



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

THIS IS THE BEGINNING OF MUR # 4725

DATE FILMED 3/10/98 CAMERA NO. 3

CAMERAMAN EES

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U. S. Department of Justice

REC'D
FEDERAL
COMM. DIV.
OFFICE

SEP 23 12 26 P.

United States Attorney
Western District of Louisiana

United States Courthouse
300 Fannin Street, Suite 3201
Shreveport, Louisiana 71101-3068
318 676 3600

Branch Office
First National Bank Tower
600 Jefferson Street, Suite 1000
Lafayette, Louisiana 70501-7206
318-262-6618

September 18, 1996

Honorable Lawrence Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Pre-MUR 342

RE: Complaint regarding Louisiana
7th Congressional District Race

Dear Mr. Noble:

On August 27, 1996 a local attorney, John Bernhardt, called my secretary requesting an appointment for the following day. No reason or reference was given for the purpose of the appointment. On August 28, 1996, Mr. Bernhardt arrived at my office with another local attorney, Wade Trahan, who is Seventh Congressional District candidate Tyrone Picard's campaign manager. They advised that they had twice met with a gentleman named Joe Chaillot, a former campaign manager for Chris John, who is another Seventh Congressional District candidate. According to Bernhardt and Trahan, Chaillot had related to them a scheme whereby federal campaign election laws could perhaps be skirted by the John campaign by taking corporate contributions and/or contributions in excess of the limit, placing those funds in the Chris John for Lieutenant Governor bank account (John ran for Lieutenant Governor in 1995, loaning his campaign approximately \$300,000.00, which debt is still outstanding according to the latest state report), then withdrawing money from the Lieutenant Governor account and using those funds in the Congressional race.

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Honorable Lawrence Noble
September 18, 1996
Page 2

I discussed this matter with Craig Donsanto at Public Integrity. He requested that I send the 302 to you and asked that you review it for a determination of what, if any, violation there may be of federal election law, and what further action might need to be taken.

Should you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,



MICHAEL D. SKINNER
United States Attorney
Western District of Louisiana

MDS/thc
Enclosures

cc: Craig Donsanto

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Candidate won't open past record

Chris John denies hiding fund sources

By BRUCE SCHULTZ
Academe bureau

Chris John of Crowley, candidate for the 7th District seat in the U.S. House, said he will not turn over campaign finance records from a previous election feud, despite an opponent's claim that John is hiding contributions.

"It's another attempt to bash me up," John said. "He (Picard) is behind in the polls and he's desperate."

Tyron Picard of Abbeville, also running for the congressional seat, issued a press release Monday calling for John to release finance records from his unsuccessful 1994 bid for lieutenant governor.

Picard said in a press release that John is using "admitted laundering" by accepting contributions to pay off his \$200,000 debt from the 1995 race for lieutenant governor, then transferring those contributions to his congressional campaign.

Picard complained John is using the method to get contributions exceeding \$1,000, the legal limit for federal campaign contributions.

"This is a flagrant subversion of federal campaign finance laws," Picard said. "The other six candidates and I have all complied fully and openly with the Federal Election Commission's regulations."

Picard wants to see John's current-year records for his lieutenant governor's campaign filed now, several months before he's required to file them with the state.

"Because state law does not require Mr. John to report 1996 contributions until next year, the spirit of full disclosure is being thrown out the window," Picard said.

"The frightening effect is that the voters won't know whose money is influencing Chris John until well after the election."

Picard said he is filing a complaint with the FEC.

John said Picard's complaints are "baseless." He said he is asking the FEC if he can divert funds from his lieutenant governor's campaign fund to his congressional race.

"I don't even know if it's legal to do that," he said. "I'm not a lawyer or an accountant."

John said contributions will help pay checks to pay off the debt from his lieutenant governor's race.

"It would be silly for me to file a report before a report is due," John said.

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POLITICS



The U.S. Justice Department is reportedly making inquiries into congressional candidate Chris John's handling of campaign funds. John's former campaign manager, Joe Chailot, told *The Times* last week that he was contacted by U.S. Attorney Milton Sidener and asked to go in for an interview. In an Aug. 29 meeting with Skinner and an FBI agent, Chailot says he was questioned about the use of contributions to John's congressional campaign to pay off the debt remaining from John's unsuccessful campaign for lieutenant governor in 1995.

Recent news reports have indicated John was considering using corporate contributions and contributions in excess of \$1,000 — neither of which are allowed in federal campaigns — to pay off the debt from his campaign for lieutenant governor, a debt which is owed to John himself for money he loaned to the campaign. John could then turn around and contribute that money personally

to his congressional campaign. There are no limits on how much a candidate can contribute to his or her own federal campaign.

Chailot says Skinner told him a complaint had been filed concerning John's campaign contributions and that the U.S. Attorney's Office was looking into it. Chailot says Skinner's questions focused on whether corporate contributors and those who contributed greater than \$1,000 intended for their contributions to be diverted to the lieutenant governor campaign. Chailot says Skinner asked specifically if that money was to be used for get-out-the-vote activities on Election Day.



Chris John

Chailot says that before he left the campaign, they discussed the idea of using the lieutenant governor fund to fund money to the congressional campaign, but that had not been done yet. Chailot was fired by John over differences of political philosophy, and Chailot subsequently

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ly complained about the way John had treated him (*The Times*, July 31). The campaign fund was one of those philosophical differences, Chailot says.

Skinner cites Justice Department policy and will neither confirm nor deny the existence of an investigation into John's campaign. The Federal Election Commission handles most campaign finance matters, but criminal penalties come into play when the amount involved exceeds \$2,000.

John told *The Times* he was unaware of any federal investigation into his campaign and says neither he nor anyone in his campaign has been contacted by the U.S. Attorney's Office or the FBI. John calls the complaint politically motivated. He says the financing tactic in question had been discussed within the campaign but declined to comment when asked if it had ever been utilized. "Whatever I say about this, the worse it gets. I have done nothing — nothing — legal, period, end of sentence."



Byron Picard

Byron Picard has launched a series of attacks in the final weeks of the campaign against John in an effort to dislodge enough votes from the apparent front-runner to get Picard into the runoff — whether that comes to Picard's advantage in a crowded eight-man field remains to be seen.

Picard has attempted to make hay of news reports concerning John's handling of campaign funds (Picard denies that he or anyone associated with his campaign filed a

complaint with the U.S. Attorney's Office calling for John to return a full accounting of the campaign funds to the lieutenant governor's campaign). Chailot says he has just been asked to file with the state board of ethics next year.

Picard has also accused John for legislative junkies participating in the state retirement system and voting for pay raises for legislators. The money for that is being circulating in the state economy.

John's campaign to the Vice campaign had a black male of that city working as a fundraiser but been asking. The top of the campaign was to be that John had wanted to be out of (perhaps) on a number of occasions. All it took was to the state board of ethics. The votes were taken on generally non-environmental issues, John says.

U.S. Rep. Bob Livingston has endorsed Republican Donald Whitfield's candidacy for the 7th District congressional seat. The endorsement is being made by Livingston, once fellow GOPer who had entered the race, but Livingston had opted to stay neutral for a while. Livingston's family is from New Orleans and has been a longtime supporter of Livingston.

Livingston also endorsed Rep. Woody Jenkins in the U.S. Senate race.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 2, 1996

Michael D. Skinner
U.S. Attorney
Western District of Louisiana
300 Fannin Street, Suite 3201
Shreveport, LA 71101-3068

RE: Pre-MUR 342

Dear Mr. Skinner:

This is to acknowledge receipt of your letter dated September 18, 1996, advising us of the possibility of a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") by Chris John et al. We will review the matter and advise you of the Commission's determination.

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.

If you have any questions or additional information, please call, Alva E. Smith, at (202) 219-3400. Our file number for this matter is Pre-MUR 342.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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INSTRUCTIONS

1. Type or print legibly in black ink.
2. The date of the primary must be included in Item 3 on the cover sheet. If the election date is not yet known, include the anticipated year of the election.
3. Schedules that do not apply should be omitted. If additional space is necessary, make copies of the needed schedules and insert at the appropriate place.
4. All transactions must be reported, regardless of amount. Exception: In-kind transactions valued at \$25 or less are not required to be reported. However, successive transactions must be added together to determine whether \$25 has been exceeded.
5. A campaign bank account must be maintained. All contributions must be deposited in the campaign account. All expenditures must be made by check drawn on the campaign account. The check must be made payable to a specific person and indicate the object or services for which it was drawn. Exception: A petty cash fund may be maintained and used for expenditures of \$100 or less that are not for personal services.
6. Cash contributions in excess of \$100 from one source during a calendar year are prohibited. A cash contributor must be given a receipt containing his name, address, social security number and signature, and the date and exact amount of the contribution. The campaign must keep a copy of the receipt.
7. A record must be kept for every transaction, including the sale of tickets to fundraising events. The sale of a ticket to a fundraising event is reported as any other contribution. Exception: in the case of a single transaction involving the sale of campaign paraphernalia for \$25 or less, no record need be kept except the total amount received and deposited and the fact that such amount was received from such sale. The total amount is reported on Line 3 of the Summary Page.
8. The following contribution limits apply: \$5,000 major office candidates, \$2,500 district office candidates, and \$1,000 any other office candidates. You may not accept more than your contribution limit from one source per election. You may not accept contributions from persons substantially interested in the gaming industry. The primary and general are considered two separate elections. When calculating whether the limits have been reached, outstanding loans, endorsements or guarantees on loans, and contributions must be added together. The limits do not apply to the candidate's use of his own funds or to contributions made by recognized political parties or their committees. The limits do apply to contributions made by family members and legal entities owned by the candidate or his family members. The limits may be doubled when the contributor is a political committee with over 250 members who contributed at least \$50 to the committee during the preceding calendar year. The committee must have certified that it meets this membership requirement on its annual Statement of Organization. The amounts received from all political committees combined may not exceed the following limits: \$50,000 major office candidates, \$35,000 district office candidates, and \$10,000 any other office candidates. These aggregate limits apply to both the primary and general elections combined.
9. The term "this election" as used through this form refers to the period from the date of first becoming a candidate (the day the first contribution was accepted, the first expenditure made, or the date of qualification to run for office, whichever came first) through the closing date of the current report.
10. Separate reporting forms are to be used for "Special Reports" and "Election Day Expenditures."
11. A candidate may report through a principal campaign committee. The use of a committee is strictly optional. If a committee is used the candidate must file a "Designation of Principal Campaign Committee." The committee must file a Statement of Organization in January of each year it will have over \$500 in financial activity. A \$100 filing fee must be submitted annually with each Statement of Organization.
12. Contributions or loans in the name of another are prohibited. If funds are made available to a candidate's campaign by a person who was loaned those funds by a third party, the name of the third party must also be disclosed.
13. Expenditures made by a public relations firm, an advertising agency or agent for the campaign must be reported to the campaign; the ultimate recipients of any such expenditures are required to be reported on Schedule E-1 of this report.
14. Expenditures, including any reimbursement of costs, to persons to transport voters to the polls are prohibited. Exception: payments to transport voters are allowed if made to a bona fide bus, taxi, or transportation service duly licensed or permitted by a governmental entity.

SUMMARY PAGE

RECEIPTS	This Period
1. Contributions (Schedule A-1)	19,500.00
2. In-kind Contributions (Schedule A-2)	- 0 -
3. Campaign paraphernalia sales of \$25 or less	- 0 -
4. TOTAL CONTRIBUTIONS (Lines 1 + 2 + 3)	19,500.00
5. Other Receipts (Schedule A-3)	182.42
6. Loans Received (Schedule B)	55,000.00
7. Loan Repayments Received (Schedule D)	886.42
8. TOTAL RECEIPTS (Lines 4 + 5 + 6 + 7)	75,568.84

DISBURSEMENTS	This Period
9. Expenditures (Schedule E-1)	852.43
10. Other Disbursements (Schedule E-2)	- 0 -
11. Loan Repayments Made (Schedule B)	72,500.00
12. Funds Loaned (Schedule D)	- 0 -
13. TOTAL DISBURSEMENTS (Lines 9 + 10 + 11 + 12)	73,352.43

FINANCIAL SUMMARY	Amount
14. Funds on hand at beginning of reporting period <small>(Must equal funds on hand at close from last report or 4-9 last report for this district)</small>	387.02
15. Plus total receipts this period <small>(Line 8 above)</small>	+ 75,568.84
16. Less total disbursements this period <small>(Line 13 above)</small>	- 73,352.43
17. Less in-kind contributions <small>(Line 2 above)</small>	- 0 -
18. Funds on hand at close of reporting period	2,603.43

Form 488, Rev. 10/88 Page 488-100

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SUMMARY PAGE (continued)

INVESTMENTS	Amount
19 Of funds on hand at beginning of reporting period (Line 14, above), amount held in investments (i.e., savings accounts, CD's, money market funds, stocks, bonds, etc.)	- 0 -
20 Of funds on hand at close of reporting period (Line 18, above), amount held in investments	- 0 -

SPECIAL TRANSACTIONS	This Period
21 Candidate's personal funds (Use of personal funds as either a contribution or loan to the campaign should be reported on Schedules A-1 or B)	15,000.00
22 Contributions received from political committees (From Schedules A-1 and A-2)	- 0 -
23 All proceeds from the sale of tickets to fundraising events (Receipts from the sale of tickets are contributions and must also be reported on Schedule A-1)	- 0 -
24 Proceeds from the sale of campaign paraphernalia (Receipts from the sale of campaign paraphernalia are contributions and must also be reported on Schedule A-1 or Line 3, above)	- 0 -
25 Expenditures from petty cash fund (Must also be reported on Schedule E-1)	- 0 -

NOTICE

The personal use of campaign funds is prohibited.* The use of campaign funds must be related to a political campaign or the holding of a public office or party position. However, campaign funds may be used to reimburse a candidate for expenses related to his campaign or office, to pay taxes on the interest earned on campaign funds or to replace articles lost, stolen, or damaged in connection with a campaign.

Excess campaign funds may be returned to contributors on a pro rata basis, given as a charitable contribution as provided in 28 USC 170(c), given to a charitable organization as defined in 28 USC 801(c)(3), expended in support of or opposition to a proposition, political party, or candidacy of any person, or maintained in a segregated fund for use in future political campaigns or activity related to preparing for future candidacy to elective office.

*The prohibition on the personal use of campaign funds does not apply to campaign funds received prior to July 15, 1988.

Form 288, Rev. 8/88 Page 4/4a 4/88

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SCHEDULE A-1: CONTRIBUTIONS (other than In-Kind Contributions)

The following information must be provided for all contributors to your campaign during this reporting period, except for in-kind contributions. Information on in-kind contributions is reported on SCHEDULE A-2: IN-KIND CONTRIBUTIONS. In Column 1, check if the contributor is a political committee or a party committee. Any personal funds a candidate contributes to his campaign must be reported on this schedule. Personal funds a candidate loans to his campaign should be reported on Schedule B. For anonymous contributions, see Schedule F. Totals and subtotals at bottom of page are optional. Completion of totals and subtotals may assist in calculating totals that must be reported on the Summary Page.

1. Name and Address of Contributor	2. Contributions this Reporting Period a. Date(s) b. Amount(s)		3. Total this Election
DOCTOR'S HOSPITAL 5101 HIGHWAY 167 SOUTH OPELOUSAS, LA 70570 POLITICAL COMMITTEE <u>NO</u> PARTY COMMITTEE <u>NO</u>	6-28-96	4,000.00	4,000.00
COPESTONE, INC. P.O. BOX 51439 LAFAYETTE, LA 70505-1439 POLITICAL COMMITTEE <u>NO</u> PARTY COMMITTEE <u>NO</u>	9-2-96	5,000.00	5,000.00
CHESAPEAKE OPERATING, INC. P.O. BOX 18496 OKLAHOMA CITY, OK 73154 POLITICAL COMMITTEE <u>NO</u> PARTY COMMITTEE <u>NO</u>	10-21-96	5,000.00	5,000.00
B F EXPLORATION & OIL, INC. P.O. BOX 94727 CLEVELAND, OH 44101-4727 POLITICAL COMMITTEE <u>NO</u> PARTY COMMITTEE <u>NO</u>	10-21-96	5,000.00	5,000.00
ACADIAN ENVIRONMENTAL, INC. P.O. BOX 1126 Eunice, LA 70535 POLITICAL COMMITTEE <u>NO</u> PARTY COMMITTEE <u>NO</u>	11-7-96	500.00	500.00
POLITICAL COMMITTEE _____ PARTY COMMITTEE _____			
POLITICAL COMMITTEE _____ PARTY COMMITTEE _____			
4. SUBTOTAL (this page)		19,500.00	N/A
5. TOTAL (complete only on last page of this schedule)		19,500.00	N/A
6. CONTRIBUTIONS FROM POLITICAL COMMITTEES SUBTOTAL (this page) <u>- 0 -</u> TOTAL (complete only on last page of this schedule) <u>- 0 -</u>			

Form 102, Rev. 6/85 Page 406-606

SCHEDULE A-1: CONTRIBUTIONS (continued)

1 Name and Address of Contributor	2 Contributions the Reporting Period a. Dollars b. Amount		3 Total the Election
N/A			
POLITICAL COMMITTEE _____ PARTY COMMITTEE _____			
POLITICAL COMMITTEE _____ PARTY COMMITTEE _____			
POLITICAL COMMITTEE _____ PARTY COMMITTEE _____			
POLITICAL COMMITTEE _____ PARTY COMMITTEE _____			
POLITICAL COMMITTEE _____ PARTY COMMITTEE _____			
POLITICAL COMMITTEE _____ PARTY COMMITTEE _____			
POLITICAL COMMITTEE _____ PARTY COMMITTEE _____			
4. SUBTOTAL (this page)			N/A
5. TOTAL (complete only on last page of the schedule)			N/A
6. CONTRIBUTIONS FROM POLITICAL COMMITTEES:			
SUBTOTAL (this page) _____	TOTAL (complete only on last page of the schedule) _____		

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SCHEDULE A-2: IN-KIND CONTRIBUTIONS

The following information must be provided for all in-kind contributions to your campaign having a monetary value in excess of \$25.00. In-kind contributions include the donation of tangible property, the use of tangible property, or the services of employees paid by a person other than the candidate or his business. In Column 1, check if the in-kind contributor is a political committee or a party committee. Any in-kind contributions a candidate makes to his own campaign must be reported here. Totals and subtotals at bottom of page are optional. Completion of totals and subtotals may assist in calculating totals that must be reported on the Summary Page.

1. Name and Address of Contributor	2. In-kind Contributions Received this Reporting Period			3. Total this Election
	a. Description(s)	b. Date(s)	c. Value(s)	
N/A				
POLITICAL COMMITTEE _____ PARTY COMMITTEE _____				
POLITICAL COMMITTEE _____ PARTY COMMITTEE _____				
POLITICAL COMMITTEE _____ PARTY COMMITTEE _____				
POLITICAL COMMITTEE _____ PARTY COMMITTEE _____				
POLITICAL COMMITTEE _____ PARTY COMMITTEE _____				
POLITICAL COMMITTEE _____ PARTY COMMITTEE _____				
POLITICAL COMMITTEE _____ PARTY COMMITTEE _____				
4. SUBTOTAL (this page)				N/A
5. TOTAL (complete only on last page of this schedule)				N/A
6. CONTRIBUTIONS FROM POLITICAL COMMITTEES ONLY				
SUBTOTAL (this page) _____		TOTAL (complete only on last page of this schedule) _____		

Form 425, Rev. 6/85 Page 425-625

SCHEDULE A-3: OTHER RECEIPTS

This schedule is used to report those receipts that are not "contributions"; that is, monies paid to the campaign that are not given for the purpose of supporting, opposing or otherwise influencing the nomination or election of a candidate to public office. Examples include interest or investment income. Receipts should be reported on this schedule only if they have not been reported elsewhere in this report. The explanation of the receipt should state the reason the payment was made to the campaign.

1. Name and Address of Source	2. Date	3. Explanation	4. Amount
BELL SOUTH 85 ANNEX ATLANTA, GA 30385-0001	1-23-96 2-5-96	DEPOSIT REFUND DEPOSIT REFUND	110.71 71.71
5. Total OTHER RECEIPTS during this reporting period			182.42

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SCHEDULE B: LOANS RECEIVED

The following information must be provided for each loan or line of credit received this reporting period, even if it has been repaid. Also, complete this schedule for loans received in prior periods that are still outstanding. Separate loans must be reported separately, even if from the same source. Any personal funds a candidate loans to his campaign must be reported on this schedule.

1. Name and address of lender CHRISTOPHER CHARLES JOHN P.O. BOX 971 CROWLEY, LA 70527-0971	2. a. Date* <u>9-9-96</u> b. Interest rate <u>-0-</u> % (a.p.r.) c. Amount borrowed* \$ <u>3,000.00</u> d. Balance due \$ <u>-0-</u> <small>*For lines of credit, give the date the line of credit was first committed at item 2a and list only the amount actually drawn at item 2c. OPTIONAL: Total amount of credit available \$ _____</small>						
3. Endorser/Guarantor (Enter the full name and address of each person or entity that has endorsed, guaranteed or otherwise secured the loan or line of credit. Also, state the amount of liability for each endorser or guarantor.)	4. Repayments this period <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="width: 30%;">Date</th> <th style="width: 35%;">Principal</th> <th style="width: 35%;">Interest</th> </tr> </thead> <tbody> <tr> <td style="text-align: left;">2-6-96</td> <td>3,000.00</td> <td></td> </tr> </tbody> </table>	Date	Principal	Interest	2-6-96	3,000.00	
Date	Principal	Interest					
2-6-96	3,000.00						
<small>(List payments of principal and interest separately. If separate amounts are not known, list all payments under principal.)</small>							

1. Name and address of lender CHRISTOPHER CHARLES JOHN P.O. BOX 971 CROWLEY, LA 70527-0971	2. a. Date* <u>2-24-95</u> b. Interest rate <u>-0-</u> % (a.p.r.) c. Amount borrowed* \$ <u>10,000.00</u> d. Balance due \$ <u>-0-</u> <small>*For lines of credit, give the date the line of credit was first committed at item 2a and list only the amount actually drawn at item 2c. OPTIONAL: Total amount of credit available \$ _____</small>						
3. Endorser/Guarantor (Enter the full name and address of each person or entity that has endorsed, guaranteed or otherwise secured the loan or line of credit. Also, state the amount of liability for each endorser or guarantor.)	4. Repayments this period <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="width: 30%;">Date</th> <th style="width: 35%;">Principal</th> <th style="width: 35%;">Interest</th> </tr> </thead> <tbody> <tr> <td style="text-align: left;">2-6-96</td> <td>10,000.00</td> <td></td> </tr> </tbody> </table>	Date	Principal	Interest	2-6-96	10,000.00	
Date	Principal	Interest					
2-6-96	10,000.00						
<small>(List payments of principal and interest separately. If separate amounts are not known, list all payments under principal.)</small>							

Form 485, Rev. 6/95 Page 2a of 2b

SCHEDULE B: LOANS RECEIVED (continued)

<p>1. Name and address of lender</p> <p>CHRISTOPHER CHARLES JOHN P.O. BOX 971 CROWLEY, LA 70527-0971</p>	<p>2. a. Date <u>4-10-95</u> b. Interest rate <u>-0-</u> % (A.P.R.)</p> <p>c. Amount borrowed <u>\$ 25,000.00</u></p> <p>d. Balance due <u>\$ -0-</u></p> <p><small>*For lines of credit, give the date the line of credit was first committed at item 2a and list only the amount actually drawn at item 2c. OPTIONAL: Total amount of credit available \$ _____</small></p>						
<p>3. Endorser/Guarantor</p>	<p>4. Repayments this period</p> <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:30%;">Date</th> <th style="width:35%;">Principal</th> <th style="width:35%;">Interest</th> </tr> </thead> <tbody> <tr> <td align="center">2-6-96</td> <td align="center">25,000.00</td> <td></td> </tr> </tbody> </table>	Date	Principal	Interest	2-6-96	25,000.00	
Date	Principal	Interest					
2-6-96	25,000.00						
<p>(Enter the full name and address of each person or entity that has endorsed, guaranteed or otherwise secured the loan or line of credit. Also, state the amount of liability for each endorser or guarantor.)</p>	<p>(List payments of principal and interest separately. If separate amounts are not known, list all payments under principal.)</p>						

<p>1. Name and address of lender</p> <p>CHRISTOPHER CHARLES JOHN P.O. BOX 971 CROWLEY, LA 70527-0971</p>	<p>2. a. Date <u>7-11-95</u> b. Interest rate <u>-0-</u> % (A.P.R.)</p> <p>c. Amount borrowed <u>\$ 200,000.00</u></p> <p>d. Balance due <u>\$ 165,500.00</u></p> <p><small>*For lines of credit, give the date the line of credit was first committed at item 2a and list only the amount actually drawn at item 2c. OPTIONAL: Total amount of credit available \$ _____</small></p>																		
<p>3. Endorser/Guarantor</p>	<p>4. Repayments this period</p> <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:30%;">Date</th> <th style="width:35%;">Principal</th> <th style="width:35%;">Interest</th> </tr> </thead> <tbody> <tr> <td align="center">2-6-96</td> <td align="center">17,000.00</td> <td></td> </tr> <tr> <td align="center">6-28-96</td> <td align="center">4,000.00</td> <td></td> </tr> <tr> <td align="center">9-3-96</td> <td align="center">5,000.00</td> <td></td> </tr> <tr> <td align="center">12-7-96</td> <td align="center">5,000.00</td> <td></td> </tr> <tr> <td align="center">12-17-96</td> <td align="center">3,500.00</td> <td></td> </tr> </tbody> </table>	Date	Principal	Interest	2-6-96	17,000.00		6-28-96	4,000.00		9-3-96	5,000.00		12-7-96	5,000.00		12-17-96	3,500.00	
Date	Principal	Interest																	
2-6-96	17,000.00																		
6-28-96	4,000.00																		
9-3-96	5,000.00																		
12-7-96	5,000.00																		
12-17-96	3,500.00																		
<p>(Enter the full name and address of each person or entity that has endorsed, guaranteed or otherwise secured the loan or line of credit. Also, state the amount of liability for each endorser or guarantor.)</p>	<p>(List payments of principal and interest separately. If separate amounts are not known, list all payments under principal.)</p>																		

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SCHEDULE B: LOANS RECEIVED

The following information must be provided for each loan or line of credit received this reporting period, even if it has been repaid. Also, complete this schedule for loans received in prior periods that are still outstanding. Separate loans must be reported separately, even if from the same source. Any personal funds a candidate loans to his campaign must be reported on this schedule.

1. Name and address of lender CHRISTOPHER CHARLES JOHN P.O. BOX 971 CROWLEY, LA 70527-0971	2. a. Date <u>10-4-95</u> b. Interest rate <u>-0-</u> % (a.p.r.) c. Amount borrowed* \$ <u>50,000.00</u> d. Balance due \$ <u>50,000.00</u> <small>*For lines of credit, give the date the line of credit was first committed at item 2a and list only the amount actually drawn at item 2c. OPTIONAL: Total amount of credit available \$ _____</small>						
3. Endorser/Guarantor (Enter the full name and address of each person or entity that has endorsed, guaranteed or otherwise secured the loan or line of credit. Also, state the amount of liability for each endorser or guarantor.)	4. Payments this period <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="width: 30%;">Date</th> <th style="width: 35%;">Principal</th> <th style="width: 35%;">Interest</th> </tr> </thead> <tbody> <tr> <td style="height: 100px;"> </td> <td> </td> <td> </td> </tr> </tbody> </table> (List payments of principal and interest separately. If separate amounts are not known, list all payments under principal.)	Date	Principal	Interest			
Date	Principal	Interest					

1. Name and address of lender CHRISTOPHER CHARLES JOHN P.O. BOX 971 CROWLEY, LA 70527-0971	2. a. Date <u>12-5-95</u> b. Interest rate <u>-0-</u> % (a.p.r.) c. Amount borrowed* \$ <u>1,000.00</u> d. Balance due \$ <u>1,000.00</u> <small>*For lines of credit, give the date the line of credit was first committed at item 2a and list only the amount actually drawn at item 2c. OPTIONAL: Total amount of credit available \$ _____</small>						
3. Endorser/Guarantor (Enter the full name and address of each person or entity that has endorsed, guaranteed or otherwise secured the loan or line of credit. Also, state the amount of liability for each endorser or guarantor.)	4. Payments this period <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="width: 30%;">Date</th> <th style="width: 35%;">Principal</th> <th style="width: 35%;">Interest</th> </tr> </thead> <tbody> <tr> <td style="height: 100px;"> </td> <td> </td> <td> </td> </tr> </tbody> </table> (List payments of principal and interest separately. If separate amounts are not known, list all payments under principal.)	Date	Principal	Interest			
Date	Principal	Interest					

Form 102, Rev. 6/88 Page 40a

SCHEDULE B: LOANS RECEIVED (continued)

<p>1. Name and address of lender</p> <p>CHRISTOPHER CHARLES JOHN P.O. BOX 971 CROWLEY, LA 70527-0971</p>	<p>2. a. Date <u>1-6-96</u> b. interest rate <u>11%</u> (4.p.r.)</p> <p>c. Amount borrowed* \$ <u>55,000.00</u></p> <p>d. Balance due \$ <u>55,000.00</u></p> <p>*For lines of credit, give the date the line of credit was first established at item 2a and list only the amount actually drawn at item 2c. OPTIONAL: Total amount of credit available \$ _____</p>						
<p>3. Endorser/Guarantor</p>	<p>4. Repayments this period</p> <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:33%;">Date</th> <th style="width:33%;">Principal</th> <th style="width:33%;">Interest</th> </tr> </thead> <tbody> <tr> <td style="height: 150px;"> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Date	Principal	Interest			
Date	Principal	Interest					
<p>(Enter the full name and address of each person or entity that has endorsed, guaranteed or otherwise secured the loan or line of credit. Also, state the amount of liability for each endorser or guarantor.)</p>	<p>(List payments of principal and interest separately if separate amounts are not known, list all payments under principal.)</p>						

<p>1. Name and address of lender</p> <p align="center">N/A</p>	<p>2. a. Date _____ b. interest rate _____ (4.p.r.)</p> <p>c. Amount borrowed* \$ _____</p> <p>d. Balance due \$ _____</p> <p>*For lines of credit, give the date the line of credit was first established at item 2a and list only the amount actually drawn at item 2c. OPTIONAL: Total amount of credit available \$ _____</p>						
<p>3. Endorser/Guarantor</p>	<p>4. Repayments this period</p> <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:33%;">Date</th> <th style="width:33%;">Principal</th> <th style="width:33%;">Interest</th> </tr> </thead> <tbody> <tr> <td style="height: 150px;"> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Date	Principal	Interest			
Date	Principal	Interest					
<p>(Enter the full name and address of each person or entity that has endorsed, guaranteed or otherwise secured the loan or line of credit. Also, state the amount of liability for each endorser or guarantor.)</p>	<p>(List payments of principal and interest separately if separate amounts are not known, list all payments under principal.)</p>						

SCHEDULE C: DEBTS AND OBLIGATIONS (OTHER THAN LOANS)

___ DEBTS OWED BY THE CAMPAIGN

___ DEBTS OWED TO THE CAMPAIGN

Use this schedule to report either debts owed by the campaign or debts owed to the campaign, checking the appropriate line above. If the campaign has experienced both types of debts, then copy this page and report them separately. Never combine debts owed by and debts owed to on the same page. Debts should be reported on this schedule until repaid. When repayments are made by the campaign a corresponding entry should be made on Schedule E-1 General Expenditures. When repayments are received by the campaign a corresponding entry should be made on Schedule A-3 Other Receipts.

1 Name and Address of Creditor/Debtor	2 Outstanding Balance Beginning This Period	3 Amounts Incurred This Period (+)	4 Payments Made This Period (-)	5 Outstanding Balance at Close of This Period
N/A Reason Debt Incurred				
Reason Debt Incurred				
Reason Debt Incurred				
Reason Debt Incurred				
Reason Debt Incurred				
Reason Debt Incurred				
Reason Debt Incurred				
Reason Debt Incurred				
Reason Debt Incurred				

Form 485, Rev. 6/85 Page 40a-c

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SCHEDULE D: FUNDS LOANED

The following information must be provided for each loan or line of credit made this reporting period, even if it has been repaid. Also, complete this schedule for loans made in prior periods that are still outstanding. Separate loans must be reported separately, even if to the same borrower.

1. Name and address of borrower CHRIS JOHN LEGISLATIVE ACCOUNT P.O. BOX 971 CROWLEY, LA 70527-0971	2. a. Date* <u>9-21-93</u> b. Interest rate <u>-0-</u> % c. Amount loaned* \$ <u>100.00</u> d. Balance due \$ <u>-0-</u> <small>*For lines of credit, give the date the line of credit was first established at item 2a and list only the amount actually drawn at item 2c. OPTIONAL: Total amount of credit available \$ _____</small>						
3. Endorser/Guarantor <small>(Enter the full name and address of each person or entity that has endorsed, guaranteed or otherwise assured the loan or line of credit. Also, state the amount of liability for each endorser or guarantor.)</small>	4. Repayments this period <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Date</th> <th style="width: 30%;">Principal</th> <th style="width: 40%;">Interest</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1-22-96</td> <td style="text-align: center;">100.00</td> <td></td> </tr> </tbody> </table> <small>(List payments of principal and interest separately. If separate amounts are not known, list all payments under principal.)</small>	Date	Principal	Interest	1-22-96	100.00	
Date	Principal	Interest					
1-22-96	100.00						

1. Name and address of borrower CHRIS JOHN LEGISLATIVE ACCOUNT P.O. BOX 971 CROWLEY, LA 70527-0971	2. a. Date* <u>7-28-92</u> b. Interest rate <u>-0-</u> % c. Amount loaned* \$ <u>1,000.00</u> d. Balance due \$ <u>213.58</u> <small>*For lines of credit, give the date the line of credit was first established at item 2a and list only the amount actually drawn at item 2c. OPTIONAL: Total amount of credit available \$ _____</small>									
3. Endorser/Guarantor <small>(Enter the full name and address of each person or entity that has endorsed, guaranteed or otherwise assured the loan or line of credit. Also, state the amount of liability for each endorser or guarantor.)</small>	4. Repayments this period <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Date</th> <th style="width: 30%;">Principal</th> <th style="width: 40%;">Interest</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1-27-96</td> <td style="text-align: center;">500.00</td> <td></td> </tr> <tr> <td style="text-align: center;">2-5-96</td> <td style="text-align: center;">286.42</td> <td></td> </tr> </tbody> </table> <small>(List payments of principal and interest separately. If separate amounts are not known, list all payments under principal.)</small>	Date	Principal	Interest	1-27-96	500.00		2-5-96	286.42	
Date	Principal	Interest								
1-27-96	500.00									
2-5-96	286.42									

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SCHEDULE E-1: EXPENDITURES

Use this schedule to report information on all campaign expenditures for this reporting period. An "expenditure" is any payment made for the purpose of supporting your election to public office and includes monies spent for the campaign's general operating expenses. Any payments made that are not "expenditures" should be reported on SCHEDULE E-2: OTHER DISBURSEMENTS. Totals and subtotals at bottom of page are optional. Completion of totals and subtotals may assist in calculating totals that must be reported on the Summary Page.

1. Name and Address of Recipient	2. Expenditures this Reporting Period		
	a. Date(s)	b. Purpose(s)	c. Amount(s)
NCCC BASEBALL 1000 SOUTH ALLEN CHANUTE, KS 66720	1-3-96	DONATION	25.00
CHEF ROY'S 2307 NORTH PARKERSON CROWLEY, LA 70526	1-3-96	DINING	20.00
CROWLEY POST SIGNAL 602 N. PARKERSON CROWLEY, LA 70526	1-4-96	ADVERTISING	78.00
CROWLEY TOWN CLUB P.O. BOX 563 CROWLEY, LA 70526	1-4-96	DUES	54.00
INTERNAL REVENUE SERVICE MEMPHIS, TN 37501	1-4-96	PAYROLL TAXES	45.81
RAYNE INDEPENDENT P.O. BOX 428 RAYNE, LA 70578	1-10-96	ADVERTISING	56.70
RAYNE ACADIAN TRIBUNE P.O. BOX 260 RAYNE, LA 70578	1-16-96	ADVERTISING	63.00
CAMPAIGN FINANCE 8401 UNITED PLAZA BLDG., STE. 200 BATON ROUGE, LA 70804-7017	1-22-96	FILING FEE	100.00
3. SUBTOTAL (optional - One page)			442.51
4. TOTAL (optional - complete only on last page of this schedule)			

Form 447, Rev. 08/88 Page 406 406

SCHEDULE E-1: EXPENDITURE (continue)

1. Name and Address of Recipient	2. Expenditures This Reporting Period		c. Amount
	a. Dates	b. Purpose	
POSTMASTER 123 EAST 3RD ST. CROWLEY, LA 70526	1-22-96	P. O. BOX RENT	104.00
	3-7-96	POSTAGE	85.00
EVANGELINE BANK & TRUST CO. 425 N. AVENUE G CROWLEY, LA 70526	1-22-96	SERVICE CHARGE	4.82
	2-27-96	SERVICE CHARGE	2.88
	3-31-96	SERVICE CHARGE	3.00
	4-26-96	SERVICE CHARGE	3.40
	5-31-96	SERVICE CHARGE	3.30
EVANGELINE BANK & TRUST CO. 425 N. AVENUE G CROWLEY, LA 70526	6-28-96	SERVICE CHARGE	4.56
	9-30-96	SERVICE CHARGE	3.96
CROWLEY KIWANIS CLUB P.O. BOX 581 CROWLEY, LA 70526	1-26-96	DONATION	20.00
NOTRE DAME HIGH SCHOOL ATHLETIC 910 N. EASTERN AVE. CROWLEY, LA 70526	1-26-96	DONATION	50.00
AMERICAN HEART ASSOCIATION P.O. BOX 496 CROWLEY LA 70526	2-18-96	DONATION	25.00
KEN GOSS - SHERIFF COURT CIRCLE CROWLEY, LA 70526	2-27-96	DONATION	30.00
KC 5499 P.O. BOX 2086 CROWLEY, LA 70527	2-28-96	DONATION	30.00
RAYNE LIONS CLUB 508 SOUTH ARENAS RAYNE, LA 70578	3-16-96	DONATION	35.00
3. SUBTOTAL (optional - this page)			404.92
4. TOTAL (optional - complete only on last page of this schedule)			

Form 1042, Rev. 07/83, Page 60a, 60b

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SCHEDULE E-1: EXPENDITURES

Use this schedule to report information on all campaign expenditures for this reporting period. An "expenditure" is any payment made for the purpose of supporting your election to public office and includes monies spent for the campaign's general operating expenses. Any payments made that are not "expenditures" should be reported on SCHEDULE E-2: OTHER DISBURSEMENTS. Totals and subtotals at bottom of page are optional. Completion of totals and subtotals may assist in calculating totals that must be reported on the Summary Page.

1. Name and Address of Recipient	2. Expenditures for Reporting Period		3. Amount
	a. Date(s)	b. Purpose(s)	c. Amount(s)
SECRETARY OF STATE BATON ROUGE, LA 70821	4-26-96	CORP. FILING FEE	5.00
3. SUBTOTAL (optional - this page)			5.00
4. TOTAL (optional - complete only on last page of this schedule)			852.43

Form 606, Rev. 6/85 Page 606-608

SCHEDULE E-1: EXPENDITURE (continue)

1. Name and Address of Recipient	2. Expenditures This Reporting Period		
	a. Dates	b. Purpose(s)	c. Amount(s)
N/A			
3. SUBTOTAL (optional - this page)			
4. TOTAL (optional - complete only on last page of this schedule)			

9
8
0
4
7
6
6
5
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3

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

FIRST GENERAL COUNSEL'S REPORT

PRE-MUR: 342
DATE ACTIVATED: 10/27/97

STAFF MEMBER: J. Michael Lehmann

SOURCE: REFERRAL COMPLAINT

RESPONDENTS: Chris John Campaign Committee, Inc. and Kenneth Dugas, as treasurer, Chris John, Robert Cox, Chris John Campaign Committee, Inc. (a.k.a. Chris John for Lieutenant Governor campaign), Greg Gibson, Doctor's Hospital of Opelousas Management, Inc., Copestone, Inc.

RELEVANT STATUTES: 2 U.S.C. §§ 434(b)(3), 441b, 441f;
11 C.F.R. §§ 110.3(d), 110.4, 110.10

INTERNAL REPORTS CHECKED Disclosure Reports
Referral Material

FEDERAL AGENCIES CHECKED None

I. GENERATION OF MATTER

This matter was referred to the Office of General Counsel (hereinafter the "Office") by the United States Attorney for the Western District of Louisiana.

II. FACTUAL AND LEGAL ANALYSIS

A. THE LAW

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits contributions or expenditures by national banks, corporations, or labor organizations with regard to federal election activity, and prohibits persons or political committees from knowingly accepting such contributions. 2 U.S.C. § 441b.

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The Act prohibits persons from making contributions in someone else's name, allowing one's name to be used for such a contribution, knowingly accepting contributions made in the name of another or knowingly assisting either the making or accepting of a contribution in the name of another. 2 U.S.C. § 441f. See also 11 C.F.R. § 110.4(b)(1).

Transfers of funds or assets from a candidate's campaign committee or account for a nonfederal election to his or her principal campaign committee or other authorized committee for a federal election are prohibited. 11 C.F.R. § 110.3(d).

The Act also requires political committees to file periodic reports of receipts and disbursements which shall include disclosure of all persons making a contribution within the relevant reporting period. 2 U.S.C. § 434(b)(3)

Except as provided in 11 C.F.R. §§ 9001, *et seq* (Presidential Election Campaign Fund General Election Financing) and 9031, *et seq* (Presidential Election Campaign Fund Presidential Primary Matching Fund), candidates for federal office may make unlimited expenditures from personal funds. 11 C.F.R. § 110.10(a). "Personal funds" are any assets which, under applicable state law, at the time he or she became a candidate, the candidate had legal right to access or control over, and with respect to which the candidate had either legal and rightful title or an equitable interest. 11 C.F.R. § 110.10(b)

B. FACTS

In 1996, Chris John ran for -- and was elected to -- the United States Congress from the Seventh District in Louisiana. John had unsuccessfully campaigned for Lieutenant Governor in 1995, and his state political committee, Chris John Campaign Committee, Inc. (hereinafter "State Committee"), remained in existence through the 1996 federal elections. During both his 1995

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Lieutenant Governor race and his 1996 congressional race, John loaned his political committees money from his personal funds.

On August 28, 1996, United States Attorney Michael D. Skinner spoke with local attorneys John Bernhardt and Wade Trahan. Bernhardt and Trahan indicated that they had spoken with Joe Chaillot, a former employee of John's congressional campaign (hereinafter "Federal Committee").¹ Their allegations are best summarized as follows:

According to Bernhardt and Trahan, Chaillot had related to them a scheme whereby federal campaign election laws could perhaps be skirted by the John campaign by taking corporate contributions and/or contributions in excess of the limit, placing those funds in the Chris John for Lieutenant Governor bank account (John ran for Lieutenant Governor in 1995, loaning his campaign approximately \$300,000.00, which debt is still outstanding according to the latest state report), then withdrawing money from the Lieutenant Governor account and using those funds in the Congressional race.

(September 18, 1996 letter from Michael D. Skinner to Lawrence Noble, p. 1.)

¹ Both Federal Committee and State Committee are named "Chris John Campaign Committee, Inc."

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State Committee reported receipt of a \$4,000 contribution from Doctor's Hospital of Opelousas Management, Inc. (hereinafter "Doctor's Hospital") on June 28, 1996.³ See Attachment #1, p. 3, State Committee's 1996 Candidate Report.⁴ State Committee in turn repaid John \$4,000 owed from a previous loan. see Attachment #1, p. 5, and John contributed \$4,000 of personal funds to Federal Committee. See Attachment #2, p. 2, July 15, 1996 Quarterly Report, Schedule A, "Loans Guaranteed or Made by Candidate."

State Committee also reported receipt of a \$5,000 contribution from Copestone, Inc. on September 2, 1996. See Attachment #1, p. 3. State Committee in turn repaid John \$5,000 owed from a previous loan. see Attachment #1, p. 5, and John contributed \$5,000 of his personal funds to Federal Committee. See Attachment #3, 48 Hour Notice filed by Federal Committee. No other information is available regarding this contribution.

After discussing the matter with the Public Integrity section of the Department of Justice, Skinner referred the matter to this Office via letter to General Counsel Lawrence M. Noble in

³ The FBI report identifies Greg Gibson as the Chief Executive Officer of "Columbia Hospital." Doctor's Hospital does business under the name "Columbia Doctor's Hospital of Opelousas." It is a subsidiary of EPIC Healthcare, Inc. and is affiliated with Columbia/HCA Healthcare Corporation.

⁴ Louisiana political committees are required to file an annual report -- complete through December 31st of the previous year -- by February 15th. La. Rev. Stat. Ann. § 18:1491.6E.

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September 1996. On October 27, 1997, the present case was activated. This Office received a copy of State Committee's 1996 Candidate Report from the Louisiana Board of Ethics in December 1997.

C. ANALYSIS

Based on Chaillot's statements, both John and certain employees of Federal Committee may have arranged that any funds used to repay State Committee's debt to John would end up as contributions from John to Federal Committee. The corporate contributors also may have been aware that contributions to State Committee would be helpful to John in his current federal campaign and this may even have been a motivating factor for the contributions to State Committee. However, a donor's mere hope, or even "intent," that contributions to retire debt from a previous campaign will indirectly aid a candidate in his or her current federal election campaign does not render them contributions to the federal committee. Cf. MUR 4000 (Fisher), First General Counsel's Report, p. 13 ("[T]ying these legal acts together -- legal contributions for debt retirement and legal contributions made by a candidate -- does not make either the contributions or the nexus illegal.")

The referral materials do not indicate that the corporate donors had been informed that their contributions would flow through the State Committee into the Federal Committee. In addition, the referral materials do not indicate that (1) that the contributions from Doctor's Hospital and Copestone, Inc. to State Committee were conditioned on State Committee repaying its debt to John or (2) that, after contributing to State Committee, the corporate donors directed the money in any way. Accordingly, there is no indication in the referral materials that Doctor's Hospital's and Copestone, Inc.'s contributions were anything other than legitimate contributions

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to State Committee, regardless of what John chose to do with the debt repayments from State Committee.

The Commission recently found no reason to believe that the Act had been violated in a similar matter. MUR 4314 (Sherman). MUR 4314 involved a candidate fundraising for his state committees at the same time as his federal campaign. The candidate used money from repayment of loans from his state committees to contribute to his federal campaign. The Commission concluded that the repayment of bona fide outstanding loans constituted personal funds of a candidate which he could contribute to his federal campaign, finding no reason to believe the repayments and contributions were illegal transfers from his state committees to his federal committee. See 11 C.F.R. § 110.3(d).

Based on all of the information set forth above, this Office recommends that the Commission open a MUR and find no reason to believe that Federal Committee and Kenneth Dugas, as treasurer, Chris John, Robert Cox, State Committee, Doctor's Hospital (or Greg Gibson) or Copestone, Inc. violated the Act in connection with the referral in Pre-MUR 342.

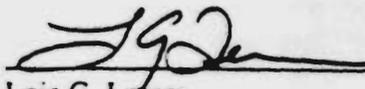
98043865699

III. RECOMMENDATIONS

1. Open a MUR.
2. Find no reason to believe that Chris John Campaign Committee, Inc. and Kenneth Dugas, as treasurer, Chris John, Robert Cox, Chris John Campaign Committee, Inc. (a.k.a. Chris John for Lieutenant Governor campaign), Greg Gibson, Doctor's Hospital of Opelousas Management, Inc. or Copestone, Inc. violated the Act in connection with the referral in Pre-MUR 342.
3. Approve the appropriate letters.
4. Close the file.

Lawrence M. Noble
General Counsel

2/23/98
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments:

- 1 State Committee's 1996 Candidate Report
- 2 Quarterly Report and Schedule A (July 15, 1996)
- 3 48 Hour Notice

Staff Assigned J Michael Lehmann

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FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/VENESHE FEREBEE-VINES
COMMISSION SECRETARY

DATE: FEBRUARY 27, 1998

SUBJECT: Pre-MUR - 342 - First General Counsel's Report
dated February 23, 1998.

(Handwritten initials: MVE)

The above-captioned document was circulated to the Commission
on Tuesday, February 24, 1998.

Objection(s) have been received from the Commissioner(s) as
indicated by the name(s) checked below:

- Commissioner Aikens —
- Commissioner Elliott —
- Commissioner McDonald —
- Commissioner McGarry —
- Commissioner Thomas —

XXX FOR THE RECORD

9 8 0 4 3 8 6 5 7 0 1

4. Close the file.

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

Attest:

3-2-98
Date

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

Received in the Secretariat: Tues., Feb. 24, 1998 1:36 p.m.
Circulated to the Commission: Tues., Feb. 24, 1998 4:00 p.m.
Deadline for vote: Fri., Feb. 27, 1998 4:00 p.m.

lrd

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 17, 1998

Daryl Doise, CEO
Doctor's Hospital of Opelousas Mgmt., Inc.
504 Highway 167 South
Opelousas, LA 70570

RE: MUR 4725

Dear Mr. Doise:

On September 23, 1996, the Federal Election Commission received a referral from Michael D. Skinner, United States Attorney for the Western District of Louisiana, advising the Commission that Doctor's Hospital of Opelousas Mgmt., Inc. may have violated the Federal Election Campaign Act of 1971, as amended.

After reviewing the referred material, the Commission found no reason to believe that Doctor's Hospital of Opelousas Mgmt., Inc. violated the Act in connection with the above-referenced referral and closed the file. Consequently, 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.

If you have any questions, please contact me at (202) 694-1650.

Sincerely,

J. Michael Lehmann
J. Michael Lehmann
Attorney

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 17, 1998

James M. Hutchison, CEO
Copestone, Inc.
1001 Pinhook Rd.
Suite 105
Lafayette, LA 70508

RE: MUR 4725

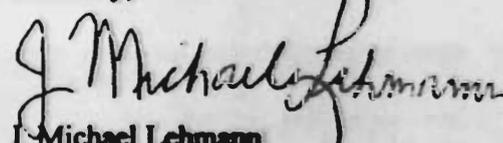
Dear Mr. Hutchison:

On September 23, 1996, the Federal Election Commission received a referral from Michael D. Skinner, United States Attorney for the Western District of Louisiana, advising the Commission that Copestone, Inc. may have violated the Federal Election Campaign Act of 1971, as amended.

After reviewing the referred material, the Commission found no reason to believe that Copestone, Inc. violated the Act in connection with the above-referenced referral and closed the file. Consequently, 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.

If you have any questions, please contact me at (202) 694-1650.

Sincerely,


J. Michael Lehmann
Attorney

Enclosure
General Counsel's Report

98043865705



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 17, 1998

Robert Cox
P.O. Box 53548
Lafayette, LA 70505

RE: MUR 4725

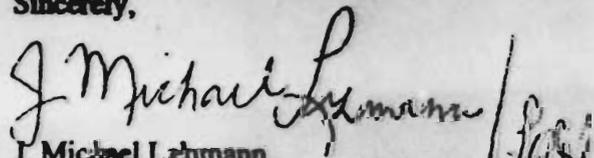
Dear Mr. Cox:

On September 23, 1996, the Federal Election Commission received a referral from Michael D. Skinner, United States Attorney for the Western District of Louisiana, advising the Commission that you may have violated the Federal Election Campaign Act of 1971, as amended.

After reviewing the referred material, the Commission found no reason to believe that you violated the Act in connection with the above-referenced referral and closed the file. Consequently, 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.

If you have any questions, please contact me at (202) 694-1650.

Sincerely,


J. Michael Lehmann
Attorney

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 17, 1998

Gregory Gibson
Rt. 1 Box 76 B 69
Opelousas, LA 70570

RE: MUR 4725

Dear Mr. Gibson:

On September 23, 1996, the Federal Election Commission received a referral from Michael D. Skinner, United States Attorney for the Western District of Louisiana, advising the Commission that you may have violated the Federal Election Campaign Act of 1971, as amended.

After reviewing the referred material, the Commission found no reason to believe that you violated the Act in connection with the above-referenced referral and closed the file. Consequently, 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.

If you have any questions, please contact me at (202) 694-1650.

Sincerely,

A handwritten signature in cursive script that reads "J. Michael Lehmann".

J. Michael Lehmann
Attorney

Enclosure
General Counsel's Report

98043865707



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 17, 1998

The Honorable Chris John
P.O. Box 971
Crowley, LA 70527

RE: MUR 4725

Dear Mr. John:

On September 23, 1996, the Federal Election Commission received a referral from Michael D. Skinner, United States Attorney for the Western District of Louisiana, advising the Commission that you may have violated the Federal Election Campaign Act of 1971, as amended.

After reviewing the referred material, the Commission found no reason to believe that you violated the Act in connection with the above-referenced referral and closed the file. Consequently, 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.

If you have any questions, please contact me at (202) 694-1650.

Sincerely,

J. Michael Lehmann
J. Michael Lehmann
Attorney

Enclosure
General Counsel's Report

98043865708



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 17, 1998

Joseph A. John, Chairman
Chris John for Congress Committee, Inc.
1213 W. Highway 90
Crowley, LA 70526

RE: MUR 4725

Dear Mr. John:

On September 23, 1996, the Federal Election Commission received a referral from Michael D. Skinner, United States Attorney for the Western District of Louisiana, advising the Commission that Chris John for Congress Committee, Inc. ("the Committee") and Joseph A. John, Chairman, may have violated the Federal Election Campaign Act of 1971, as amended.

After reviewing the referred material, the Commission found no reason to believe that the Committee and Joseph A. John, Chairman, violated the Act in connection with the above-referenced referral and closed the file. Consequently, 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.

If you have any questions, please contact me at (202) 694-1650.

Sincerely,


J. Michael Lehmann
Attorney

Enclosure
General Counsel's Report

98043865709



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 17, 1998

Kenneth Dugas, Treasurer
Chris John for Congress Committee, Inc.
P.O. Box 971
Crowley, LA 70527

RE: MUR 4725

Dear Mr. Dugas:

On September 23, 1996, the Federal Election Commission received a referral from Michael D. Skinner, United States Attorney for the Western District of Louisiana, advising the Commission that Chris John for Congress Committee, Inc. ("the Committee") and Kenneth Dugas, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended.

After reviewing the referred material, the Commission found no reason to believe that the Committee and Kenneth Dugas, as treasurer, violated the Act in connection with the above-referenced referral and closed the file. Consequently, 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.

If you have any questions, please contact me at (202) 694-1650.

Sincerely,

J. Michael Lehmann
J. Michael Lehmann
Attorney

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 17, 1998

Michael D. Skinner, Esquire
United States Attorney
Western District of Louisiana
United States Courthouse
300 Fannin Street, Suite 3201
Shreveport, LA 71101-3068

RE: MUR 4725

Dear Mr. Skinner:

This is in reference to the matter involving Chris John for Congress Committee, Inc., which your office referred to the Federal Election Commission on September 23, 1996.

On February 27, 1998, the Commission reviewed the information contained in the referral and found no reason to believe that the Federal Election Campaign Act of 1971, as amended, was violated. Accordingly, on that date, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

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 J. Michael Lehmann, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION

WASHINGTON DC 20461

THIS IS THE END OF MUR # 4725

DATE FILMED 3/10/98 CAMERA NO. 3

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