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Health Care Executive Aggregate Year-to-Date-\$ 1,000.00		
B. Full Name, Mailing Address and ZIP Code Fred M. Palmer 142 - 52nd Street, East Tuscaloosa, AL 35405	Creative Leasing, Inc.	4/19/85	\$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner Aggregate Year-to-Date-\$ 250.00		
C. Full Name, Mailing Address and ZIP Code Michael R. Parker P. O. Box 595 Fort Payne, AL 35967	Self-Employed	2/9/85	\$ 300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist Aggregate Year-to-Date-\$ 300.00		
D. Full Name, Mailing Address and ZIP Code Tim Parker, Jr. P. O. Box 72 Tuscaloosa, AL 35402	Parker Towing Co.	5/18/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner Aggregate Year-to-Date-\$ 1,000.00		
E. Full Name, Mailing Address and ZIP Code Donald W. Peak 2401 - 32nd Street Northport, AL 35476	Forest Manor, Inc.	1/21/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Health Care Executive Aggregate Year-to-Date-\$ 1,000.00		
F. Full Name, Mailing Address and ZIP Code Cynthia K. Perkins 3117 Alabama Avenue Holt, AL 35404	Perkins & Associates, Inc.	3/29/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Manager of Direct Mail Aggregate Year-to-Date-\$ 1,000.00		
G. Full Name, Mailing Address and ZIP Code Daniel Mark Perkins 3913 - 6th Street, East Tuscaloosa, AL 35404	Emergency Medical Services	4/1/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Director Aggregate Year-to-Date-\$ 1,000.00		
TOTAL of Receipts This Page (optional) . . . . .			\$5,550.00
TOTAL This Period (last page this line number only) . . . . .			

2040901191

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Name of Committee (in Full) Roy Johnson for Congress 114251

2040904192

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Joseph W. Perkins, Jr. Route 4, Box 95 Northport, AL 35476	Perkins & Associates, Inc.	3/29/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation President and Owner	Aggregate Year-to-Date-\$ 1,000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Loretta T. Perkins 3913 - 6th Street, East Tuscaloosa, AL 35404	Tuscaloosa Library	4/1/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Librarian	Aggregate Year-to-Date-\$ 1,000.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Felton F. Perry, Jr. P. O. Box 5133 Birmingham, AL 35214	Self-Employed	2/9/85	\$ 250.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist	Aggregate Year-to-Date-\$ 250.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Margaret C. Pickens 1401 Cost Drive Hueytown, AL 35023	N/A	6/27/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Retired	Aggregate Year-to-Date-\$ 1,000.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
John H. Plott P. O. Box 183 Tuscaloosa, AL 35402	John Plott Co., Inc.	3/22/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner	Aggregate Year-to-Date-\$ 500.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Howell Poole Moundville, AL 35474	Bank of Moundville	6/28/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Banker	Aggregate Year-to-Date-\$ 1,000.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Madie H. Poole P. O. Box 207 Moundville, AL 35474	Bank of Moundville	6/28/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Banker	Aggregate Year-to-Date-\$ 1,000.00	
*TOTAL of Receipts This Page (optional) . . . . .			\$5,750.00
TOTAL This Period (last page this line number only) . . . . .			

**SCHEDULE A**

**ITEMIZED RECEIPTS**

(Use separate schedule(s) for each category of the Detailed Summary Page)

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of Committee (in Full)  
 y Johnson for Congress 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Victor P. Poole P. O. Box 207 Moundville, AL 35474	Bank of Moundville	6/28/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Banker	Aggregate Year-to-Date-\$1,000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Jerry Powell Route 5, Box 289A Wetumpka, AL 36092	Self-Employed	1/21/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Retail Merchant	Aggregate Year-to-Date-\$ 1,000.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Roland Pugh P. O., Box 350 Northport, AL 35476	Roland Pugh Construction Company	4/25/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner	Aggregate Year-to-Date-\$ 500.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mitchell V. Purvis 11 North Claxton Avenue Liba, AL 36323	Self-Employed	2/9/85	\$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist	Aggregate Year-to-Date-\$ 250.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Clyde Ray, Jr. 118 Hickory Drive Muscle Shoals, AL 35660	Shoals Nursing Home	3/23/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Health Care Executive	Aggregate Year-to-Date-\$ 1,000.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Martin Ray 1810 - 4th Street Tuscaloosa, AL 35401	Self-Employed	5/14/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney	Aggregate Year-to-Date-\$ 500.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Leon A. Renaud P. O. Box 456 Bessemer, AL 35020	Self-Employed	2/15/85	\$ 300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Occupation Optometrist	Aggregate Year-to-Date-\$ 300.00	
TOTAL of Receipts This Page (optional) .....			\$4,550.00
TOTAL This Period (last page this line number only) .....			

2040901193

**SCHEDULE A**

**ITEMIZED RECEIPTS**

(Use separate sheets for each category of the Detailed Summary Page)

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of Committee (in Full)

Ray Johnson for Congress 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (This Period)
Ronald Guy Scott 5715 Bridle Path Lane Montgomery, AL 36116	Alabama Service Station Association	2/20/85	\$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Government Affairs Dir.	Aggregate Year-to-Date--\$ 250.00	
B. Full Name, Mailing Address and ZIP Code Charlie O. Sealy, Jr. 1200 Greensboro Avenue Tuscaloosa, AL 35401	Name of Employer Sealy Realty Co.	Date (month, day, year) 3/23/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner	Aggregate Year-to-Date--\$ 500.00	
C. Full Name, Mailing Address and ZIP Code John A. Searcy 4500 Shoreline Drive Alexander City, AL 35010	Name of Employer Guerdon Industries	Date (month, day, year) 2/14/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Plant Manager	Aggregate Year-to-Date--\$ 250.00	
D. Full Name, Mailing Address and ZIP Code Fred B. Setzer 45 Carribbean Circle Alabaster, AL 35007	Name of Employer Self-Employed	Date (month, day, year) 2/9/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist	Aggregate Year-to-Date--\$ 250.00	
E. Full Name, Mailing Address and ZIP Code Clyde Shown 902 South Memorial Drive Prattville, AL 36067	Name of Employer Self-Employed	Date (month, day, year) 2/20/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Chiropractor	Aggregate Year-to-Date--\$ 250.00	
F. Full Name, Mailing Address and ZIP Code Charles A. Snyder 2715 Cherokee Road Tuscaloosa, AL 35404	Name of Employer Dixie Steel & Supply Company	Date (month, day, year) 6/18/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner	Aggregate Year-to-Date--\$ 500.00	
G. Full Name, Mailing Address and ZIP Code Mike Spiller Route 4, Box 47 Tuscaloosa, AL 35405	Name of Employer Spiller Furniture Company	Date (month, day, year) 3/25/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner/Operator	Aggregate Year-to-Date--\$ 500.00	
Sub-TOTAL of Receipts This Page (optional) .....			\$2,500.00
TOTAL This Period (last page this line number only) .....			

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of Committee (in Full)  
 by Johnson for Congress 114251

2040901195

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Nerbert Stockham 4000 - 10th Avenue Birmingham, AL 35202	Stockham Valves and Fittings	6/18/85	\$ 500.00
	Occupation Owner	Aggregate Year-to-Date-\$ 500.00	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Kenneth D. Strong Drawer C Elba, AL 36323	Self-Employed	2/9/85	\$ 250.00
	Occupation Optometrist	Aggregate Year-to-Date-\$ 250.00	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
William Sullins 1420 East Olive Drive Huntsville, AL 35801	Self-Employed	2/15/85 2/20/85	\$ 250.00 100.00
	Occupation Optometrist	Aggregate Year-to-Date-\$ 350.00	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Alan J. Swindall oute 2, Box 24W adeville, AL 36853	Self-Employed	6/29/85	\$1,000.00
	Occupation Physician	Aggregate Year-to-Date-\$1,000.00	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Marshall Timberlake 2501-E Montevallo Road Birmingham, AL 35223	Balch & Bingham	6/11/85	\$ 250.00
	Occupation Attorney	Aggregate Year-to-Date-\$ 250.00	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Lanny S. Vines 1800 City Federal Building Birmingham, AL 35203	Emond & Vines	4/1/85	\$1,000.00
	Occupation Attorney	Aggregate Year-to-Date-\$ 1,000.00	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
H. B. Walby 4525 - 20th Street, NE Tuscaloosa, AL 35404	N/A	6/28/85	\$1,000.00
	Occupation Retired	Aggregate Year-to-Date-\$ 1,000.00	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
JTAL of Receipts This Page (optional) .....			\$4,350.00
TOTAL This Period (last page this line number only) .....			

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Name of Committee (in Full) **Johnson for Congress** 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mrs. H. B. Walby 4525 - 20th Street, NE Tuscaloosa, AL 35401	N/A	6/28/85	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Retired	Aggregate Year-to-Date-\$ 1,000.00	
B. Full Name, Mailing Address and ZIP Code Fred Wallace 1431 2nd Avenue, North Bessemer, AL 35021	Name of Employer Self-Employed	Date (month, day, year) 2/9/85	Amount of Each Receipt This Period \$ 300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist	Aggregate Year-to-Date-\$ 300.00	
C. Full Name, Mailing Address and ZIP Code Harry Wallace 1431 - 2nd Avenue, North Bessemer, AL 35021	Name of Employer Self-Employed	Date (month, day, year) 2/9/85	Amount of Each Receipt This Period \$ 300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist	Aggregate Year-to-Date-\$ 300.00	
D. Full Name, Mailing Address and ZIP Code John L. Wallace P. O. Box 790 Methens, AL 35611	Name of Employer Self-Employed	Date (month, day, year) 4/19/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Accountant	Aggregate Year-to-Date-\$ 500.00	
E. Full Name, Mailing Address and ZIP Code J. W. Warner P. O. Box 3199 Tuscaloosa, AL 35404	Name of Employer Gulf States Paper Corp.	Date (month, day, year) 4/12/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Chairman of the Board	Aggregate Year-to-Date-\$ 500.00	
F. Full Name, Mailing Address and ZIP Code Jon Warner 1400 River Road, NE Tuscaloosa, AL 35404	Name of Employer Gulf States Paper Corp.	Date (month, day, year) 4/12/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation President	Aggregate Year-to-Date-\$ 500.00	
G. Full Name, Mailing Address and ZIP Code James W. Webb 166 Commerce Street Montgomery, AL 36101	Name of Employer Self-Employed	Date (month, day, year) 6/11/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney	Aggregate Year-to-Date-\$ 500.00	
<b>TOTAL of Receipts This Page (optional)</b> .....			<b>\$3,600.00</b>
<b>TOTAL This Period (last page this line number only)</b> .....			

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Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

of Committee (in Full)  
 by Johnson for Congress 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Howard White 1606 Paul W. Bryant Drive Tuscaloosa, AL 35401	Fitts & White Architects.	4/23/85	\$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Architect	Aggregate Year-to-Date-\$ 250.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mrs. Johnny R. Wiggins Route 1, Box 360 Duncanville, AL 35456	N/A	3/23/85	\$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Housewife	Aggregate Year-to-Date-\$ 250.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Harold Williams P. O. Box 306 Birmingham, AL 35201	Balch & Bingham	6/11/85	\$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney	Aggregate Year-to-Date-\$ 250.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Robert T. Wilson O. Box 1090 Asper, AL 35501	Self-Employed	3/7/85 6/11/85	\$ 500.00 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney	Aggregate Year-to-Date-\$ 1,000.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
W. Rodney Windham 1127 Overlook Road, North Tuscaloosa, AL 35406	Alabama Reassurance Company	4/26/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice-President Actuary	Aggregate Year-to-Date-\$ 500.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Ralph Winton 1517 Toney Drive Huntsville, AL 35802	Self-Employed	2/15/85	\$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Optometrist	Aggregate Year-to-Date-\$ 250.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
.TOTAL of Receipts This Page (optional) . . . . .			\$2,500.00
TOTAL This Period (last page this line number only) . . . . .			

**SCHEDULE A**

**ITEMIZED RECEIPTS**

(Use separate schedule for each category of the Detailed Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

**Roy Johnson for Congress** 114251

<b>A. Full Name, Mailing Address and ZIP Code</b> Tom Coker 2665 Fairmont Road Montgomery, AL 36104	Name of Employer Self-Employed	Date (month, day, year) 2/18/85	Amount of Each Receipt This Period \$ 707.65 (in kind)
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Association Executive Aggregate Year-to-Date-\$ 707.65		
<b>B. Full Name, Mailing Address and ZIP Code</b> Julian Smith 26 Stonehurst Green Birmingham, AL 35213	Name of Employer Alabama Power Company	Date (month, day, year) 6/20/85	Amount of Each Receipt This Period \$ 535.99 (in kind)
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Governmental Affairs Aggregate Year-to-Date-\$ 535.99		
<b>C. Full Name, Mailing Address and ZIP Code</b> Art McWinney Route 4, Box 469 Deatsville, AL 36022	Name of Employer N/A (Air Force)	Date (month, day, year) 2/18/85	Amount of Each Receipt This Period \$ 507.65 (in kind)
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Retired Aggregate Year-to-Date-\$507.65		
<b>D. Full Name, Mailing Address and ZIP Code</b>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
<b>E. Full Name, Mailing Address and ZIP Code</b>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
<b>F. Full Name, Mailing Address and ZIP Code</b>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
<b>G. Full Name, Mailing Address and ZIP Code</b>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		

<b>SUBTOTAL of Receipts This Page (optional)</b>	<b>\$1,751.29</b>
<b>TOTAL This Period (last page this line number only)</b>	<b>\$100,201.29</b>

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**SCHEDULE A**

**ITEMIZED RECEIPTS**  
(Contributions From Other Political Committees)

(Use separate schedules for each category of the Detailed Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of collecting contributions or for other purposes, other than using the name and address of any political committee to solicit contributions from such committee.

of Committee (in Full)

Roy Johnson for Congress 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
ABC PAC P. O. Box 10246 Birmingham, AL 35202		6/11/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 500.00	
B. Full Name, Mailing Address and ZIP Code AT&T PAC 550 Madison Avenue New York, NY 10022	Name of Employer	Date (month, day, year) 6/28/85 4/8/85	Amount of Each Receipt This Period \$ 500.00 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 750.00	
C. Full Name, Mailing Address and ZIP Code Action Committee for Rural Electrification 1800 Massachusetts Avenue, NE Washington, D.C. 20036	Name of Employer	Date (month, day, year) 2/20/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 250.00	
D. Full Name, Mailing Address and ZIP Code Alabama Power Company Employees Federal PAC P. O. Box 2641 Birmingham, AL 35291	Name of Employer	Date (month, day, year) 6/27/85	Amount of Each Receipt This Period \$2,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 2,000.00	
E. Full Name, Mailing Address and ZIP Code Alabama Savings Association Public Affairs Committee 2012 Old Farm Road Montgomery, AL 36111	Name of Employer	Date (month, day, year) 2/6/85 6/11/85	Amount of Each Receipt This Period \$ 500.00 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 1,000.00	
F. Full Name, Mailing Address and ZIP Code Alabama Textile Committee for Free Enterprise P. O. Box 1384 Montgomery, AL 36102	Name of Employer	Date (month, day, year) 3/23/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
G. Full Name, Mailing Address and ZIP Code ALAGASCOPAC 1918 First Avenue North Birmingham, AL 35295	Name of Employer	Date (month, day, year) 6/13/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 500.00	
<b>SUBTOTAL of Receipts This Page (optional)</b> .....			<b>\$5,250.00</b>
<b>TOTAL This Period (last page this line number only)</b> .....			

**SCHEDULE A**

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(Use separate schedule for each category of the Donor - Summary Page)

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Committee (in Full)			
y Johnson for Congress 114251			
<b>A. Full Name, Mailing Address and ZIP Code</b> American Dental Political Action Committee 1101 - 17th Street, NE, Suite 1002 Washington, D.C. 20036	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$1,000.00
	Occupation	5/3/85	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 1,000.00		
<b>B. Full Name, Mailing Address and ZIP Code</b> AmSouth Political Action Committee P. O. Box 11007 Birmingham, AL 35288	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$ 500.00 2,000.00
	Occupation	2/20/85 5/24/85	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 2,500.00		
<b>C. Full Name, Mailing Address and ZIP Code</b> Avondale Mills PAC Avondale Avenue Sylacauga, AL 35150	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$ 250.00 250.00
	Occupation	2/16/85 6/11/85	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 500.00		
<b>D. Full Name, Mailing Address and ZIP Code</b> Brotherhood of Locomotive Engineers Legislative League .28 Engineers Building Cleveland, OH 44114	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$1,000.00 1,000.00
	Occupation	4/1/85 5/21/85	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 2,000.00		
<b>E. Full Name, Mailing Address and ZIP Code</b> Central BANC PAC P. O. Box 10566 Birmingham, AL 35205	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$1,500.00
	Occupation	4/13/85	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 1,500.00		
<b>F. Full Name, Mailing Address and ZIP Code</b> Chevron PAC 225 Bush Street, Room 1706 San Francisco, CA 94104	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$ 500.00
	Occupation	4/26/85	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 500.00		
<b>G. Full Name, Mailing Address and ZIP Code</b> Citizens & Southern Georgia Corporation Better Government Committee I 99 Annex Atlanta, GA 30399	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$ 100.00
	Occupation	5/3/85	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 100.00		
TOTAL of Receipts This Page (optional) .....			\$8,100.00
TOTAL This Period (last page this line number only) .....			

**SCHEDULE A**

Summary of the Donated  
Summary Page

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

of Committee (in Full)  
 by Johnson for Congress 114251

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A. Full Name, Mailing Address and ZIP Code Constructive Congress Committee of the Edison Electric Institute 1111 Nineteenth Street, NW Washington, D.C. 20036	Name of Employer  Occupation	Date (month, day, year) 6/27/85	Amount of Each Receipt This Period \$ 200.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date—\$ 200.00	
B. Full Name, Mailing Address and ZIP Code Credithrift of America Political Action Committee 601 N.W. Second Street Evansville, IN 47701	Name of Employer  Occupation	Date (month, day, year) 3/23/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date—\$ 500.00	
C. Full Name, Mailing Address and ZIP Code CULAC P. O. Box 31221 Birmingham, AL 35222	Name of Employer  Occupation	Date (month, day, year) 6/11/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date—\$ 500.00	
D. Full Name, Mailing Address and ZIP Code Dealers Election Action Committee of the National Automobile Dealers Association 400 West Park Drive McLean, VA 22102	Name of Employer  Occupation	Date (month, day, year) 3/7/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date—\$ 500.00	
E. Full Name, Mailing Address and ZIP Code Dixie Oil Producers PAC P. O. Box 22925 Jackson, MS 39205	Name of Employer  Occupation	Date (month, day, year) 2 /21/85	Amount of Each Receipt This Period \$ 300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date—\$ 300.00	
F. Full Name, Mailing Address and ZIP Code 1871 Committee for Good Government P. O. Box 2028 Tuscaloosa, AL 35403	Name of Employer  Occupation	Date (month, day, year) 3/7/85	Amount of Each Receipt This Period \$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date—\$ 1,000.00	
G. Full Name, Mailing Address and ZIP Code Elect-PAC P. O. Box 11023 Montgomery, AL 36198	Name of Employer  Occupation	Date (month, day, year) 2/20/85 6/17/85	Amount of Each Receipt This Period \$ 500.00 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date—\$ 1,000.00	
TOTAL of Receipts This Page (optional) .....			\$4,000.00
TOTAL This Period (last page this line number only) .....			



**SCHEDULE A**

**FINISHED RECEIPTS**

(Total receipts for Schedule A for each category of the Detailed Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for similar purposes, other than using the name and address of any political committee to solicit contributions from such committee.

of Committee (in Full)

Roy Johnson for Congress 114251

<b>A. Full Name, Mailing Address and ZIP Code</b> Mid-Continent Oil & Gas Association Political Action Committee 771 Adams Office Building Tulsa, OK 74103 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  Aggregate Year-to-Date—\$ 500.00	<b>Date (month, day, year)</b> 4/26/85	<b>Amount of Each Receipt This Period</b> \$ 500.00
<b>B. Full Name, Mailing Address and ZIP Code</b> Philip Morris Political Action Committee 120 Park Avenue New York, NY 10017 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  Aggregate Year-to-Date—\$ 500.00	<b>Date (month, day, year)</b> 3/23/85	<b>Amount of Each Receipt This Period</b> \$ 500.00
<b>C. Full Name, Mailing Address and ZIP Code</b> NCNB-PAC One NCNB Plaza, T15-4 Charlotte, NC 28255 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  Aggregate Year-to-Date—\$ 500.00	<b>Date (month, day, year)</b> 4/8/85	<b>Amount of Each Receipt This Period</b> \$ 500.00
<b>D. Full Name, Mailing Address and ZIP Code</b> New York State Electric & Gas Corporation PAC 4500 Vestal Parkway East Binghamton, NY 13902 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  Aggregate Year-to-Date—\$ 50.00	<b>Date (month, day, year)</b> 6/27/85	<b>Amount of Each Receipt This Period</b> \$ 50.00
<b>E. Full Name, Mailing Address and ZIP Code</b> Norfolk Southern Corporation Tax Eligible Good Government Fund One Commercial Place Norfolk, VA 23510-3609 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  Aggregate Year-to-Date—\$ 250.00	<b>Date (month, day, year)</b> 5/7/85	<b>Amount of Each Receipt This Period</b> \$ 250.00
<b>F. Full Name, Mailing Address and ZIP Code</b> PAC-One P. O. Box 2389 Tuscaloosa, AL 35403 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  Aggregate Year-to-Date—\$ 500.00	<b>Date (month, day, year)</b> 4/6/85	<b>Amount of Each Receipt This Period</b> \$ 500.00
<b>G. Full Name, Mailing Address and ZIP Code</b> PACE P. O. Box 2508 Tuscaloosa, AL 35403 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  Aggregate Year-to-Date—\$ 500.00	<b>Date (month, day, year)</b> 6/11/85	<b>Amount of Each Receipt This Period</b> \$ 500.00
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$2,800.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

(Use separate schedules for each category of the Detailed Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for other purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Committee (in Full)

roy Johnson for Congress 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Realtors Political Action Committee 430 N. Michigan Avenue Chicago, IL 60611		3/23/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 500.00	
B. Full Name, Mailing Address and ZIP Code Russell Corporation PAC - Federal P. O. Box 352 Alexander City, AL 35010	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	2/27/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 500.00		
C. Full Name, Mailing Address and ZIP Code South Central Bell Federal Political Action Committee 600 North 19th Street Birmingham, AL 35203	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	2/28/85 6/23/85	\$ 500.00 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 1,000.00		
D. Full Name, Mailing Address and ZIP Code Southern Company Services PAC 1 Perimeter Center East Atlanta, GA 30346	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	6/27/85	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 500.00		
E. Full Name, Mailing Address and ZIP Code Southtrust Corporation Committee for Good Government P. O. Box 2554 Birmingham, AL 35290	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	2/20/85 3/23/85	\$ 500.00 2,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 2,500.00		
F. Full Name, Mailing Address and ZIP Code State Employees Association PAC P. O. Box 2457 Montgomery, AL 36104	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	2/14/85	\$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 250.00		
G. Full Name, Mailing Address and ZIP Code Torchmark Corporation PAC P. O. Box 2612 Birmingham, AL 35202	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	2/20/85 6/11/85	\$ 250.00 2,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 2,250.00		
<b>SUBTOTAL of Receipts This Page (optional)</b> . . . . .			<b>\$7,500.00</b>
<b>TOTAL This Period (last page this line number only)</b> . . . . .			

**SCHEDULE A**

**ITEMIZED RECEIPTS**

(Use separate statements for each category of the General Summary Page)

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Name of Committee (in Full) Roy Johnson for Congress 114251

<b>A. Full Name, Mailing Address and ZIP Code</b> Transportation Political Education League 14600 Detroit Avenue Cleveland, OH 44107	<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> 4/19/85	<b>Amount of Each Receipt This Period</b> \$1,000.00
<b>Receipt For:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 1,000.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> Union Camp Political Action Committee 1600 Valley Road Wayne, NJ 07470	<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> 4/1/85	<b>Amount of Each Receipt This Period</b> \$ 500.00
<b>Receipt For:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 500.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> Vulcan Materials Company Political Action Committee P. O. Box 7497 Birmingham, AL 35253	<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> 6/11/85	<b>Amount of Each Receipt This Period</b> \$ 500.00
<b>Receipt For:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 500.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> WALTPAC P. O. Box 22601 Tampa, FL 33622	<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> 2/15/85 6/1/85	<b>Amount of Each Receipt This Period</b> \$1,000.00 1,500.00
<b>Receipt For:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 2,500.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> Waste Management, Inc. PAC 3003 Butterfield Road Oak Brook, IL 60521	<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> 1/22/85	<b>Amount of Each Receipt This Period</b> \$4,000.00
<b>Receipt For:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 4,000.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> Westpoint Pepperell Employees PAC P. O. Box 71 West Point GA 31833	<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> 2/14/85	<b>Amount of Each Receipt This Period</b> \$1,000.00
<b>Receipt For:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 1,000.00</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> Weyerhaeuser Political Action Committee 33663 - 32nd Drive, South Federal Way Washington, D.C. 98003	<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> 3/7/85	<b>Amount of Each Receipt This Period</b> \$ 250.00
<b>Receipt For:</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 250.00</b>		
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$9,750.00</b>
<b>TOTAL This Period (last page this line number only)</b>			<b>\$29,400.00</b>

2040907205

**SCHEDULE A**

**ITEMIZED RECEIPTS**

**(Other Receipts)**

(Use separate schedules for each category of the Detailed Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

is of Committee (in Full)

Roy Johnson for Congress 114251

A. Full Name, Mailing Address and ZIP Code	Name of Employer (Interest on savings account)	Date (month, day, year)	Amount of Each Receipt This Period
First National Bank of Tuscaloosa P. O. Box 2028 Tuscaloosa, AL 35403		1/31/85 2/28/85 3/31/85 4/30/85	\$ 11.24 116.32 282.17 507.95
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
		5/31/85 6/28/85	602.08 113.38
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 1,633.14		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
<b>SUBTOTAL of Receipts This Page (optional)</b> .....			1,633.14
<b>TOTAL This Period (last page this line number only)</b> .....			\$1,633.14

2040901206

ITEMIZED DISBURSEMENTS  
(Operating Expenditures)

(Use separate schedule for each category of the Detailed Summary Page)

Information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

Roy Johnson for Congress 114251

207  
204090

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Jimmie R. Clements 7103 - 63rd Avenue, East Tuscaloosa, AL 35405	Fund-raising trip to Washington, D.C., includes meals, hotels, gasoline, etc. (4 persons) Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/18/85	\$1,000.00
B. Full Name, Mailing Address and ZIP Code Tom Coker 2.65 Fairmont Road Montgomery, AL 36104	Purpose of Disbursement Reception for Candidate Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2/18/85	Amount of Each Disbursement This Period \$ 707.65 (in kind)
C. Full Name, Mailing Address and ZIP Code Drake Printers 1925 Sixth Street Tuscaloosa, AL 35401	Purpose of Disbursement Printing letterhead, envelopes, and cards Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2/18/85 4/5/85	Amount of Each Disbursement This Period \$ 310.45 241.82
D. Full Name, Mailing Address and ZIP Code Julian Smith 26 Stonehurst Green Birmingham, AL 35213	Purpose of Disbursement Reception for candidate Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/30/85	Amount of Each Disbursement This Period \$ 535.89 (in kind)
E. Full Name, Mailing Address and ZIP Code Art McWinney Route 4, Box 469 Deatsville, AL 36022	Purpose of Disbursement Reception for Candidate Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2/18/85	Amount of Each Disbursement This Period \$ 507.65 (in kind)
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
* TOTAL of Disbursements This Page (optional) .....			\$3,303.56
TOTAL This Period (last page this line number only) .....			\$3,303.56

**SCHEDULE D**  
(Revised 3/80)

**DEBTS AND OBLIGATIONS**  
Excluding Loans

LINE NUMBER 10  
Use separate schedules  
for each numbered line

Name of Committee (in Full) Roy Johnson for Congress 114251	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Sheraton Mountain Brook Inn 2800 US Highway 280 Birmingham, AL 35223		\$1,712.70	-0-	\$1,712.70
Nature of Debt (Purpose): Reception for Candidate				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional) .....				\$1,712.70
2) TOTAL This Period (last page this line only) .....				1,712.70
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) .....				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) .....				1,712.70

2040901208



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 31, 1988

Craig Donsanto, Esquire  
Director  
Election Crimes Branch  
Public Integrity Section  
Department Of Justice  
Washington, DC 20530

RE: PreMUR 196

Dear Mr. Donsanto:

This is to acknowledge receipt of your letter dated August 17, 1988, advising us of the possibility of a violation of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Joseph Perkins and certain of his employees. We are currently reviewing the matter and will advise you of the Commission's determination.

If you have any questions or additional information, please call Delia Jacoby, the attorney assigned to this matter, at (202) 376-5690. Our file number for this matter is PreMUR 196.

Pursuant to 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), the Commission's review of this matter shall remain confidential until the file has been closed.

Sincerely,

Lawrence M. Noble  
General Counsel

By: Lois G. Lerner  
Associate General Counsel

2040901209

**SENSITIVE**

**FIRST GENERAL COUNSEL'S REPORT**

PRE-MUR 196  
Date Referral Received by OGC:  
August 24, 1988  
Date of Notification to  
Agency: August 31, 1988  
Staff Member: C. L. Jacoby

**REFERRING AGENCY:** Department of Justice

**RESPONDENTS:** Perkins & Associates, Inc., Joseph W. Perkins, Harry H. Ferguson, Jr., Cynthia K. Perkins, Ivy Hunter, Fred Hunter, W. Lee Hudson, Fred DeLoach, Laurie Enslin, Sheri Bushery Arnold, Joyce Miller, Grover Gene Hill, Daniel Mark Perkins, Loretta T. Perkins and Alabama Education Association

**RELEVANT STATUTES:** 2 U.S.C. § 441f  
2 U.S.C. § 441b(a)

**INTERNAL REPORTS CHECKED:** Public Disclosure Reports

**FEDERAL AGENCIES CHECKED:** Referral Documents

**I. GENERATION OF MATTER**

On August 24, 1988, the Office of the General Counsel received a referral from the Department of Justice. This referral arose from a 1986 criminal investigation of alleged illegal corporate contributions made through individual conduits. The investigation determined that Joseph W. Perkins, president and owner of Perkins & Associates, Inc., presented bonuses to employees and other persons who then contributed the amount of bonus (\$1000) to the 1986 Alabama congressional campaign of Roy Johnson. These contributions principally occurred in late March

2040901210

1985. As the statutory limitation period has run, the Department of Justice has referred the matter for civil enforcement and closed its files.

**II. FACTUAL AND LEGAL ANALYSIS**

Section 441f of Title 2, United States Code makes it unlawful for any person to make a contribution in the name of another or for any person to knowingly permit his or her name to be used for that purpose. Under Section 441b(a), no corporation or labor organization may contribute to a federal electoral campaign and no officer or director may consent to such contribution by the corporation or labor organization. In March 1985, Joseph Perkins had \$10,000 in cash withdrawn from a corporate checking account. That sum was then apparently distributed to various employees and others as "bonuses" with an inquiry or suggestion that the recipient contribute a like amount to the Roy Johnson for Congress campaign.

Corporate assets were apparently contributed to a federal political committee in the names of others by the giving of "bonuses" to certain individuals who then contributed those sums to the federal political committee. Therefore, there is reason to believe that the corporation violated 2 U.S.C. §§ 441f and 441b(a). Mr. Perkins as the president and owner of the corporation is also subject to the prohibitions under Section 441b(a). Yet he apparently directed that the corporate bonuses be paid and instigated the employees' making of contributions with those bonuses. Therefore, there is reason to believe that Joseph W. Perkins violated 2 U.S.C. §§ 441b(a) and 441f. By

2040901211

accepting such bonus and making the proposed contribution to a federal candidate, the bonus recipients apparently violated Section 441f by allowing their names to be used to make prohibited contributions.

It was also alleged that the source of the \$10,000 which was withdrawn from the Perkins & Associates, Inc. account was the Alabama Education Association ("AEA"), a corporation organized under the laws of Alabama.\*/ If AEA provided these funds for the purpose of redistribution to a federal electoral campaign through conduits, then there would be reason to believe AEA violated 2 U.S.C. §§ 441b(a) and 441f.

At this time there are no indications that the Roy Johnson for Congress Committee had knowledge that certain contributions possibly derived from prohibited funds or had been made in the name of another. Should the investigation disclose any involvement by the political committee, this Office will make appropriate recommendations to the Commission.

### III. RECOMMENDATIONS

1. Find reason to believe that Alabama Education Association, Perkins & Associates, Inc. and Joseph W. Perkins violated 2 U.S.C. §§ 441f and 441b(a).
2. Find reason to believe that Harry H. Ferguson, Jr., Cynthia K. Perkins, Ivy Hunter, Fred Hunter, W. Lee Hudson, Fred DeLoach, Laurie Enslin, Sheri Bushery Arnold, Joyce Miller, Grover Gene Hill, Daniel Mark Perkins and Loretta T. Perkins violated 2 U.S.C. § 441f.

\*/ The AEA was identified as a nonprofit corporation by the Alabama Secretary of State, Corporate Division. It is possible, however, that the AEA is a labor organization within the meaning of 2 U.S.C. § 441b(b)(1).

2040901212

3. Approve the attached letters, Factual and Legal Analyses and Questions.

Lawrence M. Noble  
General Counsel

Date 11/4/88

BY:   
Lois G. Lerner  
Associate General Counsel

**Attachments**

1. Referral Materials
2. Proposed Letters (15)
3. Proposed Factual and Legal Analyses (15)
4. Questions

2040901213

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
 Perkins & Associates, Inc. )  
 Joseph W. Perkins )  
 Harry H. Ferguson, Jr. )  
 Cynthia K. Perkins )  
 Ivy Hunter )  
 Fred Hunter )  
 W. Lee Hudson )  
 Fred DeLoach )  
 Laurie Enslin )  
 Sheri Bushery Arnold )  
 Joyce Miller )  
 Grover Gene Hill )  
 Daniel Mark Perkins )  
 Loretta T. Perkins )  
 Alabama Education Association )

Pre-MUR 196

(MUR  
2797)

2040901214

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of November 30, 1988, do hereby certify that the Commission decided by a vote of 4-0 to take the following actions with respect to the above-captioned matter:

1. Open a Matter Under Review (MUR).
2. Find reason to believe that Alabama Education Association, Perkins & Associates, Inc., and Joseph W. Perkins violated 2 U.S.C. §§ 441f and 441b(a).

(continued)

3. Find reason to believe that Harry H. Ferguson, Jr., Cynthia K. Perkins, Ivy Hunter, Fred Hunter, W. Lee Hudson, Fred DeLoach, Laurie Enslen, Sheri Bushery Arnold, Joyce Miller, Grover Gene Hill, Daniel Mark Perkins, and Loretta T. Perkins violated 2 U.S.C. § 441f.
  
4. Approve the letters, Factual and Legal Analyses, and Questions as recommended in the General Counsel's report dated November 4, 1988.

Commissioners Aikens, Elliott, McDonald, and McGarry voted affirmatively for the decision; Commissioners Josefiak and Thomas were not present at the time of the vote.

Attest:

12/2/88

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

December 8, 1988

Cynthia K. Perkins  
3117 Alabama Avenue  
Holt, Alabama 35404

RE: MUR 2797  
Cynthia K. Perkins

Dear Ms. Perkins:

On November 30, 1988, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials, along with answers to the enclosed questions, to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against you, 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 the 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 the 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.

2040901215

Cynthia K. Perkins  
Page 2

Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

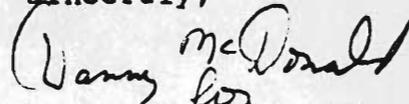
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

This matter will remain 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 Celia L. Jacoby, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Thomas J. Josefiak  
Chairman

Enclosures

- Factual and Legal Analysis
- Procedures
- Designation of Counsel Form
- Questions

6  
1  
2  
1  
0  
1  
2  
1  
0  
9  
0  
4  
0  
2



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20461

December 8, 1988

Ivy Hunter  
33 Lake Wildwood  
Cottondale, Alabama 35453

RE: MUR2797  
Ivy Hunter

Dear Ms. Hunter:

On November 30, 1988, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials, along with answers to the enclosed questions, to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against you, 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 the 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 the 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.

2040901217

Ivy Hunter  
Page 2

Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

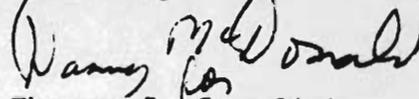
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Sincerely,



Thomas J. Josefiak  
Chairman

Enclosures

Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Questions

2040901218



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

December 8, 1988

Fred Hunter  
33 Lake Wildwood  
Cottondale, Alabama 35453

RE: MUR 2797  
Fred Hunter

Dear Mr. Hunter:

On November 30, 1988, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials, along with answers to the enclosed questions, to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against you, 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 the 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 the 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.

2040901219

Fred Hunter  
Page 2

Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

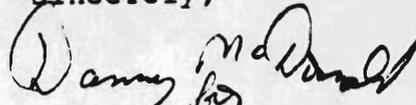
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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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 Celia L. Jacoby, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

  
Thomas J. Josefiak  
Chairman

Enclosures  
Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Questions

2040901220



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

December 8, 1988

W. Lee Hudson  
54 Claymount  
Tuscaloosa, Alabama 35404

RE: MUR 2797  
W. Lee Hudson

Dear Mr. Hudson:

On November 30, 1988, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials, along with answers to the enclosed questions, to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against you, 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 the 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 the 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.

2040901221

W. Lee Hudson  
Page 2

Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

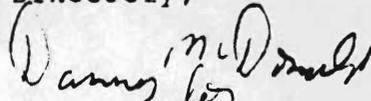
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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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 Celia L. Jacoby, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

  
Thomas J. Josefiak  
Chairman

Enclosures  
Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Questions

2040901222



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 8, 1988

Fred DeLoach  
39 Beacon Point  
Northport, Alabama 35476

RE: MUR 2797  
Fred DeLoach

Dear Mr. DeLoach:

On November 30, 1988, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials, along with answers to the enclosed questions, to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against you, 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 the 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 the 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.

2040901223

Fred DeLoach  
Page 2

Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

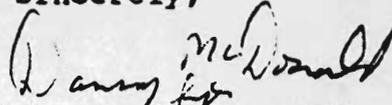
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

This matter will remain 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 Celia L. Jacoby, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

  
Thomas J. Josefiak  
Chairman

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2040901224



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

December 8, 1988

Laurie Enslin  
3514 Forrest Brook Lane  
Montgomery, Alabama 36116

RE: MUR 2797  
Laurie Enslin

Dear Ms. Enslin:

On November 30, 1988, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials, along with answers to the enclosed questions, to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

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2040901225

Laurie Enslin  
Page 2

Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

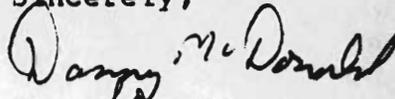
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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Celia L. Jacoby, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Thomas J. Josefiak  
Chairman

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2040901226



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

December 8, 1988

Sheri Bushery Arnold  
3706 12th St., East  
Tuscaloosa, Alabama 35404

RE: MUR 2797  
Sheri Bushery Arnold

Dear Ms. Arnold:

On November 30, 1988, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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2040901227

Sheri Bushery Arnold  
Page 2

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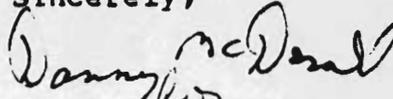
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Sincerely,



Thomas J. Josefiak  
Chairman

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2040901228



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

December 8, 1988

Joyce Miller  
Southfolk Trailer Park  
Duncanville, Alabama 35456

RE: MUR 2797  
Joyce Miller

Dear Ms. Miller:

On November 30, 1988, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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2040901229

Joyce Miller  
Page 2

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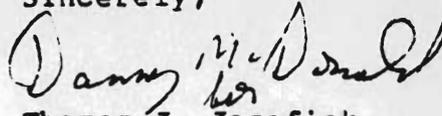
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Sincerely,



Thomas J. Josefiak  
Chairman

Enclosures

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2040901230



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 8, 1988

Grover Gene Hill  
29 Brookside  
Northport, Alabama 35476

RE: MUR 2797  
Grover Gene Hill

Dear Mr. Hill:

On November 30, 1988, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials, along with answers to the enclosed questions, to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

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2040901231

Grover Gene Hill  
Page 2

Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

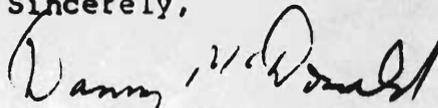
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Sincerely,



Thomas J. Josefiak  
Chairman

Enclosures

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2040901232



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 8, 1988

Daniel Mark Perkins  
3913 6th Street East  
Tuscaloosa, Alabama 35404

RE: MUR 2797  
Daniel Mark Perkins

Dear Mr. Perkins:

On November 30, 1988, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials, along with answers to the enclosed questions, to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

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2040901233

Daniel Mark Perkins  
Page 2

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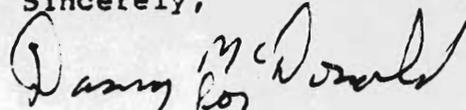
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Sincerely,



Thomas J. Josefiak  
Chairman

Enclosures

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2040901234



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 8, 1988

Loretta T. Perkins  
3913 6th Street East  
Tuscaloosa, Alabama 35404

RE: MUR 2797  
Loretta T. Perkins

Dear Ms. Perkins:

On November 30, 1988, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials, along with answers to the enclosed questions, to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against you, 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 the 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 the 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.

2040901235

Loretta T. Perkins  
Page 2

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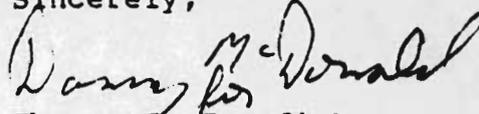
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Sincerely,

  
Thomas J. Josefiak  
Chairman

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2040901236



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 8, 1988

Alabama Education Association  
422 Dexter Avenue  
Montgomery, Alabama 36104

RE: MUR 2797  
Alabama Education  
Association

Dear Sir/Madam:

On November 30, 1988, the Federal Election Commission found that there is reason to believe Alabama Education Association (the "AEA") violated 2 U.S.C. §§ 441b(a) and 441f, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the AEA. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials, along with answers to the enclosed questions, to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the AEA, 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 the 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 the 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.

2040901237

Alabma Education Association  
Page 2

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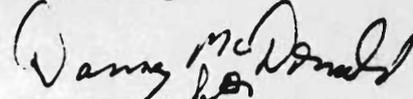
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Sincerely,



Thomas J. Josefiak  
Chairman

Enclosures

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2040901238



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 8, 1988

Joseph W. Perkins, President  
Perkins & Associates, Inc.  
2522 8th Street  
Tuscaloosa, Alabama 35401

RE: MUR 2797  
Perkins & Associates,  
Inc.

Dear Mr. Perkins:

On November 30, 1988, the Federal Election Commission found that there is reason to believe Perkins & Associates, Inc. violated 2 U.S.C. §§ 441b(a) and 441f, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against Perkins & Associates, Inc. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials, along with answers to the enclosed questions, to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against Perkins & Associates, Inc., 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 the 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 the 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.

2040901239

Perkins & Associates, Inc.  
Page 2

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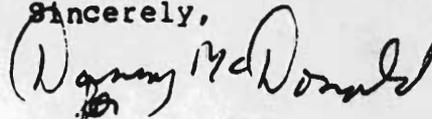
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Sincerely,



Thomas J. Josefiak  
Chairman

Enclosures

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- Procedures
- Designation of Counsel Form
- Questions

2040901240



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 8, 1988

Joseph W. Perkins  
Route 4, Box 95  
Northport, Alabama 35476

RE: MUR 2797  
Joseph W. Perkins

Dear Mr. Perkins:

On November 30, 1988, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. §§ 441b(a) and 441f, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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2040901241

Joseph W. Perkins  
Page 2

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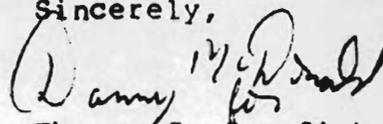
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Sincerely,

  
Thomas J. Josefiak  
Chairman

Enclosures  
Factual and Legal Analysis  
Procedures  
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Questions

2040901242



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

FEDERAL RECEIVED

88 DEC 12 AM 11:25

December 8, 1988

**SENSITIVE**

Harry H. Ferguson, Jr.  
1604 Bellingraph Drive  
Tuscaloosa, Alabama 35406

RE: MUR 2797  
Harry H. Ferguson, Jr.

Dear Mr. Ferguson:

On November 30, 1988, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials, along with answers to the enclosed questions, to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against you, 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 the 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 the 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.

2040901243

Harry H. Ferguson, Jr.  
Page 2

Further, the Commission will not entertain requests for pre-probable cause conciliation 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 the General Counsel ordinarily will not give extensions beyond 20 days.

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

This matter will remain 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 Celia L. Jacoby, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

*Danny M. Donald*  
Thomas J. Josefiak  
Chairman

Enclosures  
Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Questions

2040901244

OFC 1405



LEGAL SERVICES  
OFFICE OF GENERAL COUNSEL

NATIONAL EDUCATION ASSOCIATION • 1201 16th St., N.W., Washington, D C 20036-3290 • (202) 822-7035

MARY MATWOOD FUTRELL, President  
KEITH GEIGER, Vice President  
ROXANNE E. BRADSHAW, Secretary-Treasurer

DON CAMERON, Executive Director

December 19, 1988

88DEC 19 PM 3:12

RECEIVED  
FEDERAL ELECTION COMMISSION

Hand-Delivered

Celia L. Jacoby, Esq.  
Office of General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2797  
Alabama Education Association

Dear Ms. Jacoby:

This memorandum summarizes our telephone conversation of December 14, 1988. This office represents the Alabama Education Association ("AEA") in the above MUR, and a Statement of Designation of Counsel is attached. The AEA received notification from the Commission that there is reason to believe AEA violated the Federal Election Campaign Act of 1971, as amended, on December 13, 1988, which would make a response due December 28. We request a 20-day extension of time from that date in which to prepare a response (making the response due January 17) for the following reasons: (1) AEA Executive Secretary Paul Hubbert, who may have knowledge of the matter in question, is traveling and will be unavailable to consult with us until at least January 3; (2) the undersigned counsel is leaving town on December 22 and will be away from the office until January 2; and (3) both the AEA and NEA buildings will be closed over the Christmas holiday. Thus, as a practical matter, we will be unable to prepare a response within the initial time frame.

We appreciate your consideration in this matter.

Sincerely,

*Joy Koletsky*  
Joy Koletsky  
Counsel for NEA-PAC, et al.

cc: Paul Hubbert

JK/jp

2040901245

**STATEMENT OF DESIGNATION OF COUNSEL**

MUR 2797

**NAME OF COUNSEL:** Robert H. Chanin  
Joy L. Koletsky  
**ADDRESS:** Office of General Counsel  
National Education Association  
1201 - 16th Street, N.W.  
Washington, D.C. 20036  
**TELEPHONE:** (202) 822-7035

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and other  
communications from the Commission and to act on my behalf before  
the Commission.

December 19, 1988  
Date

Paul Hubbert  
Signature  
Paul Hubbert, Executive Secretary  
*by Joy Koletsky*

**RESPONDENT'S NAME:** \_\_\_\_\_  
**ADDRESS:** Alabama Education Association  
422 Dexter Avenue, Box 4177  
Montgomery, Alabama 36104  
**HOME PHONE:** \_\_\_\_\_  
**BUSINESS PHONE:** (205) 834-9790

2040901246

06C 1930  
RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

LAW OFFICES  
OF

88 DEC 21 AM 10:48

ARGO, ENSLEN, HOLLOWAY & SABEL, P.C.  
300 SOUTH HULL STREET  
P. O. DRAWER 1550  
MONTGOMERY, ALABAMA 36102-1550  
(205) 834-2460

J. KNOX ARGO\*  
FREDERICK T. ENSLEN\*  
JOHN M. HOLLOWAY, JR.  
M. WAYNE SABEL\*\*  
(ADMITTED ALABAMA  
AND DISTRICT OF COLUMBIA)\*  
(ADMITTED ALABAMA  
AND GEORGIA)\*\*

December 16, 1988

Federal Election Commission  
Washington, D. C. 20463

ATTN: Ms. Celia L. Jacoby

Re: MVR 2797  
Laurie Enslin

RECEIVED  
FEDERAL ELECTION COMMISSION  
88 DEC 21 PM 4:48

12040901247

Dear Ms. Jacoby:

My sister-in-law, Laurie Enslin, received the information from your office on December 14, 1988. She has moved twice since she made her last statement to federal authorities.

Laurie is in her ninth month of a very complicated pregnancy and is not in any condition to re-hash this matter. As a matter of fact, this mailing is quite upsetting to her. In other words, she cannot complete the questions by fifteen days from the date she received the letter.

I am certain Laurie will cooperate with you as she has done in the past. I will work with her on the questions soon after the first of the year and after her baby is born. I therefore request sufficient time for recuperation before the answers are due.

If you have any questions, please give me a call.

Sincerely,

*F. T. Enslin*  
Frederick T. Enslin

sap

cc: Ms. Laurie P. Enslin

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Official Business  
Penalty for Private Use \$300

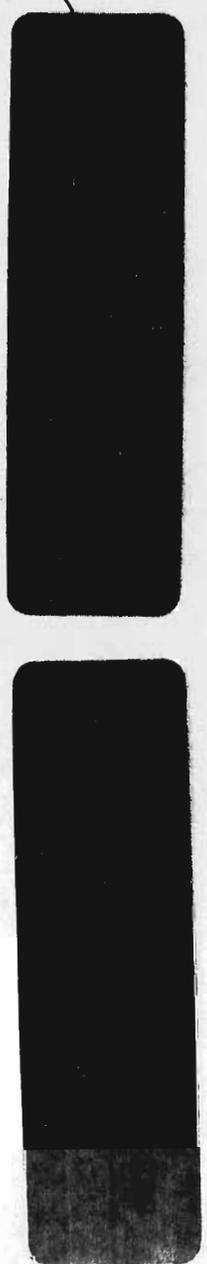
*Fred Enslin*

Ms. Laurie Enslin  
3514 Forrest Brook Lane  
Montgomery, AL 36116



Postage and Fees Paid  
Federal Election Commission

BO



2040901248



STATEMENT OF DESIGNATION OF COUNSEL

MUR 2797

NAME OF COUNSEL: Jack Drake

ADDRESS: Drake, Knowles & Pierce  
1509 University Blvd,  
Tuscaloosa, AL

TELEPHONE: 35401

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and other  
communications from the Commission and to act on my behalf before  
the Commission.

12-19-88  
Date

Cynthia K. Perkins  
Signature

RESPONDENT'S NAME: Cynthia K. Perkins

ADDRESS: 3117 Alabama Avenue  
Holt, AL 35404

HOME PHONE: 553-9721

BUSINESS PHONE: 759-7122

2040901250

066 1936  
RECEIVED  
FEDERAL ELECTION COMMISSION

LAW OFFICE OF  
DRAKE, KNOWLES AND PIERCE  
1808 UNIVERSITY BOULEVARD  
TUSCALOOSA, ALABAMA 35401

88 DEC 22 AM 10:31

RUSSELL JACKSON DRAKE  
RALPH I. KNOWLES, JR.  
JOSEPH G. PIERCE

MAILING ADDRESS  
POST OFFICE BOX 88  
TUSCALOOSA, ALABAMA 35402  
(205) 789-1234

December 19, 1988

Celia L. Jacoby  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2797

Dear Ms. Jacoby:

In the above-referenced proceeding, I represent Loretta Perkins, Joyce E. Albright (formerly Miller), Fred A. Hunter, and Ivy Hunter. It is entirely possible that other persons involved will ask me to represent them. However, I have so far only been contacted by these individuals and their Statements of Designation Of Counsel are enclosed. For your information, Daniel Mark Perkins is deceased.

I would like a continuance of thirty (30) days so that I can complete answers to all your questions.

My clients are interested in conciliation, depending, of course, upon what you propose.

You may be interested in knowing that the original allegation with the Justice Department was that the Alabama Education Association and the Alabama Trial Lawyers Association provided money to Perkins and Associates, Inc. to give, through its employees, to Roy Johnson's congressional campaign. That allegation was an interesting one to the Assistant U. S. Attorneys involved. However, when the prosecutors involved learned that that allegation was baseless, they lost interest in the matter. Assuming that there was a violation of 441(f), we are talking about a very minor and unimportant matter. It is not insignificant to me that Roy Johnson never ran for Congress.

Given my perspective of the matter, I would be happy to talk about conciliation of the matter.

Sincerely,

  
Jack Drake

JD/lb  
enclosures

RECEIVED  
FEDERAL ELECTION COMMISSION  
88 DEC 22 AM 11:36

2040901251

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2797

NAME OF COUNSEL: Tom Duvke

ADDRESS: Duvke, Krawler & Ponce  
1509 University Blvd  
Tusculum, AL

TELEPHONE: 35401

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

12-15-88  
Date

Coretta J. Perkins  
Signature

RESPONDENT'S NAME: Coretta Perkins

ADDRESS: 3913 6th St East  
Tusculum, AL  
35404

HOME PHONE: 205 553-0156

BUSINESS PHONE: \_\_\_\_\_

2040901252

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2797

NAME OF COUNSEL: Jack Drake

ADDRESS: 1509 University Blvd.  
Tuscaloosa, AL 35901

TELEPHONE: \_\_\_\_\_

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

12/16/88  
Date

Joyce E. Albright  
Signature

RESPONDENT'S NAME: Joyce E. Albright

ADDRESS: 26 Southfork  
Duncanville, AL 35456

HOME PHONE: 758-9984

BUSINESS PHONE: 758-5773

2040901253

**STATEMENT OF DESIGNATION OF COUNSEL**

MUR 2797

NAME OF COUNSEL: Josh Drake

ADDRESS: Drake, Kunkle + Pieren  
1509 University Blvd  
Tuscaloosa, AL 35401

TELEPHONE: \_\_\_\_\_

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

12/16/88  
Date

Guy Hunter  
Signature

RESPONDENT'S NAME: \_\_\_\_\_

ADDRESS: P.O. Box 394 Canyon Lakes  
Cottontail, AL 35453

HOME PHONE: 553-1757

BUSINESS PHONE: 345-5188

2040901254

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2797

NAME OF COUNSEL: Jack Drake

ADDRESS: Drake, Knovich & Pierce  
1509 University Blvd  
Tusculoosa, AL 35401

TELEPHONE: \_\_\_\_\_

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

12/14/88  
Date

Fred A. Hunter  
Signature

RESPONDENT'S NAME: FRED A. HUNTER

ADDRESS: 394 Canyon Lake  
COTTONDALE, AL 35453

HOME PHONE: 205-553-1757

BUSINESS PHONE: 205-758-0407  
205-553-1333

2040901255



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

=  
December 23, 1988

Joy Koletsky, Esquire  
Office of General Counsel  
National Education Association  
1201 16th Street, N.W.  
Washington, D.C. 20036

RE: MUR 2797  
Alabama Education Association

Dear Ms. Koletsky:

This is in response to your letter dated December 19, 1988, which we received on December 19, requesting an extension of twenty days to respond to the questions posed to your client, the Alabama Education Association, in the above-referenced matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on Tuesday, January 17, 1989.

If you have any questions, please contact Celia Jacoby, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

2040901256

OGC 1446

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

88 DEC 23 AM 9: 10

LAW OFFICE OF  
DRAKE, KNOWLES AND PIERCE  
1808 UNIVERSITY BOULEVARD  
TUSCALOOSA, ALABAMA 35401

December 20, 1988

RUSSELL JACKSON DRAKE  
RALPH I. KNOWLES, JR.  
JOSEPH G. PIERCE

MAILING ADDRESS  
POST OFFICE BOX 86  
TUSCALOOSA, ALABAMA 35402  
(205) 789-1224

88 DEC 23 AM 10: 22

RECEIVED  
FEDERAL ELECTION COMMISSION

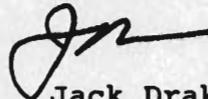
Celia Jacoby  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2797

Dear Ms. Jacoby:

I have now been retained by Harry Ferguson Jr. His designation is enclosed.

Sincerely,



Jack Drake

JD/lb

enclosure

2040901257

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2797

NAME OF COUNSEL: Jack Drake

ADDRESS: Drake, Knowler & Pierce  
1509 University Blvd.  
Tusculum, AL.

TELEPHONE: 35401

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and other  
communications from the Commission and to act on my behalf before  
the Commission.

12/20/88  
Date

Harry Ferguson Jr  
Signature

RESPONDENT'S NAME: Harry Ferguson Jr

ADDRESS: 1604 Bellingsoph Drive  
Tusculum, AL.  
35406

HOME PHONE: \_\_\_\_\_

BUSINESS PHONE: \_\_\_\_\_

2040901258

GC#1460

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

LAW OFFICES

MITCHELL, WILLIAMS, SELIG & ~~TUCKER~~ 27 AM 9:50

1000 SAVERS FEDERAL BUILDING  
CAPITOL AVENUE AT SPRING STREET  
LITTLE ROCK, ARKANSAS 72901  
TELEPHONE 501-688-8800  
TELECOPIER 501-688-8807

MARCELLA J. TAYLOR  
TIMOTHY W. BROOKS  
TRACY BARBER  
WALTER G. WRIGHT, JR.  
T. SCOTT CLEVELER  
LYN PEEPLES PRUITT  
WYLLIE D. CAVIN III  
JOE E. HARRIS, JR.  
W. BRADFORD BIERMAN  
RICHARD L. ANGEL  
EVALETTE L. MARTIN  
JEFFREY H. THOMAS  
ROBERT S. IRVING  
FREDERICK H. CAMPBELL  
DONNA H. BARBER  
COLEEN M. BARBER  
RENEE S. DALE  
STUART P. MILLER  
PHILLIP A. PETER

WRITER'S DIBBOT DIAL  
(501) 688-8827

December 21, 1988

M. MAURICE MITCHELL  
RICHARD A. WILLIAMS  
JOHN S. SELIG  
JOSEPH W. GELZINE  
W. CHRISTOPHER BARRIER  
JIM GUY TUCKER  
BYRON FREELAND  
RENT FOSTER  
ALLAN GATES  
PAT MORAN  
W. H. L. WOODWARD, III  
MICHAEL C. O'MALLEY  
JOHN C. LESSEL  
DOAK FOSTER  
JEAN D. STOCKBURGER  
ANNE RITCHEY  
DEBRA K. BROWN  
EDWIN F. JACKSON  
SHERRY P. BARTLEY  
CRAIG WESTBROOK  
RICHARD C. JANS  
SUSAN GUNTER  
BOYCE E. HARR  
R. T. BEARD, III  
W. KIRBY LOCKHART

OF COUNSEL  
HENRY E. SPITZBERG

Secretary  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

RE: MUR 2797, Sheri Bushery Arnold  
(now Sheri Arnold Brown)

Dear Sir:

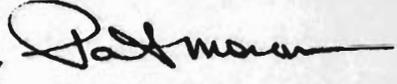
This Firm represents the above-named individual (see enclosed Statement of Designation of Counsel) in connection with your letter dated December 8, 1988, wherein the Commission states it has found reason to believe Ms. Brown has violated 2 USC § 441F of the Federal Election Campaign Act of 1971.

The Commission's letter was sent to Ms. Brown's last known address in the state of Alabama and eventually forwarded to her at her present address which is 114 Oaklawn Drive, Conway, Arkansas 72032. However, Ms. Brown only received the letter on December 20, 1988, and retained us to assist her on December 21, 1988. While I have reviewed the written materials enclosed with the Commission's letter and spoken briefly to Ms. Jacoby in the General Counsel's office, I have not had any opportunity to discuss the matter in detail with Ms. Brown at this time. For these reasons, I respectfully request an extension of time until January 20, 1989, in which to respond to the matters contained in this letter.

Thank you for your kind consideration of this request.

Sincerely yours,

MITCHELL, WILLIAMS, SELIG & TUCKER

By   
Pat Moran

PM:dap  
cc: Ms. Celia L. Jacoby ✓  
Ms. Sheri Arnold Brown

2040901259

88 DEC 27 PM 2:30

RECEIVED  
FEDERAL ELECTION COMMISSION

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2797

NAME OF COUNSEL: Pat Moran

ADDRESS: Mitchell, Williams, Selig & Tucker  
1000 Savers Federal Bldg.  
Little Rock, AR 72201

TELEPHONE: (501) 688-8800

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and other  
communications from the Commission and to act on my behalf before  
the Commission.

December 20, 1988  
Date

*Sheri Lynn Arnold Brown*  
Signature

RESPONDENT'S NAME: Sheri Lynn Arnold Brown

ADDRESS: 114 Oaklawn Drive  
Conway, AR 72032

HOME PHONE: (501) 329-7886

BUSINESS PHONE: \_\_\_\_\_

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

88 DEC 27 AM 10:00

Nov 2797

LAW OFFICE OF  
DRAKE, KNOWLES AND PIERCE  
1809 UNIVERSITY BOULEVARD  
TUSCALOOSA, ALABAMA 35401

RUSSELL JACKSON DRAKE  
RALPH I. KNOWLES, JR.  
JOSEPH G. PIERCE

December 23, 1988

MAILING ADDRESS  
POST OFFICE BOX 88  
TUSCALOOSA, ALABAMA 35402  
(205) 789-1224

Dear Ms. Jacoby  
My office is closed today.  
Mr. Hill contacted me  
and asked me to represent  
him. I am enclosing his  
designation.

*John R.*

02040901260

88 DEC 27 PM 2:21

FEDERAL RECEIVED  
FEDERAL ELECTION COMMISSION

STATEMENT OF DESIGNATION OF COUNSEL

88 DEC 27 AM 10:00

MUR 2797

NAME OF COUNSEL: Jack Drake

ADDRESS: 1509 University Blvd.  
Tusculum, Ill.

TELEPHONE: \_\_\_\_\_

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and other  
communications from the Commission and to act on my behalf before  
the Commission.

\_\_\_\_\_  
Date

*Archer Gene Hill*  
Signature

RESPONDENT'S NAME: Archer Gene Hill

ADDRESS: 29 Brookside  
Northport, AL  
35476

HOME PHONE: \_\_\_\_\_

BUSINESS PHONE: \_\_\_\_\_

2040901261



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 3, 1989

Frederick T. Enslin, Esquire  
Argo, Enslin, Holloway & Sabel, P.C.  
300 South Hull Street  
P.O. Drawer 1550  
Montgomery, Alabama 36102-1550

RE: MUR 2797  
Laurie Enslin

Dear Mr. Enslin:

This is in response to your letter dated December 16, 1988, which we received on December 21, requesting an indefinite extension of time to respond to the questions posed to your client, Ms. Enslin, in the above-referenced matter. After considering the circumstances presented in your letter, I have granted an extension of thirty days. Accordingly, your response is due by the close of business on Monday, January 30, 1989.

If you have any questions, please contact Celia Jacoby, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

*Lois G. Lerner*  
BY: Lois G. Lerner *by [Signature]*  
Associate General Counsel

2040901262



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 3, 1989

Jack Drake, Esquire  
Drake, Knowles and Pierce  
P.O. Box 86  
Tuscaloosa, Alabama 35402

RE: MUR 2797  
Loretta Perkins, Joyce (Miller)  
Albright, Fred A. Hunter,  
Ivy Hunter, Grover Gene Hill,  
Harry Ferguson, Jr. and  
Cynthia K. Perkins

Dear Mr. Drake:

This is in response to your letters dated December 19, 20 and 23, 1988, which we received on December 22, 23 and 27, respectively, requesting extensions of thirty days to respond to the questions posed to your clients in the above-referenced matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on Monday, January 30, 1989.

If you have any questions, please contact Celia Jacoby, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature in cursive script, appearing to read "Lois G. Lerner".

BY: Lois G. Lerner  
Associate General Counsel

2040901263



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 3, 1989

Pat Moran, Esquire  
Mitchell, Williams, Selig & Tucker  
1000 Savers Federal Building  
Little Rock, Arkansas 72201

RE: MUR 2797  
Sheri Bushery Arnold Brown

Dear Mr. Moran:

This is in response to your letter dated December 21, 1988, which we received on December 27, requesting extension until January 20, 1989 to respond to the questions posed to your client, Ms. Brown, in the above-referenced matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on Monday, January 23, 1989.

If you have any questions, please contact Celia Jacoby, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

*Lois G. Lerner*  
*by [Signature]*

BY: Lois G. Lerner  
Associate General Counsel

2040901264

DEC 14 1989

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

LAW OFFICE OF  
DRAKE, KNOWLES AND PIERCE  
1808 UNIVERSITY BOULEVARD  
TUSCALOOSA, ALABAMA 35401

89 JAN -3 AM 10:05

RUSSELL JACKSON DRAKE  
RALPH I. KNOWLES, JR.  
JOSEPH G. PIERCE

December 29, 1988

MAILING ADDRESS  
POST OFFICE BOX 88  
TUSCALOOSA, ALABAMA 35402  
(205) 789-1234

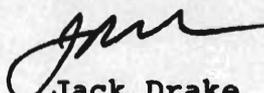
Celia Jacoby  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2797

Dear Ms. Jacoby:

This is to confirm our telephone conversation in which I stated to you that my request for additional time is being made on behalf of every person represented by me. This would include Gene Hill, Harry Ferguson, Cynthia Perkins, Loretta Perkins, Joyce Albright, Ivy Hunter and Fred Hunter. I also represent Perkins & Associates, Inc., and include the corporation within my request.

Sincerely,

  
Jack Drake

JD/mjd

2040901265

89 JAN -3 PM 12:21

FEDERAL ELECTION COMMISSION



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

January 9, 1989

Jack Drake, Esquire  
Drake, Knowles and Pierce  
P.O. Box 86  
Tuscaloosa, Alabama 35402

RE: MUR 2797  
Perkins & Associates, Inc.

Dear Mr. Drake:

This is in response to your letter dated December 29, 1988, which we received on January 3, 1989, requesting an extension of thirty days to respond to the questions posed to your client in the above-referenced matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on Monday, February 6, 1989.

If you have any questions, please contact Celia Jacoby, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

2040901266

0601538  
RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM  
*Mon* 2797  
89 JAN -9 AM 11:17

LAW OFFICE OF  
DRAKE, KNOWLES AND PIERCE  
1208 UNIVERSITY BOULEVARD  
TUSCALOOSA, ALABAMA 35401

RUSSELL JACKSON DRAKE  
RALPH I KNOWLES, JR.  
JOSEPH S. PIERCE

January 6, 1989

MAILING ADDRESS  
POST OFFICE BOX 88  
TUSCALOOSA, ALABAMA 35402  
(205) 756-1254

Celia Jacoby  
Federal Election Commission  
Washington, D.C. 20463

Dear Ms. Jacoby:

Enclosed is the Designation Of Counsel for Perkins and Associates. I will respond for all my clients no later than January 30, 1989.

Sincerely,

*Jack*  
Jack Drake

JD/lb

enclosure

2040901267

RECEIVED  
FEDERAL ELECTION COMMISSION  
89 JAN 10 PM 2:43

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2797

NAME OF COUNSEL: Jack Drake

ADDRESS: Drake, Kramer & Pierce  
P.O. Box 86  
Tusculoosa, Al.

TELEPHONE: 35402

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

1/6/88  
Date

Perkins & Associates  
Signature by [Signature]

RESPONDENT'S NAME: Perkins & Associates Inc.

ADDRESS: Am South Bldg  
2330 University Blvd  
Tusculoosa, Al 35401

HOME PHONE: \_\_\_\_\_

BUSINESS PHONE: 251 758-0407

2040901268

89 JAN 11 PH 4 31

In the Matter of )  
 )  
Loretta Perkins, Joyce (Miller) )  
Albright, Fred Hunter and Ivy )  
Hunter )

MUR 2797

**SENSITIVE**

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On November 30, 1988, the Commission found reason to believe that Loretta Perkins, Joyce Miller,<sup>\*/</sup> Fred Hunter and Ivy Hunter had participated in contribution-reimbursement activity contrary to 2 U.S.C. § 441f. Counsel for these individuals indicated an interest in conciliation in a letter dated December 19, 1988.

**II. ANALYSIS**

Included in the reason to believe notification addressed to these respondents were interrogatories. Counsel sought and received a thirty-day extension of time to respond to those interrogatories. This Office believes that conciliation prior to the receipt and analysis of those responses would be premature. Therefore, this Office recommends that the Commission decline to enter into conciliation prior to the completion of the investigation in this matter.

**III. RECOMMENDATIONS**

1. Decline to enter into conciliation with Loretta Perkins, Joyce Albright, Fred Hunter and Ivy Hunter prior to a finding of probable cause to believe.

\*/ According to her counsel, Joyce Miller presently uses the name Albright.

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2. Approve the attached letter.

Lawrence M. Noble  
General Counsel

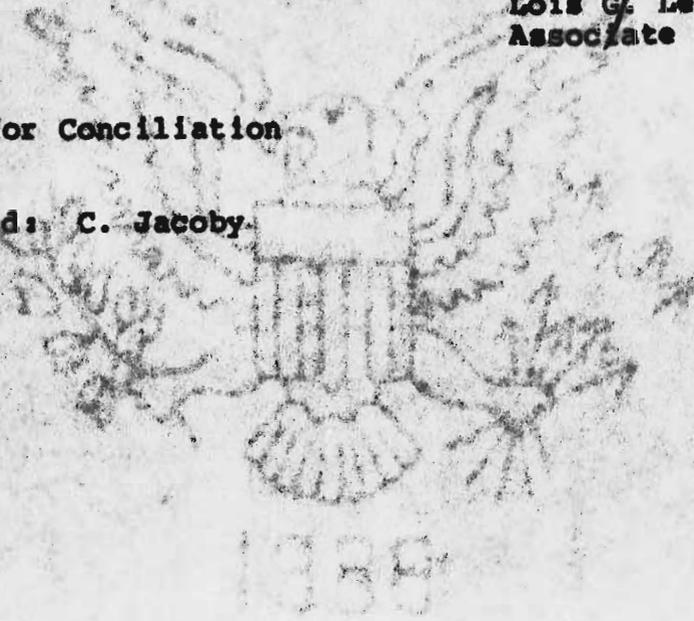
1-10-89  
Date

BY:   
Lois G. Lerner  
Associate General Counsel

**Attachments**

- 1. Request for Conciliation
- 2. Letter

Staff Assigned: C. Jacoby



2040901270

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

Loretta Perkins, Joyce (Miller) )  
Albright, Fred Hunter and Ivy )  
Hunter )

MUR 2797

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 17, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 2797:

1. Decline to enter into conciliation with Loretta Perkins, Joyce Albright, Fred Hunter and Ivy Hunter prior to a finding of probable cause to believe.
2. Approve the letter, as recommended in the General Counsel's report signed January 10, 1989.

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

Attest:

January 17, 1989  
Date

Hilda Arnold  
for Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary:	Wed.,	1-11-89,	4:31
Circulated on 48 hour tally basis:	Thurs.,	1-12-89,	11:00
Deadline for vote:	Tues.,	1-17-89,	11:00

2040901271



NATIONAL EDUCATION ASSOCIATION • 1201 16th St., N.W., Washington, D C 20036-3290 • (202) 822-7035

MARY HATWOOD FUTRELL, President  
KEITH GEIGER, Vice President  
ROXANNE E. BRADSHAW, Secretary-Treasurer

DON CAMERON, Executive Director

0661594  
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FEDERAL ELECTION COMMISSION  
LEGAL SERVICES  
OFFICE OF GENERAL COUNSEL  
89 JAN 18 AM 11:10

January 17, 1989

Thomas J. Josefiak  
Chairman  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2797 - Alabama Education Association

Dear Chairman Josefiak:

On December 8, 1988 you notified the Alabama Education Association ("AEA") that the Commission found there is reason to believe [AEA] violated 2 U.S.C. §§441b(a) and 441f, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). You invited AEA to "submit any factual or legal materials that [we] believe are relevant to the Commission's consideration of this matter." In addition you asked AEA to answer questions submitted by the Commission. This letter and the attached Answers are submitted on behalf of AEA in response to the Commission's invitation and request.

According to the Factual and Legal Analysis ("Analysis") which formed a basis for the Commission's finding, a 1986 Department of Justice investigation of alleged illegal corporate contributions made through individual conduits determined that monies were "apparently distributed to various employees [of Perkins and Associates, Inc. ("Perkins" or "Perkins, Inc.")] and others as bonuses [by Perkins' president and owner Joseph W. Perkins] with an inquiry or suggestion that the recipient contribute a like amount to the Roy Johnson for Congress Campaign." The Analysis says information disclosed during the investigation "suggests that the monies distributed as bonuses may have originated with the [AEA]." The Analysis says, "If the source of the \$10,000 was the AEA, and if AEA provided these funds for the purpose of redistribution to a federal electoral campaign through conduits, violations of Sections 441b(a) and 441f occurred."

The Analysis does not provide in any manner whatsoever the factual basis for the Commission's belief that AEA was involved in the transaction at issue, and we are hard pressed to find one. AEA's only involvement with Perkins has been that, over a period of about eight years, AEA has employed Perkins for various state political projects, including advice on state legislative matters, state political advertisements, polling relating to state educational and political issues, and other

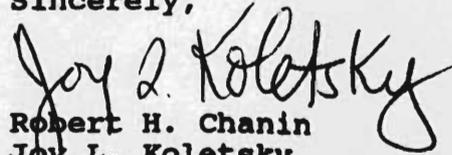
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political advice. AEA's transactions with Perkins have consisted of the purchase of, and payment for, services rendered. AEA did not in any way provide monies or other current funds to Perkins, Inc. or Joseph W. Perkins for the purpose of its or him making contributions to the Roy Johnson for Congress Committee. The foregoing information is attested to in the attached Answers by Paul R. Hubbert, Executive Secretary, AEA.

Based on the foregoing, we respectfully request that the Commission take no further action against AEA and that it close the file on AEA in this matter.

Sincerely,



Robert H. Chanin  
Joy L. Koletsky  
Counsel for AEA

2040901273

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF )  
 ) MUR 2797  
ALABAMA EDUCATION ASSOCIATION )

Answers of Alabama Education Association

1. The Alabama Education Association ("AEA") is an organization that represents the interests of public school employees in the state of Alabama. AEA has as purposes the protection and enhancement of employee rights and benefits and the promotion of the cause of public education.

2. A list of AEA's Board of Directors and officers is attached. AEA does not have a registered agent, but service of process may be made upon the undersigned.

3. AEA's primary contact with Perkins and Associates, Inc. ("Perkins, Inc.") has been through Joseph W. Perkins, the company's president and owner. AEA has employed Perkins, Inc. over a period of about eight years for various state political projects, including advice on state legislative matters, state political advertisements, polling relating to state educational and political issues, and other political advice. AEA's transactions with Perkins, Inc. have consisted of the purchase of, and payment for, services rendered.

4. See answer to No. 3 above.

5. Roy Johnson has been Speaker Pro Tem of the Alabama House of Representatives and recognized as a spokesperson for education. As such AEA has had numerous contacts with Johnson regarding education issues and has assisted him in his campaigns for state legislature. Johnson is a member of AEA.

6. AEA made a recommendation to the National Education Association-Political Action Committee ("NEA-PAC") to make a contribution to the Roy Johnson for Congress Committee. NEA-PAC acted favorably on this recommendation. (See answer to No. 8 below.)

7. No.

8. Yes.

a. NEA-PAC  
1201 - 16th Street, NW  
Washington, DC 20036

b. See answer to No. 6 above.

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9. The foregoing questions were answered on the basis of the personal knowledge of the undersigned.

I hereby declare under penalty of perjury that to the best of my knowledge and belief the foregoing is true and correct.



Paul R. Hubbert, Executive Secretary  
Alabama Education Association

DATE: January 17, 1989

2040901275

1988-89  
AEA OFFICERS AND BOARD OF DIRECTORS

Joan Aldridge  
Barbara Boyd  
John Drenning  
Tonia Eason  
Phillip Fields  
Linda C. Garrett  
Betty C. Graham  
Edna Harris  
James Harris  
Sheila Hocutt  
Eunice Horton  
Ralph Howard, Sr.  
Becky Howell Lee  
Sherry Lott  
Judy Lowe  
Tom McDonald  
Kathy McVay  
Genette Meeks  
Jo Anne Minnitt  
Peggy Mobley  
Evelyn Moore  
Theresa Patterson  
Montriel Pitts  
Garland Pounds - President  
Anita Raby  
L. M. Randolph  
Shirley Rose  
Eleanor Smithers  
Maryann Spann  
David Sprayberry  
Frankye Underwood - Vice President  
Edward Walton  
Myra Wooldridge

2040901276



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 23, 1989

Jack Drake, Esquire  
Drake, Knowles and Pierce  
1509 University Boulevard  
Tuscaloosa, Alabama 35401

RE: MUR 2797  
Loretta Perkins, Joyce Miller  
Albright, Fred Hunter and  
Ivy Hunter

Dear Mr. Drake:

On December 8, 1988, your clients, Loretta Perkins, Joyce Miller Albright, Fred Hunter and Ivy Hunter, were notified that the Federal Election Commission found reason to believe that they had violated 2 U.S.C. § 441f. On December 19, 1988, you submitted a request to enter into conciliation negotiations prior to a finding of probable cause to believe.

The Commission has considered your request and determined, because of the need to complete the investigation, to decline at this time to enter into conciliation prior to a finding of probable cause to believe.

At such time when the investigation in this matter has been completed, the Commission will consider your request to enter into conciliation prior to a finding of probable cause to believe.

If you have any questions, please contact Celia Jacoby, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

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*plm*

1630

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FEDERAL ELECTION COMMISSION

LAW OFFICES

MITCHELL, WILLIAMS, SELIG & TUCKER JAN 23 AM 11:30

H. MAURICE MITCHELL  
RICHARD A. WILLIAMS  
JOHN S. SELIG  
JOSEPH W. GELZINE  
W. CHRISTOPHER BARRIER  
JIM GUY TUCKER  
BYRON FREELAND  
KENT FOSTER  
ALLAN GATES  
PAT MORAN  
W. H. L. WOODYARD, III  
MICHAEL C. O'MALLEY  
JOHN C. LESSEL  
DOAK FOSTER  
JEAN D. STOCKBURGER  
ANNE RITCHEY  
DEBRA K. BROWN  
EDWIN F. JACKSON  
SHERRY P. BARTLEY  
CRAIG WESTBROOK  
RICHARD C. JANS  
SUSAN GUNTER  
BOYCE E. HAWK  
R. T. BEARD, III  
W. KIRBY LOCKHART

1000 SAVERS FEDERAL BUILDING  
CAPITOL AVENUE AT SPRING STREET  
LITTLE ROCK, ARKANSAS 72201  
TELEPHONE 501-688-8800  
TELECOPIER 501-688-8807

MARCELLA J. TAYLOR  
MOTHY W. GROOMS  
TRACY BARGER  
WALTER G. WRIGHT, JR.  
T. SCOTT CLEVENGER  
LYN PEEPLES FRUIT  
WYLIE D. CAVIN III  
JOE E. MADDEN, JR.  
W. BRADFORD SHERMAN  
RICHARD L. ANGEL  
JEFFRETT L. MARTIN  
JEFFREY H. THOMAS  
ROBERT S. IRVING  
FREDERICK K. CAMPBELL  
DONNA H. BABER  
COLEEN H. BARGER  
RENEE S. DALE  
STUART P. MILLER  
PHILLIP A. PEBER

WRITER'S DIRECT DIAL  
(501) 688-8827

OF COUNSEL  
HENRY E. SPITZBERG

January 18, 1989

Office of General Counsel  
Federal Election Commission  
999 E. Street, N.W.  
Washington, DC 20463

Attn: Ms. Cecilia Jacoby  
RE: MUR 2797  
Sheri Bushery Arnold Brown

Dear Ms. Jacoby:

On behalf of the above named respondent, we reply to the Commission's letter of December 8, 1988, stating reason to believe respondent had violated 2 U.S.C. § 441F. The Commission's letter was sent to respondent at her last known address and eventually forwarded to her at her present Arkansas address, being received by her on December 20, 1988. By letter dated December 21, 1988, respondent's counsel requested an extension of time in which to answer, which extension until January 23, 1989, was granted by the General Counsel in a letter dated January 3, 1989. Having entered this case for the respondent in the "reason to believe" stage, you may treat this letter as a request for pre-probable cause conciliation.

Enclosed with this response, in affidavit form, you will find respondent's answers to questions propounded to her in the Commission's letter of December 8. We also submit the following additional information and arguments on behalf of respondent.

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Ms. Cecilia Jacoby  
January 18, 1989  
Page 2

This matter involves events transpiring nearly four years ago. Respondent Sheri Brown is presently a 29 year old housewife with an 11 month old baby who resides in Conway, Arkansas. She and her present husband are also expecting their second child in mid 1989. She is not employed outside the home and has no plans to be any time in the foreseeable future. She has only modest financial means at her disposal. As with many couples in this situation, what little money available, after payment of fixed monthly expenses, is saved for the purpose of eventually making a down payment on a home.

What we apparently have in this case according to the factual and legal analysis furnished (which is all respondent's counsel has to go on) is a series of highly questionable acts committed by some of the main principals in the corporate firm where respondent was formerly employed and certain members of the Roy Johnson Congressional Campaign Committee, all of which gave rise to a Justice Department criminal investigation. The Justice Department either found no criminal violations or chose not to pursue the matter for whatever reason and the question of whether to assess civil penalties is now in the hands of this Commission.

In the individual case of respondent Sheri Brown, we would submit that the Commission is not looking at one of the main principals at all, but rather a person who could, at best, be described as only peripherally involved and on the far periphery at that. We think that respondent's answers to the Commission's questions completely rule out any willful and knowing violation of the law. Respondent's job duties involved her mostly in the non-political type work of her firm. She was not a political operative and had no dealings at all with members of the congressional campaign committee of Roy Johnson. Respondent's complete trust in her superior was misplaced. Her unfamiliarity with the law is not a defense and respondent's counsel does not plead such here. Our plea for this respondent goes rather to the equity and fairness with which one in respondent's situation should be treated.

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Ms. Cecilia Jacoby  
January 18, 1989  
Page 3

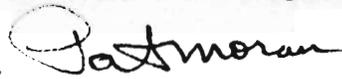
2 U.S.C. § 437g(a)(5)(A) is couched in permissive rather than mandatory language and leaves it within the sound discretion of this Commission whether or not to require the payment of a civil penalty in this matter. Sheri Brown, the respondent here, is questioned regarding a single instance that occurred in the somewhat distant past. In the ensuing four year period of time she has divorced, remarried and started a new life in another part of the country. She has cooperated in answering the Commission's questions and is willing to continue that cooperation if such is necessary. It would be most difficult for respondent to come up with any amount of money for the payment of a civil penalty. Based on the facts in this respondent's particular case, it would seem that neither the ends of justice nor any overall public purpose would be served by requiring the payment of a penalty.

For the above stated reasons, respondent respectfully requests that she not be required to pay a civil penalty in this matter.

Sincerely,

MITCHELL, WILLIAMS, SELIG & TUCKER  
Attorneys for Respondent

By



Pat Moran

PM:dap  
Enclosure

2040901280

AFFIDAVIT

STATE OF ARKANSAS)

COUNTY OF PULASKI)

KNOW ALL MEN BY THESE PRESENTS:

I Sheri Arnold Brown being first duly sworn, on oath make the following answers to a series of questions propounded to me by the Federal Election Commission in their letter dated December 8, 1988 in FEC File No. MUR2797:

QUESTION NO. 1: Please state your name, current address (residential and business), and telephone number (residential and business).

ANSWER NO. 1: My name is Sheri Lynn Arnold Brown. I live at 114 Oaklawn Drive, Conway, Arkansas 72032. My telephone number is

QUESTION NO. 2: Are you or have you been employed by Perkins & Associates, Inc.? If yes, please state dates of employment, positions or job title held, and salary received.

ANSWER NO. 2: I was employed with Perkins & Associates from January 31, 1983, to June 27, 1986. Beginning as a secretary, I later was Assistant Production Manager and then Production Manager. At the time I left Perkins & Associates, my salary was approximately per year.

QUESTION NO. 3: Do you know Joseph W. Perkins? Please describe your relationship to him (relative, friend, business, etc.)

ANSWER NO. 3: I know Joseph W. Perkins as a past employer.

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QUESTION NO. 4: Did you make a contribution to Roy Johnson or the Roy Johnson for Congress Committee? If yes,

a. Please state the date on which you made the contribution, how and to whom you delivered the contribution.

b. Please provide a copy (both sides) of the check, money order or other written instrument used to make the contribution.

c. If the contribution was made by check, please provide a copy of the relevant bank statement or account reconciliation on which such check was reported or otherwise disclosed.

d. Please identify the source of funds used to make the contribution, including all relevant account identification. To extent available, please state the average balance in this account for the 60 days prior to the date of the contribution.

ANSWER NO. 4: Yes.

a. I do not remember the specific date I made the contribution. The check was written on a joint checking account, but I cannot recall exactly how I delivered the check.

b. Since the check was written almost 4 years ago, I cannot provide a copy of the check at this time. As I have stated, it was written on a joint checking account held with my former husband, Mr. Steve Bushery.

c. My former husband has indicated that he does not have this checking account statement at this time and is unable to locate it at this date.

d. The check was written on Alabama Federal Savings and Loan Association from an account held jointly by myself and my former husband, Steve Bushery.

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QUESTION NO. 5: Did anyone ever solicit (or request or suggest) a contribution from you to Roy Johnson or the Roy Johnson for Congress Committee? If yes,

a. Please describe the circumstances in detail, including who solicited, how the solicitation was made and identify anyone else who was present.

ANSWER NO. 5: Yes.

a. Mr. Harry H. Ferguson, Business Manager at Perkins & Associates, who was my immediate superior and the person that I reported to, told me to make the contribution to the Johnson campaign. At the time, I questioned the legality of the contribution because of the nature in which I was being asked to make it, but was told in no uncertain terms by Mr. Ferguson that in no way was this transaction illegal. He simply said to "just do it and not worry about it." Hindsight at this point would indicate that I should have made some independent inquiry as to the legality of what I was being asked to do, but I completely trusted my superior, Mr. Ferguson, as well as Mr. Perkins. A majority of my work duties in the job I held at the Perkins firm involved working with their more traditional clients. I knew very little about political accounts or the laws governing political campaigns. Certainly, if I had had any idea that my making of the contribution could be a violation of federal law, then I would not have taken any part in the matter.

QUESTION NO. 6: Do you know anyone else who made a contribution to Roy Johnson or the Roy Johnson for Congress Committee? If yes, please state:

a. Name and address of each such person.

b. How you acquired this knowledge or information.

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ANSWER NO. 6: Although I did not see them make a contribution, I know of others who may have made such contributions.

a. To the best of my knowledge, those other individuals who may have made such contributions were:

1. Harry Ferguson
2. Ivy Hunter
3. Dennis Stanard
4. Lee Hudson
5. Cindy Perkins
6. Fred DeLoach

b. My belief that these individuals may have made such contributions is based on general conversations had in the office with these individuals.

QUESTION NO. 7: Did you receive a bonus, advance, premium or other gratuity from Perkins & Associates, Inc. (or any officer, director, agent or employee thereof) on or about March 29, 1985? If yes,

a. How was such bonus, advance, premium or other gratuity made (e.g., cash, check, etc.)?

b. What was the amount?

c. How and by whom was it delivered?

d. Please describe in full all circumstances surrounding the making and receipt of such bonus, advance, premium or gratuity.

ANSWER NO. 7: Yes, although I do not recall the exact date.

a. The bonus was given to me in cash.

b. \$1,000.00.

c. It was given to me by Harry Ferguson.

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d. The bonus was given to me by Mr. Ferguson at the time he told me to make the contribution which I have mentioned in my Answer to Question 5.

QUESTION NO. 8: Had you ever received a bonus, advance, premium or other gratuity from Perkins & Associates, Inc. prior to March 29, 1985? If yes,

a. Please state dates, amounts and circumstances of each such prior bonus, advance, premium or other gratuity.

ANSWER NO. 8: Yes, I had received Christmas bonuses from the firm.

a. I am not sure of the exact dates and amounts, but, as stated, I did receive a bonus at Christmas time in each of the years that I worked at Perkins & Associates. The amount of such bonuses varied from \$100 in my first year at the firm to \$1500 one year.

QUESTION NO. 9: Do you know of any other employee or person who received a bonus, advance, premium or other gratuity from Perkins & Associates, Inc., on or about March 29, 1985? If yes, please identify each such person and describe in detail how you acquired this knowledge.

ANSWER NO. 9: See Answer No. 6 above.

QUESTION NO. 10: To your knowledge, information or belief were any officials, employees or agents of Roy Johnson for Congress Committee aware that Perkins & Associates, Inc. (or officers, employees, or agents thereof) provided cash to any individual in exchange for a check payable to Roy Johnson for Congress? If yes, please state the names of each such committee official, employee or agent, and state how your knowledge or belief was acquired.

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ANSWER NO. 10: I have no knowledge or information on what members of the Johnson for Congress Campaign Committee may have been aware of because, as I have stated, I did not work much on political campaign accounts and I never had any direct dealings with any members of the Johnson Committee.

QUESTION NO. 11: Please identify any person (other than counsel) who was consulted or assisted in the preparation of answers to these interrogatories.

ANSWER NO. 11: No one, although my husband, Gene Brown, is aware of my discussions with counsel.

Further, affiant sayeth not.

WITNESS my hand on this 15 day of January, 1989.

Sheri Arnold Brown  
Sheri Arnold Brown

Before me on this day appeared Sheri Arnold Brown who, after being duly sworn, gave the above and foregoing statement for the intents and purposes set forth therein.

Luca Capretto  
Notary Public

My Commission Expires:

November 4, 1992  
( S E A L )

2040901286

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RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

LAW OFFICE OF  
DRAKE, KNOWLES AND PIERCE  
1808 UNIVERSITY BOULEVARD  
TUSCALOOSA, ALABAMA 35401

89 JAN 30 PM 12:07

RUSSELL JACKSON DRAKE  
RALPH I. KNOWLES, JR.  
JOSEPH G. PIERCE

January 25, 1989

MAILING ADDRESS  
POST OFFICE BOX 66  
TUSCALOOSA, ALABAMA 35408  
(205) 759-1234

RECEIVED  
FEDERAL ELECTION COMMISSION  
89 JAN 30 PM 2:51

Celia Jacoby  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2797

Dear Ms. Jacoby:

Enclosed are the answers of my clients to the questions propounded to them by the Commission. As I indicated to you earlier, the complaint originally filed with the Justice Department alleged that money was funneled to the Roy Johnson campaign by the Alabama Education Association through Perkins and Associates, Inc. That did not occur. Once the U.S. Attorney's office realized that AEA was not involved, it dropped the investigation and referred the matter to your agency.

As you can see from the answers of various persons, Perkins and Associates, Inc. was actively engaged, in March 1985, in efforts to raise money for the Johnson campaign. P & A would also have run Johnson's campaign had he in fact run for Congress. It was natural for everyone in this small agency to be intimately involved in the fundraising effort.

It may also be of some interest to you that as a member of the Alabama Legislature, Roy Johnson secured the passage of a bill providing Joseph W. Perkins Sr. (father of the President of P & A) with an annual expense allowance to serve as constable in an unincorporated community in Tuscaloosa County, Alabama. This small community is the home of Roy Johnson. The Perkins family is very close to Roy Johnson.

Whoever filed this complaint cast a very wide net. Included in the complaint was an apparent allegation that Gene Hill, Mark Perkins, and Loretta Perkins had received money from AEA to give to Johnson. Again, that did not occur. Gene Hill is Roy Johnson's uncle. Mark Perkins (now deceased) was a member of the Perkins family, son of Joe Sr. and brother of Joe Jr. It may be of some interest to you that both Gene Hill

2040901287

Celia Jacoby  
Page 2  
January 25, 1989

and Mark Perkins were elected to the Tuscaloosa County Board of Education, principally through the efforts of Roy Johnson. Loretta Perkins is the widow of Mark Perkins.

The FBI spent hundreds of hours investigating this case. Dozens of people have been interviewed. The bank records of each person named in the complaint have been examined. All of the business records of P & A have been examined. P & A has spent thousands of dollars in attorneys fees directly as a result of the Justice Department's investigation.

An agent in the FBI office in Montgomery leaked all of the details of the investigation to a Montgomery reporter. The case has received a great deal of attention in the state's media. The reputation of P & A has been damaged. A great many people have been embarrassed and harmed emotionally by the investigation. It is time it ended.

Sincerely,



Jack Drake

JD/lb

enclosures

2040901288

BEFORE THE FEDERAL ELECTION COMMISSION

MUR 2797

Answers of Perkins & Associates, Inc.

1. President: Joseph W. Perkins, Jr.  
Secretary: Cynthia Perkins  
There are no other officers or directors.

Registered Agent: Joseph W. Perkins, Jr.  
(home) 210-D Indian Lake Townhomes  
Tuscaloosa, AL

(office) P. O. Box 309  
Tuscaloosa, AL 35402  
(205) 758-0407

2. Yes.

a. Ivy Hunter; Harry Ferguson; Cynthia Perkins; Lee Hudson; Laurie Enslin; Sherry Buschery; Joyce Albright; Fred Deloach; Joseph W. Perkins, Jr.

b. Cash.

c. \$1,000 each.

d. Delivered by Harry Ferguson.

e. It was common for Perkins & Associates, Inc. to pay its employees cash bonuses as a motivational incentive. The \$1,000 bonuses were paid as a reward to employees and one independent contractor for jobs well done.

f. The money came from Perkins & Associates, Inc. checking account at the First National Bank of Tuscaloosa, N.A. account

g. No.

h. Joseph W. Perkins, Jr.

i. See (e).

j. N.A. See (h).

3. Yes.

a. Joe.

b. Joseph W. Perkins, Jr.

2040901289

4. No.

5. Persons who received the bonuses were not asked to contribute to the Roy Johnson campaign. Each person involved knew that Joseph W. Perkins, Jr. was actively involved in raising money for the Johnson campaign. Each recipient knew that Perkins & Associates Inc. would do all the advertising and polling work for the Johnson campaign. Each recipient made the contribution on his or her own. Each recipient was free to keep the money.

6. Perkins & Associates, Inc. (P & A) has done consulting work for the Alabama Education Association (AEA) for some 8 years. P & A has done polling work for AEA, helped AEA plan legislative lobbying strategy, and has done general political consulting work for AEA. P & A is an advertising agency which has run numerous political campaigns including statewide campaigns in both Alabama and Georgia. P & A has a general expertise in all services which are needed by political campaigns and political organizations. AEA is one of many organizations, individuals and entities which have made use of P & A's services over a period of nearly 10 years.

7. No.

8. My attorney, Jack Drake

  
Perkins & Associates, Inc.  
By: Joseph W. Perkins, Jr.,  
Its President.

STATE OF ALABAMA )  
 )  
TUSCALOOSA COUNTY )

Sworn to and subscribed before me on this the 24 day of January, 1989.

  
Notary Public

2040901290

BEFORE THE FEDERAL ELECTION COMMISSION

MUR 2797

Answers of Ivy Hunter

1. Ivy Hunter  
Route 3, Box 394, Canyon Lakes  
Cottondale, AL 35453  
  
(205) 345-5188-0

2. I am not now employed by Perkins & Associates Inc.; however, I was employed there from 1983 - 1988 as assistant business manager. My salary ranged from \_\_\_\_\_ per year to \_\_\_\_\_ per year.

3. Yes. I first met Joe when I worked at another job--he called on me to solicit the advertising business of my employer. My husband, Fred, also knew Joe. Of course, I knew Joe as an employee of his.

4. Yes. I gave \$1,000 in March 1985. I cannot find the cancelled check. The check was written on my personal account.

5. Yes, Harry Ferguson asked me to make the contribution.

6. Yes. Joyce Albright, Lee Hudson, Sherry Bushery, Fred Deloach, Fred Hunter, and Laurie Enslin. I do not have their addresses (with the exception of Fred Hunter, my husband, who lives with me). These people told me they had made contributions.

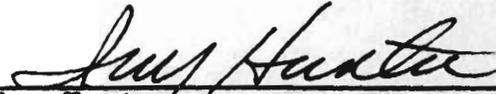
7. Yes, \$1,000 in cash. It was given to me by Harry Ferguson.

8. Yes. On numerous occasions I received cash bonuses, usually after a political campaign which required hard work and long hours. I do not remember any specific dates but it would usually be \$100 or \$200 at a time.

9. Yes, the persons listed in #6.

10. No.

11. No one.

  
Ivy Hunter

12040901291

STATE OF ALABAMA

)  
)  
)

TUSCALOOSA COUNTY

Sworn to and subscribed before me on this the 24<sup>th</sup> day of  
January, 1989.

Lane Caplinger Bettes  
Notary Public

2040901292

BEFORE THE FEDERAL ELECTION COMMISSION

MUR 2797

Answers of Fred Hunter

1. Fred Hunter  
(home) 394 Canyon Lake  
Cottondale, AL 35453

(business) P. O. Box 309  
Tuscaloosa, AL 35403  
(205) 758-0408

2. Yes. Account Executive. February 1988 - Present.  
per month.

3. Yes. Joseph W. Perkins is the father of one of my  
employers, Joseph W. Perkins Jr.

4. Yes. A contribution was made on my behalf by my wife  
with my consent.

a. March 1985. The contribution was made as  
described above. I do not have a copy of the check.

5. Yes. I received a telephone call from my wife saying  
that money was being raised for the Roy Johnson campaign. Since  
she knew of my prior association with Roy Johnson through local  
schools, she felt I would like to make a campaign contribution.  
At that point, as I recall, I asked her how much we could give  
and she said we were allowed to give \$1,000 each. I said that  
was "Fine with me." There was no mention of any "bonus" or any  
requirement to make a donation of any amount.

6. Yes.

a & b. Other than my wife, I have only a passing or  
business acquaintance with any of the other people who were  
contributors to the campaign in question. I do not know them  
well enough to be familiar with their current addresses.

7. No.

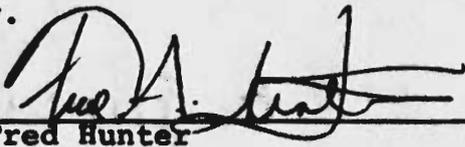
8. Yes. I customarily received periodic payments for  
free-lance services I performed for Perkins & Associates such as  
copy writing, talent in commercial production, etc. Often,  
however, these payments were included in my wife's regular salary  
check from Perkins & Associates. Thus, determining exact dates  
or amounts would be impossible without a complete record of  
invoices submitted to Perkins & Associates over the past 5 years.

2040901293

9. Other than my wife, I have no personal knowledge of payroll or bonus payments of Perkins & Associates during the period in question.

10. No.

11. My wife, Ivy J. Hunter.

  
Fred Hunter

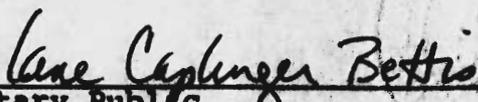
STATE OF ALABAMA

)

TUSCALOOSA COUNTY

)

Sworn to and subscribed before me on this the 24<sup>th</sup> day of January, 1989.

  
Notary Public

2040901294

BEFORE THE FEDERAL ELECTION COMMISSION

MUR 2797

Answers of Cynthia Perkins

1. Cynthia Perkins  
3117 Alabama Ave.  
Holt, AL 35404  
  
(205) 759-7122-W

2. I am not now employed by Perkins & Associates Inc., but I was employed as a secretary from 1982 - 1988. My salary ranged from \_\_\_\_\_ per week to \_\_\_\_\_ per week.

3. Yes. He is my brother.

4. Yes. I do not have the bank records but I made a \$1,000 contribution to Roy Johnson's campaign in March, 1985. The funds came from my personal checking account.

5. No.

6. My brothers, Joe and Mark, made contributions as did some of the employees of Perkins & Associates, Inc.

7. I received \$1,000 in cash from Harry Ferguson.

8. Yes, from time to time I received cash bonuses. I do not remember the dates or amounts.

9. I was aware from office talk that other employees received a bonus of \$1,000 in March 1985.

10. No.

11. No one.

Cynthia Perkins  
Cynthia Perkins

STATE OF ALABAMA )

TUSCALOOSA COUNTY )

Sworn to and subscribed before me on this the 24<sup>th</sup> day of January, 1989.

Lane Caplinger Bettis  
Notary Public

2040901295

BEFORE THE FEDERAL ELECTION COMMISSION

MUR 2797

Answers of Grover Gene Hill

1. Grover Gene Hill  
29 Brookside  
Northport, AL 35476

No business number.

2. No.

3. Yes. I know Joe Perkins in a very casual way, mostly by reputation.

4. Yes. I do not have a copy of the check or bank statement. Roy Johnson is my nephew. I gave the contribution of \$1,000.00 from my own personal funds to Roy Johnson.

5. No.

6. No.

7. No.

8. No.

9. No.

10. No.

11. No one.

Grover Gene Hill  
Grover Gene Hill

STATE OF ALABAMA )

TUSCALOOSA COUNTY )

Sworn to and subscribed before me on this the 23<sup>rd</sup> day of January, 1989.

Lane Caplinger Bettis  
Notary Public

2040901296

BEFORE THE FEDERAL ELECTION COMMISSION

MUR 2797

Answers of Loretta T. Perkins

1. Loretta Perkins  
3913 6th St. East  
Tuscaloosa, AL 35404

2. No.

3. Yes. Joseph W. Perkins Jr. is the brother of my deceased husband, Daniel Mark Perkins.

4. Yes. I do not have the checks or bank statements.

5. My husband suggested we make the contribution.

6. No other than my husband.

7. No.

8. No.

9. No.

10. No.

11. No one.

Loretta T. Perkins  
Loretta T. Perkins

STATE OF ALABAMA )  
TUSCALOOSA COUNTY )

Sworn to and subscribed before me on this the 24<sup>th</sup> day of January, 1989.

Lane Caplinger Be Hio  
Notary Public

2040901297

BEFORE THE FEDERAL ELECTION COMMISSION

MUR 2797

Answers of Joyce Miller Albright

1. Joyce Miller Albright  
(home) 26 Southfork  
Duncanville, AL

(business) 2303 13th St.  
Tuscaloosa, AL 35401  
(205) 752-5773

2. Yes. Jan-June 1985, Receptionist, Approx.  
; June 1985 - July 1988, Prod. Mgr.

3. Yes. He was my employer until July 1988. He was and  
still is a good friend.

4. Yes. I do not have the checks or bank statements.

5. No.

6. Yes.

a. Harry Ferguson, Ivy Hunter. Home addresses  
unknown.

b. Just conversation in the office. I don't know  
exactly what amount was contributed.

7. Yes. I received a bonus around the first of March. I  
don't recall the exact date.

a. I really don't recall clearly. I presume a check.

b. \$1,000.

c. By the business manager -- in his office.

d. I had taken on more responsibility and had shown  
cause for advancement. I suppose Perkins & Associates saw cause  
for a bonus.

8. No.

9. No.

2040901298

10. No.

11. No one.

Joyce Miller Albright  
Joyce Miller Albright

STATE OF ALABAMA

TUSCALOOSA COUNTY

)  
)  
)

Sworn to and subscribed before me on this the 24<sup>th</sup> day of  
January, 1989.

Lane Caplinger Bettis  
Notary Public

2040901299

BEFORE THE FEDERAL ELECTION COMMISSION

MUR 2797

Answers of Harry Ferguson, Jr.

1. Harry Ferguson, Jr.  
1604 Bellingrath Drive  
Tuscaloosa, AL 35406

2. I am not now employed by Perkins & Associates, Inc. I was employed as Business Manager by P & A from March 1981 until August 1988 at a salary of \_\_\_\_\_ per year.

3. Yes. I knew Joe Perkins as my employer.

4. Yes. I contributed \$1,000 to Roy Johnson's campaign in March 1985. The check was written on my account. A copy of the check is attached.

5. No. At P & A we were actively raising money for Roy Johnson's campaign. Without being asked, I understood that I should contribute to the campaign and did so.

6. Yes. Several P & A employees contributed. Among them were Cynthia Perkins, Ivy Hunter, and Joyce Miller Albright.

7. Yes. I received a cash bonus of \$1,000. I paid it to myself at the direction of Joe Perkins. From time to time I was paid bonuses and at least once a year. The bonuses were paid in cash as a reward for work well done. The March 1985 bonus was paid to me as both a reward and an incentive.

8. Yes. I was paid a bonus on a number of occasions but I do not remember the exact dates or amounts. I can remember being paid a cash bonus of \$100 and I remember other employees being paid bonuses in cash.

9. Yes. Cynthia Perkins, Ivy Hunter, and Joyce Miller Albright.

10. No.

11. No one.

  
Harry Ferguson, Jr.

2040901300

STATE OF ALABAMA

)

TUSCALOOSA COUNTY

)

Sworn to and subscribed before me on this the 24<sup>th</sup> day of January, 1989.

Lane Caplinger Bettis  
Notary Public

2040901301

MR HARRY H FERGUSON JR OR

04/24/85

	2	1444.75	1	1000.00	1.16
--	---	---------	---	---------	------

CHECKING ACCOUNT TRANSACTIONS			SOC	SFC	NBR
DATE	DEBITS	CREDITS	DESCRIPTION		
03/29		1000.00			DEPOSIT
04/16		444.75			DEPOSIT
04/24	1.16				SERVICE CHARGE

CHECKS		AMOUNT	DATE	CHECK NO	AMOUNT
DATE	CHECK NO				
03/29	*	1000.00			

2040901302

Please Examine At Once. If No Error is Reported in Ten Days The Account Will Be Considered Correct.  
 All Items Credited Subject To Final Payment.  
**SEE REVERSE SIDE FOR IMPORTANT INFORMATION**

2040901303

Henry H. Ferguson, Jr.

Perkins & Assoc.  
Bus. Mgr.

PAY ANY BANK PEG 032965#0144622  
THE FNB OF ALABAMA 02 891104366  
TUSCALOOSA

0

03

06C 1672

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

LAW OFFICES  
OF

ARGO, ENSLEN, HOLLOWAY & SABEL, P.C.

89 JAN 26 PM 12: 23

300 SOUTH HULL STREET

P. O. DRAWER 1550

MONTGOMERY, ALABAMA 36102-1550

(205) 834-2460

J. KNOX ARGO\*  
FREDERICK T. ENSLEN\*  
JOHN M. HOLLOWAY, JR.  
M. WAYNE SABEL\*\*  
(ADMITTED ALABAMA  
AND DISTRICT OF COLUMBIA)\*  
(ADMITTED ALABAMA  
AND GEORGIA)\*\*

January 24, 1989

Federal Election Commission

Washington, D. C. 20463

ATTN: Ms. Celia Jacoby

Re: Laurie P. Enslin  
MUR 2797

Dear Ms. Jacoby:

Enclosed please find answers to the questions you propounded to Laurie P. Enslin.

If you need anything further, please give me a call.

Sincerely,



Frederick T. Enslin

sap  
Enclosure

89 JAN 26 PM 3: 33

FEDERAL ELECTION COMMISSION

2040901304

BEFORE THE FEDERAL ELECTION COMMISSION

IN RE: MUR 2797

ANSWERS TO QUESTIONS SUBMITTED TO LAURIE ENSLEN

ANSWERS

1. Residential - Laurie Enslen  
9713 Rosalie Drive  
Montgomery, Alabama 36117

Business - None.

2. Yes.

Date of Employment - October 1984 - August 1985

Position - Media Buyer

Salary - Approximately Annually.

3. Yes - business.

4. (a) March 29, 1985? Either Harry Ferguson or Ivy Hunter  
in Accounting Department.

(b) and (c) I have moved three times since 1985 and  
cannot locate my checks and bank statements for that year. The  
account was with The First National Bank of Tuscaloosa. I will  
attempt to get a copy of the checks and statement and forward it  
under separate cover.

(d) Bonus of \$1,000.00 deposited in my checking account:  
wrote personal check from my checking account. The average  
balance in my account for sixty days prior was approximately

2040901305

2040901306

5. Yes.

(a) Solicited by Harry Ferguson. He told me that other employees were donating their \$1,000.00 bonus to the Ray Johnson Campaign and asked if I'd like to do the same. No one else was present that I recall.

6. Harry Ferguson told me that other employees were donating their bonus.

(a) I don't know which employees specifically.

(b) from Harry Ferguson.

7. Yes.

(a) Cash or check -- I don't remember.

(b) \$1,000.00.

(c) Harry Ferguson or Ivy Hunter (I don't remember which one) handed it to me.

(d) I don't know the circumstances, just that Harry Ferguson told me that other employees and I were getting a bonus.

8. No.

9. I know that other employees received a bonus, I don't know which ones specifically.

10. Not to my knowledge.

11. I called Joe Perkins upon receipt of these questions and asked him what it was all about. He said that these questions were from the Federal Election Commission and were similar to those I answered a couple of years ago in a deposition. He did not assist me in the preparation of my answers.

The questions propounded to me have been answered to the best of my knowledge, recollection and belief.

*Laurie P. Enslin*  
Laurie P. Enslin

Sworn to and subscribed before me this 24th day of January 1989.

*Sarah B. Paris*  
Notary Public



2040901307

06C1721

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

LAW OFFICES  
OF

ARGO, ENSLEN, HOLLOWAY & SABEL, P.C.

89 FEB -2 AM 10:04

300 SOUTH HULL STREET

P. O. DRAWER 1550

MONTGOMERY, ALABAMA 36102-1550

(205) 834-2460

J. KNOX ARGO\*  
FREDERICK T. ENSLEN\*  
JOHN M. HOLLOWAY, JR.  
M. WAYNE SABEL\*\*  
(ADMITTED ALABAMA  
AND DISTRICT OF COLUMBIA)\*  
(ADMITTED ALABAMA  
AND GEORGIA)\*\*

January 30, 1989

Federal Election Commission

Washington, D. C. 20463

ATTN: Ms. Celia Jacoby

Re: Laurie P. Enslin  
MUR 2797

Dear Ms. Jacoby:

In accordance with answer 4. (b) and (c) submitted by Laurie P. Enslin, I have enclosed a copy of her check made payable to the Roy Johnson Campaign and the corresponding bank statement.

Sincerely,



Frederick T. Enslin

sap  
Enclosure

2040901308

89 FEB -2 PM 3:37

RECEIVED  
FEDERAL ELECTION COMMISSION

LARRY P. BROWN  
P.O. BOX 68  
MONTGOMERY, ALABAMA 36102  
3/29

*Ray Johnson Campaign*

2040901309

SECRET

ALABAMA - MONTGOMERY 2 89110

89 APR -3 AM 11:33

BEFORE THE FEDERAL ELECTION COMMISSION

**SENSITIVE**

In the Matter of )  
 )  
Sheri Bushery Arnold Brown ) MUR 2797

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On November 30, 1988, the Commission made various reason to believe findings with respect to contributions made to the Roy Johnson for Congress Committee by fourteen respondents. These findings included a determination that there was reason to believe Sheri Bushery Arnold Brown violated 2 U.S.C. § 441f. Interrogatories and Requests for Documents were mailed to all respondents on December 8, 1988.

On December 21, 1988, Sheri Bushery Arnold Brown requested a 23-day extension of time, which was granted. This Office received Sheri Bushery Arnold Brown's response on January 23, 1988.<sup>(?)</sup> The response includes answers to the December 8, 1988 Interrogatories and Requests for Documents and a request to enter into pre-probable cause conciliation. See Attachment 1.

II. ANALYSIS

At this time the Office of the General Counsel recommends that the request be denied.

Of the fourteen respondents in this matter, this Office has received responses to discovery requests from eleven. These responses indicate the need for a more detailed investigation with respect to the violations. This Office believes that until

2040901310

such time as the investigation concludes with respect to all respondents, the Commission should deny the requests.

**III. RECOMMENDATIONS**

1. Decline, at this time, to enter into conciliation with Sheri Bushery Arnold Brown prior to a finding of probable cause to believe.
2. Approve the attached letter.

Lawrence M. Noble  
General Counsel

March 31, 1989  
Date

BY: George F. Rishel  
George F. Rishel  
Acting Assistant  
General Counsel

**Attachments**

1. Request for Conciliation
2. Letter

**Staff Assigned: Michael Marinelli**

2040901311

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Sheri Bushery Arnold Brown ) MUR 2797

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 5, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 2797:

1. Decline, at this time, to enter into conciliation with Sheri Bushery Arnold Brown prior to a finding of probable cause to believe.
2. Approve the letter, as recommended in the General Counsel's report signed March 31, 1989.

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

Attest:

4-5-89  
Date

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

Received in the Office of Commission Secretary:	Mon.,	4-3-89,	11:33
Circulated on 48 hour tally basis:	Mon.,	4-3-89,	4:00
Deadline for vote:	Wed.,	4-5-89,	4:00

2040901312



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 11, 1989

Pat Moran, Esquire  
Mitchell, Williams, Selig & Tucker  
1000 Savers Federal Building  
Capital Avenue at Spring Street  
Little Rock, Arkansas 72201

RE: MUR 2797  
Sheri Bushery Arnold Brown

Dear Mr. Moran:

On December 8, 1988, your client, Sheri Bushery Arnold Brown, was notified that the Federal Election Commission found reason to believe that she had violated 2 U.S.C. § 441f.

On January 18, 1989, you submitted on behalf of Sheri Bushery Arnold Brown a request to enter into conciliation negotiations prior to a finding of probable cause to believe. The Commission has considered your request and determined, because of the need to complete the investigation, to decline at this time to enter into conciliation prior to a finding of probable cause to believe.

At such time when the investigation in this matter has been completed, the Commission will reconsider your request to enter into conciliation prior to a finding of probable cause to believe.

If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: George F. Rishel  
Acting Associate  
General Counsel

2040901313

OGC 4516

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

NOV 13 11:10:28



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 1, 1989

POSTMASTER  
Tuscaloosa, AL 35404

RE: MUR 2797

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
NOV 13 11:41

Dear Sir or Madam:

Pursuant to 39 C.F.R. § 265(d)(1), we request that you provide us with the present address of Mr. W. Lee Hudson. According to our records, the address of Mr. W. Lee Hudson was 54 Claymont or Claymount Street, as of June 1986.

Under 39 C.F.R. § 265.8e(8)(iii), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please call Michael Marinelli, the attorney assigned to this matter, at (202) 376-8200.

Thank you for your assistance.

Sincerely,

Lawrence M. Noble  
General Counsel

BY:   
Lois G. Lerner  
Associate General Counsel

Enclosure  
Envelope

*Forwarding order has expired  
no forwarding order on record.*

11-7-89 0431  
CJ

2040901314

OGC 4602

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

NOV 20 1989

LAW OFFICE OF  
DRAKE, KNOWLES AND PIERCE  
1809 UNIVERSITY BOULEVARD  
TUSCALOOSA, ALABAMA 35401

RUSSELL JACKSON DRAKE  
RALPH I. KNOWLES, JR.  
JOSEPH G. PIERCE

November 15, 1989

MAILING ADDRESS  
POST OFFICE BOX 86  
TUSCALOOSA, ALABAMA 35402  
(205) 759-1234  
FAX (205) 752-9644

09 NOV 20 PM 11:50

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL

Michael Marinelli  
Federal Election Commission  
Department of Justice  
Washington, D.C. 20463

Re: MUR 2797

Dear Mr. Marinelli:

This is to confirm my telephone conversation in which I told you that my request for conciliation was made on behalf of all my clients, including Joseph W. Perkins Jr., Perkins & Associates, Gene Hill, Harry Ferguson, Ivy Hunter, Loretta Perkins, and Joyce Albright. If I have left anyone out it is an oversight and you should treat the request as one made for all my clients. Of course, the proceedings against some people, e.g., Loretta Perkins and Gene Hill, are due to be dismissed since their contributions to the Johnson campaign had absolutely no connection with Perkins and Associates.

Sincerely,



Jack Drake

JD/lb

2040901315

060 4995

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

LAW OFFICE OF  
**DRAKE, KNOWLES AND PIERCE** 89 DEC 28 AM 10:38  
1809 UNIVERSITY BOULEVARD  
TUSCALOOSA, ALABAMA 35401

RUSSELL JACKSON DRAKE  
RALPH I. KNOWLES, JR.  
JOSEPH S. PIERCE

December 22, 1989

MAILING ADDRESS  
POST OFFICE BOX 86  
TUSCALOOSA, ALABAMA 35402  
(205) 759-1234  
FAX (205) 752-9644

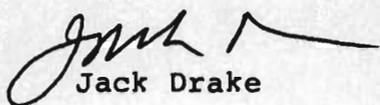
Michael Marinelli  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2797

Dear Mr. Marinelli:

Enclosed are the answers of Joe Perkins and the  
supplemental answer of Gene Hill.

Sincerely,

  
Jack Drake

JD/lb

enclosures

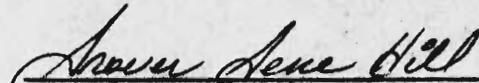
2040901316

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF LEGAL COUNSEL  
89 DEC 28 PM 12:57

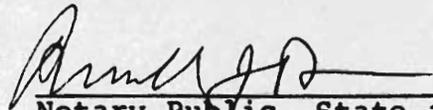
SUPPLEMENTAL ANSWER OF  
GROVER GENE HILL

4. As I have previously indicated, the \$1,000.00 contribution I gave to Roy Johnson's campaign came from my own personal funds. At the time I was unmarried and worked a lot of overtime. It was my habit at the time to keep fairly large sums of cash on my person or at home. I deposited \$1,000.00 of my own money into my checking account and wrote a check to the Johnson campaign.

I should say that Roy is my nephew, but my relationship to him is more like that of a brother. I did not and do not give large contributions to political candidates. But at the time, I was happy to make this large contribution to Roy.

  
\_\_\_\_\_  
Grover Gene Hill

Sworn to and subscribed before me on this the 22 day  
of December, 1989.

  
\_\_\_\_\_  
Notary Public, State at Large.

My Commission Expires: 1-3-93

2040901317

ANSWERS OF JOSEPH W. PERKINS JR.

1. Joseph W. Perkins, Jr.  
Route 4, Box 95 (Home)  
Northport, AL 35476

Box 39 (Business)  
Tuscaloosa, AL 35402  
(205) 758-0407

2. Yes. President. March 1980 to present.

3. Yes.

a. As I recall, a check was sent to the campaign on about March 30, 1985. I do not recall how it was delivered.

b. Enclosed.

c. Unavailable.

d. Personal funds.

e. I do not recall a direct solicitation at all. I have known Roy Johnson most of my life.

4a. Yes.

Mark Perkins  
3913 6th St. E.  
Tuscaloosa, AL 35404

Cindy Perkins  
3117 Alabama Ave. NE  
Tuscaloosa, AL 35040

Fred Hunter  
Box 394 Canyon Lakes  
Cottondale, AL 35453

Ivy Hunter  
Box 395 Canyon Lakes  
Cottondale, AL 35453

Gene Hill  
29 Brookside  
Northport, AL 35476

Joyce Albright  
4509 21st St. NE  
Tuscaloosa, AL 35404

Harry Ferguson  
1604 Bellingrath Dr. N  
Tuscaloosa, AL 35406

Laurie Enslin  
Montgomery, AL

Sherry Bushery  
Unavailable

Fred Deloach  
Unavailable

Lee Hudson  
Unavailable

2040901318

4b. I know of these contributions because of family, social or business relationships through which these people revealed their contributions. And, of course, all contributions are published in the local newspaper. These are just the only ones I remember offhand.

5. I have known Roy Johnson since childhood. We grew up in the same community and attended the same schools. I have worked both professionally and on a volunteer basis in his campaigns for the state legislature.

6. None.

7. Yes. I have known Mr. Reed for approximately ten years. We have come in contact through his role as Associate Director of the Alabama Education Association and his role in the Democratic caucus. Our association has been casual and we have had few direct dealings with each other.

8. Yes. Dr. Paul Hubbert is the Executive Director of the Alabama Education Association. I have known him for about ten years. He is a friend and business associate. Over the years, I have done extensive research work for AEA and have provided public relations consultation on several occasions.

9. My dealings with AEA have always been directly with Dr. Paul Hubbert and consisted of research and public relations consultation jobs over a number of years.

10a. Yes.

Cindy Perkins	Laurie Enslin
Ivy Hunter	Harry Ferguson
Fred Deloach	Joyce Albright
Lee Hudson	Sherry Bushery

b. Cash

c. \$1,000 each.

d. In person, by Mr. Harry Ferguson, Business Manager at the time.

e. Each individual given a bonus was a key individual in our company's operation. The bonuses were given for outstanding performance in their jobs. Bonuses are common and usually given in cash to our employees.

f. All funds come from the general operating account of Perkins & Associates. Records of this account along with other information requested here were obtained by Federal authorities years ago. The account number is \_\_\_\_\_ and the account is at AmSouth Bank in Tuscaloosa.

2040901319

11. Over the last ten years, I have received numerous bonuses from Perkins & Associates. Amounts range from a few hundred to several thousand dollars. I have kept no records of the dates of these bonuses.

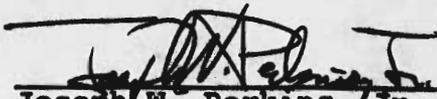
12. In 1985, I was actively soliciting contributions to the Roy Johnson campaign from individuals around the state. These solicitations were numerous. However, I did not receive personally any contributions which may have resulted from the solicitations. Furthermore, I did not solicit contributions from any employees of Perkins & Associates.

13. No. Absolutely not.

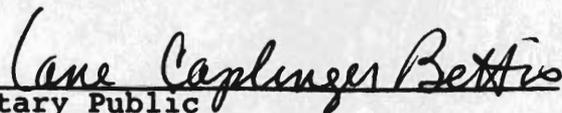
14. This question asks if I have knowledge of other peoples' knowledge of something which, to my knowledge, did not happen. I authorize all expenditures of funds from Perkins & Associates and I did not give any employees money on the condition they give it to the Roy Johnson campaign.

15. None.

Answered this the 22 day of December, 1989.

  
\_\_\_\_\_  
Joseph W. Perkins, Jr.

Sworn to and subscribed before me on this the 22<sup>nd</sup> day of December, 1989.

  
\_\_\_\_\_  
Notary Public  
State of Alabama At Large

DEC 4990

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

LAW OFFICES  
OF

ARGO, ENSLEN, HOLLOWAY & SABEL, P. 09 DEC 28 AM 9:28

300 SOUTH HULL STREET  
P. O. DRAWER 1550

MONTGOMERY, ALABAMA 36102-1550

J. KNOX ARGO  
FREDERICK T. ENSLEN  
JOHN M. HOLLOWAY, JR.  
M. WAYNE SABEL

TELEPHONE (205) 834-2460  
FAX (205) 265-3837

December 22, 1989

Federal Election Commission

Washington, D. C. 20463

ATTN: Michael Marinelli

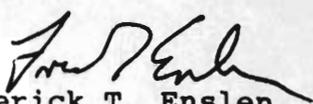
Re: Laurie P. Enslin  
MUR 2797

Dear Mr. Marinelli:

On behalf of my client, Laurie P. Enslin, I would like to request conciliation in the above case.

When you have had an opportunity to draft your proposed conciliation agreement, please send me a copy for review.

Sincerely,

  
Frederick T. Enslin

sap

cc: Laurie P. Enslin

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF LEGAL COUNSEL  
09 DEC 28 PM 12:58

2040901320

90 JAN 12 AM 10:12

BEFORE THE FEDERAL ELECTION COMMISSION

**SENSITIVE**

In the Matter of	)	
	)	
Alabama Education Association	)	
Perkins & Associates, Inc.	)	
Joseph W. Perkins, Jr.	)	
Ivy Hunter	)	MUR 2797
Fred Hunter	)	
Cynthia Perkins	)	
Grover Gene Hill	)	
Daniel Mark Perkins	)	
Loretta Perkins	)	
Joyce Miller Albright	)	
Harry Ferguson Jr.	)	
W. Lee Hudson	)	
Fred DeLoach	)	
Sheri Arnold Brown	)	
Laurie Enslin	)	

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

Following a referral from the Department of Justice, the Commission found reason to believe that Perkins & Associates, Inc. ("P&A"), the Alabama Education Association ("AEA"); and Joseph W. Perkins, Jr., president of P&A, had violated 2 U.S.C. §§ 441b and 441f. The Commission also found that twelve individuals who were employees or friends or family members of employees of P&A had violated 2 U.S.C. § 441f. These individuals are Ivy Hunter, Fred Hunter, Cynthia Perkins, Grover Gene Hill, Daniel Mark Perkins, Loretta Perkins, Joyce Miller Albright, Harry Ferguson, Jr., W. Lee Hudson, Fred DeLoach, Sheri Arnold Brown and Laurie Enslin.

The Commission's findings were based upon the possibility that P&A had given Joseph Perkins, Jr., and the above twelve other individuals bonuses and gifts on or about March 29, 1985,

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to enable them to make \$13,000 in contributions of \$1,000 each to State representative Roy Johnson's campaign in the 1985 Republican primary for the office of U.S. Representative from the 7th Congressional district in Alabama.<sup>1</sup> Twelve of these thirteen contributions were reported in the Roy Johnson for Congress Committee's 1985 Mid-Year Report as having been made on March 29, 1985.<sup>2</sup> The referral from the Department of Justice also raised the possibility that the money for the bonuses might have been provided by the Alabama Education Association, a labor organization of which Roy Johnson is a member.

Letters and questions were mailed to the respondents, and responses have been received from the National Education Association (responding on behalf of the AEA), Sheri Arnold Brown and Laurie Enslin. A joint response as was submitted by P&A, Joseph Perkins, Ivy Hunter, Fred Hunter, Cynthia Perkins, Grover Gene Hill, Loretta Perkins, Joyce Miller Albright and Harry Ferguson, Jr.<sup>3</sup>

---

1. Roy Johnson, Speaker pro tem of the Alabama State Assembly, is State Representative for the 47th Representative District of Tuscaloosa city and county. In the 1986 race to succeed to the Congressional seat vacated by Richard Shelby as a result of his successful Senate bid, Mr. Johnson was considered the leading candidate until his withdrawal from the race before the June 24, 1985 primary.

2. The exception was the \$1,000 contribution made by Grover Gene Hill. This was reported as having been made on July 29, 1985.

3. Counsel representing P&A represents these respondents as well as Joseph W. Perkins, Jr. Several respondents have failed to respond to the Commission's findings and questions. These are Fred DeLoach, W. Lee Hudson and Daniel Mark Perkins. In the January 25, 1989 joint response, counsel representing P&A informed this Office that Daniel Mark Perkins is deceased. As for W. Lee Hudson and Fred DeLoach, the letter and questions to

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In a November 20, 1989 letter, counsel representing P&A extended a previous request for pre-probable cause conciliation to those respondents not covered by an earlier request denied by the Commission. Included in the extended request are P&A, Joseph W. Perkins, Jr., Cynthia Perkins, Grover Gene Hill, and Harry Ferguson, Jr.<sup>4</sup> On December 28, 1989 this Office received a request for conciliation from Laurie Enslin.

## II. ANALYSIS

### A. Response by P&A and its employees.

#### 1. The Making of the March 29, 1985 Bonuses

P&A admits that it gave nine of its employees a \$1,000 cash bonus on March 29, 1985. The employees whom P&A names as receiving bonuses are Harry Ferguson, Jr., Cynthia Perkins, Ivy Hunter, W. Lee Hudson, Fred DeLoach, Laurie Enslin, Sheri Arnold Brown, Joyce Miller Albright and Joseph W. Perkins, Jr. All the employees of the company named above who have responded to the Commission's findings admit to receiving a March 29, 1985, \$1,000 cash bonus. P&A states that these bonuses were distributed by Harry Ferguson, Jr., the firm's business manager.

Fred Hunter's relationship with P&A differs from that of the other employees. Fred Hunter describes his employment

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(Footnote 3 continued from previous page)

Fred DeLoach were remailed on November 9, 1989, when this Office found a new address for Mr. DeLoach. No new address could be found for Mr. Hudson and the postmaster stated in a November 14, 1989 response to a Commission letter that there was no forwarding order in force for Mr. Hudson.

4. Included in the original request were Loretta Perkins, Joyce Albright Miller, Fred Hunter and Ivy Hunter. The Commission has also denied an earlier request made by Sheri Arnold Brown.

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relationship with P&A as free lance. P&A does not list him as receiving a bonus. However, Mr. Hunter explains that payment for his free lance services was included in the pay checks of his wife, Ivy Hunter. This Office notes that the Department of Justice referral indicates that bank records show that on March 29, 1985 there were two \$1,000 deposits made into the Hunters' account.

In her response to the Commission's questions, Ivy Hunter states that she received only one \$1,000 bonus.

P&A states that it was common for it to give its employees bonuses for motivational reasons. However, the employee responses indicate that the sizes of the March 29, 1985 bonuses were large by comparison to the usual bonuses received by P&A employees. Sheri Arnold Brown states in her response that, prior to the March 29, 1985 bonus, she received Christmas bonuses which varied in size from \$100 in the first year she worked, to \$1,500. This \$1,500 is the largest previous bonus listed in any of the responses. Mrs. Hunter and Mr. Ferguson state they remember receiving previous bonuses of between \$100 to \$200. The newer employees at the time, Joyce Miller Albright and Laurie Enslin, state they do not remember receiving a previous bonus. Although Cynthia Perkins states she remembers receiving previous bonuses,

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she does not remember the actual amounts.<sup>5</sup>

**2. Relation of the March 29, 1985 bonuses to the March 29, 1985 contributions to Roy Johnson.**

The responses of P&A employees admit to the making of \$1,000 contributions to the Roy Johnson campaign. Most do not give the exact date of the contributions; however, Harry Ferguson, Jr., and Laurie Enslin have provided copies of the two \$1,000 checks dated March 29, 1985 that were used to make their contributions.<sup>6</sup>

In its response, P&A denies that there was any connection between the contributions and the bonuses. It states:

Persons who received the bonus were not asked to contribute to the Roy Johnson campaign. Each person involved knew that Joseph W. Perkins, Jr. was actively involved in raising money for the Johnson campaign. Each recipient knew that Perkins & Associates Inc. would do all the advertising and polling work for the Johnson campaign. Each recipient made the contribution on his or her own. Each recipient was free to keep the money. Attachment 4 at 25.

In his response, Joseph Perkins, Jr. likewise denies that there was a connection. Attachment 5 at 45.

Cynthia Perkins and Joyce Miller Albright also assert that they were not solicited to make the contribution. Fred Hunter states that his wife, Ivy Hunter, asked him to make the \$1,000

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5. This Office further notes that the sizes of the March 29, 1985 bonuses seem large in comparison to the yearly salaries these nine employees were earning at the time. Yearly salaries of the respondent employees ranged from the \$20,000 paid to to the \$8,000 paid to

6. Ivy Hunter, Fred Hunter and Cynthia Perkins simply state that they made their contributions to the Johnson campaign in March of 1985. The remaining employees either fail to give a date or state they cannot remember the exact date. Nothing presented in the replies contests the March 29, 1985 date found in the Roy Johnson for Congress Committee reports.

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contribution. Harry Ferguson denies he was actually asked to make a contribution, but states, "Without being asked, I understood that I should contribute to the campaign and did so." Id. at 35.

The remaining responses, however, including one from a respondent sharing P&A counsel, contradict the P&A assertion that no one was solicited. Ivy Hunter states in her response that "Harry Ferguson asked me to make the contribution." Id. at 26. Laurie Enslin states that she was "[s]olicited by Harry Ferguson. He told me that other employees were donating their \$1,000 bonus to the Ray Johnson Campaign and asked if I'd like to do the same." Attachment 3 at 17. The response submitted by Sheri Arnold Brown goes into some detail on the solicitation:

Mr. Harry H. Ferguson, Business Manager at Perkins & Associates, who was my immediate superior and the person that I reported to, told me to make the contribution to the Johnson campaign. At the time, I questioned the legality of the contribution because of the nature in which I was being asked to make it, but was told in no uncertain terms by Mr. Ferguson that in no way was this transaction illegal. He simply said to "just do it and not worry about it." Hindsight at this point would indicate that I should have made some independent inquiry as to the legality of what I was being asked to do, but I completely trusted my superior, Mr. Ferguson, as well as Mr. Perkins. Attachment 2 at 11.

Information in the Department of Justice referral provided by

corroborate the

responses given by Ivy Hunter, Laurie Enslin and Sheri Arnold

stated that they were

asked by Mr. Ferguson at the time they received their March 29, 1985 bonuses to make a contribution to the Roy Johnson Campaign.

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B. Responses by relatives and friends of Joseph Perkins, Jr.

Notifications of the Commission's findings and questions were sent to other individuals who had not worked for P&A but who were friends or relatives of Mr. Perkins, its president. These were: Daniel Mark Perkins, brother of Joseph W. Perkins, Jr.; Loretta Perkins, Daniel Mark Perkins' wife; and Grover Gene Hill, a friend of Joseph W. Perkins, Jr., and uncle of Roy Johnson.

As noted earlier, this Office has received information that Daniel Mark Perkins is deceased. However, counsel for P&A included responses from both Loretta Perkins and Grover Gene Hill in the January 25, 1989 joint reply.

In her response, Loretta Perkins denies the receipt of any bonus or money from P&A. She states that she made the \$1,000 contribution to Roy Johnson at the request of her husband. No further details are provided.

The response provided by Grover Gene Hill is similar in that it denies any money was received from the firm. Mr. Hill denies there was any solicitation involved before the contribution was made. This Office notes that bank records subpoenaed and described in the Department of Justice referral provide no record of a March 29, 1985 deposit into Mr. Hill's account. Rather, the referral describes a \$1,000 deposit that was made into Mr. Hill's checking account on July 2, 1985. The referral, as well as

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contributions to the Roy Johnson Campaign. None of the other responses indicate a financial link between the AEA and P&A's March 29, 1985 bonuses.

**D. Analysis of responses and recommendations**

While the responses received from P&A and its employees provide evidence of Section 441f and 441b violations, there is conflicting evidence regarding the role of the AEA.

Mr. Hudson's statements indicate that the AEA was the ultimate source for the \$10,000 used for the bonuses. It is possible that, despite its statements to the contrary, the AEA provided P&A with funds directly for the purpose of facilitating the scheme to assist the Johnson campaign. It is also possible that the AEA contributed the \$10,000 to the Johnson campaign to pay for political advertising work done by P&A and then, at the campaign's behest, P&A attempted to return the funds to the campaign by means of the bonuses.<sup>7</sup>

To remove all ambiguity regarding involvement by the AEA, this Office believes that the investigation in this matter should continue. This Office proposes sending additional questions to Harry Ferguson, Jr., regarding the details of what he told employees when he distributed the March 29, 1985 bonuses and his knowledge regarding the original source of the funds used by P&A

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7. Commission records do not list a political action committee maintained by the AEA. Reports filed by the Johnson committee do not indicate that it received a contribution from either the AEA or NEA-PAC, the political action committee maintained by the National Education Association. This would seem to contradict the position taken by the AEA that the NEA made a contribution to the Johnson campaign. Attachment 1 at 3.

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to make the bonuses. This Office also recommends that additional questions and requests for documents be sent to P&A and the AEA regarding the funds used to make the March 29, 1985 bonuses. This Office further recommends that the requests to enter into pre-probable cause conciliation made by P&A, Joseph W. Perkins, and Harry Ferguson, Jr., be denied at this time.

The Commission should also deny the request to enter into pre-probable cause conciliation made by Grover Gene Hill. Mr. Hill was not an employee of P&A either before or at the time he made his June 28, 1985 contribution. There is no evidence he received any compensation from P&A to make the contribution and he has stated in a Department of Justice interview that the deposit he made to his account on July 2 1985, came from his own funds. Thus, the available evidence indicates that there was no violation of 2 U.S.C. § 441f on his part. Rather than in a conciliation agreement, Grover Gene Hill's situation will be addressed in a brief which this Office is now preparing.

The evidence in hand indicates that, while they did not receive any compensation from P&A at the same time the P&A employees did, Daniel Mark Perkins and Loretta Perkins made their contributions to the Roy Johnson campaign at the same time as the various P&A employees made their contributions. Therefore, Mr. Perkins and his wife may have been involved in the reimbursement

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scheme assisting the Roy Johnson campaign. However, the death of Daniel Mark Perkins hampers the investigation as it removes the person who apparently possessed the best information regarding his own and his wife's gifts to the Roy Johnson campaign. The response provided by Loretta Perkins demonstrates her limited knowledge of the contributions to the Roy Johnson campaign. No evidence collected thus far contradicts her position that she acted only at the request of her husband, the brother of the president of P&A. Therefore, this Office recommends that no further action be taken against Daniel Mark Perkins and Loretta Perkins and that the file be closed as to these two respondents.

There is sufficient information in hand concerning Section 441f violations by the remaining employees to permit the Commission to enter into conciliation negotiations. Therefore, this Office further recommends that the Commission grant the requests for pre-probable cause conciliation made by Ivy Hunter, Fred Hunter, Cynthia Perkins, Joyce Miller Albright, Sheri Arnold Brown and Laurie Enslin.

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

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**IV. RECOMMENDATIONS**

1. Approve the attached Questions to Harry Ferguson, Jr.
2. Approve the attached Questions and Request for Documents to Perkins & Associates and to the Alabama Education Association.
3. Decline, at this time, to enter into conciliation with Perkins and Associates, Joseph W. Perkins, Jr., Grover Gene Hill, and Harry Ferguson, Jr., prior to a finding of probable cause to believe.
4. Enter into conciliation prior to a finding of probable cause to believe with Ivy Hunter, Fred Hunter, Cynthia Perkins, Joyce Miller Albright, Sheri Arnold Brown and Laurie Enslin.
5. Take no further action and close the file as regards Daniel Mark Perkins and Loretta Perkins.
6. Approve the conciliation agreements (6) and attached letters (4).

Lawrence M. Noble  
General Counsel

Date

1-11-90

BY:

  
Lois G. Lerher  
Associate General Counsel

**Attachments**

1. January 18, 1989 Response of the AEA
2. January 23, 1989 Response by Sheri Arnold Brown
3. January 26, 1989 Response and February 2, 1989 supplement by Laurie Enslin
4. January 25, 1989 response by P&A, Ivy Hunter, Fred Hunter, Cynthia Perkins, Grover Gene Hill, Loretta Perkins, Joyce Miller Albright and Harry Ferguson, Jr.
5. November 15, 1989 extended conciliation request
6. December 28, 1989 supplementary responses by Grover Gene Hill and response by Joseph W. Perkins Jr.
7. December 28, 1989 conciliation request by Laurie Enslin
8. Additional discovery requests to Harry Ferguson, Jr., Perkins & Associates and the Alabama Education Association
9. Proposed Conciliation agreements (6)
10. Letters (4)

Staff assigned: Michael Marinelli

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Alabama Education Association )  
Perkins & Associates, Inc. )  
Joseph W. Perkins, Jr. ) MUR 2797  
Ivy Hunter )  
Fred Hunter )  
Cynthia Perkins )  
Grover Gene Hill )  
Daniel Mark Perkins )  
Loretta Perkins )  
Joyce Miller Albright )  
Harry Ferguson, Jr. )  
W. Lee Hudson )  
Fred DeLoach )  
Sheri Arnold Brown )  
Laurie Enslen )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 18, 1990, the Commission decided by voted of 4-0 to take the following actions in MUR 2797:

1. Approve the Questions to Harry Ferguson, Jr., as recommended in the General Counsel's Report dated January 11, 1990.
2. Approve the Questions and Request for Documents to Perkins & Associates and to the Alabama Education Association, as recommended in the General Counsel's Report dated January 11, 1990.
3. Decline, at this time, to enter into conciliation with Perkins and Associates, Joseph W. Perkins, Jr., Grover Gene Hill, and Harry Ferguson, Jr. prior to a finding of probable cause to believe.

(continued)

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4. Enter into conciliation prior to a finding of probable cause to believe with Ivy Hunter, Fred Hunter, Cynthia Perkins, Joyce Miller Albright, Sheri Arnold Brown and Laurie Enslin.
5. Take no further action and close the file as regards Daniel Mark Perkins and Loretta Perkins, as recommended in the General Counsel's Report dated January 11, 1990.
6. Approve the conciliation agreements (6) and letters (4), as recommended in the General Counsel's Report dated January 11, 1990.

Commissioners Elliott, Josefiak, McDonald and McGarry voted affirmatively for the decision; Commissioners Aikens and Thomas did not cast votes.

Attest:

Jan. 18, 1990  
Date

Marjorie W. Enmons  
Marjorie W. Enmons  
Secretary of the Commission

Received in the Secretariat: Fri., Jan. 12, 1990 10:12 a.m.  
Circulated to the Commission: Fri., Jan. 12, 1990 12:00 p.m.  
Deadline for vote: Wed., Jan. 17, 1990 4:00 p.m.  
At the time of deadline, 4 affirmative votes had not been received.  
Final vote received: Thursday, January 18, 1990 at 11:12 a.m.

2040901332



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 23, 1990

Pat Moran, Esquire  
Mitchell, Williams, Selig & Tucker  
1000 Savers Federal Building  
Capital Avenue at Spring Street  
Little Rock, Arkansas 72201

RE: MUR 2797  
Sheri Arnold Brown

Dear Mr. Moran:

On November 30, 1988, the Federal Election Commission found reason to believe that Sheri Arnold Brown violated 2 U.S.C. § 441f. At your request, on January 18, 1990, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your client agrees 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.

2040901333

Pat Moran, Esquire  
Page 2

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 Michael Marinelli, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel



BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

2040901334



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 23, 1990

Frederick T. Enslin, Esquire  
Argo, Enslin, Holloway & Sabel, P.C.  
300 South Hull Street  
P.O. Drawer 1550  
Montgomery, Alabama 36102-1550

RE: MUR 2797  
Laurie Enslin

Dear Mr. Enslin:

On November 30, 1988, the Federal Election Commission found reason to believe that Laurie Enslin violated 2 U.S.C. § 441f. At your request, on January 18, 1990, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your client agrees 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.

2040901335

Frederick T. Enslin, Esquire  
Page 2

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 Michael Marinelli, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

  
BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

2040901336



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 23, 1990

Robert H. Chanin, Esquire  
Joy L. Koletsky, Esquire  
Office of General Counsel  
National Education Association  
1201 16th Street, N.W.  
Washington D.C. 20036

RE: MUR 2797  
Alabama Education  
Association

Dear Mr. Chanin and Ms. Koletsky:

On December 8, 1988, your clients were notified that the Federal Election Commission found reason to believe that the Alabama Education Association violated 2 U.S.C. §§ 441b and 441f. On January 17, 1989, you submitted a response on behalf of your clients to the Commission's findings.

The Commission has reviewed the response and has determined that additional information is needed in order that the Commission may complete its investigation. This information is requested in the attached Interrogatories and Request for Documents. A response should be submitted to the Office of the General Counsel within 15 days of receipt of this letter.

If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature in black ink, appearing to read "L. G. Lerner", written over the typed name of Lois G. Lerner.

BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Interrogatories

2040901337

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)  
)  
) MUR 2797  
)

INTERROGATORIES AND REQUEST  
FOR PRODUCTION OF DOCUMENTS

TO: Alabama Education Association  
422 Dexter Avenue, Box 4177  
Montgomery, AL 36104

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

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INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1984 to December 1986.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

2040901339

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

2040901340

**INTERROGATORIES**

State whether the Alabama Education Association made any payments to Perkins and Associates in 1985-86 related to services performed by Perkins and Associates on behalf of the campaign of Roy Johnson. If yes, please provide the dates and amounts of such payments.

**REQUEST  
FOR PRODUCTION OF DOCUMENTS**

Provide all documents including, but not limited to, bank statements, ledgers and correspondence related to payments made to Perkins and Associates in 1985.

2040901341



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

January 23, 1990

Mr. Jack Drake, Esquire  
Drake, Knowles and Pierce  
1509 University Boulevard  
Tuscaloosa AL 35401

RE: MUR 2797  
Perkins & Associates  
et al.

Dear Mr. Drake:

On December 8, 1988, your clients, Perkins & Associates ("P&A") and Joseph W. Perkins, Jr., were notified that the Federal Election Commission found reason to believe that they had violated 2 U.S.C. §§ 441b and 441f. On that same day your clients, Daniel Mark Perkins, Loretta Perkins, Cynthia Perkins, Grover Gene Hill and Harry Ferguson Jr., were notified that the Commission found reason to believe that they had violated 2 U.S.C. § 441f. On January 25, 1989, you submitted a response on behalf of the above clients to the Commission's reason to believe findings in this matter.

After considering the circumstances of the matter, the Commission determined on January 18, 1990, to take no further action against Daniel Mark Perkins and Loretta Perkins. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel. The Commission reminds you that the making of contributions in the name of another is a violation of 2 U.S.C. § 441f. Your client, Loretta Perkins, should take immediate steps to insure that this activity does not occur in the future.

On December 22, 1988 and November 20, 1989 you made requests to enter into conciliation negotiations prior to a finding of probable cause to believe on behalf of Perkins and Associates, Joseph W. Perkins, Jr., Grover Gene Hill, Harry Ferguson, Jr., Ivy Hunter, Fred Hunter, Cynthia Perkins, and Joyce Miller Albright. The Commission has considered your most recent request and determined, because of the need to complete the investigation, to decline at this time to enter into conciliation with Perkins and Associates, Joseph W. Perkins, Jr., Grover Gene Hill, and Harry Ferguson, Jr. At such time as the investigation

2 2 0 4 0 9 0 1 3 4 2

Mr. Jack Drake, Esquire  
page 2

in this matter has been completed, the Commission will reconsider these requests to enter into conciliation prior to findings of probable cause to believe.

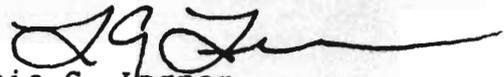
Further, pursuant to its investigation of this matter, the Commission has issued the attached questions to your client, Harry Ferguson, Jr., and a request for documents and questions to your client, Perkins & Associates. It is requested that these two clients submit all answers to questions under oath within 15 days of your receipt of these questions. It is also requested that P&A produce the documents sought within 15 days of your receipt of this letter.

The Commission has, however, determined to enter into negotiations directed towards reaching conciliation agreements with your remaining clients, Ivy Hunter, Fred Hunter, Cynthia Perkins, and Joyce Miller Albright. Enclosed are conciliation agreements that the Commission has approved in settlement of this matter with these respondents. If your clients agree with the provisions of the enclosed agreements, please sign and return them, along with the civil penalties, 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 agreements, or if you wish to arrange a meeting in connection with mutually satisfactory conciliation agreements, please contact Michael Marinelli, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel



BY: Lois G. Lerner  
Associate General Counsel

Enclosures

Request for Production of Documents  
Interrogatories  
Conciliation Agreements

22040901343

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)  
)  
) MUR 2797  
)

INTERROGATORIES AND REQUEST  
FOR PRODUCTION OF DOCUMENTS

TO: Perkins & Associates  
P.O. Box 309  
Tuscaloosa, AL 35402

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

2040901344

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1984 to December 1986.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

2040901345

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

2040901346

**INTERROGATORIES**

State whether the Alabama Education Association made any payments to Perkins and Associates in 1985-86 related to services performed by Perkins and Associates on behalf of the campaign of Roy Johnson. If yes, please provide the dates and amounts of such payments.

**REQUEST  
FOR PRODUCTION OF DOCUMENTS**

1. Provide all documents including, but not limited to, bank statements, ledgers, payroll records, canceled checks, and cover letters relating to the March 29, 1985 bonuses paid to Ivy Hunter, Harry Ferguson, Jr., Cynthia Perkins, Lee Hudson, Laurie Enslin, Sheri Arnold Brown, Joyce Albright, Fred DeLoach and Joseph W. Perkins, Jr.
2. Provide all documents including, but not limited to, bank statements, ledgers and correspondence related to payments received from the Alabama Education Association in 1985.

2040901347

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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)  
) MUR 2797  
)

INTERROGATORIES

TO: Harry Ferguson, Jr.  
1604 Bellingrath Drive  
Tuscaloosa, AL 35406

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request.

2040901348

INSTRUCTIONS

In answering these questions each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each question propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the response.

If you cannot answer the following questions in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following questions, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1984 to December 1986.

The following questions are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

2040901349

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

INTERROGATORIES

You have been identified as the employee of Perkins & Associates who distributed bonuses on March 29, 1985, to Harry Ferguson, Cynthia Perkins, Ivy Hunter, W. Lee Hudson, Fred DeLoach, Laurie Enslin, Sheri Arnold Brown, Joyce Miller Albright and Joseph W. Perkins, Jr.

1. Identify the source of the funds used to make these bonuses.
  - a. If any person, entity or organization provided funds to Perkins & Associates for the purpose of making the March 29, 1985 bonuses or to make political contributions, identify each such person, entity or organization and the amount of the funds provided.
  - b. If the Alabama Education Association ("the AEA") provided any part of the moneys used by Perkins and Associates to make the March 29, 1985 bonuses, state who at the AEA provided these moneys and the amount provided. Identify who informed you that the AEA had provided the moneys.

2040901350

2. Please describe in full your contacts, dealings and other associations with the AEA and state the names of all persons affiliated with the AEA with whom you dealt during your employment at Perkins and Associates.

2040901351

76C 5304

LAW OFFICES

**MITCHELL, WILLIAMS, SELIG & TUCKER**

1000 SAVERS FEDERAL BUILDING  
CAPITOL AVENUE AT SPRING STREET  
LITTLE ROCK, ARKANSAS 72201  
TELEPHONE 501-688-8800  
TELEFAX 501-688-8807

WRITER'S DIRECT DIAL  
(501) 688-8819

January 31, 1990

H. MAURICE MITCHELL  
RICHARD A. WILLIAMS  
JOHN B. SELIG  
JOSEPH W. GELZINE  
W. CHRISTOPHER BARRIER  
JIM GUY TUCKER  
BYRON FREELAND  
KENT FOSTER  
ALLAN GATES  
PAT MORAN  
W. H. L. WOODYARD, III  
MICHAEL C. O'MALLEY  
JOHN C. LESSEL  
DOAK FOSTER  
JEAN D. STOCKBURGER  
ANNE RITCHIE  
DEBRA K. BROWN  
EDWIN F. JACKSON  
SHERRY P. BARTLEY  
CRAIG WESTBROOK  
RICHARD C. JANS  
SUSAN GUNTER  
BOYCE E. MANK  
R. T. BEARD, III  
W. KIRBY LOCKHART  
MARCELLA J. TAYLOR  
TIMOTHY W. BROOKS  
ARK MONROE, III  
C. NICHOLAS THOMPSON

TRACY BARGER  
WALTER G. WRIGHT, JR.  
T. SCOTT CLEVELAND  
LYN PEOPLES FRUITT  
WYLLIE D. CAVIN III  
RICHARD L. ANGEL  
EVERETTE L. MARTIN  
JEFFREY H. THOMAS  
ROBERT S. IRVING  
FREDERICK A. CAMPBELL  
COLEEN M. BARGER  
RENÉE S. DALE  
STUART P. MILLER  
PHILLIP A. PEBER  
ABRAHAM W. BOGOSLAVSKY  
LANCE R. MILLER  
DONALD L. PARKER II  
RYLE R. WILSON  
LISA N. DAVIS

COUNSEL  
ROBERT W. SUBANS, III

OF COUNSEL  
HENRY E. SPITZBERG

Office of General Counsel  
Federal Election Commission  
999 E. Street, N.W.  
Washington, D.C. 20463

ATTN: Mr. Michael Marinelli

RE: MUR2797 Sherry Arnold Brown

Dear Sir:

2040901352

90 FEB -5 AM 9-00

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

90 FEB -5 PM 3:55

FEDERAL ELECTION COMMISSION

Mr. Michael Marinelli  
January 31, 1990  
Page Two

The Commission clearly has the discretion under 2 U.S.C. § 437g(a)(5)(A) to apply principles of fairness and equity to the plight in which Ms. Brown finds herself in this situation some 5 years after the fact. Ms. Brown was obviously an unwilling participant in a web of questionable conduct being engaged in by her superiors at her place of employment and principals in the Roy Johnson campaign. She understands that permitting use of her name for the contribution in question was a violation of the Act, albeit a very technical violation under the circumstances of her particular case.

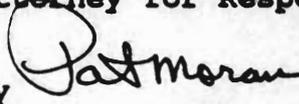
2040901353

I would appreciate hearing from you regarding these suggestions.

Sincerely yours,

MITCHELL, WILLIAMS, SELIG & TUCKER  
Attorney for Respondent

By



Pat Moran

PM:dap  
cc: Ms. Sherry Brown

OGC 5437

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

90 FEB 15 AM 10:47

LAW OFFICE OF  
DRAKE, KNOWLES AND PIERCE  
1809 UNIVERSITY BOULEVARD  
TUSCALOOSA, ALABAMA 35401

February 6, 1990

RUSSELL JACKSON DRAKE  
RALPH I. KNOWLES, JR.  
JOSEPH S. PIERCE

MAILING ADDRESS  
POST OFFICE BOX 66  
TUSCALOOSA, ALABAMA 35402  
(205) 782-1234  
FAX (205) 782-9644

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
90 FEB 15 PM 2:23

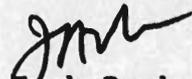
Michael Marinelli  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2797

Dear Mr. Marinelli:

Enclosed are the answers of Perkins and Associates and Harry Ferguson, Jr. Also enclosed are copies of the documents requested.

Sincerely,

  
Jack Drake

JD/lb

cc: Joy Koletsky

enclosures

2040901354

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of:

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)  
)  
)

MUR 2797

ANSWERS OF PERKINS AND ASSOCIATES

In answer to the interrogatories propounded herein,  
Perkins and Associates states as follows:

To the one interrogatory propounded, the answer is "no".

Response to Request For Production

1. Perkins and Associates, Inc. is no longer in business. The corporation may or may not file a bankruptcy proceeding. We have been unable to locate the cancelled check in question. Harry Ferguson cashed one check and distributed the bonuses in cash.

2. An invoice and one ledger sheet are enclosed. An earlier ledger sheet must have existed at one time but cannot be located.

Please note the hand-written notations on the invoice. The notations read: "Includes February poll" and "Ivy, this includes my travel expenses for this job also." Both notations were written by Joe Perkins.

Joseph W. Perkins, Jr.  
Perkins and Associates, Inc.  
By Joseph W. Perkins, Jr.,  
Its President

Sworn to and subscribed before me this the 12<sup>th</sup> day of February, 1990.

Deel M. [Signature]  
Notary Public

2040901355

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of:

)  
)  
) MUR 2797  
)

ANSWERS OF HARRY FERGUSON, JR.

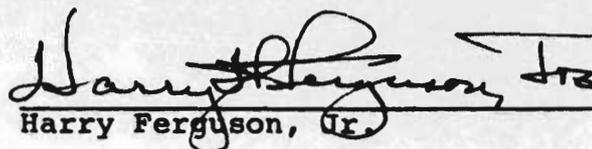
In answer to the interrogatories propounded to him, Harry Ferguson, Jr. answers as follows:

1. The funds for the bonuses came from working capital of Perkins and Associates, Inc.

A. No/Not applicable.

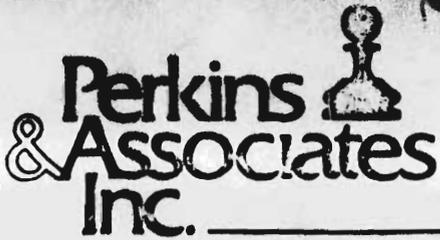
B. The money did not come from the Alabama Education Association.

2. I do not remember having had any personal contact with anyone at AEA.

  
Harry Ferguson, Jr.

Sworn to and subscribed before me this the 6 day of February, 1990.

  
Notary Public



CLIENT  
INVOICE

ADVERTISING / MARKETING

CLIENT: Paul Hubbard  
CLIENT#: 00144  
CONTACT:  
ADDRESS:

CURRENT DATE: January 29, 1985  
BILLING MONTH: 01

<u>CONTROL #</u>	<u>DESCRIPTION</u>	<u>COST</u>
00000	For professional services rendered including consulting fees.	\$10,000.00
	TOTAL BILLING	\$10,000.00
	TOTAL DUE	<u>\$10,000.00</u>

2040901356

*Paul Hubbard*

*This copy is  
for [unclear]*

NAME: *Adelphi Education Center*  
*St. Paul Hubbert*  
 STREET  
 CITY & STATE

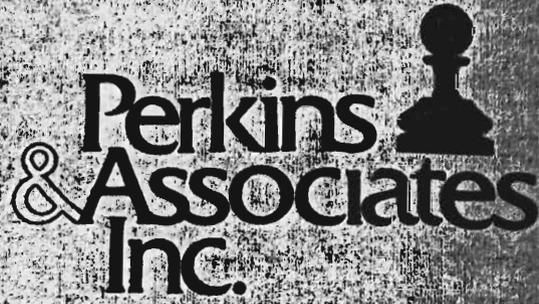
ACCOUNT NO.
SHEET NO.

BALANCE FORWARD  $\blacktriangleright$  *-0-*

	DATE	REF.	DESCRIPTION	CHARGES	✓	CREDITS	BALANCE	DR. CR.	PREVIOUS BALANCE
1	6/24/85			8752.00			8752.00		-0-
2	7/6/85					8750.00	-0-		8750.00
3	11/13/86					4375.00	(4375.00)		-0-
4	11/31/86			4375.00			-0-		(4375.00)
5	5/31/86			9375.00			9375.00		-0-
6	10/23/86					9375.00	-0-		9375.00
7	6/30/86			1440.00			1440.00		-0-
8	11/30/86			18.80			1458.80		1440.00
9	7/3/86					1440.00	18.80		1458.80
10	7/13/86					4375.00	(4356.20)		18.80
11	7/21/86					18.80	(4375.00)		(4356.20)
12	10/31/86		transferred to Ad. Comm. Print Com. (4375.00)			(4375.00)	-0-		(4375.00)
13	2/14/87					2000.00	(2000.00)		-0-
14	2/28/87			2000.00			-0-		(2000.00)
15	3/11/87					2000.00	(2000.00)		-0-
16	3/31/87			2000.00			-0-		(2000.00)
17	4/14/87					2000.00	(2000.00)		-0-
18	4/20/87			2000.00			-0-		(2000.00)
19									
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2040901358

CONFIDENTIAL



STATEWIDE SURVEY

OF

VOTER OPINIONS

22040901359

CONFIDENTIAL

Perkins & Associates  
April, 1985

### STATEWIDE SURVEY OF VOTER OPINIONS

Perkins and Associates conducted a telephone survey during the week of March 1, 1985. The goals of this survey included:

1. ascertaining how certain groups influence voters
2. determining whether or not big or small business endorsement influences voters
3. determining voter attitudes toward the kind of job several public figures are doing
4. determining voter preference for Governor
5. determining voter preference for Attorney General
6. determining voter preference for Lt. Governor
7. determining voter preference for U.S. Senator and
8. determining issues which are of utmost importance to voters.

22040901360

## SUMMARY

The following is a summary of the results, which are discussed in greater detail in the body of this report.

1. The Alabama Education Association is the most influential endorsing organization.
2. Voters in Alabama are more inclined to vote for a candidate who is endorsed by small business than a candidate who is endorsed by big business.
3. There is no statistical difference in the support for Wallace, Baxley, Graddick, and McMillan. George Wallace will not be elected Governor again. The combination of a high negative rating and erosion of traditional voter base make his election remote although he does currently lead in the polls.
4. Charles Graddick has a very high positive rating and a growing constituency.
5. Because of his attraction of many former Wallace votes, Bill Baxley is the favorite for the Democratic Gubernatorial nomination, however, the race is still extremely close.
6. Jim Zeigler shows a strong position in a number of possible races.
7. Siegalman is favored at this time for Attorney General.
8. Camp is favored at this time for Lt. Governor. However, there is no statistical difference between Camp and Siegalman.
9. Denton is the overwhelming favorite at this time for U.S. Senator.
10. A clear majority prefers a plan which distributes oil and gas income to county and city governments.
11. The single most important issue facing voters is unemployment.

2040901361

## METHODOLOGY

A systematic, random sample was employed in this research, stratified by congressional districts. In addition, random digit dialing was utilized to ensure that each telephone number (unlisted as well) had an equal chance of being chosen for the survey. The total sample size equalled 700, 100 from each district. It is the opinion of Perkins and Associates that the quality of the sampling techniques used results in a 95 per cent confidence interval, with a maximum error of plus or minus 3 percentage points. This means that if the survey were administered 100 times, the same results which follow would occur 95 times with a margin of error of 3 percent.

Only trained interviewers were used to administer the survey. About 25 per cent of the calls were monitored by a trained research supervisor to ensure that the survey was administered properly. None of the interviewers were informed of the total purpose or the sponsor, to control for interviewer bias. In fact, as is customary in scientific research, an exit interview was conducted with each interviewer. No interviewer could guess the correct sponsor or the purpose of the survey.

AGC 5370



LEGAL SERVICES  
OFFICE OF GENERAL COUNSEL

NATIONAL EDUCATION ASSOCIATION • 1201 16th St., N.W., Washington, D C 20036-3290 • (202) 822-7035

KEITH GEIGER, President  
ROBERT CHASE, Vice President  
ROXANNE E. BRADSHAW, Secretary-Treasurer

DON CAMERON, Executive Director

February 9, 1990

Lawrence M. Noble  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2797  
Alabama Education Association

Dear Mr. Noble:

On January 23, 1990, you sent us Interrogatories and Request for Production of Documents for the Alabama Education Association ("AEA") in connection with the above MUR. Enclosed is AEA's response. With regard to the documents that we have provided, we note that because only a few lines on the enclosed bank statements and ledgers are relevant to your request, we have redacted all other information contained in these documents.

The enclosed response confirms that AEA purchased from, and paid for, services from Perkins and Associates, and we request once again that the Commission close the file with respect to AEA on this matter.

Sincerely,

*Joy L. Koletsky*  
Robert H. Chanin  
Joy L. Koletsky

Counsel for AEA

cc: Paul Hubbert

RECEIVED  
FEDERAL ELECTION COMMISSION  
90 FEB -9 PM 2:51

2040901363

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF  
ALABAMA EDUCATION ASSOCIATION

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)  
)

MUR 2797

Answers of Alabama Education Association  
to Interrogatories Dated January 23, 1990

No

I hereby declare under penalty of perjury that to the best  
of my knowledge and belief the foregoing is true and correct.



Paul R. Hubbert, Executive Secretary  
Alabama Education Association

DATE:

2/7/90

2040901364

① ② ③ ④ ⑤ ⑥ ⑦ ⑧ ⑨

1924	Bank	Account	C.P.E.	CD	Time	
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	1
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	2
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	3
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	4
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	5
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	6
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	7
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	8
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	9
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	10
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[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	13
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	14
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[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	17
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	18
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	19
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	20
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	21
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	22
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	23
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	24
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	25
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	26
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	27
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	28
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	29
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	30
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	31
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	32

32 → 1500.00  
 33 → 1000.00  
 34 → 500.00  
 35 → 200.00  
 36 → 100.00  
 37 → 50.00  
 38 → 25.00  
 39 → 12.50  
 40 → 6.25





UNION BANK & TRUST CO.  
MONTGOMERY, ALABAMA

# ALABAMA EDUCATION ASSOCIATION

422 DEXTER AVENUE  
MONTGOMERY, ALABAMA 36105  
(205) 264-6780

11-89

No. 11464

DATE 2/14/89 1989

PAY  
TO THE ORDER OF

\$ 3,000.00

Perkins & Associates, Inc.  
2330 University Blvd.  
P.O. Box 309  
Tuscaloosa, AL

ALABAMA EDUCATION ASSOCIATION

**COPY - NOT NEGOTIABLE**

## REMITTANCE ADVICE

ACCOUNT	AMOUNT	ACCOUNT	AMOUNT	ACCOUNT	AMOUNT	ACCOUNT	AMOUNT
	757-11						

ALABAMA EDUCATION ASSOCIATION  
422 DEXTER AVENUE

2040901368

189 91 87  
28 16 198

ALABAMA VOTE  
PH. 634-6799  
P. O. BOX 4297  
MONTGOMERY, ALABAMA 36108

2/14/85 10

322  
32

PAY TO THE ORDER OF Berkins & Associates, Inc

\$ 5,000.00

Five Thousand & no/100

UNION BANK & TRUST COMPANY  
MONTGOMERY, ALABAMA

FEB 1 5 85

ALABAMA VOTE

FOR

⑆0003 22⑆ ⑆106 2200385⑆ 118 627 7⑆ ⑆00005000⑆

2040901369

ALABAMA VOTE  
PH. 634-6799  
P. O. BOX 4297  
MONTGOMERY, ALABAMA 36108

4/25/85 10

338  
33

PAY TO THE ORDER OF Joe Rarkine Associates

\$ 1,000.00

One Thousand & no/100

UNION BANK & TRUST COMPANY  
MONTGOMERY, ALABAMA

PAID  
APR 25 1985

ALABAMA VOTE

FOR

⑆000338⑆ ⑆106 2200385⑆ 118 627 7⑆ ⑆00001000⑆

I certify that the above two copies of cancelled checks are true copies of the original.

Hilda Venable  
Hilda Venable Accountant 1/31/90



UNION BANK OF ALABAMA  
MONTGOMERY, ALABAMA

NUMBER  
FOUR

ALABAMA VOTE  
P. O. BOX 4297  
MONTGOMERY, ALABAMA

36195

118-627-7

DATE 02-28-65  
PAGE 1

ACCOUNT NO. 118-627-7 COMMERCIAL CHECKING

[REDACTED]

MISCELLANEOUS DEBITS AND CREDITS

DATE CHECK # AMOUNT DESCRIPTION

CHECKS POSTED

DATE	CHECK NO.	AMOUNT	DATE	CHECK NO.	AMOUNT
[REDACTED]	[REDACTED]	[REDACTED]	02-19	322	5,000.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

• DENOTES BREAK IN CHECK NUMBER SEQUENCE

DAILY BALANCE SUMMARY

DATE BALANCE DATE BALANCE

2040901371







**UNION BANK & TRUST CO.**  
MONTGOMERY, ALABAMA

MEMBER  
FDIC

ALABAMA EDUCATION ASS'N  
422 DEXTER AVENUE  
MONTGOMERY, ALABAMA

36104

100-066-3

DATE 02-28-05  
PAGE 4

ACCOUNT NO.

100-066-3

CONTINUED

DATE	CHECKS POSTED - CHECK NO.	AMOUNT	DATE	CHECKS POSTED - CHECK NO.	AMOUNT
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2040901375



**UNION BANK & TRUST CO.**  
MONTGOMERY, ALABAMA

MEMBER  
FDIC

ALABAMA EDUCATION ASS'N  
422 DEXTER AVENUE  
MONTGOMERY, ALABAMA

36104

100-066-3

DATE 02-20-69  
PAGE 6

ACCOUNT NO.

100-066-3

CONTINUED

- - DAILY BALANCE SUMMARY - -  
BALANCE DATE

DATE

[REDACTED]

[REDACTED]

[REDACTED]

BALANCE

[REDACTED]

22040901377



Date: 31-JUL-85

ALABAMA EDUCATION ASSOCIATION  
GENERAL LEDGER

Page

Acct-No	Acct-Description	Debits	Bal Forward
Trn-Date	Src		Credits

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

07/05/85 CKR 12919 PERKINS & ASSOC

8,780.00

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

2040901379



# UNION BANK & TRUST CO.

MONTGOMERY, ALABAMA

NUMBER  
PAGE

ALABAMA VOTE  
P. O. BOX 4297  
MONTGOMERY, ALABAMA

110-627-7

36195

DATE 04-30-65  
PAGE 1

ACCOUNT NO. 110-627-7 COMMERCIAL CHECKING

PREVIOUS BALANCE . . . . .	03-29-65	17,226.90
3 DEPOSITS AND CREDITS . . . . .		11,009.74
7 CHECKS AND DEBITS . . . . .		6,664.27
CURRENT BALANCE . . . . .	04-30-65	24,572.35

- - MISCELLANEOUS DEBITS AND CREDITS - -

DATE	CHECK #	AMOUNT	DESCRIPTION
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████████	████████	████████	████████

- CHECKS POSTED -

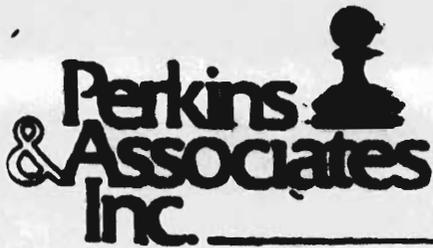
DATE	CHECK NO.	AMOUNT	DATE	CHECK NO.	AMOUNT
████████	████████	████████	████████	████████	████████
████████	████████	████████	████████	████████	████████
████████	████████	████████	04-30	338	1,000.00

• DENOTES BREAK IN CHECK NUMBER SEQUENCE

- - DAILY BALANCE SUMMARY - -

DATE	BALANCE	DATE	BALANCE
████████	████████	████████	████████
████████	████████	████████	████████
████████	████████	████████	████████

2040901381



ADVERTISING / MARKETING

CLIENT: Alabama Education Assoc.  
ADDRESS: Attn: Dr. Paul Hubbert  
422 Dexter Avenue  
Montgomery, Al 36104

CURRENT DATE: 6/28/85  
BILLING MONTH: 05

CONTROL# MEDIA: DESCRIPTION COST

CONTROL# PRODUCTION:

Half-payment for series of poles as described  
in proposal provided by Perkins & Associates.....\$8750.00

TOTAL DUE \$8750.00

7/9/85  
OK

RRH  
Chrg to Billing Acct  
in Gov. Rel.

629.15  
ATB

PAID  
JUL 8 1985  
ALABAMA EDUCATION ASSOC.

22040901382

UNION BANK & TRUST CO.  
MONTGOMERY, ALABAMA

# ALABAMA EDUCATION ASSOCIATION

422 DEXTER AVENUE  
MONTGOMERY, ALABAMA 36108  
(205) 834-0700

12/2  
002

No. 12919

DATE 7/9/85 1985

PAY  
TO THE ORDER OF

\$8,750.00

┌  
Services & Associates, Inc.  
7330 University Boulevard/5th Floor  
P. O. Box 303  
└ Tuscaloosa, Alabama 35402

ALABAMA EDUCATION ASSOCIATION

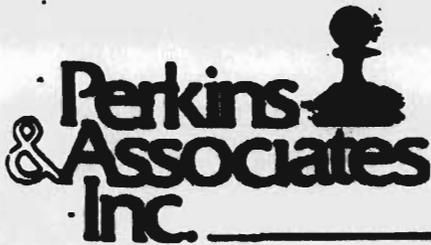
**COPY - NOT NEGOTIABLE**

### REMITTANCE ADVICE

ACCOUNT	AMOUNT	ACCOUNT	AMOUNT	ACCOUNT	AMOUNT	ACCOUNT	AMOUNT
	679-15						
	<i>PRA</i>						

ALABAMA EDUCATION ASSOCIATION  
422 DEXTER AVENUE

2040901383



ADVERTISING / MARKETING

cc  
Bus. Off.

July 10, 1985

Dr. Paul Hubbert  
Executive Director  
Alabama Education Association  
422 Dexter Avenue  
Montgomery, Alabama 36104

Dear Dr. Hubbert:

This document will serve as a letter of agreement between Perkins & Associates and the Alabama Education Association for provision of polling services. The nature and terms of the services are outlined in the attached document. However, one change to the schedule in the document is in order. Rather than the first poll being administered during June of 1985, it will be administered during July and will be delivered before August 15. This change was made necessary due to delays in gaining sufficient numbers of subscribers for the polling services.

Terms of payment for the polling services are as follows. Total cost of the service will be \$17,500. Half of this amount is due upon agreement to participate in the subscription service. The second payment of \$4,375 is on January 1, 1986 and the final payment of \$4,375 is due July 1, 1986.

I hope the terms and arrangements for the polling service are satisfactory. Please call me if there are any questions.

Sincerely,

  
Joseph W. Perkins, Jr.  
President

1st payment - \$8750 ch 125  
Made 6/10/85  
PPH

cc: Hilda Venable 7/15/85

629.15

2040901384







MONTGOMERY, ALABAMA

MEMBER  
FOUR

ALABAMA EDUCATION ASS'N  
422 DEXTER AVENUE  
MONTGOMERY, ALABAMA 36104

100-066-3

DATE 07-31-69  
PAGE 4

ACCOUNT NO.

100-066-3

CONTINUED

- CHECKS POSTED -			- CHECKS POSTED -		
DATE	CHECK NO.	AMOUNT	DATE	CHECK NO.	AMOUNT

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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DENOTES BREAK IN CHECK NUMBER SEQUENCE.

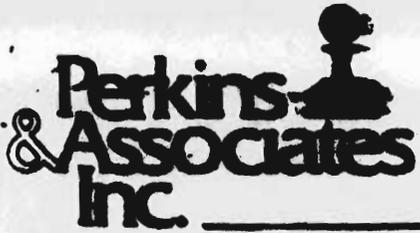
DATE

- - DAILY BALANCE SUMMARY - -  
BALANCE ... DATE

BALANCE

[REDACTED]	[REDACTED]	[REDACTED]
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2040901388



CLIENT INVOICE

DEC 30 1985  
ALABAMA EDUCATION ASSOCIATION  
ADVERTISING / MARKETING

CLIENT: ALABAMA EDUCATION ASSOCIATION  
ADDRESS: ATTN: Dr. Paul Hubbard  
422 Dexter Avenue  
Montgomery, Al. 35104

CURRENT DATE: 12/27/85  
BILLING MONTH: 01

CONTROL# MEDIA DESCRIPTION COST

CONTROL# PRODUCTION:

ONE-QUARTER BILLING FOR SERIES OF POLLS AS DESCRIBED  
IN PORPOSAL PROVIDED BY PERKINS & ASSOCIATES.....\$4375.00

TOTAL DUE... \$4375.00

Final bill to come in June

627-15  
ATZ

1/3/85  
OK  
PRH

Chg to Polling  
Acct

22040901389

0645503

LAW OFFICES  
OF  
ARGO, ENSLEN, HOLLOWAY & SABEL, P.C.  
300 SOUTH HULL STREET  
P. O. DRAWER 1550  
MONTGOMERY, ALABAMA 36102-1550

J. KNOX ARGO  
FREDERICK T. ENSLEN  
JOHN M. HOLLOWAY, JR.  
M. WAYNE SABEL

TELEPHONE (205) 834-2460  
FAX (205) 265-3837

February 13, 1990

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

ATTN: Hon. Michael Marinelli  
Enforcement Attorney

Re: MUR 2797  
Laurie Enslen

Dear Mr. Marinelli:

Enclosed please find the Conciliation Agreement which I have executed on behalf of my client. I have also enclosed our firm's check for \$350.00 which represents the civil fine agreed to in this case.

If this meets with your approval, please send me an executed copy for my file.

Sincerely,

  
Frederick T. Enslen

sap

cc: Mrs. Laurie Enslen

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAR 13 1990  
90FEB 20 PM 10:59

22040901390

06C5639

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

90 MAR -7 AM 9:13

LAW OFFICE OF  
DRAKE, KNOWLES AND PIERCE  
1809 UNIVERSITY BOULEVARD  
TUSCALOOSA, ALABAMA 35401

February 27, 1990

RUSSELL JACKSON DRAKE  
RALPH I. KNOWLES, JR.  
JOSEPH G. PIERCE

MAILING ADDRESS  
POST OFFICE BOX 86  
TUSCALOOSA, ALABAMA 35402  
(205) 759-1234  
FAX (205) 752-9644

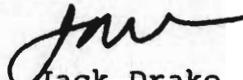
Michael Marinelli  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2797

Dear Mr. Marinelli:

Enclosed is the conciliation agreement for Cynthia Perkins and an American Express money order for \$400.00. Also enclosed are the conciliation agreements for Joyce Albright, Ivy Hunter, and Fred Hunter. I do not have the money for the other agreements but will forward the money in a few days.

Sincerely,

  
Jack Drake

JD/lb

enclosures

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
90 MAR -8 AM 11:44

22040901391

AMERICAN EXPRESS MONEY ORDER

1/17

Credit Union Money Order

04-218,633,871

PAY THE SUM OF  
NOT GOOD OVER \$1,000.

Feb 22, 1990

THE SUM 400 DOLS 00 CTS



TO THE ORDER OF

Federal Election Commission

Member's Name and Address: Willie K. Perkins 3117 Oklahoma Ave. Hialeah, FL 33140

MEMBER'S NAME AND ADDRESS

Issued by American Express  
Travel Related Services Company, Inc.  
Englewood, Colorado

Payable at  
United Bank of Grand Junction - Downtown  
Grand Junction, Colorado

⑆102100400⑆04 ⑈2186338716⑈

2040901392

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

Ivy Hunter )

Fred Hunter )

Cynthia Perkins )

Joyce Miller Albright )

Laurie Enslin )

MUR 2797

**SENSITIVE**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached are conciliation agreements signed by Ivy Hunter, Fred Hunter, Cynthia Perkins, Joyce Miller Albright, and Laurie Enslin.

Following a referral from the Department of Justice, the Commission found reason to believe that Perkins & Associates, Inc. ("P&A"), the Alabama Education Association ("AEA"); and Joseph W. Perkins, Jr., president of P&A, had violated 2 U.S.C. §§ 441b and 441f. The Commission's findings were based upon the allegation that P&A had given several employees, or family members of employees, bonuses and gifts to enable them to make contributions of \$1,000 each to Alabama State Representative Roy Johnson's 1985 Congressional campaign.

The Commission also found reason to believe that the five individuals cited above, who were employees or family members of employees of P&A, had violated 2 U.S.C. § 441f.

On January 18, 1990, the Commission agreed to enter into preprobable cause conciliation with these five respondents.

2040901393

2040901394

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1. The Commission also found reason to believe that another employee of P&A, Sheri Arnold Brown, had violated Section 441f. A conciliation agreement identical to that approved for the other individuals was approved by the Commission for submission to Mrs. Brown and was mailed to her on January 23, 1990. Discussions with Mrs. Brown's counsel on February 6, 1990 and March 7, 1990 indicate that further negotiations will produce an acceptable agreement. Therefore, this Office will continue that conciliation process an additional twenty days.

The Commission on January 18, 1990, approved questions and requests for documents to be sent to P&A and the Alabama Education Association, plus questions to be sent to another employee, Harry Ferguson, Jr. Responses have been received. When this Office has completed its review of the information provided, it will prepare a report making further recommendations regarding these respondents.

The

agreements submitted contain no other changes from those approved by the Commission on January 18, 1990.

**II. RECOMMENDATIONS**

1. Accept the attached conciliation agreements with Ivy Hunter, Fred Hunter, Cynthia Perkins, Joyce Miller Albright, and Laurie Enslin.
2. Close the file as to Ivy Hunter, Fred Hunter, Cynthia Perkins, Joyce Miller Albright, and Laurie Enslin.
3. Approve the attached letters (2).

Lawrence M. Noble  
General Counsel

Date

3/20/90

BY:

  
Lois G. Lerner  
Associate General Counsel

**Attachments**

1. February 13, 1990 counteroffer by Laurie Enslin
2. February 27, 1990 counteroffer by Ivy Hunter, Fred Hunter, Cynthia Perkins, and Joyce Miller Albright.
3. Letters to Counsel (2)

Staff Assigned: Michael Marinelli

2040901395

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Ivy Hunter	)	MUR 2797
Fred Hunter	)	
Cynthia Perkins	)	
Joyce Miller Albright	)	
Laurie Enslin	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 30, 1990, the Commission decided by a vote of 6-0 to take the following actions in MUR 2797:

1. Accept the conciliation agreements with Ivy Hunter, Fred Hunter, Cynthia Perkins, Joyce Miller Albright, and Laurie Enslin, as recommended in the General Counsel's report dated March 20, 1990.
2. Close the file as to Ivy Hunter, Fred Hunter, Cynthia Perkins, Joyce Miller Albright, and Laurie Enslin.
3. Approve the letters, as recommended in the General Counsel's report dated March 20, 1990.

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

Attest:

3-30-90

Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary of the Commission

Received in the Secretariat:	Wed., March 21, 1990	11:17 a.m.
Circulated to the Commission:	Wed., March 21, 1990	4:00 p.m.
Deadline for vote:	Fri., March 30, 1990	4:00 p.m.

2040901396



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 4, 1990

Frederick T. Enslin, Esquire  
Argo, Enslin, Holloway & Sabel, P.C.  
300 South Hull Street  
P.O. Drawer 1550  
Montgomery, Alabama 36102-1550

RE: MUR 2797  
Laurie Enslin

Dear Mr. Enslin:

On March 30, 1990, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your client. This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

2040901397

Frederick T. Enslin, Esquire  
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel



BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

2040901398

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Laurie Enslin

)  
)  
) MUR 2797  
)

CONCILIATION AGREEMENT

This matter was initiated by a referral from the Department of the Justice. The Federal Election Commission ("Commission") found reason to believe that Laurie Enslin ("Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent, Laurie Enslin is a person within the meaning of 2 U.S.C. § 431(11).

2. Perkins & Associates, Inc., incorporated under the laws of Alabama, is an advertising agency involved in political campaign work in both Alabama and Georgia.

3. On March 29, 1985, various employees of

2040901399

Perkins & Associates, including Respondent, accepted \$1,000 in corporate funds given in the form of a \$1,000 bonus.

4. On the same date, Respondent made a \$1,000 contribution to the Roy Johnson for Congress Committee by means of a personal check.

5. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no person shall knowingly permit his name to be used to effect such a contribution.

V. Respondent knowingly permitted her name to be used to effect a \$1,000 contribution to the Roy Johnson for Congress Committee, in violation of 2 U.S.C. § 441f.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of three hundred and fifty dollars (\$350), 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. 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 enforceable.

FOR THE COMMISSION:

*Lawrence M. Noble*  
Lawrence M. Noble  
General Counsel

4/4/90  
Date

FOR THE RESPONDENT:

*Frederick T. Enslin*  
(Name) Frederick T. Enslin  
(Position) Attorney for Respondent  
Argo Enslin Holloway & Sabel, P.C.  
Attorneys at Law  
P.O. Drawer 1550  
Montgomery, AL 36102

February 13, 1990  
Date

22040901400



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 4, 1990

Mr. Jack Drake, Esquire  
Drake, Knowles and Pierce  
1509 University Boulevard  
Tuscaloosa, AL 35401

RE: MUR 2797  
Perkins & Associates  
et al.

Dear Mr. Drake:

On March 30, 1990, the Federal Election Commission accepted the signed conciliation agreements submitted by you on behalf of your clients, Ivy Hunter, Fred Hunter, Cynthia Perkins, and Joyce Miller Albright, in settlement of violations of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to these respondents. This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

2040901401

Jack Drake, Esquire  
Page 2

Enclosed you will find copies of the fully executed conciliation agreements for your files. If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

  
BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreements

22040901402

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Joyce Miller Albright

)  
)  
) MUR 2797  
)

CONCILIATION AGREEMENT

This matter was initiated by a referral from the Department of the Justice. The Federal Election Commission ("Commission") found reason to believe that Joyce Miller Albright ("Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent, Joyce Miller Albright is a person within the meaning of 2 U.S.C. § 431(11).

2. Perkins & Associates, Inc., incorporated under the laws of Alabama, is an advertising agency involved in political campaign work in both Alabama and Georgia.

3. On March 29, 1985, various employees of

22040901403

Perkins & Associates, including Respondent, accepted \$1,000 in corporate funds given in the form of a \$1,000 bonus.

4. On the same date, Respondent made a \$1,000 contribution to the Roy Johnson for Congress Committee by means of a personal check.

5. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no person shall knowingly permit his name to be used to effect such a contribution.

V. Respondent knowingly permitted her name to be used to effect a \$1,000 contribution to the Roy Johnson for Congress Committee, in violation of 2 U.S.C. § 441f.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of four hundred dollars (\$400), 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. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and

2040901404

implement the requirements contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

LM Noble (Signature)  
Lawrence M. Noble  
General Counsel

4/4/90  
Date

FOR THE RESPONDENT:

Joseph Miller Albright (Signature)  
(Name)  
(Position)

February 20, 1990  
Date

22040901405

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Ivy Hunter

)  
)  
) MUR 2797  
)

CONCILIATION AGREEMENT

This matter was initiated by a referral from the Department of the Justice. The Federal Election Commission ("Commission") found reason to believe that Ivy Hunter ("Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent, Ivy Hunter is a person within the meaning of 2 U.S.C. § 431(11).

2. Perkins & Associates, Inc., incorporated under the laws of Alabama, is an advertising agency involved in political campaign work in both Alabama and Georgia.

3. On March 29, 1985, various employees of

22040901406

Perkins & Associates, including Respondent, accepted \$1,000 in corporate funds given in the form of a \$1,000 bonus.

4. On the same date, Respondent made a \$1,000 contribution to the Roy Johnson for Congress Committee by means of a personal check.

5. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no person shall knowingly permit his name to be used to effect such a contribution.

V. Respondent knowingly permitted her name to be used to effect a \$1,000 contribution to the Roy Johnson for Congress Committee, in violation of 2 U.S.C. § 441f.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of four hundred dollars (\$400), 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. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and

22040901407

implement the requirements contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

Lawrence M. Noble (Signature)  
Lawrence M. Noble  
General Counsel

4-5-90  
Date

FOR THE RESPONDENT:

Jay Hunter (Signature)  
(Name)  
(Position)

2-16-90  
Date

22040901408

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Fred Hunter

)  
)  
) MUR 2797  
)

CONCILIATION AGREEMENT

This matter was initiated by a referral from the Department of the Justice. The Federal Election Commission ("Commission") found reason to believe that Fred Hunter ("Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent, Fred Hunter is a person within the meaning of 2 U.S.C. § 431(11).

2. Perkins & Associates, Inc., incorporated under the laws of Alabama, is an advertising agency involved in political campaign work in both Alabama and Georgia. During 1985, Fred Hunter did free lance work for the firm.

2040901409

3. On March 29, 1985, various employees of Perkins & Associates, including Respondent's wife, accepted corporate funds given in the form of bonuses. Respondent's wife accepted a \$2,000 bonus, of which \$1,000 consisted of a bonus to Respondent.

4. On the same date, Respondent made a \$1,000 contribution to the Roy Johnson for Congress Committee by means of a personal check.

5. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no person shall knowingly permit his name to be used to effect such a contribution.

V. Respondent knowingly permitted his name to be used to effect a \$1,000 contribution to the Roy Johnson for Congress Committee, in violation of 2 U.S.C. § 441f.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of four hundred dollars (\$400), 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

2040901410

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 enforceable.

FOR THE COMMISSION:

*Lawrence M. Noble*  
Lawrence M. Noble  
General Counsel

4/5/90  
Date

FOR THE RESPONDENT:

*Fred [unclear]*  
(Name)  
(Position)

2/16/90  
Date

22040901411

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Cynthia Perkins ) MUR 2797

CONCILIATION AGREEMENT

This matter was initiated by a referral from the Department of the Justice. The Federal Election Commission ("Commission") found reason to believe that Cynthia Perkins ("Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent, Cynthia Perkins is a person within the meaning of 2 U.S.C. § 431(11).

2. Perkins & Associates, Inc., incorporated under the laws of Alabama, is an advertising agency involved in political campaign work in both Alabama and Georgia.

3. On March 29, 1985, various employees of

22040901412

Perkins & Associates, including Respondent, accepted \$1,000 in corporate funds given in the form of a \$1,000 bonus.

4. On the same date, Respondent made a \$1,000 contribution to the Roy Johnson for Congress Committee by means of a personal check.

5. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no person shall knowingly permit his name to be used to effect such a contribution.

V. Respondent knowingly permitted her name to be used to effect a \$1,000 contribution to the Roy Johnson for Congress Committee, in violation of 2 U.S.C. § 441f.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of four hundred dollars (\$400), 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. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and

2040901413

implement the requirements contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

*Lawrence M. Noble (FP)*  
Lawrence M. Noble  
General Counsel

4-5-90  
Date

FOR THE RESPONDENT:

*John A. Roberts*  
(Name)  
(Position)

2-27-90  
Date

92040901414

90 APR -5 04:11

BEFORE THE FEDERAL ELECTION COMMISSION

**SENSITIVE**

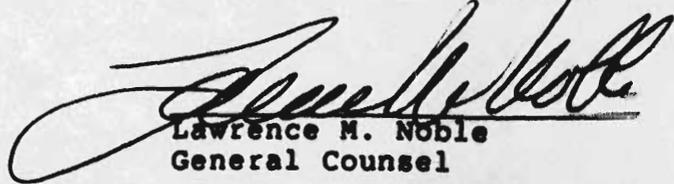
In the Matter of  
Grover Gene Hill

)  
) MUR 2797  
)

The Office of the General Counsel is prepared to close the investigation in this matter as to Respondent Grover Gene Hill, based on the assessment of the information presently available.

Date

4/4/90

  
Lawrence M. Noble  
General Counsel

22040901415

LAW OFFICE OF  
DRAKE, KNOWLES AND PIERCE  
1509 UNIVERSITY BOULEVARD  
TUSCALOOSA, ALABAMA 35401  
April 10, 1990

90 APR 13 PM 12: 20

RUSSELL JACKSON DRAKE  
RALPH I. KNOWLES, JR.  
JOSEPH G. PIERCE

MAILING ADDRESS  
POST OFFICE BOX 86  
TUSCALOOSA, ALABAMA 35402  
(205) 789-1234  
FAX (205) 782-9644

Michael Marinelli  
Federal Election Commission  
Washington, D.C. 20463

RE: MUR 279 7

Dear Mr. Marinelli:

Enclosed is my trust account check for \$1,200.00 made payable to the Federal Election Commission. This covers the civil fines of Ivy Hunter, Fred Hunter, and Joyce Miller Albright. Cynthia Perkins previously paid her fine by postal money order.

Sincerely,

  
Jack Drake

JD/dc

enclosure

22040901416

**DRAKE, KNOWLES AND PIERCE**  
ATTORNEYS AT LAW-TRUST ACCOUNT  
PO BOX 88 (205) 789-1234  
TUSCALOOSA, AL 35402

293

PAY TO THE ORDER OF Federal Election Commission \$ 1,200.<sup>00</sup>

4/10 1990 ~~00~~

Julius Hubbard and wife

DOLLARS  
DRAKE, KNOWLES AND PIERCE  
TRUST ACCOUNT

FOR cash for rent for the month of April 1990

ANSOUTH  
Fidelity Bank N.A.  
PO BOX 293  
TUSCALOOSA, AL 35402

11410604026

90 APR 19 AM 11:17

BEFORE THE FEDERAL ELECTION COMMISSION

**SENSITIVE**

In the Matter of )  
 ) MUR 2797  
Sheri Arnold Brown )

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement signed by counsel on behalf of Sheri Arnold Brown.

Following a referral from the Department of Justice, the Commission found reason to believe that Perkins & Associates, Inc. ("P&A"), the Alabama Education Association ("AEA"); and Joseph W. Perkins, Jr., president of P&A, had violated 2 U.S.C. §§ 441b and 441f. The Commission's findings were based upon the allegation that P&A had given several employees, or family members of employees, bonuses and gifts to enable them to make contributions of \$1,000 each to Alabama State Representative Roy Johnson's 1985 Congressional campaign.

The Commission also found reason to believe that Sheri Arnold Brown, an employee of P&A, had violated 2 U.S.C. § 441f. On January 18, 1990, the Commission agreed to enter into preprobable cause conciliation with Ms. Brown.

1. The Commission, on that same day agreed to enter into preprobable cause conciliation with five other respondents who also received funds from P&A in order to make their contributions. These were Ivy Hunter, Fred Hunter, Cynthia Perkins, Joyce Miller Albright, and Laurie Enslin. On March 30,

2040901418

92040901419

The agreement submitted contains no other changes from that approved by the Commission on January 18, 1990. A civil penalty check has not yet been received.

**II. RECOMMENDATIONS**

1. Accept the attached conciliation agreement with Sheri Arnold Brown and close the file as it pertains to her.

---

(Footnote 1 continued from previous page)  
1990, the Commission accepted signed conciliation agreements from the above respondents with civil penalties ranging from \$450 to \$350.

2. Approve the attached letter.

Lawrence M. Noble  
General Counsel

Date

4/18/90

BY:



Lois G. Lerner  
Associate General Counsel

**Attachments**

1. April 12, 1990 counteroffer by Sheri Arnold Brown.
2. Letter to Counsel

**Staff Assigned: Michael Marinelli**

92040901420

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 2797  
Sheri Arnold Brown )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 23, 1990, the Commission decided by a vote of 5-0 to take the following actions in MUR 2797:

1. Accept the conciliation agreement with Sheri Arnold Brown and close the file as it pertains to her, as recommended in the General Counsel's Report dated April 18, 1990.
2. Approve the letter, as recommended in the General Counsel's Report dated April 18, 1990.

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

Attest:

4-23-90  
Date

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

Received in the Secretariat: Thurs., April 19, 1990 11:17 a.m.  
Circulated to the Commission: Thurs., April 19, 1990 4:00 p.m.  
Deadline for vote: Mon., April 23, 1990 4:00 p.m.

22040901421



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

April 26, 1990

Pat Moran, Esquire  
Mitchell, Williams, Selig & Tucker  
1000 Savers Federal Building  
Capital Avenue at Spring Street  
Little Rock, Arkansas 72201

RE: MUR 2797  
Sheri Arnold Brown

Dear Mr. Moran:

On April 23, 1990, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your client. This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

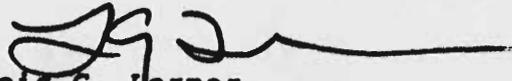
2040901422

Pat Moran, Esquire  
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel



BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

32040901423

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Sheri Arnold Brown

)  
)  
) MUR 2797  
)

CONCILIATION AGREEMENT

This matter was initiated by a referral from the Department of the Justice. The Federal Election Commission ("Commission") found reason to believe that Sheri Arnold Brown ("Respondent") violated 2 U.S.C. §441f.

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent, Sheri Arnold Brown, is a person within the meaning of 2 U.S.C. §431(11).

22040901424

2. Perkins & Associates, Inc., incorporated under the laws of Alabama, is an advertising agency involved in political campaign work in both Alabama and Georgia.

3. On March 29, 1985, various employees of Perkins & Associates, including Respondent, accepted \$1,000.00 in corporate funds given in the form of a \$1,000.00 bonus.

4. On the same date, Respondent made a \$1,000.00 contribution to the Roy Johnson for Congress Committee by means of a personal check.

5. Pursuant to 2 U.S.C. §441f, no person shall make a contribution in the name of another person and no person shall knowingly permit his name to be used to effect such a contribution.

V. Respondent knowingly permitted her name to be used to effect a \$1,000.00 contribution to the Roy Johnson for Congress Committee, in violation of 2 U.S.C. §441f.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Three Hundred and no/100 Dollars (\$300.00), pursuant to 2 U.S.C. §437g(a)(5)(A). Said penalty shall be payable within thirty (30) days from the date the Commission approves this Conciliation Agreement.

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

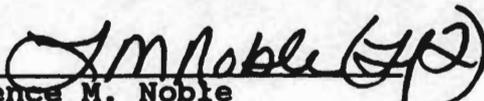
or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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. Respondent shall notify the Commission when she has completed the requirements contained in this agreement.

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:

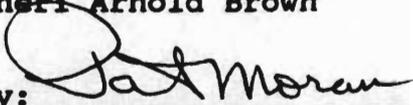
  
Lawrence M. Noble  
General Counsel

4/26/90  
Date

FOR THE RESPONDENT:

MITCHELL, WILLIAMS, SELIG & TUCKER  
1000 Savers Federal Building  
320 West Capitol  
Little Rock, Arkansas 72201  
(501) 688-8800

Attorneys for Respondent  
Sheri Arnold Brown

By:   
Pat Moran

4-6-90  
Date

22040901425

OGC 6188

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM



90 MAY 10 AM 8:26

LEGAL SERVICES  
OFFICE OF GENERAL COUNSEL

NATIONAL EDUCATION ASSOCIATION • 1201 16th St., N.W., Washington, D C 20036-3290 • (202) 822-7035

KEITH GEIGER, President  
ROBERT CHASE, Vice President  
ROXANNE E. BRADSHAW, Secretary-Treasurer

DON CAMERON, Executive Director

May 8, 1990

FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
90 MAY 10 PM 8:02

Michael Marinelli  
Federal Election Committee  
Washington, D.C. 20463

Re: MUR 2797  
Alabama Education Association

Dear Mr. Marinelli:

This is to advise you that I have terminated my employment with the National Education Association. Please direct all further correspondence in this matter solely to NEA General Counsel Robert H. Chanin.

Thank you.

Sincerely,  
  
Joy L. Koletsky

JK/jp

2040901426

066. 6306

N. MAURICE MITCHELL  
RICHARD A. WILLIAMS  
JOHN S. SELIG  
JOSEPH W. GELBERG  
W. CHRISTOPHER BARRIER  
JIM GUY TUCKER  
BYRON FREELAND  
KENT FOSTER  
ALLAN BATES  
PAT MORAN  
W. H. L. WOODYARD, III  
MICHAEL C. O'NEALLEY  
JOHN C. LESSEL  
DOAN FOSTER  
JEAN D. STOCKBURGER  
ANNE RITCHEY  
DEBRA K. BROWN  
EDWIN F. JACKSON  
SHERRY P. BARTLEY  
CRAIG WESTBROOK  
SUSAN GORDON GUNTER  
BOYCE E. HARR  
R. T. BEARD, III  
W. KIRBY LOCKHART  
MARCELLA J. TAYLOR  
TIMOTHY W. GROOMS  
ARK MONROE, III  
C. NICHOLAS THOMPSON

LAW OFFICES

MITCHELL, WILLIAMS, SELIG & TUCKER

1000 SAYERS FEDERAL BUILDING  
690 WEST CAPITOL AVENUE  
LITTLE ROCK, ARKANSAS 72201  
TELEPHONE 501-688-8800  
TELEFAX 501-688-8807

FREDERICK E. CAMPBELL  
ROBERT N. EUBANK, III  
WALTER G. WHEAT, JR.  
LYN PEOPLES PRINITY  
T. SCOTT CLEVELAND  
WYLLIE D. SMITH III  
RICHARD L. ANGEL  
EVERETTE L. MARTIN  
JEFFREY H. THOMAS  
COLEEN M. BARBER  
STUART P. MILLER  
PHILLIP A. PEEBLES  
ABRAHAM W. BOGGS  
LANCE R. MILLER  
DONALD L. RYAN II  
KYLE R. WILSON  
STEVEN T. BLASE

WRITERS DIRECT DIAL

(501) 688-8827

May 18, 1990

COUNSEL  
RICHARD C. JANS

OF COUNSEL  
HENRY E. SPENCER

90 MAY 23 PM 12:53

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAY 23 1990

Office of the General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

ATTN: Mr. Michael Marinelli

RE: MUR 2797; Sheri Arnold Brown

Dear Sir:

I enclose a money order from my client payable to the Federal Election Commission in the sum of Three Hundred Dollars (\$300.00) in full payment of the civil penalty assessed in this matter.

Please let me know if there are any further steps that should be taken regarding this file, otherwise, we shall consider the matter closed.

Sincerely yours,

MITCHELL, WILLIAMS, SELIG & TUCKER  
Attorneys for Sheri Arnold Brown

By 

Pat Moran

PM/as

Enclosure

cc: Ms. Sheri Arnold Brown

90 MAY 21 AM 11:16

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAY 21 1990

22040901427





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION COMMISSION  
SECRETARIAT

90 JUN 12 AM 10:07

**SENSITIVE**

June 12, 1990

**MEMORANDUM**

TO: The Commission  
FROM: Lawrence M. Noble  
General Counsel *[Signature]*  
SUBJECT: MUR 2797

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of no probable cause to believe were mailed on June 12, 1990. Following receipt of the respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to respondent

22040901429

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Grover Gene Hill ) MUR 2797  
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On August 24, 1988, the Office of the General Counsel received a referral from the Department of Justice arising from a 1986 criminal investigation of contributions made to the Roy Johnson for Congress Committee and bonuses received from Perkins and Associates by the makers of those contributions. Perkins & Associates, Inc. ("P&A"), incorporated under the laws of Alabama, is an advertising agency involved in political campaign work in both Alabama and Georgia. This investigation had determined that on March 29, 1985, Joseph W. Perkins, Jr., president and owner of P&A, had \$10,000 in cash withdrawn from a corporate checking account. That sum was then allegedly distributed by Harry Ferguson, Jr., the business manager of ("P&A"), to employees of P&A. On March 29, 1985, as reported in the Roy Johnson for Committee's 1985 Mid-Year Report, those same ten employees each made a \$1,000 contribution to the 1986 Alabama Congressional campaign of Roy Johnson.

Respondent, Grover Gene Hill, is the uncle of Roy Johnson and a friend of Joseph W. Perkins, Jr. The Roy Johnson for Congress Committee's 1985 Mid-Year Report states that Grover Gene Hill made a \$1,000 contribution on June 28, 1985, to the Roy Johnson campaign. Bank records subpoenaed by the Justice Department

22040901430

indicate that a \$1,000 deposit was made by Mr. Hill into his checking account on July 2, 1985.

Based on the Justice Department referral, the Federal Election Commission found reason to believe on November 30, 1988 that Respondent had violated 2 U.S.C. § 441f. Questions were mailed to Mr. Hill on December 8, 1988 and a response was received on January 25, 1989.

In his response to the Commission's questions, Mr. Hill has denied any employment with P&A or that there was any solicitation prior to the making of his contribution to his nephew's campaign. In explaining the contribution, Mr. Hill affirms that the \$1,000 to make contributions came from personal funds. In an affidavit in response to Commission questions Mr. Hill states:

At the time [of the contribution] I was unmarried and worked a lot of overtime. It was my habit at the time to keep large sums of cash on my person or at home. I deposited \$1,000 of my own money into my checking account and wrote a check to the Johnson campaign.<sup>1</sup>

## II. ANALYSIS

Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no person shall knowingly permit his name to be used to effect such a contribution.

Mr. Hill was not an employee of P&A either before or at the time he made his June 28, 1985 contribution to the Roy Johnson

---

1. Mr. Hill has declared in a sworn statement that in 1985 he paid income taxes on a number he states is taken from his 1985 tax return. In a February 2, 1990 conversation with staff of this Office, Mr. Hill's attorney stated that Mr. Hill held a position with B.F. Goodrich at the time the contribution was made.

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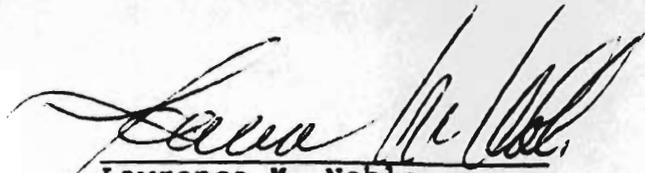
for Congress Committee. This Office notes that Mr. Hill's contribution was made almost 4 months after the contributions that were related to P&A's March 29, 1989 bonus plan and that, unlike the employees of P&A, he is a close relative of the candidate. Further, there is no evidence in the information provided in the Justice Department referral, or in the information obtained through this Office's investigation, that Mr. Hill received any compensation from P&A to make the contribution. Thus, the available evidence does not indicate that there was a violation of 2 U.S.C. § 441f on his part. The Office of the General Counsel recommends that the Commission find no probable cause to believe that Grover Gene Hill violated 2 U.S.C. § 441f.

III. GENERAL COUNSEL'S RECOMMENDATION(S)

Find no probable cause to believe that Grover Gene Hill violated 2 U.S.C. § 441f.

Date

6/1/90

  
 Lawrence M. Noble  
 General Counsel

22040901432



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 12, 1990

Mr. Jack Drake, Esquire  
Drake, Knowles and Pierce  
1509 University Boulevard  
Tuscaloosa, AL 35401

RE: MUR 2797  
Grover Gene Hill

Dear Mr. Drake:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on December 8, 1988, the Federal Election Commission found reason to believe that your client, Grover Gene Hill, violated 2 U.S.C. § 441f and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

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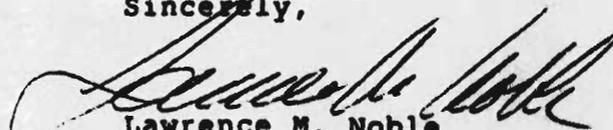
Jack Drake, Esquire  
Page 2

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Michael Marinelli, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble  
General Counsel

Enclosure  
Brief

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RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

90 JUN 26 PM 1:30

LAW OFFICE OF  
DRAKE, KNOWLES AND PIERCE  
1808 UNIVERSITY BOULEVARD  
TUSCALOOSA, ALABAMA 35401  
June 22, 1990

RUSSELL JACKSON DRAKE  
RALPH I KNOWLES, JR.  
JOSEPH G. PIERCE

MAILING ADDRESS  
POST OFFICE BOX 88  
TUSCALOOSA, ALABAMA 35402  
(205) 759-1234  
FAX # (205) 752-9644

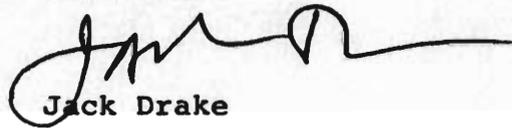
Lawrence Noble  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

RE: MUR 2797  
Grover Gene Hill

Dear Mr. Noble:

I do not desire to file a brief on behalf of Grover Gene Hill. I am satisfied with the brief and recommendation of the General Counsel's office.

Sincerely,



Jack Drake

JD/dc

cc: The Federal Election Commission

22040901435

90 JUN 26 PM 3:13  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

90 SEP 26 AM 9:26

September 5, 1990

POSTMASTER  
Tuscaloosa, AL 35476

RE: NUR 2797

Dear Sir or Madam:

Pursuant to 39 C.F.R. § 265(d)(1), we request that you provide us with the present address of Mr. Fred DeLoach. According to our records, the address of Mr. Fred DeLoach, as of June 1989, was 1040 Fairfax Drive, Northport Tuscaloosa AL 35476.

Under 39 C.F.R. § 265.8e(8)(iii), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please call Michael Marinelli, the attorney assigned to this matter, at (202) 376-8200.

Thank you for your assistance.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Berner  
Associate General Counsel

Enclosure  
Envelope

1040 FAIRFAX Drive  
TUSCALOOSA AL  
35406

92040901436

90 SEP 26 PM 2:54

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 11, 1990

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Fred DeLoach  
1040 Fairfax Drive, Northport  
Tuscaloosa AL 35406

RE: MUR 2797

Dear Mr. DeLoach

Enclosed is a copy of a letter and questions mailed to you on December 8, 1989 but returned to us by the postal service. Please submit your response to the enclosed questions within fifteen days.

Should you have any questions or require any further information, please call Michael Marinelli, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lois G. Lerner  
Associate General Counsel

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90 NOV 19 AM 11:47

BEFORE THE FEDERAL ELECTION COMMISSION

**SENSITIVE**

In the Matter of  
Grover Gene Hill

)  
) MUR 2797  
)

**NOV 27 1990**

GENERAL COUNSEL'S REPORT

**EXECUTIVE SESSION**

I. BACKGROUND

On November 30, 1988, the Commission found reason to believe that Grover Gene Hill violated 2 U.S.C. § 441f. The finding was based on allegations contained in an August 24, 1988 referral from the Department of Justice that Mr. Hill's June 28, 1985 \$1,000 contribution to the 1986 Roy Johnson Congressional Campaign was paid for by Perkins & Associates, Inc., an Alabama corporation. Questions were mailed to Mr. Hill and a response was received. Following the conclusion of the investigation, this Office mailed to Mr. Hill's counsel, a brief recommending that the Commission find no probable cause to believe that respondent violated 2 U.S.C. § 441f. On June 26, 1990, this Office received a response from counsel for Mr. Hill.

II. ANALYSIS (the General Counsel's Brief is incorporated herein by reference)

Counsel for Mr. Hill in his response declined to file a brief on behalf of Mr. Hill but stated agreement with the position taken by this Office. Attachment 1.

As stated in the General Counsel's Brief, it is the view of this Office that the available evidence does not indicate that Mr. Hill received compensation from Perkins & Associates for his June 28, 1985 \$1,000 contribution. Therefore, the Office of the General Counsel recommends that the Commission find no probable

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cause to believe that Grover Gene Hill violated 2 U.S.C. § 441f and close the file as to this respondent.

**III. RECOMMENDATIONS**

1. Find no probable cause to believe that Grover Gene Hill violated 2 U.S.C. § 441f and close the file as it pertains to him.
2. Approve the appropriate letter.

          
Date 6/16/90

          
Lawrence N. Noble  
General Counsel

Staff Assigned: Michael Marinelli

Attachment  
June 16, 1990 response by Mr. Hill.

22040901439

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Grover Gene Hill

)  
)  
)

MUR 2797

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on November 27, 1990, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2797:

1. Find no probable cause to believe that Grover Gene Hill violated 2 U.S.C. § 441f and close the file as it pertains to him.
2. Approve the appropriate letter as recommended in the General Counsel's report dated November 16, 1990.

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

Attest:

11-28-90  
Date

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

92040901440



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 6, 1990

Mr. Jack Drake, Esquire  
Drake, Knowles and Pierce  
1509 University Boulevard  
Tuscaloosa, AL 35401

RE: MUR 2797  
Grover Gene Hill

Dear Mr. Drake:

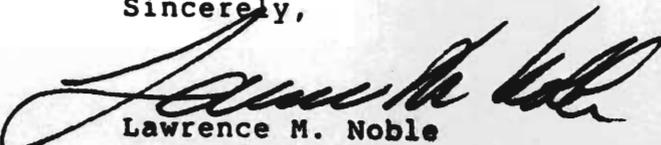
This is to advise you that on November 27, 1990, the Federal Election Commission found that there is no probable cause to believe your client, Grover Gene Hill, violated 2 U.S.C. § 441f. Accordingly, the file in this matter has been closed as it pertains to Grover Gene Hill.

The file will be made part of the public record within 30 days after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

  
Lawrence M. Noble  
General Counsel

22040901441



P.O. Box 100699, Fort Lauderdale, Florida 33310 (305) 941-7802  
(800) 327-8699

Membership Number: 6301  
Member Since: 1986

03/26/1991

Mr. Michael Marinelli,  
Federal Election Commission,  
Office of General Counsel,  
999 B St. N.W.,  
Washington, DC 20463

Dear Mr. Marinelli:

Re: DELOACH, CLYDE FREDRICK  
Your File: File # MOR 2797  
Case No: 58196  
Listing Expired: 27 FEB 1991

Using our Regular Service skip-tracing procedures, we have been unsuccessful, as of this date, in locating the whereabouts of the subject listed above. As per your request, we have ceased all efforts in locating this subject at no charge to you.

It is standard procedure to shred all paperwork included within this file for the protection of our members. Should you, at a later date, want us to reopen this case, it would be necessary to resend all documentation regarding this subject.

As always, we thank you for using PEOPLE LOCATOR, INC., and we look forward to servicing you again in the near future.

If I can be of any further assistance, please feel free to contact me at 1-800-327-8699.

Sincerely,

Melody E. Fleri  
Vice President/General Manager  
PEOPLE LOCATOR, INC.

RECEIVED  
FEDERAL ELECTION COMMISSION  
91 APR 19 PM 4:04

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P.O. Box 100698, Fort Lauderdale, Florida 33310 (305) 941-7802  
(800) 327-8699

Membership Number: 6301  
Member Since: 1986

03/26/1991

Mr. Michael Marinelli,  
Federal Election Commission,  
Office of General Counsel,  
999 E St. N.W.,  
Washington, DC 20463

Dear Mr. Marinelli:

Re: HUDSON, W. LEE  
Your File: File # MOR 2797  
Case No: 58197  
Listing Expired: 27 FEB 1991

Using our Regular Service skip-tracing procedures, we have been unsuccessful, as of this date, in locating the whereabouts of the subject listed above. As per your request, we have ceased all efforts in locating this subject at no charge to you.

It is standard procedure to shred all paperwork included within this file for the protection of our members. Should you, at a later date, want us to reopen this case, it would be necessary to resend all documentation regarding this subject.

As always, we thank you for using PEOPLE LOCATOR, INC., and we look forward to servicing you again in the near future.

If I can be of any further assistance, please feel free to contact me at 1-800-327-8699.

Sincerely,

Melody E. Fleri  
Vice President/General Manager  
PEOPLE LOCATOR, INC.

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FEDERAL ELECTION COMMISSION  
91 APR 19 PM 2:51

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LAW OFFICE OF  
DRAKE AND PIERCE  
1509 UNIVERSITY BOULEVARD  
TUSCALOOSA, ALABAMA 35401

RUSSELL JACKSON DRAKE  
JOSEPH G. PIERCE

October 17, 1991

MAILING ADDRESS  
POST OFFICE BOX 88  
TUSCALOOSA, ALABAMA 35402  
(205) 789-1254  
FAX (205) 782-8844

Tony Buckley  
Federal Election  
Commission  
999 E Street, NW  
Washington, DC 20463

RE: MUR2797

Dear Mr. Buckley:

This is a follow up to our telephone conversation of October 16, 1991 in which I informed you that I still represent Perkins & Associates, Inc., Joseph W. Perkins, and Harry Ferguson in this matter. I am reasonably confident that Perkins & Associates, Inc. has been dissolved. It is certainly defunct and no longer operational. So far as I have been able to determine, all of the assets of Perkins & Associates, Inc., including its accounts receivable, were turned over to AmSouth Bank of Tuscaloosa in settlement of money owed to the bank.

I also indicated to you that Harry Ferguson is a retired military enlisted man. Joe Perkins is now a graduate student at the University of Alabama. Neither person is a man of substantial means.

Both Mr. Ferguson and Mr. Perkins would be amenable to entering into some conciliation discussions with the Commission. If, in fact, Perkins & Associates, Inc. has been dissolved, then there would, of course, be no reason for that company to be involved in any conciliation discussions.

I look forward to hearing from you.

Sincerely,

  
Jack Drake

JD/st

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FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
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OFFICE OF GENERAL COUNSEL  
91 OCT 22 PM 3:06



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WASHINGTON, D.C. 20463

RECEIVED  
F.E.C.  
SECRETARIAT

October 28, 1991

**SENSITIVE**

**MEMORANDUM**

**TO:** The Commission  
**FROM:** Lawrence M. Noble *LMN*  
General Counsel  
**SUBJECT:** MUR 2797  
Alabama Education Association

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of no probable cause to believe were mailed on October 28, 1991. Following receipt of the respondent's reply to this notice, this Office will make a further report to the Commission.

**Attachments**

1. Brief
2. Letter to respondent

92040901445

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Alabama Education Association ) MUR 2727

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On August 24, 1988, the Office of the General Counsel received a referral from the Department of Justice arising from a 1986 criminal investigation of contributions made to the Roy Johnson for Congress Committee (the "Committee") and bonuses received from Perkins and Associates, Inc. ("P&A") by the makers of those contributions. P&A, incorporated under the laws of Alabama, is an advertising agency involved in political campaign work in both Alabama and Georgia. The Justice Department had determined that on March 29, 1985, Joseph W. Perkins, Jr., president and owner of P&A, had \$10,000 in cash withdrawn from a corporate checking account. That sum was then allegedly distributed by Harry Ferguson, Jr., the business manager of P&A, to employees of P&A. According to the Committee's 1985 Mid-Year Report, those same ten employees each made a \$1,000 contribution to the 1986 Alabama Congressional campaign of Roy Johnson on March 29, 1985.

The Justice Department referral [indicated that]

Harry Ferguson, Business Manager, called into his office at Perkins and Associates and told him that the office needed to

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return some money back to Roy Johnson. Ferguson stated that Perkins and Associates had been given \$10,000.00 for Johnson's campaign and that Mr. Johnson did not want the money to stay with Perkins and Associates, that he wanted it back in his campaign fund. Ferguson also told them that the money could not be returned as a lump sum payment to the Johnson campaign, that it needed to be done in smaller amounts.... also stated that Ferguson told him that the Alabama Education Association ... was the contributor of the \$10,000 to the Johnson for Congress campaign.

Based on the Justice Department referral, the Commission found reason to believe that the Alabama Education Association ("AEA") had violated 2 U.S.C. § 441f. Questions were mailed to the AEA, P&A and Harry Ferguson, addressing the issue of AEA's involvement in P&A's bonus program. Responses were received from all three parties.

The AEA is a labor organization within the definition of 2 U.S.C. § 441b(b)(1) and a nonprofit corporation organized under the laws of Alabama. In its response, the AEA has stated that it has had business relations with P&A during the past eight years. According to the AEA, the services provided by P&A dealt with "state political projects" and consisted of "advice on state legislative matters, state political advertisements, polling relating to state educational and political issues, and other political advice."<sup>1</sup>

AEA has denied involvement in P&A's violations of 2 U.S.C. § 441f. It has argued that any payments it made to P&A were

---

1. Commission records do not list a political action committee maintained by the AEA. Reports filed by the Johnson committee do not indicate that it received a contribution from either the AEA or NEA-PAC, the political action committee maintained by the National Education Association.

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pursuant to legitimate business transactions. Mr. Ferguson, in his responses to Commission questions, has denied any contact with the AEA and has stated that the funds for the bonuses came from "working capital of Perkins and Associates, Inc." Mr. Ferguson also states that "[t]he money [for the bonuses] did not come from the Alabama Education Association."

Both AEA and P&A have produced documentation of the payments made by AEA during 1985, one of which was a \$10,000 payment to P&A made near the time P&A bonuses were made. According to a January 29, 1985 invoice, copies of which were provided both by AEA and P&A, this payment was "[f]or professional services rendered including consulting fees." Bank records provided by AEA indicate that payment was made to P&A by means of two \$5,000 checks dated February 14, 1985. Part of the work product for which these payments were apparently made has been provided by P&A. The submission by P&A includes the first three pages of a document dated April 1985 marked "confidential" which is entitled "Statewide Survey of Voter Opinions." These three pages summarize the results of the telephone survey

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conducted on March 1, 1985 and discuss the methodology used in making the survey.

According to the summary, the survey concerned the public perception of the AEA, public opinion on state issues and the level of support enjoyed by various candidates for state wide offices such as governor and attorney general. The only Federal election mentioned in the summary as included in the survey was the 1986 Senate Race. Neither Roy Johnson's name nor the name of any other congressional candidate appears in the summary.

2. ISSUE DEVELOPMENT

Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no person shall knowingly permit his name to be used to effect such a contribution.

This Office notes that while the referral from the Department of Justice contained statements on AEA's involvement in P&A's violations of Section 441f, the available evidence does not substantiate these statements. Information provided by AEA and P&A adequately explains the nature of the \$10,000 payment made by AEA to P&A on February 14, 1990. This Office notes that it is possible that the working capital of P&A used to make the \$10,000 March 29, 1985 bonuses may have included part or all of the funds paid by the AEA for P&A services. However, there is no evidence in hand that the AEA directly provided funds to P&A

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with the intention or knowledge that these funds would be used to make the March 29, 1985 bonuses.

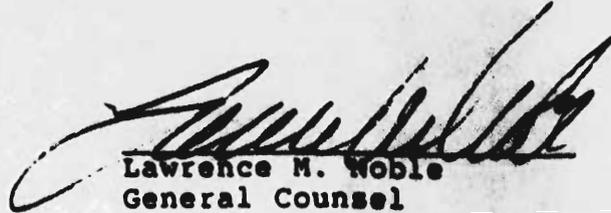
Thus, the available evidence does not indicate that there was a violation of 2 U.S.C. § 441f by the AEA. Accordingly, the Office of the General Counsel recommends that the Commission find no probable cause to believe that the Alabama Education Association violated 2 U.S.C. § 441f.

**III. GENERAL COUNSEL'S RECOMMENDATION**

1. Find no probable cause to believe that the Alabama Education Association violated 2 U.S.C. § 441f.

Date

10/25/91

  
Lawrence M. Noble  
General Counsel

92040901450

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F.E.C.  
SECRETARIAT

91 OCT 23 AM 11:40

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Alabama Education Association ) MUR 2797

**SENSITIVE**

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to the Alabama Education Association, based on the assessment of the information presently available.

10-22-91  
Date

Lawrence M. Noble (7/2)  
Lawrence M. Noble  
General Counsel

92040901451



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 28, 1991

Robert H. Chanin, Esquire  
Office of General Counsel  
National Education Association  
1201 16th Street, N.W.  
Washington D.C. 20036

RE: MUR 2797  
Alabama Education Association

Dear Mr. Chanin:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission found reason to believe that your client, the Alabama Education Association, violated 2 U.S.C. § 441f, and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be

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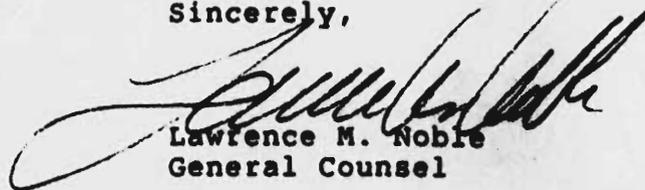
Robert H. Chanin, Esq.  
Page 2

demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Tony Buckley, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,



Lawrence M. Noble  
General Counsel

Enclosure  
Brief

92040901453

06C 3856



LEGAL SERVICES  
OFFICE OF GENERAL COUNSEL

NATIONAL EDUCATION ASSOCIATION • 1201 16th St., N.W., Washington, D C 20036-3290 • (202) 822-7035

KEITH GEIGER, President  
ROBERT CHASE, Vice President  
MARILYN MONAHAN, Secretary-Treasurer

DON CAMERON, Executive Director

November 4, 1991

Lawrence M. Noble  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2797  
Alabama Education Association

Dear Mr. Noble:

We have your October 28, 1991 letter in which you indicate that your office "is prepared to recommend that the [Federal Election] Commission find no probable cause to believe that a violation" of the Federal Election Campaign Act was committed by our client, the Alabama Education Association, in the above-referenced matter. After reviewing the brief that your office intends to submit to the Commission, we see no need for an additional filing by the Alabama Education Association.

We appreciate your cooperation in this matter.

Sincerely,

Robert H. Chanin  
Counsel for Alabama  
Education Association

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OFFICE OF GENERAL COUNSEL  
91 NOV -7 PM 3:21

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**SENSITIVE**

November 15, 1991

**MEMORANDUM**

**TO:** The Commission  
**FROM:** Lawrence M. Noble *LMN*  
General Counsel  
**SUBJECT:** MUR 2797  
Alabama Education Association

Attached for the Commission's review is a supplemental brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter regarding the previously-found violation of 2 U.S.C. § 441b. A copy of this supplemental brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission findings of no probable cause to believe as to the apparent violation of 2 U.S.C. §§ 441b and 441f were mailed on November 15, 1991. A brief and letter addressing the previously-found violation of 2 U.S.C. § 441f were mailed on October 28, 1991. Following receipt of the respondent's reply to the most recent notice, this Office will make a further report to the Commission.

**Attachments**

1. Brief
2. Letter to respondent

92040901455

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Alabama Education Association ) MUR 2797

GENERAL COUNSEL'S SUPPLEMENTAL BRIEF

I. STATEMENT OF THE CASE

On August 24, 1988, the Office of the General Counsel received a referral from the Department of Justice arising from a 1986 criminal investigation of contributions made to the Roy Johnson for Congress Committee (the "Committee") and bonuses received from Perkins and Associates, Inc. ("P&A") by the makers of those contributions. P&A, incorporated under the laws of Alabama, is an advertising agency involved in political campaign work in both Alabama and Georgia. The Justice Department had determined that on March 29, 1985, Joseph W. Perkins, Jr., president and owner of P&A, had \$10,000 in cash withdrawn from a corporate checking account. That sum was then allegedly distributed by Harry Ferguson, Jr., the business manager of P&A, to employees of P&A. According to the Committee's 1985 Mid-Year Report, those same ten employees each made a \$1,000 contribution to the 1986 Alabama Congressional campaign of Roy Johnson on March 29, 1985.

The Justice Department referral [indicated that]

Harry Ferguson, Business Manager, called  
into his office at Perkins and  
Associates and told him that the office needed to

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return some money back to Roy Johnson. Ferguson stated that Perkins and Associates had been given \$10,000.00 for Johnson's campaign and that Mr. Johnson did not want the money to stay with Perkins and Associates, that he wanted it back in his campaign fund. Ferguson also told them that the money could not be returned as a lump sum payment to the Johnson campaign, that it needed to be done in smaller amounts.... also stated that Ferguson told him that the Alabama Education Association ... was the contributor of the \$10,000 to the Johnson for Congress campaign.

Based on the Justice Department referral, the Commission found reason to believe that the Alabama Education Association ("AEA") had violated 2 U.S.C. § 441b. Questions were mailed to the AEA, P&A and Harry Ferguson, addressing the issue of AEA's involvement in P&A's bonus program. Responses were received from all three parties.

The AEA is a labor organization within the definition of 2 U.S.C. § 441b(b)(1) and a nonprofit corporation organized under the laws of Alabama. In its response, the AEA has stated that it has had business relations with P&A during the past eight years. According to the AEA, the services provided by P&A dealt with "state political projects" and consisted of "advice on state legislative matters, state political advertisements, polling relating to state educational and political issues, and other political advice."<sup>1</sup>

AEA has denied involvement in P&A's violations of 2 U.S.C. § 441f. It has argued that any payments it made to P&A were

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1. Commission records do not list a political action committee maintained by the AEA. Reports filed by the Johnson committee do not indicate that it received a contribution from either the AEA or NEA-PAC, the political action committee maintained by the National Education Association.

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pursuant to legitimate business transactions. Mr. Ferguson, in his responses to Commission questions, has denied any contact with the AEA and has stated that the funds for the bonuses came from "working capital of Perkins and Associates, Inc."

Mr. Ferguson also states that "[t]he money [for the bonuses] did not come from the Alabama Education Association."

Both AEA and P&A have produced documentation of the payments made by AEA during 1985, one of which was a \$10,000 payment to P&A made near the time P&A bonuses were made. According to a January 29, 1985 invoice, copies of which were provided both by AEA and P&A, this payment was "[f]or professional services rendered including consulting fees." Bank records provided by AEA indicate that payment was made to P&A by means of two \$5,000 checks dated February 14, 1985. Part of the work product for which these payments were apparently made has been provided by P&A. The submission by P&A includes the first three pages of a document dated April 1985 marked "confidential" which is entitled "Statewide Survey of Voter Opinions." These three pages summarize the results of the telephone survey

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conducted on March 1, 1985 and discuss the methodology used in making the survey.

According to the summary, the survey concerned the public perception of the AEA, public opinion on state issues and the level of support enjoyed by various candidates for state wide offices such as governor and attorney general. The only Federal election mentioned in the summary as included in the survey was the 1986 Senate Race. Neither Roy Johnson's name nor the name of any other congressional candidate appears in the summary.

II. ANALYSIS

Pursuant to 2 U.S.C. § 441b(a), it is illegal for any corporation or labor organization to make a contribution or expenditure in connection with any Federal election.

This Office notes that while the referral from the Department of Justice contained statements on AEA's involvement in P&A's violations of Section 441f, the available evidence does not substantiate these statements. Information provided by AEA and P&A adequately explains the nature of the \$10,000 payment made by AEA to P&A on February 14, 1990. This Office notes that it is possible that the working capital of P&A used to make the \$10,000 March 29, 1985 bonuses may have included part or all of the funds paid by the AEA for P&A services. However, there is no evidence in hand that the AEA directly provided funds to P&A with the intention or knowledge that these funds would be used to make the March 29, 1985 bonuses.

Thus, the available evidence does not indicate that there was a violation of 2 U.S.C. § 441b by the AEA. Accordingly, the

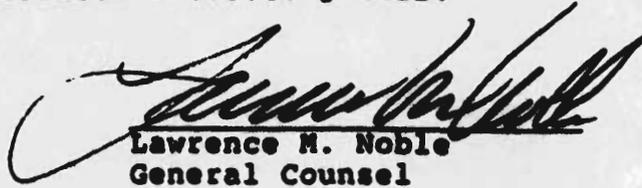
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Office of the General Counsel recommends that the Commission find no probable cause to believe that the Alabama Education Association violated 2 U.S.C. § 441b.

**III. GENERAL COUNSEL'S RECOMMENDATION**

1. Find no probable cause to believe that the Alabama Education Association violated 2 U.S.C. § 441b.

11/15/91  
Date

  
Lawrence M. Noble  
General Counsel

92040901460



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 15, 1991

Robert H. Chanin, Esquire  
Office of General Counsel  
National Education Association  
1201 16th Street, N.W.  
Washington D.C. 20036

RE: MUR 2797  
Alabama Education Association

Dear Mr. Chanin:

On October 28, 1991, this Office mailed to you the General Counsel's Brief in the above-captioned matter. At that time, we informed you that this Office was prepared to recommend to the Federal Election Commission that it find no probable cause to believe that your client, the Alabama Education Association, violated 2 U.S.C. § 441f. That General Counsel's Brief, however, did not address the fact that the Commission had also found that there was reason to believe the Alabama Education Association had violated 2 U.S.C. § 441b.

In addition to being prepared to recommend that the Commission find no probable cause to believe a violation of 2 U.S.C. § 441f has occurred, this Office is also prepared to recommend that the Commission find no probable cause to believe that a violation of 2 U.S.C. § 441b has occurred.

The Commission may or may not approve the General Counsel's recommendations. Submitted for your review is a supplemental brief which states the position of the General Counsel on the legal and factual issues regarding a Section 441b violation. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the briefs of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's Brief, the General Counsel's Supplemental Brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe violations have occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be

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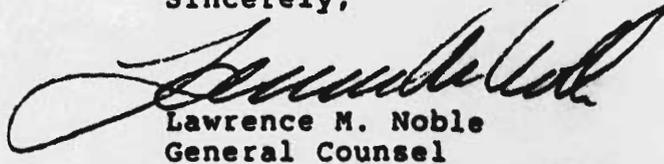
Robert H. Chanin, Esquire  
Page 2

demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Tony Buckley, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,



Lawrence M. Noble  
General Counsel

Enclosure  
Supplemental Brief

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nea

NATIONAL EDUCATION ASSOCIATION

06-C 3588

Keith Geiger, President  
Robert Chase, Vice President  
Marilyn Monahan, Secretary-Treasurer

1201 16th Street, N.W.  
Washington, D.C. 20036-3290  
(202) 822-7035 Fax (202) 822-7033

Don Cameron, Executive Director

LEGAL SERVICES  
OFFICE OF GENERAL COUNSEL

November 27, 1991

Lawrence M. Noble  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2797  
Alabama Education Association

Dear Mr. Noble:

We have your November 15, 1991 letter regarding the above MUR in which you indicate that, in addition to recommending that the Federal Election Commission find no probable cause to believe that our client, the Alabama Education Association ("AEA"), violated 2 U.S.C. § 441f, your office also will "recommend that the Commission find no probable cause to believe that" the AEA violated 2 U.S.C. § 441b. After reviewing the supplemental brief that your office intends to submit to the Commission, we see no need for an additional filing by the AEA.

We appreciate your cooperation in this matter.

Sincerely,

Robert H. Chanin  
Counsel for Alabama  
Education Association

RHC/jp

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BEFORE THE FEDERAL ELECTION COMMISSION

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In the Matter of )  
 )  
Alabama Education Association ) MUR 2797

**SENSITIVE**  
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GENERAL COUNSEL'S REPORT

**EXECUTIVE SESSION**

I. BACKGROUND

On August 24, 1988, the Office of the General Counsel received a referral from the Department of Justice arising from a 1986 criminal investigation of \$10,000 in contributions made to the Roy Johnson for Congress Committee (the "Committee") and of bonuses received from Perkins & Associates, Inc. ("P&A") by the makers of those contributions. The Alabama Education Association (the "AEA") was cited in one FBI interview as the source of the \$10,000.

Based on the Justice Department referral, the Commission, inter alia, found reason to believe that the Alabama Education Association had violated 2 U.S.C. §§ 441b and 441f by making corporate contributions and by making contributions in the names of others. Questions were mailed to the AEA, P&A and Harry Ferguson, the business manager of P&A, addressing the issue of AEA's involvement in P&A's bonus program. Responses were received from all three parties.

On October 28, 1991, this Office informed the AEA of our intention to recommend to the Commission that it find no probable cause to believe that the AEA violated 2 U.S.C. § 441f. On November 15, 1991, this Office informed the AEA of our intention to further recommend that the Commission find no reason to believe that the AEA violated 2 U.S.C. § 441b. On

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November 7 and December 2, 1991, this Office received letters from counsel for the AEA stating that, after reviewing our briefs, they saw no need for additional filings. Attachment 1.

II. ANALYSIS (The General Counsel's Brief and the General Counsel's Supplemental Brief are incorporated herein by reference.)

Pursuant to 2 U.S.C. § 441b(a), it is illegal for any corporation or labor organization to make a contribution or expenditure in connection with any Federal election. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no person shall knowingly permit his name to be used to effect such a contribution.

The AEA is a labor organization within the definition of 2 U.S.C. § 441b(b)(1) and a nonprofit corporation organized under the laws of Alabama. In its response to the Commission's reason to believe findings, the AEA stated that it has had business relations with P&A during the past eight years. According to the AEA, the services provided by P&A dealt with "state political projects" and consisted of "advice on state legislative matters, state political advertisements, polling relating to state educational and political issues, and other political advice."<sup>1</sup>

The AEA has also denied involvement in P&A's violations of 2 U.S.C. § 441f, arguing that that any payments it made to P&A

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1. Commission records do not list a political action committee maintained by the AEA. Reports filed by the Johnson committee do not indicate that it received a contribution from either the AEA or NEA-PAC, the political action committee maintained by the National Education Association.

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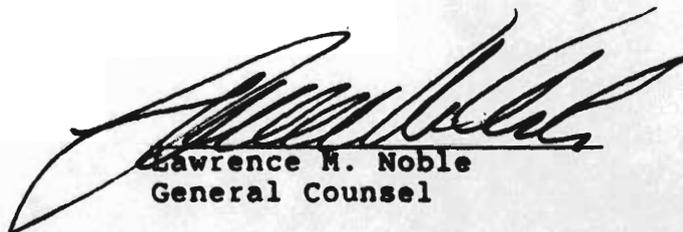
were pursuant to legitimate business transactions. Information provided by AEA and P&A adequately explains the nature of the \$10,000 payment made by AEA to P&A on February 14, 1990. This Office notes that it is possible that the working capital of P&A used to make the bonuses may have included part or all of the funds paid by the AEA for P&A services. However, there is no evidence in hand that the AEA directly provided funds to P&A with the intention or knowledge that these funds would be used to make the bonuses.

Thus, the available evidence does not indicate that there were violations of 2 U.S.C. §§ 441b and 441f by the AEA. Accordingly, the Office of the General Counsel recommends that the Commission find no probable cause to believe that the Alabama Education Association violated 2 U.S.C. §§ 441b and 441f, and that it approve the appropriate letter and close the file as it pertains to this respondent.

**III. RECOMMENDATIONS**

1. Find no probable cause to believe that the Alabama Education Association violated 2 U.S.C. §§ 441b and 441f.
2. Approve the appropriate letter.
3. Close the file as it pertains to the Alabama Education Association.

12/9/91  
Date

  
Lawrence M. Noble  
General Counsel

Attachment  
Letters from Respondent

Staff Assigned: Tony Buckley

92040901466



P.O. Box 100699, Fort Lauderdale, Florida 33310 (305) 941-7802  
(800) 327-8699

Membership Number: 6301  
Member Since: 1986

11/29/1990

Mr. Michael Marinelli,  
Federal Election Commission,  
Office of General Counsel,  
999 E St. N.W.,  
Washington, DC 20463

*Classic Laid*

Dear Mr. Marinelli:

Re: HUDSON, W. LEE  
Your File: File # MOR 2797  
Case No: 58197  
Listing Expires: 27 FEB 1991  
Locate Fee: \$195.00

We acknowledge with thanks your REGULAR locate request named herein. Our guaranteed "No Result - No Fee" search has now commenced and we again confirm that your only obligation is to allow us our exclusive three month assignment period to handle this case on your behalf. Early cancellations are subject to a handling charge equal to one half of our normal fee.

Upon a successful locate occurring you will be advised, by telephone of the subject's new residential address and/or place of employment. Our invoice for services rendered will also contain written verification of the information provided by telephone. Unless otherwise arranged, invoices are due and payable upon receipt. Overdue interest is charged at the rate of 1.5% per month from date of invoice.

If additional information comes to your attention that you feel could help us in our search, please call our customer service department toll free 1-800-426-9850 or FAX the new information to (305) 941-2399.

You may expect to hear from us further on this matter in the near future.

Yours truly,

PEOPLE LOCATOR, INC.

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DRAKE AND PIERCE

1508 UNIVERSITY BOULEVARD  
TUSCALOOSA, ALABAMA 35401

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December 9, 1991

RUSSELL JACKSON DRAKE  
JOSEPH G. PIERCE

MAILING ADDRESS  
POST OFFICE BOX 66  
TUSCALOOSA, ALABAMA 35408  
(205) 782-1234  
FAX (205) 782-9644

Tony Buckley  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

RE: MUR2797

Dear Mr. Buckley:

This is a follow-up to our telephone conversation of a few days ago in which you asked for additional information about Perkins & Associates, Inc. I am advised that Perkins & Associates, Inc. ceased doing business in any capacity on January 31, 1990. At that time, all of the corporate assets, including its accounts receivable, had been assigned to AmSouth Bank of Tuscaloosa.

The President and Chief Executive Officer of Perkins & Associates, Inc., was Joseph W. Perkins, Jr. After closing his business in 1990, Mr. Perkins went back to graduate school at the University of Alabama to work on his Ph.d. Mr. Perkins does not maintain an office, but does do free lance consulting work in his individual capacity out of his house.

Perkins & Associates, Inc. has not been dissolved and, in a technical sense, is still a legal entity. It was not dissolved because of the cost of dissolution. Perkins & Associates, Inc. was advised by another lawyer not to dissolve and not to file for bankruptcy. It is my understanding that the other lawyer felt there was no need to take those actions since everything owned by the corporation was, in fact, owned by AmSouth Bank. The corporation has no bank account, no assets, no employees and, for all practical purposes, no longer exists. I do not know where any of the corporate records are. The corporation has no office. Joseph Perkins has moved since the operations of the company were shut down.

I do not know what I could find, if anything, in writing that supports what I have told you, however, I am enclosing an affidavit signed by Joseph W. Perkins, Jr. in which he supports the contents of this letter.

Sincerely,

  
Jack Drake

JD/st

enclosure

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STATE OF ALABAMA  
TUSCALOOSA COUNTY

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)  
)

AFFIDAVIT OF JOSEPH W. PERKINS, JR.

I am Joseph W. Perkins, Jr. I founded Perkins & Associates, Inc. approximately ten (10) years ago. That corporation engaged in the business of providing advertising and consulting services to various businesses in Alabama. The business became unprofitable and I was forced to close it January 31, 1990. At the time the business ceased to operate, all of the business' assets and all of the business' accounts receivable had been assigned to and/or were secured by liens filed by AmSouth Bank of Tuscaloosa.

The corporation has no office, it has no employees, it conducts no business, and for all practical purposes, it does not exist. I was advised by counsel not to dissolve the corporation and not to file bankruptcy proceedings for the corporation because all of the assets of the corporation, in fact, were owned by AmSouth Bank.

After I closed the Perkins & Associates, Inc. business, I entered graduate school at the University of Alabama to complete work on my Ph.d. I have been supporting myself and my family by working on a free lance basis out of my home. The corporate records of Perkins & Associates, Inc. are scattered about here and there. I actually do not know the location of most of the records. Even if I could locate the records, they do not address the questions addressed in this Affidavit. When a company ceases to do business, there aren't necessarily records to reflect the fact that it no longer operates. However, I can categorically say that the

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corporation has no money and no assets. I can also say that the corporation does not conduct business and will not conduct business in the future. At the time Perkins & Associates ceased doing business, the corporation owed approximately \$200,000.00.

Joseph W. Perkins, Jr.  
Joseph W. Perkins, Jr.

Subscribed and sworn to before me on this the 9 day of December, 1991.

[Signature]  
Notary Public, State At Large  
My Commission Expires: 1/1/93

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Joseph W. Perkins, Fred DeLoach, ) MUR 2797  
W. Lee Hudson, Harry Ferguson, )  
Perkins & Associates, Inc. )

**SENSITIVE**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On August 24, 1988, the Office of the General Counsel received a referral from the Department of Justice arising from a 1986 criminal investigation of contributions made to the Roy Johnson for Congress Committee and bonuses received from Perkins & Associates, Inc. by the makers of those contributions. Perkins & Associates, Inc. ("P&A"), incorporated under the laws of Alabama, was an advertising agency involved in political campaign work in both Alabama and Georgia. The Roy Johnson for Congress Committee (the "Committee") was the principal campaign committee of Roy Johnson to fill the vacant seat in Alabama's 7th Congressional District.

The Justice Department investigation had determined that on March 29, 1985, Joseph W. Perkins, Jr., president and owner of P&A, had \$10,000 in cash withdrawn from a corporate checking account. That sum was then allegedly distributed by Harry Ferguson, Jr., the business manager of P&A, to employees of P&A. On March 29, 1985, as reported in the Roy Johnson for Congress Committee's 1985 Mid-Year Report, those same ten employees each

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made a \$1,000 contribution to the 1986 Alabama Congressional campaign of Roy Johnson.

**The Justice Department referral**

[indicated that]

Harry Ferguson, Business Manager, called into his office at Perkins and Associates and told him that the office needed to return some money back to Roy Johnson. Ferguson stated that Perkins and Associates had been given \$10,000.00 for Johnson's campaign and that Mr. Johnson did not want the money to stay with Perkins and Associates, that he wanted it back in his campaign fund. Ferguson also told them that the money could not be returned as a lump sum payment to the Johnson campaign, that it needed to be done in smaller amounts.... also stated that Ferguson told him that the Alabama Education Association ... was the contributor of the \$10,000 to the Johnson for Congress campaign.

Based on the Justice Department referral, the Commission found reason to believe that Perkins and Associates, Inc., Joseph W. Perkins and the Alabama Education Association had each violated 2 U.S.C. §§ 441b and 441f by making corporate contributions and by making contributions in the names of others; and that the following employees who had allowed their names to be used to make these contributions had each violated 2 U.S.C. § 441f: Harry Ferguson, Cynthia Perkins, Ivy Hunter, W. Lee Hudson, Fred DeLoach, Laurie Enslin, Sheri Bushery Arnold, Joyce Miller, Grover Gene Hill, Daniel Mark Perkins, Loretta T. Perkins,

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and Joseph W. Perkins. In addition, the Commission instituted its own investigation by issuing questions to these respondents.

The Commission's investigation revealed the following: P&A gave nine of its employees a \$1,000 cash bonus on March 29, 1985. The employees to whom P&A gave such bonuses are Harry Ferguson, Jr., Cynthia Perkins, Ivy Hunter, W. Lee Hudson, Fred DeLoach, Laurie Enslin, Sheri Arnold Brown, Joyce Miller Albright and Joseph W. Perkins, Jr. All the employees of the company named above who have responded to the Commission's findings admit to receiving a March 29, 1985, \$1,000 cash bonus. These bonuses were distributed by Harry Ferguson, Jr., the firm's business manager.

P&A states that it was common for it to give its employees bonuses for motivational reasons. However, the employee responses indicate that the sizes of the March 29, 1985 bonuses were large by comparison to the usual bonuses received by P&A employees. Sheri Arnold Brown states in her response that, prior to the March 29, 1985 bonus, she received Christmas bonuses which varied in size from \$100 in the first year she worked, to \$1,500. This \$1,500 is the largest previous bonus listed in any of the responses. Mrs. Hunter and Mr. Ferguson state they remember receiving previous bonuses of between \$100 to \$200. The newer employees at the time, Joyce Miller Albright and Laurie Enslin, state they do not remember receiving a previous bonus. Although Cynthia Perkins states she remembers receiving previous bonuses,

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she does not remember the actual amounts.<sup>1</sup>

The responses of P&A employees admit to the making of \$1,000 contributions to the Roy Johnson campaign. Most do not give the exact date of the contributions; however, Harry Ferguson, Jr., and Laurie Enslin have provided copies of the two \$1,000 checks dated March 29, 1985 that were used to make their contributions.<sup>2</sup> In its response, P&A denies that there was any connection between the contributions and the bonuses. It states:

Persons who received the bonus were not asked to contribute to the Roy Johnson campaign. Each person involved knew that Joseph W. Perkins was actively involved in raising money for the Johnson campaign. Each recipient knew that Perkins & Associates Inc. would do all the advertising and polling work for the Johnson campaign. Each recipient made the contribution on his or her own. Each recipient was free to keep the money.

In his response, Joseph Perkins likewise denies that there was a connection.

Cynthia Perkins and Joyce Miller Albright also assert that they were not solicited to make the contribution. Fred Hunter states that his wife, Ivy Hunter, asked him to make the \$1,000 contribution. Harry Ferguson denies he was actually asked to make

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1. The sizes of the March 29, 1985 bonuses seem large in comparison to the yearly salaries these nine employees were earning at the time. Yearly salaries of the respondent employees ranged from the \$20,000 paid to \_\_\_\_\_ to the \$8,000 paid to \_\_\_\_\_

2. Ivy Hunter, Fred Hunter and Cynthia Perkins simply state that they made their contributions to the Johnson campaign in March of 1985. The remaining employees either fail to give a date or state they cannot remember the exact date. Nothing presented in the replies contests the March 29, 1985 date found in the Roy Johnson for Congress Committee reports.

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a contribution, but states, "Without being asked, I understood that I should contribute to the campaign and did so."

The remaining responses, however, including one from a respondent sharing P&A counsel, contradict the P&A assertion that no one was solicited. Ivy Hunter states in her response that "Harry Ferguson asked me to make the contribution." Laurie Enslin states that she was "[s]olicited by Harry Ferguson. He told me that other employees were donating their \$1,000 bonus to the Ray Johnson Campaign and asked if I'd like to do the same." The response submitted by Sheri Arnold Brown goes into some detail on the solicitation:

Mr. Harry H. Ferguson, Business Manager at Perkins & Associates, who was my immediate superior and the person that I reported to, told me to make the contribution to the Johnson campaign. At the time, I questioned the legality of the contribution because of the nature in which I was being asked to make it, but was told in no uncertain terms by Mr. Ferguson that in no way was this transaction illegal. He simply said to "just do it and not worry about it." Hindsight at this point would indicate that I should have made some independent inquiry as to the legality of what I was being asked to do, but I completely trusted my superior, Mr. Ferguson, as well as Mr. Perkins.

Information in the Department of Justice referral provided by  
corroborates the responses given by  
Ivy Hunter, Laurie Enslin and Sheri Arnold Brown. Both  
stated that they were asked by  
Mr. Ferguson at the time they received their March 29, 1985  
bonuses to make a contribution to the Roy Johnson Campaign.

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At present, this matter has been resolved with regard to all respondents except Joseph W. Perkins, Fred DeLoach, W. Lee Hudson, Harry Ferguson and Perkins & Associates.<sup>3</sup>

In the course of this matter, this Office has been unable to locate two of the respondents, W. Lee Hudson and Fred DeLoach. Most recently, we retained a tracing service to locate them, but a four month search turned up no information. Because further efforts to locate these individuals would appear to be useless, and consistent with the proper order of the Commission's priorities and resources, see Heckler v. Cheney, 470 U.S. 821 (1985), this Office recommends that the Commission take no further action against W. Lee Hudson and Fred DeLoach and close the file with respect to them.

This Office has recently been in touch with counsel for Joseph W. Perkins, Harry Ferguson and P&A, and he has requested conciliation on behalf on Messrs. Perkins and Ferguson. Attachment 1. While the Commission has denied such requests on behalf of these two respondents previously, this Office believes that, based on the evidence detailed above, an adequate understanding of the violations that occurred in this matter exists, and that it is proper to conciliate with these two

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3. The Commission has accepted signed conciliation agreements from Cynthia Perkins, Ivy Hunter, Laurie Enslin, Sheri Bushery Arnold, and Joyce Miller; taken no further action against Loretta Perkins and Daniel Mark Perkins; and found no probable cause to believe with respect to Grover Gene Hill and the Alabama Education Association.

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respondents at this time. Accordingly, this Office recommends that the Commission enter into conciliation with Joseph W. Perkins and Harry Ferguson prior to findings of probable cause to believe, and that it approve the attached conciliation agreements and appropriate letters.

Regarding P&A, Counsel has submitted a signed and sworn affidavit from Joseph Perkins relating to the status of that corporation. Mr. Perkins states that P&A became unprofitable and he was forced to close it on January 31, 1990. He further states that at the time P&A ceased to operate, all of its assets and accounts receivable were assigned to or secured by liens filed by AmSouth Bank of Tuscaloosa. While Mr. Perkins acknowledges that P&A did not file for bankruptcy or otherwise dissolve, he claims that P&A has no office or employees and conducts no business, and that for all practical purposes it does not exist.

Given the statements by Mr. Perkins, it does not appear that further effort with regard to P&A is necessary. Additionally, the violations by P&A are substantially addressed in the conciliation agreement for its president, Joseph Perkins. Accordingly, this Office recommends that the Commission take no further actions against Perkins & Associates, Inc., and that it close the file with respect to it.

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**II. RECOMMENDATIONS**

1. Take no further action against W. Lee Hudson, Fred DeLoach, and Perkins and Associates, Inc.
2. Close the file as it pertains to W. Lee Hudson, Fred DeLoach, and Perkins and Associates, Inc.
3. Enter into conciliation with Joseph W. Perkins and Harry Ferguson prior to findings of probable cause to believe.
4. Approve the attached conciliation agreements and the appropriate letters.

Lawrence M. Noble  
General Counsel

12/19/91  
Date

BY:   
Lois G. Lerner  
Associate General Counsel

**Attachments**

1. Request for Conciliation
2. Affidavit from Joseph Perkins
3. Conciliation Agreements (2)

Staff assigned: Tony Buckley

92040901478

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Alabama Education Association ) MUR 2797

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on December 19, 1991, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2797:

1. Find no probable cause to believe that the Alabama Education Association violated 2 U.S.C. §§ 441b and 441f.
2. Approve the appropriate letter as recommended in the General Counsel's report dated December 9, 1991.
3. Close the file as it pertains to the Alabama Education Association.

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

Attest:

12-24-91  
Date

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

92040901479

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Joseph W. Perkins, Fred DeLoach, ) MUR 2797  
W. Lee Hudson, Harry Ferguson, )  
Perkins & Associates, Inc. )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 26, 1991, the Commission decided by a vote of 5-0 to take the following actions in MUR 2797:

1. Take no further action against W. Lee Hudson, Fred DeLoach, and Perkins and Associates, Inc.
2. Close the file as it pertains to W. Lee Hudson, Fred DeLoach, and Perkins and Associates, Inc.
3. Enter into conciliation with Joseph W. Perkins and Harry Ferguson prior to findings of probable cause to believe.

(continued)

92040901480

4. Approve the conciliation agreements and the appropriate letters, as recommended in the General Counsel's Report dated December 19, 1991.

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

Attest:

12-26-91  
Date

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

Received in the Secretariat: Fri., Dec. 20, 1991 10:10 a.m.  
Circulated to the Commission: Fri., Dec. 20, 1991 2:00 p.m.  
Deadline for vote: Tues Dec. 24, 1991 4:00 p.m.

bjf

92040901481



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 3, 1992

Jack Drake, Esq.  
Drake and Pierce  
P.O. Box 86  
Tuscaloosa, Alabama 35402

RE: MUR 2797  
Perkins & Associates, Inc.;  
Joseph W. Perkins, Jr.; Harry  
Ferguson

Dear Mr. Drake:

On November 11, 1988, your clients, Joseph W. Perkins, Jr. and Perkins & Associates, Inc., were notified that the Federal Election Commission had found reason to believe that they had each violated 2 U.S.C. §§ 441b(a) and 441f. Also on that date, your client, Harry Ferguson, was notified that the Commission had found reason to believe that he had violated 2 U.S.C. § 441f. On October 17, 1991, you submitted a request to enter into pre-probable cause conciliation on behalf of Messrs. Perkins and Ferguson. On December 9, 1991, you submitted information regarding the current status of Perkins & Associates, Inc.

After considering the circumstances of the matter, the Commission determined on December 26, 1991, to take no further action against Perkins & Associates, Inc., and closed the file as it pertains to it. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

At your request, also on December 26, 1991, the Commission determined to enter into negotiations directed towards reaching conciliation agreements in settlement of this matter prior to findings of probable cause to believe with regard to Messrs. Perkins and Ferguson.

Enclosed are conciliation agreements that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return them, along with the civil penalties, to the Commission. In light

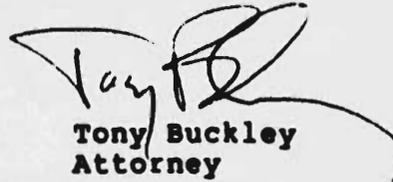
92040901482

Jack Drake, Esq.  
Page 2

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, please contact me at (202) 219-3690.

Sincerely,



Tony Buckley  
Attorney

Enclosures  
Conciliation Agreements

92040901483



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 3, 1992

Robert H. Chanin, Esquire  
Office of General Counsel  
National Education Association  
1201 16th Street, N.W.  
Washington D.C. 20036

RE: MUR 2797  
Alabama Education Association

Dear Mr. Chanin:

This is to advise you that on December 19, 1991, the Federal Election Commission found that there is no probable cause to believe your client, the Alabama Education Association, violated 2 U.S.C. §§ 441b and 441f. Accordingly, the file in this matter has been closed as it pertains to your client.

The file will be made part of the public record within 30 days after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

If you have any questions, please contact Tony Buckley, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble  
General Counsel

92040901484

LAW OFFICE OF  
DRAKE AND PIERCE  
1808 UNIVERSITY BOULEVARD  
TUSCALOOSA, ALABAMA 35401

March 13, 1992

RUSSELL JACKSON DRAKE  
JOSEPH G. PIERCE

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

MAR 17 10 44 AM '92

MAILING ADDRESS  
POST OFFICE BOX 88  
TUSCALOOSA, ALABAMA 35402  
(205) 789-1224  
FAX (205) 788-9644

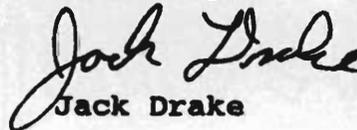
Tony Buckley  
Federal Election Commission  
Washington, D.C. 20463

RE: MUR 2797  
Joseph W. Perkins, Jr. and Harry Ferguson

Dear Mr. Buckley:

Enclosed are the two Conciliation Agreements signed by Harry Ferguson and Joseph W. Perkins, Jr. Also enclosed are their respective checks made payable to the FEC in the amount of \$5,000.00 each. This should conclude this matter. Should you have any questions, please give me a call.

Sincerely,

  
Jack Drake

JD/dc

enclosures

92040901485

JOSEPH W. PERKINS, JR. 01  
COMMUNICATION CONSULTANT  
11820 BENT CREEK LN, PH. 205-339-1547  
NORTHPORT, AL 36478

1137

PAY TO THE  
ORDER OF

*Die Howard of edus*  
*Federal Election Commission*

*79* 19 *92* *02*  
\$15,000<sup>00</sup>

DOLLARS

**Southern Bank**  
Southern Bank of Business Services  
P.O. Box 177  
Northport, Alabama 36478

*Joseph Perkins*

9 8 4 1 0 6 0 4 0 2 6

HARRY H. FERGUSON, JR. OR  
BETTE S. FERGUSON  
1004 BELLINGWORTH DR. PH. 348-1381  
TUSCALOOSA, AL 35405

622

3/12/1992

61-451  
281

PAY TO THE ORDER OF Federal Election Committee \$ 5000.00  
Five Thousand and 00/100 DOLLARS



A FEDERAL SAVINGS BANK  
TUSCALOOSA, AL 35405

*[Handwritten Signature]*

MEMO

92040901487

92 MAR 25 PM 5:13

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

Joseph W. Perkins )

Harry Ferguson )

MUR 2797

**SENSITIVE**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached are conciliation agreements which have been signed by Joseph W. Perkins and Harry Ferguson, respectively.

Attachment 1.

The attached agreements contain no changes from those approved by the Commission on December 26, 1991. Checks for the civil penalties have been received. Acceptance of the attached agreements will result in this matter being resolved with regard to all outstanding respondents.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreements with Joseph W. Perkins and Harry Ferguson.
2. Approve the appropriate letters.
3. Close the file.

Lawrence M. Noble  
General Counsel

3-24-92  
Date

BY:   
Lois G. Lerner  
Associate General Counsel

Attachments

1. Conciliation Agreements (2)
2. Photocopies of civil penalty checks (2)

Staff Assigned: Tony Buckley

92040901488

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Joseph W. Perkins;  
Harry Ferguson.

)  
)  
) MUR 2797  
)

CERTIFICATION

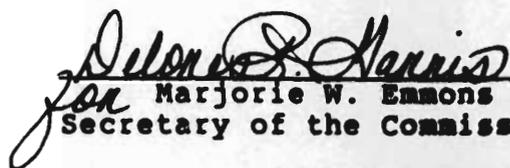
I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 30, 1992, the Commission decided by a vote of 6-0 to take the following actions in MUR 2797:

1. Accept the conciliation agreements with Joseph W. Perkins and Harry Ferguson, as recommended in the General Counsel's Report dated March 24, 1992.
2. Approve the appropriate letters, as recommended in the General Counsel's Report dated March 24, 1992.
3. Close the file.

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

Attest:

3-31-92  
Date

  
for Marjorie W. Emmons  
Secretary of the Commission

Received in the Secretariat:	Wed.,	Mar., 25, 1992	5:13 p.m.
Circulated to the Commission:	Thurs.,	Mar., 26, 1992	4:00 p.m.
Deadline for vote:	Tues.,	Mar., 31, 1992	4:00 p.m.

bjr

92040901489



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 7, 1992

Craig C. Donsanto, Director  
Election Crimes Branch  
Criminal Division  
U.S. Department of Justice  
P.O. Box 27321  
Central Station  
Washington, D.C. 20038

RE: MUR 2797

Dear Mr. Donsanto:

This is in reference to the matter involving the Alabama Education Association, Perkins & Associates, Inc., Joseph W. Perkins, Fred DeLoach, W. Lee Hudson, Harry Ferguson, Cynthia Perkins, Ivy Hunter, Laurie Enslin, Sheri Bushery Arnold, Joyce Miller, Loretta Perkins, Daniel Mark Perkins, Grover Gene Hill, and Fred Hunter, which your office referred to the Federal Election Commission.

On November 30, 1988, the Commission found that there was reason to believe the Alabama Education Association, Perkins & Associates, Inc., and Joseph W. Perkins violated 2 U.S.C. §§ 441b(a) and 441f, and that Fred DeLoach, W. Lee Hudson, Harry Ferguson, Cynthia Perkins, Ivy Hunter, Laurie Enslin, Sheri Bushery Arnold, Joyce Miller, Loretta Perkins, Daniel Mark Perkins, Grover Gene Hill and Fred Hunter violated 2 U.S.C. § 441f. The Commission has now entered into conciliation agreements in the matter with Joseph W. Perkins, Harry Ferguson, Cynthia Perkins, Ivy Hunter, Laurie Enslin, Sheri Bushery Arnold, Joyce Miller, Loretta Perkins, Daniel Mark Perkins, Grover Gene Hill, and Fred Hunter. Copies of these agreements are enclosed for your information. The Commission also has taken no further action with regard to Fred DeLoach, W. Lee Hudson, and Perkins and Associates, Inc.; and found no probable cause to believe with regard to Grover Gene Hill and the Alabama Education Association.

92040901490

Craig C. Donsanto, Director  
Page 2

We appreciate your cooperation in helping the Commission meet its enforcement responsibilities under the Federal Election Campaign Act of 1971, as amended.

If you have any questions, please contact Tony Buckley, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble  
General Counsel

  
BY: Lois G. Lerner  
Associate General Counsel

Enclosures  
Conciliation Agreements

92040901491



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 7, 1992

Jack Drake, Esq.  
Drake and Pierce  
P.O. Box 86  
Tuscaloosa, Alabama 35402

RE: MUR 2797  
Perkins & Associates, Inc.;  
Joseph W. Perkins, Jr.; Harry  
Ferguson; Cynthia Perkins;  
Fred Hunter; Ivy Hunter; Joyce  
Miller; Grover Gene Hill;  
Daniel Mark Perkins; Loretta T.  
Perkins

Dear Mr. Drake:

On March 30, 1992, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on behalf of your client, Joseph W. Perkins, in settlement of violations of 2 U.S.C. §§ 441b and 441f, provisions of the Federal Election Campaign Act of 1971, as amended, and the signed conciliation agreement and civil penalty submitted on behalf of your client, Harry Ferguson, in settlement of a violation of 2 U.S.C. § 441f. As the acceptance of these agreements resolves this matter with regard to all outstanding respondents, the file has been closed in this matter.

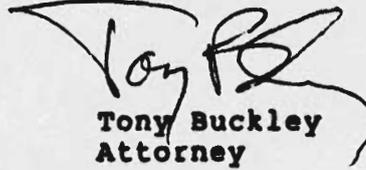
This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreements, however, will become a part of the public record.

92040901492

Jack Drake, Esq.  
Page 2

Enclosed you will find copies of the fully executed conciliation agreements for your files. If you have any questions, please contact me at (202) 219-3690.

Sincerely,



Tony Buckley  
Attorney

Enclosures  
Conciliation Agreements (2)

92040901493



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 7, 1992

Frederick T. Enslin, Esquire  
Argo, Enslin, Holloway & Sabel, P.C.  
300 South Hull Street  
P.O. Drawer 1550  
Montgomery, Alabama 36102-1550

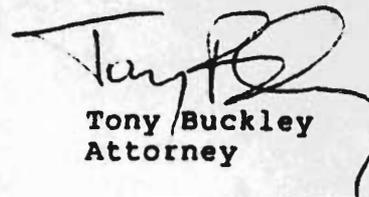
RE: MUR 2797  
Laurie Enslin

Dear Mr. Enslin:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact me at (202) 219-3690.

Sincerely,

  
Tony Buckley  
Attorney

92040901494



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 7, 1992

Robert H. Chanin, Esquire  
Office of General Counsel  
National Education Association  
1201 16th Street, N.W.  
Washington D.C. 20036

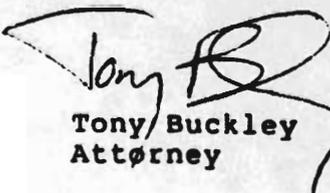
RE: MUR 2797  
Alabama Education Association

Dear Mr. Chanin:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact me at (202) 219-3690.

Sincerely,



Tony Buckley  
Attorney



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**CLOSED**

April 7, 1992

Pat Moran, Esquire  
Mitchell, Williams, Selig & Tucker  
1000 Savers Federal Building  
Capital Avenue at Spring Street  
Little Rock, Arkansas 72201

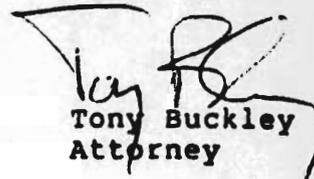
RE: MUR 2797  
Sheri Arnold Brown

Dear Mr. Moran:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact me at (202) 219-3690.

Sincerely,

  
Tony Buckley  
Attorney

92040901495

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Harry Ferguson ) MUR 2797

CONCILIATION AGREEMENT

This matter was initiated by a referral from the Department of Justice. The Federal Election Commission ("Commission") found reason to believe that Harry Ferguson ("Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Harry Ferguson is a person within the meaning of 2 U.S.C. § 431(11).

2. Perkins & Associates, Inc., incorporated under the laws of Alabama, is an advertising agency involved in political campaign work in both Alabama and Georgia.

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3. The Roy Johnson for Congress Committee was the principal campaign committee for Roy Johnson for the Republican nomination to fill the seat in Alabama's 7th Congressional District during the 1985 primary election. Mr. Johnson withdrew from the race prior to the primary election.

4. On March 29, 1985, various employees of Perkins & Associates, including Respondent, accepted \$1,000 in corporate funds given in the form of a \$1,000 bonus.

5. On the same date, Respondent made a \$1,000 contribution to the Roy Johnson for Congress Committee by means of a personal check.

6. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no person shall knowingly permit his name to be used to effect such a contribution.

V. Respondent knowingly permitted his name to be used to effect a \$1,000 contribution to the Roy Johnson for Congress Committee, in violation of 2 U.S.C. § 441f.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Five Thousand dollars (\$5,000), 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

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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 enforceable.

FOR THE COMMISSION:

*Lawrence M. Noble (7/2)*  
Lawrence M. Noble  
General Counsel

4-7-92  
Date

FOR THE RESPONDENT:

*[Signature]*  
(Name)  
(Position)

3/12/92  
Date

92040901498

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Joseph W. Perkins ) MUR 2797

CONCILIATION AGREEMENT

This matter was initiated by a referral from the Department of Justice. The Federal Election Commission ("Commission") found reason to believe that Joseph W. Perkins ("Respondent") violated 2 U.S.C. §§ 441b and 441f.

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Joseph W. Perkins is a person within the meaning of 2 U.S.C. § 431(11).

2. Perkins & Associates, Inc., incorporated under the laws of Alabama, is an advertising agency involved in political campaign work in both Alabama and Georgia. Respondent

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is an officer of Perkins & Associates, Inc, within the meaning of 2 U.S.C. § 441b(a).

3. The Roy Johnson for Congress Committee was the principal campaign committee for Roy Johnson for the Republican nomination to fill the seat in Alabama's 7th Congressional District during the 1985 primary election. Mr. Johnson withdrew from the race prior to the primary election.

4. On March 29, 1985, Respondent, as president of Perkins & Associates, Inc., authorized that corporation to pay bonuses in the amount of \$1,000 to various of its employees from corporate funds. Respondent, as an employee of Perkins & Associates, Inc., accepted one of these bonuses.

5. On the same date, Respondent and all other Perkins & Associates, Inc. employees receiving such bonuses, made \$1,000 contributions to the Roy Johnson for Congress Committee by means of personal checks.

6. Pursuant to 2 U.S.C. § 441b(a), it is illegal for any officer of any corporation to consent to any contribution by that corporation in connection with a Federal election.

7. Pursuant to 2 U.S.C. § 441f, no person shall make a contribution in the name of another person and no person shall knowingly permit his name to be used to effect such a contribution. Section 441f also applies to those who actively assist in the making of contributions in the name of another.

V. 1. Respondent knowingly permitted his name to be used to effect a \$1,000 contribution to the Roy Johnson for Congress Committee, in violation of 2 U.S.C. § 441f.

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2. Respondent actively assisted Perkins & Associates, Inc. in making contributions in the names of its employees to the Roy Johnson for Congress Committee, in violation of 2 U.S.C. § 441f.

3. Respondent, as an officer of Perkins and Associates, Inc., consented to contributions by that corporation to the Roy Johnson for Congress Committee, in violation of 2 U.S.C. § 441b(a).

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Five Thousand dollars (\$5,000), 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. 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

92040901501

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 (7/2)  
Lawrence M. Noble  
General Counsel

4-7-92  
Date

FOR THE RESPONDENT:

James D. Perkins, Jr.  
(Name)  
(Position)

March 9, 1992  
Date

92040901502

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

APR 27 12 51 PM '92

LAW OFFICE OF  
DRAKE AND PIERCE  
1809 UNIVERSITY BOULEVARD  
TUSCALOOSA, ALABAMA 35401

RUSSELL JACKSON DRAKE  
JOSEPH S. PIERCE

April 23, 1992

MAILING ADDRESS  
POST OFFICE BOX 86  
TUSCALOOSA, ALABAMA 35408  
(205) 789-1834  
FAX (205) 782-9844

Federal Election Commission  
Washington, DC 20463

RE: MUR 2797  
Perkins & Associates, Inc.  
Joseph W. Perkins, Jr.  
Harry Ferguson

92 APR 27 PM 3:40

To Whom It May Concern:

This statement is being prepared to be placed in the file of Joseph W. Perkins, Jr., Perkins & Associates, Inc., and Harry Ferguson. This statement is to be read by any person who requests access to the files of the above stated persons and corporation. The allegations against Joseph W. Perkins, Jr., Harry Ferguson, and Perkins & Associates, Inc. by the Federal Election Commission are allegations which have been consistently denied from the first time those allegations were made. Perkins & Associates routinely gave its employees bonuses as an incentive for those employees to work hard and, also, as a reward to employees for results achieved.

At the relevant time periods, employees of Perkins & Associates and others did, in fact, make contributions to the congressional campaign of Roy Johnson. Perkins & Associates, Joseph W. Perkins, Jr., and Harry Ferguson have consistently denied that any money from Perkins & Associates was given to these individuals for the purpose of making contributions to the Johnson campaign. It is correct that bonuses were paid to employees of Perkins & Associates shortly before these same employees gave contributions to the Johnson campaign.

Harry Ferguson and Joseph W. Perkins, Jr. have entered into a conciliation agreement with the Federal Election Commission in order to avoid the of cost contesting this proceeding. Both Perkins and Ferguson deny any wrongdoing and deny that they violated any statute of the United States. Both Perkins and Ferguson agreed to pay relatively modest civil fines in order to avoid continued legal cost and other costs associated with this proceeding. Both Ferguson and Perkins wish to point out to anyone who might read this file that this proceeding is and was

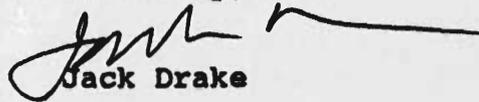
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FEDERAL ELECTION COMMISSION

Federal Election Commission  
Page 2  
April 23, 1992

civil in nature. No criminal proceedings have ever been instituted based upon the facts made the basis of this civil proceeding. Anyone desiring further comments regarding this proceeding should contact Jack Drake at area code (205) 759-1234 or Joseph W. Perkins, Jr. at area code (205) 339-7976.

Sincerely,

  
Jack Drake

JD/st

92040901504



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2797

DATE FILMED 5-21-92 CAMERA NO. 1

CAMERAMAN E.E.S.

92040901505