



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4004

DATE FILMED 10-3-94 CAMERA NO. 2

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**REPORTS ANALYSIS REFERRAL****TO****OFFICE OF GENERAL COUNSEL****DATE: September 24, 1993****ANALYST: PETER KELL JR.**

**I. COMMITTEE:** Fields for Congress, Inc.  
(C00261065)  
Gerard G. Hall, Treasurer  
P.O. Box 4228  
Baton Rouge, LA 70821

**II. RELEVANT STATUTE:** 2 U.S.C. §434(a)(6)  
11 CFR §104.5(f)

**III. BACKGROUND:****Failure to File Forty-Eight Hour Notifications**

Fields for Congress, Inc. ("the Committee") has failed to file 11 of 24, or 45.8%, of the required Forty-Eight (48) Hour Notifications ("48-Hour Notices") for contributions totalling \$18,000 received prior to the 1992 General Election.

The candidate was involved in the General Election held on November 3, 1992. Prior Notice was sent to the Committee on September 28, 1992 (Attachment 2). The Notice includes a section titled "Last-Minute Contributions". This section reads "Notices are required if the committee receives contributions (including contributions and loans from the candidate's personal funds; and endorsements or guarantees of bank loans) of \$1,000 or more, during the period of October 15 through October 31. The notices must reach the appropriate federal and state filing offices within 48 hours of the committee's receipt of the contribution(s)."

Schedule A of the 1992 30 Day Post-General Report indicates that the Committee failed to file eleven (11) 48-Hour Notices for contributions received during the aforementioned period (Attachment 3). The following is a list of the contributions for which no 48-Hour Notices were filed:

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<u>Contributor Name</u>	<u>Date</u>	<u>Amount</u>
Milton Womack	10/21/92	\$1,000
Morgan Watson	10/31/92	\$1,000
AICPA Effective Legislation Committee	10/20/92	\$1,500
Transportation Political Education League	10/29/92	\$2,500
American Fed of State, County & Mun. Employees AFL-CIO	10/29/92	\$3,000
Machinists Non-Partisan Political League	10/28/92	\$1,000
OPTHPAC	10/30/92	\$2,000
AT&T PAC	10/30/92	\$1,000
Transportation Political Education League	10/23/92	\$2,500
N.B.W.A. PAC	10/25/92	\$1,000
National Association of Life Underwriters PAC	10/29/92	\$1,500

On June 1, 1993, a Request for Additional Information ("RFAI") was sent to the Committee (Attachment 4). The RFAI notes on an informational basis that the Committee may have failed to file one or more of the required 48-Hour Notices for "last minute" contributions of \$1,000 or more. The notice requests the Committee to review their procedures for checking contributions received during the aforementioned time period. In addition, the notice states that although the Commission may take legal steps, any response would be taken into consideration.

On August 4, 1993, a Reports Analysis Division analyst phoned the Treasurer, Gerard Hall (Attachment 5). The analyst asked Mr. Hall if he intended to respond to the RFAIs he had been sent on the October Quarterly, 12 Day Pre-General, 30 Day Post-General and Year End Reports. Mr. Hall stated that he had mailed amendments on August 2, 1993. To date, no response has been received.

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FEDERAL ELECTION COMMISSION  
1991-1992  
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 23SEP93

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	OFFICE SOLICIT/	PARTY	PRIMARY	GENERAL			
<b>FIELDS, CLED</b>							
HOUSE 04 DEMOCRATIC PARTY				LOUISIANA		1992 ELECTION ID# HOLA00025	
1. STATEMENT OF CANDIDATE							
1992 STATEMENT OF CANDIDATE				24FEB92		1 92HSE/443/0528	
STATEMENT OF CANDIDATE - AMENDMENT				13MAY92		1 92HSE/464/0214	
2. PRINCIPAL CAMPAIGN COMMITTEE							
<b>FIELDS FOR CONGRESS INC</b>							
1992 STATEMENT OF ORGANIZATION				19FEB92		1 92HSE/443/0527	
STATEMENT OF ORGANIZATION - AMENDMENT				17MAY92		1 92HSE/464/0229	
48 HOUR CONTRIBUTION NOTICE				24SEP92		1 92HSE/467/3610	
48 HOUR CONTRIBUTION NOTICE				25SEP92		2 92HSE/467/3676	
48 HOUR CONTRIBUTION NOTICE				28OCT92		2 92HSE/481/7839	
48 HOUR CONTRIBUTION NOTICE				29OCT92		2 92HSE/481/4752	
APRIL QUARTERLY		30,157		2,288	14FEB92 -31MAR92	16	92HSE/450/0084
APRIL QUARTERLY - AMENDMENT		50,157		2,288	14FEB92 -31MAR92	15	92HSE/463/0549
REQUEST FOR ADDITIONAL INFORMATION				14FEB92 -31MAR92		2	92FEC/758/1694
REQUEST FOR ADDITIONAL INFORMATION 2ND				14FEB92 -31MAR92		3	92FEC/762/1891
JULY QUARTERLY		8,559		11,338	1APR92 -30JUN92	14	92HSE/497/2593
JULY QUARTERLY - AMENDMENT		8,559		11,338	1APR92 -30JUN92	13	92HSE/476/5016
REQUEST FOR ADDITIONAL INFORMATION				1APR92 -30JUN92		1	92FEC/783/3257
REQUEST FOR ADDITIONAL INFORMATION 2ND				1APR92 -30JUN92		1	92FEC/800/2587
PRE-PRIMARY		69,440		34,126	1JUL92 -13SEP92	29	92HSE/467/1994
PRE-PRIMARY - AMENDMENT		64,210		33,905	1JUL92 -13SEP92	38	92HSE/476/5029
REQUEST FOR ADDITIONAL INFORMATION				1JUL92 -13SEP92		7	92FEC/783/3249
REQUEST FOR ADDITIONAL INFORMATION 2ND				1JUL92 -13SEP92		8	92HSE/800/2578
OCTOBER QUARTERLY		21,770		99,186	14SEP92 -30SEP92	17	92HSE/476/4771
REQUEST FOR ADDITIONAL INFORMATION				14SEP92 -30SEP92		2	93FEC/841/2094
REQUEST FOR ADDITIONAL INFORMATION 2ND				14SEP92 -30SEP92		3	93FEC/843/5299
PRE-GENERAL				62,386	36,067 11OCT92 -14OCT92	61	92HSE/481/4201
NOTICE OF FAILURE TO FILE				10CT92 -14OCT92		1	92FEC/800/1842
REQUEST FOR ADDITIONAL INFORMATION				10CT92 -14OCT92		2	93FEC/841/2097
REQUEST FOR ADDITIONAL INFORMATION 2ND				10CT92 -14OCT92		3	93FEC/843/5296
POST-GENERAL				62,731	88,485 15OCT92 -23NOV92	58	92HSE/489/8778
REQUEST FOR ADDITIONAL INFORMATION				15OCT92 -23NOV92		2	93FEC/841/2100
REQUEST FOR ADDITIONAL INFORMATION 2ND				15OCT92 -23NOV92		3	93FEC/843/5293
YEAR-END				-24NOV92 -31DEC92		1	93HSE/493/4998
YEAR-END				2,500	9,235 24NOV92 -31DEC92	12	93HSE/493/4343
REQUEST FOR ADDITIONAL INFORMATION				24NOV92 -31DEC92		1	93FEC/841/2103
REQUEST FOR ADDITIONAL INFORMATION 2ND				24NOV92 -31DEC92		2	93FEC/843/5291
<b>TOTAL</b>		<b>144,696</b>	<b>127,617</b>	<b>136,717</b>	<b>134,587</b>	<b>324</b>	<b>TOTAL PAGES</b>
3. AUTHORIZED COMMITTEES							
<b>CLED FIELDS FOR CONGRESS COMMITTEE</b>							
1991 MID-YEAR REPORT				539		2,181 1JAN91 -30JUN91	
MID-YEAR REPORT - AMENDMENT						7 91HSE/435/2556	
						7 92HSE/442/3962	

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FEDERAL ELECTION COMMISSION  
1991-1992  
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 23SEP93

PAGE 2

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/ PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION TYPE OF FILER
		PRIMARY	GENERAL	PRIMARY	GENERAL			
MID-YEAR REPORT - AMENDMENT		539		2,181		1JAN91 -30JUN91	9	92HSE/454/1283
MID-YEAR REPORT - AMENDMENT		539		2,181		1JAN91 -30JUN91	9	92HSE/453/3193
NOTICE OF FAILURE TO FILE						1JAN91 -30JUN91	1	91FEC/709/4877
1 <sup>ST</sup> LETTER INFORMATIONAL NOTICE						1JAN91 -30JUN91	2	91FEC/723/0096
REQUEST FOR ADDITIONAL INFORMATION						1JAN91 -30JUN91	1	92FEC/745/4827
REQUEST FOR ADDITIONAL INFORMATION 2ND YEAR-END		23,417		22,894		1JAN91 -30JUN91	2	92FEC/753/4059
YEAR-END - AMENDMENT		23,417		22,894		1JUL91 -31DEC91	11	92HSE/442/4225
REQUEST FOR ADDITIONAL INFORMATION						1JUL91 -31DEC91	2	92FEC/745/4822
REQUEST FOR ADDITIONAL INFORMATION 2ND YEAR-END						1JUL91 -31DEC91	3	92FEC/753/4054
1992 STATEMENT OF ORGANIZATION - AMENDMENT						18FEB92	1	92HSE/442/4515
STATEMENT OF ORGANIZATION - AMENDMENT						4JUN92	1	92HSE/453/3233
STATEMENT OF ORGANIZATION - AMENDMENT						1OCT92	1	92HSE/467/4736
MID-YEAR REPORT		6,456		6,894		1JAN92 -30JUN92	10	92HSE/464/1030
NOTICE OF FAILURE TO FILE						1JAN92 -30JUN92	1	92FEC/776/0889
YEAR-END			0			1JUL92 -31DEC92	8	93HSE/493/4335
							88	TOTAL PAGES
							88	AUTH TOT PAGES

JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN

All reports reviewed.

Cash on Hand as of 12/31/92: \$1,006.18

Debts outstanding as of 12/31/92: \$40,692.67

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# GENERAL ELECTION REPORT NOTICE

## FEDERAL ELECTION COMMISSION

CONGRESSIONAL

September 28, 1992

### 1992 GENERAL ELECTION CANDIDATE COMMITTEES

REPORT	REPORTING PERIOD*	REG./CERT.	FILING
		MAILING	DATE
		DATE**	DATE
Pre-General	10/01/92 - 10/14/92	10/19/92	10/22/92
Post-General	10/15/92 - 11/23/92	12/03/92	12/03/92

#### WHO MUST FILE

All 1992 general election principal campaign committees of congressional candidates (including unopposed candidates) who seek election in the November 3, 1992 General Election must file the Pre- and Post-General Election Reports.

#### WHO NEED NOT FILE

Principal campaign committees of candidates not active in the 1992 elections (i.e., committees active in past or future elections) and 1992 campaign committees not participating in the general election do not file the Pre- and Post-General Reports.

#### 48 HOUR NOTICES ON CONTRIBUTIONS

Notices are required if the committee receives contributions (including contributions and loans from the candidate's personal funds; and endorsements or guarantees of bank loans) of \$1,000 or more, during the period of October 15 through October 31. The notices must reach the appropriate federal and state filing offices within 48 hours of the committee's receipt of the contribution(s).

#### LABEL

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

#### COMPLIANCE

TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

\*The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

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

FOR INFORMATION, Call: 800/424-9530 or 202/219-3420

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SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the Detailed Summary Page  
 PAGE 30  
 FOR 1992-1993

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

NAME OF CONTRIBUTOR (in Full)

FIELDS FOR CONGRESS CAMPAIGN, INC.

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Donald Fuelier P.O. Box 12994 New Iberia, LA 70564	Self Occupation: Attorney	11/03/92	\$500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		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)
Milton Monack P.O. Box 2147 Baton Rouge, LA 70821	Self Occupation: Contractor	10/21/92	\$1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$ 2,000.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Samuel Williams 9 Hidden Oak Lane Baton Rouge, LA 70810	Self Occupation:	11/22/92	\$300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$ 300.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Walter Banks 2625 77th Avenue Baton Rouge, LA 70807	Self Occupation:	11/22/92	\$250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		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)
Morgan Watson 4402 Anton Drive Baker, LA 70714	Self Occupation:	10/31/92	\$1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		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)
Aubrey LaPlace P.O. Box 31 St. Gabriel, LA 70776	Self Occupation: Industrial Contractor	10/19/92	\$1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$ 2,000.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
John Young 8655 Jefferson Highway, #11 Baton Rouge, LA	Self Occupation:	10/21/92	\$250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$ 250.00	

TOTAL of Receipts This Page (transfer)

TOTAL This Period (see Page 1 and 2 for other)

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

Use separate schedule 1 for each category of the Detailed Summary Page PAGE OF FOR LINE NUMBER

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

**NAME OF COMMITTEE on Full**

**FIELDS FOR CONGRESS CAMPAIGN COMMITTEE, INC.**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month day, year)	Amount of Each Receipt this Period
IPAA Wildcatter PAC 1101-16th St. NW Washington, D.C. 20036		10/28/92	\$500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	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
Responsible Citizens Political League 3 Research Place Rockville, MD 20850		10/28/92	\$300.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month day, year)	Amount of Each Receipt this Period
AICPA Effective Legislation Committee 1455 Pennsylvania Ave. N.W. Washington, D.C. 20004		10/28/92	\$1,500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1,500.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month day, year)	Amount of Each Receipt this Period
Brotherhood of Locomotive Engineers 1370 Ontario Street Cleveland, Ohio 44113		10/29/92	\$500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	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
Metropolitan Life Ins. Company Met Life Employees' Political New York, NY		10/30/92	\$300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 300.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month day, year)	Amount of Each Receipt this Period
Tidewater, Inc. PAC 1440 Canal Street New Orleans, LA 70112		11/02/92	\$200.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 200.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month day, year)	Amount of Each Receipt this Period
EBS Employees' PAC 1331 Pennsylvania Ave. N.W. Ste. 1300 Washington, D.C. 20004		11/04/92	\$500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 500.00	

TOTAL of Receipts This Page (optional)

\$3,000.00

TOTAL This Period (for page and line number only)

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Use separate forms for each recipient of contributions for each calendar year. Do not combine contributions from such contributors.

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Only information copied from each Report and Statement may not be used or used by any person for the purpose of identifying contributors or for the purposes of harassment, other than using the name and address of any political committee to solicit contributions from such contributors.

NAME OF CONTRIBUTOR OR FUND

**FIELDS FOR CONGRESS CAMPAIGN COMMITTEE, INC.**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Texas Political Involvement Committee P.O. Box 60232 New Orleans, LA 70160	Occupation	10/29/92	\$500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$ 500.00	
Bobert Caucus P.O. Box 31564 Tucson, Az 85751	Occupation	10/29/92	\$500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$ 500.00	
Transportation Political Education League 14600 Detroit Ave. Cleveland, OH 44107	Occupation	10/29/92	\$2,500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$ 2,500.00	
American Fed of State, Country & Man. Employees AFL-CIO 1625 L. Street NW Washington, D.C. 20036	Occupation	10/29/92	\$3,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$ 3,000.00	
Grounding-Perrie Industries PAC P.O. Box 3151 Houston, TX	Occupation	10/29/92	\$500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$ 500.00	
The Williams Companies PAC One Williams Center Tulsa, OK 74103	Occupation	10/28/92	\$500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$ 500.00	
Committee for Thorough Agricultural Political Education of Ass. Milk Producers P.O. Box 700267, San Antonio, TX 78276	Occupation	08/29/92	\$500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$ 500.00	

TOTAL of Receipts This Page (attach)

TOTAL This Period (last page of this report only)

**SCHEDULE A**

**ITEMIZED RECEIPTS**

List these receipts in order of date received. For each receipt, enter the date received, the name of the donor, and the amount received. Do not include receipts for which you have already reported the amount.

Any information obtained from such Reports and Statements may not be used by any person for the purpose of identifying contributions or for the purpose of determining the amount of any political contribution to which such information from such Reports and Statements is used.

NAME OF COMMITTEE OR FUND

**FIELD FOR CONGRESS CAMPAIGN COMMITTEE, INC.**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month day, year)	Amount of Each Receipt (in Period)
Mechanics Non-Partisan Political League 1300 Connecticut Ave., NW Washington, D.C. 20031		10/28/92	\$1,000.00
Receipts For: <input type="checkbox"/> Other Identify: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation		
<input type="checkbox"/> Other Identify:	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 (in Period)
OPTEMPAC 1101 Vermont Ave, NW Ste. 300 Washington, D.C. 20005-3570		10/30/92	\$2,000.00
Receipts For: <input type="checkbox"/> Other Identify: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation		
<input type="checkbox"/> Other Identify:	Aggregate Year-to-Date > \$2,000.00		

C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month day, year)	Amount of Each Receipt (in Period)
United Gas Pipe Line Company PAC P.O. Box 1478 Houston, TX 77251-1478		10/29/92	\$250.00
Receipts For: <input type="checkbox"/> Other Identify: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation		
<input type="checkbox"/> Other Identify:	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 (in Period)
AMOC PAC 350 Madison Ave. New York, NY 10022		10/30/92	\$1,000.00
Receipts For: <input type="checkbox"/> Other Identify: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation		
<input type="checkbox"/> Other Identify:	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 (in Period)
San Tomas for Congress 970 Broad Street Room 1435 B Stamuch, NJ 07102		11/02/92	\$1,000.00
Receipts For: <input type="checkbox"/> Other Identify: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation		
<input type="checkbox"/> Other Identify:	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 (in Period)
Food Motor Company The American Road Beverly, MA		10/28/92	\$500.00
Receipts For: <input type="checkbox"/> Other Identify: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation		
<input type="checkbox"/> Other Identify:	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 (in Period)
Freston G. Ellis & Bouvelac Made P.A.C. 1735 New York Ave., NW Ste 300 Washington, D.C. 20005		11/08/92	\$500.00
Receipts For: <input type="checkbox"/> Other Identify: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation		
<input type="checkbox"/> Other Identify:	Aggregate Year-to-Date > \$500.00		

TOTAL of Receipts This Page Reported \$6,250.00

TOTAL This Period from page one and two number only

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**SCHEDULE A ITEMIZED RECEIPTS**

Use this form to report receipts for each calendar year. Do not include receipts for 1991. See instructions.

Any information reported on this report and the attached may not be sold or used by the Service for the purpose of carrying out the duties of the Internal Revenue Service, other than using the name and address of any person or corporation to solicit contributions from such person or corporation.

Name of Committee on Form

**FIELDS FOR CONGRESS CAMPAIGN COMMITTEE**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Delahoy Realty 804 Court St. Plaquemine, LA 70764 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		11/07/92	\$500.00
Aggregate Year-to-Date > \$500.00			
Transportation Political Education League 14608 Detroit Ave. Cleveland, OH 44107 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		10/23/92	\$2,500.00
Aggregate Year-to-Date > \$2,500.00			
B.B.W.A. PAC 5205 Leeburg Pike Suite 1600 Falls Church, VA 22041 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		10/25/92	\$1,000.00
Aggregate Year-to-Date > \$1,000.00			
Action Committee for Rural Electrification 1000 Massachusetts Ave. SW Washington, D.C. 20036 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		10/29/92	\$500.00
Aggregate Year-to-Date > \$500.00			
First Citizens Corp PAC 210 Bienville Street New Orleans, LA 70112 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		10/29/92	\$250.00
Aggregate Year-to-Date > \$250.00			
National Association of Life Underwriters PAC 1022 F Street NW Washington, D.C. 20006 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		10/29/92	\$1,500.00
Aggregate Year-to-Date > \$1,500.00			
Bell South Telecommunications PAC 365 Canal Street New Orleans, LA 70140 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			\$1,000.00
Aggregate Year-to-Date > \$1,000.00			

1992 1000

TOTAL of Receipts This Page (attach) \$7,250.00

TOTAL This Period (see page 1-4 for number)



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20543

RG-3

JAN 1 1993

Gerard G. Hall, Treasurer  
Fields for Congress Inc.  
PO Box 4228  
Baton Rouge, LA 70821

Identification Number: C00261065

Reference: 30 Day Post-General Report (10/15/92-11/23/92)

Dear Mr. Hall:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-You must provide the occupation and name of employer for each contributor; required to be itemized on Schedule A. Please amend your report by supplying the omitted information.

With respect to the occupation and name of employer of the contributor, your committee may demonstrate "best efforts" to obtain the required information. This demonstration must describe your committee's procedures for requesting the information. You may also supply a copy of the solicitation. Under 11 CFR §104.7(b), the solicitation shall consist of a clear request for the required information (i.e., name, mailing address, occupation, and name of employer). The request should also inform the contributor that the reporting of such information is required by law. See 11 CFR §104.3(a)(1)(i) and 11 CFR §104.7.

-Schedule A of your report indicates that your committee may have failed to file one or more of the required 48 hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-General Report. A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking

1 3 2 34 80 41 3 51 80 3 5 4

contributions received during the aforementioned time period. Although the Commission may take legal action, any response you wish to make concerning this matter will be taken into consideration. (11 CFR 8104.5(f))

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

*Andrew Zehe*

Andrew Zehe  
Reports Analyst  
Reports Analysis Division

1 3 2 3 9 A 13 518J51 3 5 5

**MEMORANDUM FOR FILES:** TELECON

**SUBJECT:** RFAI's on Q3, 12G, 30G and YE

**FROM:** A. Zehe, RAD

**TO:** Gerard Hall 504-357-0528

**NAME OF COMMITTEE:** Fields for Congress, INC

**DATE:** 8/4/93

---

I called and asked Mr. Hall if he intended to respond to the RFAI's. He stated that he had sent out amendments on 8/2/93.

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RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

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

30 9 42 AM '94  
**SENSITIVE**

**FIRST GENERAL COUNSEL'S REPORT**

RAD Referral: #93L-70  
Date Activated: 6/01/94  
Staff Member: Robert Ridenour

SOURCE: I N T E R N A L L Y G E N E R A T E D

RESPONDENTS: Fields for Congress, Inc. and Gerard G. Hall,  
as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(6)(A)

INTERNAL REPORTS CHECKED: Referral Material  
Disclosure Reports

FEDERAL AGENCIES CHECKED: None

**I. GENERATION OF MATTER**

The Office of the General Counsel ("OGC" or "this Office") received a referral from the Reports Analysis Division ("RAD") on September 27, 1993. Attachment 1. The basis for the attached referral is the failure of Fields for Congress, Inc. and Gerard G. Hall, as treasurer, ("Respondents") to file timely the 48-hour notifications ("48-hour notices") for eleven (11) of twenty-four (24) contributions totalling \$18,000. The \$18,000 is comprised of two (2) contributions from individuals totalling \$2,000 and nine (9) contributions from political action committees totalling \$16,000. The candidate, Cleo Fields, won the 1992 General Election in the fourth (4th) Congressional District in the State of Louisiana with seventy-four percent (74%) of the vote.

**II. FACTUAL AND LEGAL ANALYSIS**

Based on the Factual and Legal Analysis, Attachment 2, this Office recommends that the Commission find reason to believe the

24043585357

Respondents violated 2 U.S.C. § 434(a)(6)(A).

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

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

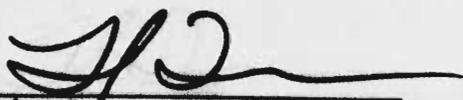
24043585358

**IV. RECOMMENDATIONS**

1. Open a MUR.
2. Find reason to believe Fields for Congress, Inc. and Gerard G. Hall, as treasurer, violated 2 U.S.C. § 434(a)(6)(A), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached Factual and Legal Analysis, proposed conciliation agreement, and the appropriate letter.

Lawrence M. Noble  
General Counsel

Date 6/29/94

BY:   
Lois G. Lerner  
Associate General Counsel

**Attachments**

1. Referral Materials
2. Factual and Legal Analysis
3. Proposed agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Fields for Congress, Inc., and  
Gerard G. Hall, as treasurer.

)  
)  
)  
)

RAD Referral  
#93L-70

MUR 4004

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 6, 1994, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral #93L-70:

1. Open a MUR.
2. Find reason to believe Fields for Congress, Inc. and Gerard G. Hall, as treasurer, violated 2 U.S.C. § 434(a)(6)(A), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the Factual and Legal Analysis, proposed conciliation agreement, and the appropriate letter, as recommended in the General Counsel's Report dated June 29, 1994.

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

Attest:

7-6-94  
Date

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

Received in the Secretariat: Thurs., June 30, 1994 9:42 A.M.  
Circulated to the Commission: Thurs., June 30, 1994 4:00 P.M.  
Deadline for vote: Wed., July 06, 1994 4:00 P.M.

nck

24043585359



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20461

July 14, 1994

Gerard G. Hall, Treasurer  
Fields for Congress, Inc.  
P.O. Box 4228  
Baton Rouge, LA 70821

RE: MUR 4004  
Fields for Congress, Inc.  
and Gerard G. Hall,  
as treasurer

Dear Mr. Hall:

On July, 6, 1994, the Federal Election Commission found that there is reason to believe Fields for Congress, Inc. and you, as treasurer, violated 2 U.S.C. §434(a)(6)(A), 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.

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 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 additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

In order to expedite the resolution of this matter, the Commission has also decided to offer 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.

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, 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.

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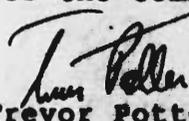
Gerard G. Hall  
Page 2

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 Robert A. Ridenour, the attorney assigned to this matter, at (202) 219-3400.

For the Commission,

  
Trevor Potter  
Chairman

**Enclosures**

Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Conciliation Agreement

cc: The Honorable Cleo Fields (Letter and Factual and Legal Analysis)

24043585361



or more received from October 15 through October 31, 1992, within 48 hours of their receipt. A review of the Committee's 1992 30 Day Post-General Report identified eleven (11) contributions of \$1,000 or more, totalling \$18,000, received between October 15 and October 31, 1992. Respondents did not submit the required 48-hour notices for these contributions:

<u>Contributor name</u> (as reported by Respondents)	<u>Date</u>	<u>Amount</u>
Milton Womack	10/21/92	\$1,000
Morgan Watson	10/31/92	\$1,000
AICPA Effective Legislation Committee	10/20/92	\$1,500
Transportation Political Education League	10/29/92	\$2,500
American Fed. of State, County & Mun. Employees AFL-CIO	10/29/92	\$3,000
Machinists Nonpartisan Political League	10/28/92	\$1,000
OPTHPAC	10/30/92	\$2,000
AT&T PAC	10/30/92	\$1,000
Transportation Political Education League	10/23/92	\$2,500
N.B.W.A. PAC	10/25/92	\$1,000
National Association of Life Underwriters PAC	10/29/92	\$1,500
TOTAL		<u>\$18,000</u>

Therefore, there is reason to believe Fields for Congress, Inc. and Gerard G. Hall, as treasurer, violated 2 U.S.C. § 434(a)(6)(A) by failing to report, within 48 hours of their receipt, campaign contributions of \$1,000 or more which were received after the 20th day, but more than 48 hours before the General Election.

24043585363

**JOHN MARK TARVER**  
ATTORNEY AND COUNSELOR AT LAW

3029 SOUTH SHERWOOD FOREST BOULEVARD · SUITE 100 (70818)  
POST OFFICE BOX 65122  
BATON ROUGE, LOUISIANA 70898  
TELEPHONE (504) 292-2897 · TELECOPIER (504) 927-4708

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

AUG 4 2 29 PM '94

August 1, 1994

Federal Election Commission  
Office of General Counsel  
Robert A. Ridenour, Esquire  
999 "E" Street, N.W.  
Washington, D.C. 20463

*By Facsimile & United States Mail*

RE: MUR 4004  
Fields for Congress, Inc.  
and Gerard G. Hall,  
as treasurer

Dear Mr. Ridenour:

Following please find correspondence from Gerard Hall designating me counsel for Fields for Congress (the Committee) in the above-referenced matter. We are unable to use the form prepared by the Federal Election Commission (FBC), because we have yet to receive same.

Please accept this as a request for an enlargement of time within which to respond with factual or legal materials to the Commission's notification in the referenced dated July 14, 1994. The basis of this request is as follows: Mr. Hall checked the Committee's post office box on July 22, 1994, before travelling to New Orleans to attend a convention. No materials from the Commission had arrived as of July 22. On his return from New Orleans on July 29, 1994, Mr. Hall again checked the Committee's post office box, and no materials from the Commission were found. Finally, this morning Mr. Hall again checked the Committee's post office box and found no materials from the Commission.

In sum, the Committee has not yet received the Commission's notification dated July 14, 1994, or enclosures. Undersigned counsel received the Commission's notification and Factual and Legal Analysis by facsimile on July 25, 1994, from Congressman Fields' office in Washington. Counsel is currently investigating the claims made in the July 14, 1994, notification and should be prepared to submit factual or legal materials, or an executed conciliation agreement, within fifteen (15) days. Accordingly, Fields for Congress respectfully requests a fifteen day extension of time within which to file exculpatory materials or to enter into a conciliation

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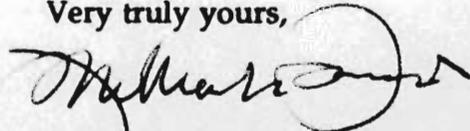
Mr. Robert A. Ridenour, Esquire  
August 1, 1994  
Page 2

agreement. The deadline for response under the proposed extension would, then, be August 15, 1994.

Because I have no copy of the Commission's proposed Conciliation Agreement, I would further request that you transmit same to me both by facsimile and United States mail at your *earliest* convenience. My facsimile number and post office address are set out on this letterhead.

Please contact me should you require additional information or have any questions or concerns. Thanking you for your consideration and courtesy, I remain

Very truly yours,



John Mark Tarver

JMT/ds

enclosure

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Fields for Congress  
Post Office Box 4228  
Baton Rouge, Louisiana 70821

August 1, 1994

Federal Election Commission  
Office of General Counsel  
Robert A. Ridenor, Esquire  
999 "E" Street, N.W.  
Washington, D.C. 20463

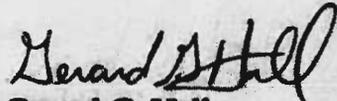
RE: MUR 4004  
Fields for Congress, Inc.  
as treasurer

Dear Mr. Ridenour:

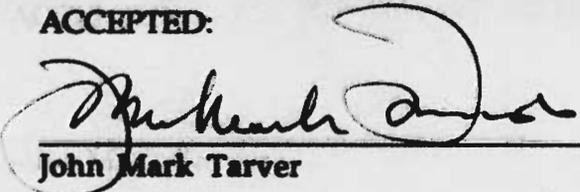
This is to advise that John Mark Tarver has been appointed counsel in the above-referenced matter by Fields for Congress.

Mr. Tarver's acceptance of this appointment is below.

Sincerely,

  
Gerard G. Hall  
Treasurer

ACCEPTED:

  
John Mark Tarver

Date

August 1, 1994

La. Bar # 20387

240435853366



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

August 1, 1994

VIA FACSIMILE

John Mark Tarver, Esq.  
3029 South Sherwood Forest Blvd.  
Ste. 100  
Baton Rouge, LA 70896

RE: MUR 4004  
Fields for Congress, Inc.  
and Gerard C. Hall,  
as treasurer

Dear Mr. Tarver:

Pursuant to your request of today, enclosed please find an additional copy of the proposed conciliation agreement in MUR 4004 which was sent to Fields for Congress, Inc. on July 14, 1994. Received with your request was a request for an extension of time of 15 days in which to respond to the Commission's reason to believe finding and a designation of counsel signed by the treasurer.

After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on August 15, 1994.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Robert A. Ridenour  
Attorney

Enclosure:  
Conciliation Agreement

94043585367

**JOHN MARK TARVER**  
ATTORNEY AND COUNSELOR AT LAW

3029 SOUTH SHERWOOD FOREST BOULEVARD · SUITE 100 (70816)  
POST OFFICE BOX 65122  
BATON ROUGE, LOUISIANA 70896  
TELEPHONE (504) 292-2897 · TELECOPIER (504) 927-4708

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

AUG 5 12 07 PM '94

July 29, 1994

Federal Election Commission  
Office of General Counsel  
Robert A. Ridenour, Esquire  
999 "E" Street, N.W.  
Washington, D.C. 20463

*By Facsimile & United States Mail*

RE: MUR 4004  
Fields for Congress, Inc.  
and Gerard G. Hall,  
as treasurer

Dear Mr. Ridenour:

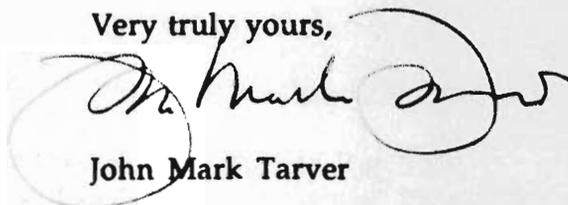
I represent Fields for Congress and Gerard G. Hall, as treasurer, in the referenced. Although I have received a facsimile of your correspondence dated July 14, 1994, and of your Factual and Legal Analysis from Congressman Fields' office, Mr. Hall has been out of town and had not received the complete set of documents you forwarded under cover of the July 14 correspondence as of July 22.

As soon as Mr. Hall is able to check his post office box again, we will investigate the factual basis of the matter by reviewing the campaign records of the committee. Should your assertions regarding violation of the 48-hour rule prove accurate, we will be happy to begin negotiation of a conciliation agreement. It may be, however, that the pertinent reports contain unintentional inaccuracies regarding the dates of contributions.

I would appreciate your cooperation as I work up the records and facts in this matter. Please do not hesitate to contact me should you have any questions or concerns.

With kind regards, I am

Very truly yours,



John Mark Tarver

JMT/ds

34043585368

**JOHN MARK TARVER**  
ATTORNEY AND COUNSELOR AT LAW

3029 SOUTH SHERWOOD FOREST BOULEVARD · SUITE 100 (70816)  
POST OFFICE BOX 65122  
BATON ROUGE, LOUISIANA 70896  
TELEPHONE (504) 292-2897 · TELECOPIER (504) 927-4708

August 12, 1994

Federal Election Commission  
Office of General Counsel  
Robert A. Ridenour, Esquire  
999 "E" Street, N.W.  
Washington, D.C. 20463

VIA AIRBORNE EXPRESS  
AIRBILL # 6847866174

RE: MUR 4004  
Fields for Congress, Inc.  
and Gerard G. Hall,  
as treasurer

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
AUG 15 3 04 PM '94

Dear Mr. Ridenour:

We have completed a review and inquiry of the several contributions made to Fields for Congress, Inc., a principal campaign committee of Cleo Fields, Gerard G. Hall, Treasurer, the reporting of which concerns the Federal Election Commission.

We do not believe that any of the contributions violate the 48 hour reporting rule as they were received by the Treasurer, Mr. Hall, on November 4, 1992, and were deposited that same day. See Reg. 103.3(a) in re: the ten day rule. Our inquiry indicates that the checks were mailed or hand delivered to the campaign headquarters sometime between the date of the check and election day, November 3, 1992, and accumulated by the campaign workers to be given to the treasurer when he returned to the office. Cf. Reg. 102.8(a). One fact is absolutely clear: not one dime of the contributed funds was used by the Committee prior to being deposited in the bank on November 4, 1992. During the last two weeks of the campaign, the treasurer and all officials knowledgeable about the handling of the campaign money were in the field campaigning while the headquarters was operated by mainly part-time campaign volunteers. While we are aware of the 10 day forwarding-after-receipt rule for contributions, we do not believe that there is any basis for a sanction for violation. For example, the Morgan Watson check of \$1,000.00 was returned NSF twice and was never made good.

Mr. Hall apparently used the date of the check as the date the contributions were received in many cases and also used this date on the FEC report, unaware that this signaled a technical violation, as he knew for a fact that he received and deposited the check on November 4, 1992. Cf. Reg. 102.9. The 48 hour rule requires the reporting of contributions of \$1,000.00 or more received after the 20th day but more than 48 hours before 12:01 a.m. of the day of the election. Cf. Reg. 104.5(f); and Reg 104.7(a), on best efforts.

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Robert A. Ridenour, Esquire  
August 12, 1994  
Page 2

With respect to the 1992 general election of November 3, 1992, the 48 hour rule period stretches from October 15 to October 30. Thus, checks of \$1,000.00 or more received after October 15 and before October 31, 1992, are covered by the 48 hour reporting rule. Given the 10 day forwarding rule of Reg. 102.8(a) and the 10 day depositing rule for treasurers, Reg 103.3(a), there can be no violation, in our opinion. The 10 day forwarding and the 10 day deposit regulations make no exception for the 48 hour reporting rule.

Please contact me in order to schedule a meeting at your earliest convenience for Mr. Ted Jones of this office to meet with you in Washington. We are sending to you evidence relative to the contributions and an affidavit of the treasurer for review in advance of a meeting.

Thanking you and with every good wish, I am

Sincerely yours

  
John Mark Tarver

enclosure

cc: Mr. Gerard Hall, Treasurer  
Honorable Cleo Fields

94043585370

STATE OF LOUISIANA

PARISH OF EAST BATON ROUGE

**AFFIDAVIT**

BEFORE ME, the undersigned authority personally came and appeared:

GERARD G. HALL

a person of the full age of majority and domiciled in the State and Parish aforesaid, who after being first duly sworn, did depose as follows:

- I. Morgan Watson's check dated 10/31/92, incorrectly reported by me to have been received on 10/31/92, in the amount of \$1,000.00 was returned by the bank twice for non-sufficient funds. The amount of \$1,000.00 represented by this check has never been collected by Fields for Congress, Inc.
- II. All checks related to FEC proceeding MUR 4004 were received by me, Treasurer of Fields for Congress, Inc., and deposited into the Committee's campaign depository, Premier Bank in Baton Rouge, Louisiana, on November 4, 1992.
- III. I make these foregoing statements of my own personal knowledge and belief.

BATON ROUGE, LOUISIANA, this 12<sup>th</sup> day of August, 1994.

WITNESSES:

*John D. [Signature]*

*Gerard G. Hall*  
GERARD G. HALL

*Diana S. [Signature]*

*[Signature]*  
NOTARY PUBLIC

94043585371

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Contributor	Check	Check No.	Check Amount	Date on PBC Report	Treatment	Receipt Date	Receipt Date By	Deposit Date	Comment
William Whack	10/21/92	25453	\$1,000.00	10/21/92		11/04/92	G. Hall	11/04/92	Unable to obtain info.
Morgan Watson	10/31/92	3963	\$1,000.00	10/31/92	by hand	11/24/92		11/24/92	NSP Check
AICPA Effective Legislation Committee	10/15/92	2713	\$1,500.00	10/20/92	letter dated 10/20/92	11/04/92		11/04/92	
Transportation Political Education League (1)	10/23/92	2755	\$2,500.00	10/20/92	letter dated 10/23/92	11/04/92		11/04/92	
Transportation Political Education League (2)	10/23/92	2756	\$2,500.00	10/20/92	letter dated 10/23/92	11/04/92		11/04/92	
MPCRM / S.E.O.P.L.E.	10/29/92	3024	\$3,000.00	10/20/92	overnight letter dated 10/20/92 (P1)	11/04/92		11/04/92	
Mechanics Non-Political League	10/20/92	10793	\$1,000.00	10/20/92	USPS Bookmark 10/20/92 (P1)	11/04/92		11/04/92	
OPTRIPAC	10/23/92	02914	\$2,000.00	10/20/92	overnight delivered by hand 10/23	11/04/92		11/04/92	
WEST PAC	10/30/92	0009647	\$1,000.00	10/20/92	by hand 11/02/92 - 11/04/92	11/04/92		11/04/92	

Contributor Name	Check Date	Check No.	Check Amount	Recpt Per FEC Report	Transmit	Receipt Date	Receipt Date By G. Hall	Deposit Date	Comment
N.B.W.A. PAC	10/22/92	4180	\$1,000.00	10/25/92	by hand letter dated 10/22/92		11/04/92	11/04/92	
National Association of Life Underwriters PAC	10/22/92	101465	\$1,500.00	10/29/92	by hand- env. only		11/04/92	11/04/92	

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**MILTON WOMACK, Baton Rouge, Louisiana**

8/3/94

Called Womack's secretary today at [redacted] (Baton Rouge). She didn't give her name. She told me she had no idea how to go about getting information as to when or how the contribution was delivered or received. She complained that hundred of checks went in and out everyday and that they'd been through the Roemer election. As a consequence the information I requested was impossible to obtain. She was very uncooperative.

CONTRIBUTOR INVESTIGATION FINISHED.

**B. MORGAN WATSON, Baton Rouge, Louisiana**

8/3/94

According to Gerard Hall, this check was returned NSF twice. To his recollection, the Committee returned the check to Morgan Watson. Hall will call to find out whether Watson still has the check and whether Watson remembers anything about how or when the check was delivered.

This check was deposited on 11/24/92. All other checks were deposited on 11/4/94. Hall says that on 11/4 Cleo Fields gave him all the checks Fields had on hand. Hall then deposited all checks on 11/4.

8/4/94

I called Morgan Watson at home this a.m. His immediate recollection was that he had written the check at the campaign office & handed it over to someone with the committee at that time. This would put receipt by someone at the Committee on 10/31/92.

He confirmed that the check was NSF, but wasn't sure whether he had the check. He agreed to look for it. Hall will look again tonight through his records. He recalled that he had asked campaign staff not to cash the check for a few days, so that he could cover the check.

He asked me to call him at his office at telephone (504) 927-7240 (Baton Rouge), should I need anything further.

8/9/94

Hall can't find a copy of the NSF check. He will request one from the bank, if one exists.

CONTRIBUTOR INVESTIGATION FINISHED.

94043585374

**C. AICPA EFFECTIVE LEGISLATION COMMITTEE, Washington, D.C.**

8/3/94

Contact person at AICPA is Sheila Calclasure at telephone (202) 434-9263.

Called Calclasure today. She believes the AICPA check was sent down to Baton Rouge for hand delivery by Jake Netterville or Barry Melancon. She will check into the matter and telephone me with further information.

8/4/94

Sheila called. She advised the check was mailed to Barry Melancon, executive director of the state CPAs, at telephone (504) 484-1040 (Baton Rouge, from National on 10/20/92. The check then went either to Jim Harris or to Jake Netterville, one of whom transferred it to the Committee. She hoped to get something more definite by 8/5.

8/5/94

Sheila called. She advised that Jim Harris and Jake Netterville delivered the check personally to Fields. As to the date of this delivery, she didn't know.

Called Netterville at telephone (Baton Rouge) to see if he has it calendared, etc. Called Netterville: Harris had nothing to do with delivery of the check although he was present at a meeting during which Netterville delivered the check to Fields. Netterville thinks he can place the date of the meeting; he will call back when he gets more.

Netterville's records indicate that the check was received by Fields on October 28, 1992. The meeting lasted from 8:30 a.m. to 9:00 a.m.

CONTRIBUTOR INVESTIGATION FINISHED.

**D. TRANSPORTATION POLITICAL EDUCATION LEAGUE, Cleveland, Ohio**

8/3/94

This PAC is connected with the United Transportation Union at telephone (216) 228-9400. TPEL contributed 2 checks on the same date, both for \$2,500.00.

Called TPEL today, but the person in charge of political contribution matters was not in the office; left message to call me back.

8/4/94

Talked to Olga Moore at national. She advised the check was mailed to A. B. Woodall in Louisiana on 10/24/92. Woodall is former state contact at AFL-CIO. Current contact is Tyrone C. Boudreaux at telephone (504) 383-5741. Boudreaux is out all day today. Left message for him to phone.

24043585375

8/5/94

Talked to A.B. Woodall. Boudreaux is out until Tues., 8/9. Woodall will come by the office on Tues. and talk to Sybil Holt and Boudreaux and go through the files to see if he can find out anything more definite about when the contribution was delivered to the committee.

8/9/94

Talked to Boudreaux. He looked back through his records and could find none pertaining to the 92 elections.

CONTRIBUTOR INVESTIGATION FINISHED.

**E. AFSCME/P.E.O.P.L.E. Washington, D.C.**

8/3/94

Contact person at AFSCME is Linda Canan at (202) 429-1198; at fax (202) 429-1197. Canan agreed to attempt to research the matter & asked that I fax her a written request, which I did. Any pertinent material is in AFSCME's archive/storage and may take a long time to locate. She will be out of town all next week. She speculated that Garland Webb in Baton Rouge had delivered the contribution.

8/5/92

Linda advised today that Garland did not receive the check for delivery. She speculated that it was overnighted to the campaign office on 10/30/92, which was a Friday. She has no records.

CONTRIBUTOR INVESTIGATION FINISHED.

**E. MACHINISTS NON-PARTISAN POLITICAL LEAGUE, Washington, D.C.**

8/3/94

This contribution was mailed to Fields' office on Scenic Hwy. in Baton Rouge. The postmark on the envelope bears the date 10/29/94.

CONTRIBUTOR INVESTIGATION FINISHED.

**G. OPHTHPAC, Washington, D.C.**

8/3/94

Office of Dr. Don Texada of Shreveport (contact Beth Morgan at telephone (318) 221-8646) received the check from OPHTHPAC's offices in Washington and overnighted it on 10/26/94 to lobbyist Jerry Doty in Baton Rouge (at telephone (504) 925-9919). I have a tele-facsimile copy of a FedEx Sender Activity Summary, which shows that the check was received at Doty's home on 10/27/92 at 11:49 a.m. by Mrs. Doty.

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Called Doty to get his recollection: One morning rather early Doty called Fields,, and the two arranged that Doty would meet that morning (between approximately 9 a.m. to 11 a.m., but definitely the morning) to transfer the contribution. Fields told Doty that he had to get on a plane that day, so Doty had to meet him soon. Doty stated that he did not think he waited more than a day or two after receiving it to deliver the contribution. The contribution was received at Doty's house the Tuesday before the election, 10/27, but the contribution was not received by Fields on that day because it was received by the Dotys at about noon and Doty remembers calling and delivering it to Fields fairly early in the morning. The contribution was delivered before the 11/3 election because Fields was about to get on a plane for a campaign tour. Thus it appears that Fields received the contribution on after 10/28.

Doty said he would check his records to see if he could turn up anything further and suggested that we check Fields' calendar to see when he was flying during the 10/27 through 11/2 period.

8/9/94

Doty hasn't been able to turn up anything more.

CONTRIBUTOR INVESTIGATION FINISHED.

**H. AT&T PAC, Washington, D.C.**

8/3/94

Called Sonya King at AT&T at (202) 457-3417. She agreed to research how and when the check was delivered and call back on 8/4.

8/4/94

Charles E. Wright at telephone \_\_\_\_\_ called in response to inquiry from Sonya King. He stated that he brought the check to Fields' Scenic Hwy. office on 11/4/92, the morning after the election. He will sign an affidavit to that effect.

This may conflict with information from Gerard that Cleo handed the checks over to Gerard the morning of 11/4 before the bank opened and Gerard was at the bank when it opened to deposit the checks.

CONTRIBUTOR INVESTIGATION FINISHED.

24043585377

N.B.W.A. PAC, Falls Church, Virginia

8/3/94

I am having trouble identifying what N.B.W.A stands for. Check has a Falls Church address for the organization, but no N.B.W.A. is listed according to directory assistance. The check is signed by Ronald A. Sarasin at telephone (703) 876-0291. Called his home number and left message on the machine. Gerard Hall is checking to see if he can determine the full name of the organization.

8/4/94

This is the PAC of the Nation Beer Wholesale Association. Called Linda Auglis at telephone (703) 683-4300 regarding information on the contribution. She advised that the contribution was mailed down to the Louisiana Beer Industry League on 10/22/92. Hall also advise that he had located the cover letter & envelope, with letter dated 10/22/92.

Called Charlie Tapp at La. Beer Industry League. He advised he received the check from national. He then called Cleo's campaign office & they sent somebody over to pick it up. He doesn't remember when this pick up occurred.

CONTRIBUTOR INVESTIGATION FINISHED.

J. NATIONAL ASSOCIATION OF LIFE UNDERWRITERS PAC,  
Washington, D.C.

8/3/94

Called Linda Stevenson at the national office at telephone (202) 331-8027. She stated that the check had been FedExed to Cornel Arceneaux at telephone (504) 924-3800. Arceneaux advised that he had not delivered the check and that I should call Joyce Paul at the state association office at telephone (504) 293-5258 (Baton Rouge). Paul advised that Don Gogreve at telephone (Baton Rouge) had delivered the contribution. Don Gogreve agreed to look back through his records and the state association records. He will call when they have something for me. Gogreve recalled that he and Tim Flowers had met with Fields and delivered a check, but couldn't remember when this meeting took place.

8/5/94

Called Gogreve, left message to return call.

Gogreve called. Check was delivered by Gogreve, Arceneaux, and a 3d person at breakfast with Fields. Gogreve will try to find his 92 records and get back with me next week.

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3/9/94

Gogrove says he can't find any records regarding the contribution.

CONTRIBUTOR INVESTIGATION FINISHED.

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Fields for Congress  
Post Office Box 4228  
Baton Rouge, Louisiana 70821

August 12, 1994

REC'D  
FEDERAL ELECTION  
OFFICE OF GENERAL  
COUNSEL  
AUG 19 12 47 PM '94

Federal Election Commission  
Office of General Counsel  
Robert A. Ridenour, Esquire  
999 "E" Street, N.W.  
Washington, D.C. 20463

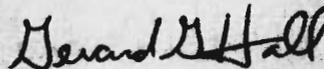
RE: MUR 4004  
Fields for Congress, Inc.  
and Gerard G. Hall,  
as treasurer

Dear Mr. Ridenour:

This is to advise that Theodore (Ted) L. Jones has been appointed counsel in the above-referenced matter by Fields for Congress. Mr. Jones appointment is in addition to the previously-noticed appointment of John Mark Tarver.

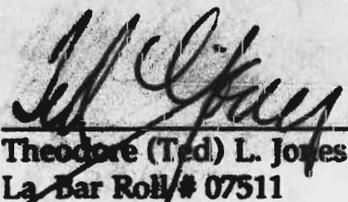
Mr. Jones' acceptance of this appointment is below.

Sincerely,



Gerard G. Hall  
Treasurer

ACCEPTED:

  
Theodore (Ted) L. Jones  
La. Bar Roll # 07511

Date

8/18/94

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RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

SEP 29 42 AM '94

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Fields for Congress, Inc. and ) NUR 4004  
Gerard G. Hall, as treasurer )

**SENSITIVE**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement submitted on behalf of Fields for Congress, Inc. and Gerard G. Hall, as treasurer, ("Respondents"). Attachment 1. counsel for Respondents.

For the reasons discussed below, this Office recommends that the Commission accept the agreement and close the file in this matter. A check for the civil penalty has not been received.

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For the reasons stated above and in the interest of settling this matter, this Office recommends that the Commission accept the conciliation agreement signed by counsel for Respondents and close the file in this matter.

**II. RECOMMENDATIONS**

1. Accept the attached conciliation agreement with Fields for Congress, Inc. and Gerard G. Hall, as treasurer.
2. Approve the appropriate letter.
3. Close the file.

Lawrence M. Noble  
General Counsel

Date 9/2/94

BY:   
Lois G. Lerner  
Associate General Counsel

**Attachments**

1. Conciliation Agreement
2. Response dated August 12, 1994.

Staff Assigned: Robert A. Ridenour

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Fields for Congress, Inc. and ) MUR 4004  
Gerard G. Hall, as treasurer. )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 9, 1994, the Commission decided by a vote of 6-0 to take the following actions in MUR 4004:

1. Accept the conciliation agreement with Fields for Congress, Inc. and Gerard G. Hall, as treasurer, as recommended in the General Counsel's Report dated September 2, 1994.
2. Approve the appropriate letter, as recommended in the General Counsel's Report dated September 2, 1994.
3. Close the file.

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

Attest:

9-9-94  
Date

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

Received in the Secretariat: Fri., Sept. 2, 1994 9:42 a.m.  
Circulated to the Commission: Fri., Sept. 2, 1994 12:00 p.m..  
Deadline for vote: Fri., Sept. 9, 1994 4:00 p.m.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 14, 1994

Theodore Jones  
3029 South Sherwood Forest Blvd.  
Ste. 100  
Baton Rouge, LA 70896

RE: MUR 4004  
Fields for Congress and  
Gerard G. Hall, as Treasurer

Dear Mr. Jones:

On September 9, 1994, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of a violation of 2 U.S.C. § 434(a)(6)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondents and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Robert A. Ridenour  
Attorney

Enclosure  
Conciliation Agreement

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**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 ) MUR 4004  
Fields for Congress, Inc. and )  
Gerard G. Hall, as treasurer )

**CONCILIATION AGREEMENT**

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Fields for Congress, Inc. and Gerard G. Hall, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(6)(A).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

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

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

1. Fields for Congress, Inc. is the authorized principal campaign committee for Cleo Fields.

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2. Gerard G. Hall is the treasurer of Fields for Congress, Inc.

3. The Federal Election Campaign Act of 1971, as amended, ("the Act") requires principal campaign committees of candidates for federal office to notify, in writing, either the Secretary of the Senate, the Clerk of the U.S. House of Representatives or the Commission, as appropriate, and the Secretary of State of each contribution totalling \$1,000 or more received by any authorized committee of the candidate after the 20th day, but more than 48 hours before any election. 2 U.S.C. § 434(a)(6)(A). The Act requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate, the office sought by the candidate, the date of the receipt, the amount of the contribution, and the identification of the contributor. Id. The notification of these contributions shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B).

4. The General Election of the State of Louisiana was held on November 3, 1992. Between October 15 and October 31, 1992, Respondents received eleven (11) contributions of \$1,000 or more, totalling \$18,000. Respondents did not submit 48-hour notices for these contributions.

5. On the 1992 30 Day Post-General Report, Respondents disclosed the receipt of these eleven (11) contributions.

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V. Respondents failed to report campaign contributions of \$1,000 or more received after the 20th day, but more than 48 hours before the General Election within 48 hours of receipt of the contributions, in violation of 2 U.S.C. § 434(a)(6)(A).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of three thousand dollars (\$3,000), 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. Respondents shall have no more than 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,

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made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble  
General Counsel

BY: *Lois G. Lerner* 9/14/94  
Lois G. Lerner Date  
Associate General Counsel

FOR THE RESPONDENTS:

*Ted Jones* 8/24/94  
Ted Jones Date  
Attorney for Respondents

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4004

DATE FILMED 10-3-54 CAMERA NO. 2

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Date: 10/19/94

           Microfilm  
            Public Records  
            Press

THE ATTACHED MATERIAL IS BEING ADDED TO CLOSED NUR 4004

24043591596

**JOHN MARK TARVER**  
ATTORNEY AND COUNSELOR AT LAW

3029 SOUTH SHERWOOD FOREST BOULEVARD · SUITE 100 (70810)  
POST OFFICE BOX 65122  
BATON ROUGE, LOUISIANA 70896  
TELEPHONE (504) 292-2697 · TELECOPIER (504) 927-4711

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
ADMINISTRATIVE DIVISION

OCT 11 3 25 PM '94

October 3, 1994

Federal Election Commission  
Office of General Counsel  
Robert A. Ridenour, Esquire  
999 "E" Street, N.W.  
Washington, D.C. 20463

*Via United States Certified Mail*  
Article Number P 866 991 936

OCT 12 11 29 AM '94

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

RE: MUR 4004  
Fields for Congress and  
Gerard G. Hall, as Treasurer

Dear Mr. Ridenour:

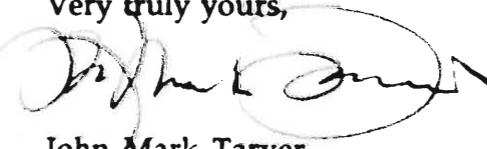
I am in receipt of your correspondence in the referenced directed to Theodore Jones and dated September 14, 1994.

In accordance with the terms of the conciliation agreement, I am transmitting herewith the check of Fields for Congress Campaign, number 1372, in the amount of THREE THOUSAND AND 00/100 DOLLARS (\$3,000.00).

Please do not hesitate to contact me should you have any questions or concerns.

With kind regards, I remain

Very truly yours,



John Mark Tarver

JMT/ds

enclosure

cc Mr. Gerard G. Hall

24043591597

FIELDS FOR CONGRESS CAMPAIGN

0 4 3 5 9 1 5 9 8

1372

Box 4228  
Rt 70821

7900 SCENIC HWY. STE. 2010 PH. 774-0100  
BATON ROUGE, LA. 70807

Oct 3 19 94

04-13/054  
2929

PAY TO THE ORDER OF Federal Election Commission

\$ 3,000<sup>00</sup>

Three Thousand 00/100

DOLLARS

**Premier Bank** Baton Rouge, La.

Bank Code 02

OR Civil Penalty

*Merand H. Hall*

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