



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 1383

DATE SCANNED 9/13/05

SCANNER NO. 1

SCAN OPERATOR S.E.G

25092580772



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2005 APR 22 A 11: 46

April 21, 2005

**MEMORANDUM**

**SENSITIVE**

TO: THE COMMISSION

THROUGH: JAMES A. PEHRKON  
STAFF DIRECTOR

ROBERT J. COSTA *R.J. Costa*  
DEPUTY STAFF DIRECTOR

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

SUBJECT: REASON TO BELIEVE RECOMMENDATION – 2004 YEAR  
END REPORT FOR THE ADMINISTRATIVE  
FINES PROGRAM

Attached is a list of political committees and their treasurers who failed to file, or failed to timely file, the 2004 Year End Report in accordance with 2 U.S.C. 434(a). On December 27, 2004, Prior Notice was sent to all political committees and their treasurers, informing them that the Year End Report was due on January 31, 2005.

The committees listed in the attached RTB Circulation Report either failed to file the report, filed the report more than five (5) days after the due date, or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 C.F.R. 111.43, these committees should be assessed the civil money penalties included on the report provided.

**Recommendation**

- (1) Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Report violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
- (2) Send the appropriate mailgrams.

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FEDERAL ELECTION COMMISSION 2003-2004  
Reason to Believe Circulation Report  
2004 YEAR END

DATE 04/21/2005  
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AF #	COMMITTEE NAME	STATE	CANDIDATE NAME	THRESHOLD AMOUNT	SENSITIVE	PREVIOUS VIOLATIONS
COMMITTEE ID	TREASURER					CIVIL MONEY PENALTY
RECEIPT DATE	DAYS LATE	LEVEL OF ACTIVITY				

AF01343	MAC COLLINS FOR SENATE	GA	COLLINS, MICHAEL ALLEN (MAC)	\$3,717,747	No	0	\$1,475
C00387340	WANDA TSCHUDY						
02/07/2005	7	\$135,999					
AF01344	JOHN KENNEDY FOR US SENATE INC	LA	KENNEDY, JOHN NEELY	\$3,839,653	No	0	\$560
C00396044	WILLIAM C POTTER						
02/18/2005	18	\$46,040					
AF01345	CHASE COMMITTEE	MA	CHASE, KENNETH G	\$128,567	No	0	\$100
C00399527	NAZMUL HUQ						
02/10/2005	10	\$6,710					
AF01346	AL GREEN FOR CONGRESS	TX	GREEN, ALEXANDER	\$1,759,017	No	0	\$3,300
C00396028	WILLIAM A LAWSON						
03/01/2005	29	\$75,472					

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DATE 04/21/2005

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FEDERAL ELECTION COMMISSION 2003-2004

Reason to Believe Circulation Report

2004 YEAR END

AF #	COMMITTEE NAME	STATE	CANDIDATE NAME	THRESHOLD AMOUNT	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
COMMITTEE ID	TREASURER			LEVEL OF ACTIVITY			
RECEIPT DATE	DAYS LATE						

AF01349	CAMPBELL FOR SENATE	CA	CAMPBELL, TOM				
C00350942	CHARLES P ZAHL	\$606,652	No	2			\$5,250
Not Filed		\$86,664 (est)					

AF01350	SITTER FOR CONGRESS	CO	SITTER, DOUGLAS RICHARD				
C00392027	BRAD TAFOYA	\$124,706	No	1			\$312
04/06/2005	Not Filed	\$275					

AF01352	CHRIS JENNINGS FOR CONGRESS	FL	JENNINGS, CHRISTINE L				
C00398305	SUSAN K FLYNN	\$1,135,281	No	0			\$250
03/08/2005	Not Filed	\$3,340					

AF01353	SAULL FOR SENATE	FL	SAULL, KAREN				
C00401398	ALICE THORNTON STANLEY	\$1,726,176	No	0			\$11,500
Not Filed		\$863,088 (est)					

AF01354	CLAY FOR CONGRESS.COM	GA	CLAY, CHARLES COMMANDER				
C00388280	Thomas Rogers	\$2,339,483	No	0			\$250
03/21/2005	Not Filed	\$3,389					

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FEDERAL ELECTION COMMISSION 2003-2004  
Reason to Believe Circulation Report  
2004 YEAR END

DATE 04/21/2005  
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AF #	COMMITTEE NAME	STATE	CANDIDATE NAME	THRESHOLD AMOUNT	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
COMMITTEE ID	TREASURER			LEVEL OF ACTIVITY			
RECEIPT DATE	DAYS LATE						

AF01356	SCOTT FOR CONGRESS	LA	SCOTT, JOHN WYETH	\$298,104	No	0	\$2,700
C00403659	STEPHEN R FURR						
Not Filed				\$74,526 (est)			

AF01358	JOHN MCKINNIS FOR CONGRESS INC	MD	MCKINNIS, JOHN R II	\$186,933	No	0	\$900
C00391268	WILLIAM L CALLAHAN						
Not Filed				\$26,704 (est)			

AF01359	FRIENDS OF PAUL DEWEESE FOR CONGRESS	MI	DEWEESE, PAUL	\$609,319	No	0	\$3,500
C00386623	KEVIN BROWNLOW						
Not Filed				\$87,045 (est)			

AF01361	SMITH FOR CONGRESS LLC	MO	SMITH, MARK	\$445,286	No	0	\$2,700
C00389759	HENRY F LUEPKE						
Not Filed				\$74,214 (est)			



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FEDERAL ELECTION COMMISSION 2003-2004  
Reason to Believe Circulation Report  
2004 YEAR END  
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AF #	COMMITTEE NAME	STATE	CANDIDATE NAME	THRESHOLD AMOUNT	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
COMMITTEE ID	TREASURER						
RECEIPT DATE	DAYS LATE			LEVEL OF ACTIVITY			

AF #	COMMITTEE NAME	STATE	CANDIDATE NAME	PREVIOUS VIOLATIONS
COMMITTEE ID	TREASURER	THRESHOLD AMOUNT	SENSITIVE	CIVIL MONEY PENALTY
RECEIPT DATE	DAYS LATE	LEVEL OF ACTIVITY		

AF01376	COMMITTEE TO ELECT WILLIAM VADEN FOR CONGRESS	TX	VADEN, WILLIAM R	
C00394692	WILLIAM ROSS VADEN	\$100,208	No	0
Not Filed		\$16,701 (est)		\$500

AF01380	EMPIRE DISTRICT ELECTRIC COMPANY PAC	MO		
C00208249	JAY WILLIAMS	\$120,535	No	0
03/02/2005	30	\$6,334		\$200

AF01381	INTERNATIONAL CHIROPRACTORS ASSOCIATION-PAC VA			
C00329920	GARY WALSEMANN	\$116,397	No	0
02/16/2005	16	\$28,082		\$520

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FEDERAL ELECTION COMMISSION 2003-2004  
Reason to Believe Circulation Report  
2004 YEAR END

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AF #	COMMITTEE NAME	TREASURER	STATE	CANDIDATE NAME	THRESHOLD AMOUNT	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
RECEIPT DATE	DAYS LATE	LEVEL OF ACTIVITY						
AF01382	MCKENNA LONG AND ALDRIDGE LLP PAC		GA					
C00391383	EDGAR H SIMS		\$136,785	No		0	\$155	
02/11/2005	11	\$21,000						
AF01383	METRO-GOLDWYN-MAYER PAC		CA					
C00207589	DEBORAH J ARVESEN		\$114,495	No		1	\$118	
02/14/2005	14	\$285						
AF01385	U S IMMIGRATION REFORM PAC		DC					
C00253906	WILLIAM W CHIP		\$340,071	No		0	\$135	
02/22/2005	22	\$3,275						
AF01387	SOUTHEAST ANESTHESIA ASSOCIATES PAC		NC					
C00306878	H ARTHUR MCCULLOCH MD		\$246,375	No		1	\$375	
03/23/2005	Not Filed	\$6,990						
AF01388	COLONIAL BANCGROUP INC FEDERAL PAC		AL					
C00309526	HARLAN PARRISH		\$141,709	No		3	\$1,575	
Not Filed		\$35,427 (est)						

AF #	COMMITTEE NAME	STATE	CANDIDATE NAME	PREVIOUS VIOLATIONS
COMMITTEE ID	TREASURER	THRESHOLD AMOUNT	SENSITIVE	CIVIL MONEY PENALTY
RECEIPT DATE	DAYS LATE	LEVEL OF ACTIVITY		
AF01389	CONGRESSIONAL BLACK CAUCUS PAC	DC		
C00147512	Arthur R. Collins	\$680,400	No	5
Not Filed		\$136,080 (est)		\$10,125
AF01391	PLUMBERS LOCAL 519 PAC	FL		
C00143362	PHIL TRUCKS JR	\$130,725	No	0
03/28/2005	Not Filed	\$3,737		\$250



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

**SENSITIVE**

DATE & TIME OF TRANSMITTAL: Friday, April 22, 2005 12:00

BALLOT DEADLINE: Wednesday, April 27, 2005 4:00

COMMISSIONER: MASON, McDONALD, SMITH, THOMAS, TONER, WEINTRAUB

SUBJECT: **Reason to Believe Recommendation -2004 Year End Report for the Administrative Fines Program. Memorandum from the Assistant Staff Director Reports Analysis Division dated April 21, 2005.**

- ( ) I approve the recommendation(s)
- ( ) I object to the recommendation(s)
- ( ) I approve the recommendations except those following to which I object (please insert AF#)  
\_\_\_\_\_
- ( ) I approve the recommendations except those following in which I abstain (please insert AF#)  
\_\_\_\_\_
- ( ) I approve the recommendations except those following in which I am recused (please insert AF#)  
\_\_\_\_\_
- ( ) I am not voting on this tally.

A definite vote is required. All ballots must be signed and dated. Please return **ONLY THE BALLOT** to the Commission Secretary. Please return ballot no later than date and time shown above.

DATE: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION

25092580782

## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
 Reason To Believe Recommendation - 2004 )  
 Year End Report for the Administrative )  
 Fines Program: )

MAC COLLINS FOR SENATE, and ) AF# 1343  
 WANDA TSCHUDY as treasurer; )  
 JOHN KENNEDY FOR US SENATE INC, ) AF# 1344  
 and WILLIAM C POTTER as treasurer; )  
 CHASE COMMITTEE, and NAZMUL ) AF# 1345  
 HUQ as treasurer; )  
 AL GREEN FOR CONGRESS, and ) AF# 1346  
 WILLIAM A LAWSON as treasurer; )

CAMPBELL FOR SENATE, and ) AF# 1349  
 CHARLES P ZAHL as treasurer; )  
 SITTER FOR CONGRESS, and BRAD ) AF# 1350  
 TAFOYA OF BROWN WHEELDON )  
 TAFOYA & as treasurer; )

CHRIS JENNINGS FOR CONGRESS, and ) AF# 1352  
 SUSAN K FLYNN as treasurer; )  
 SAULL FOR SENATE, and ALICE ) AF# 1353  
 THORNTON STANLEY as treasurer; )

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CLAY FOR CONGRESS.COM, and ) AF# 1354  
Thomas Rogers as treasurer; )

SCOTT FOR CONGRESS, and STEPHEN ) AF# 1356  
R FURR as treasurer; )

JOHN MCKINNIS FOR CONGRESS INC, ) AF# 1358  
and WILLIAM L CALLAHAN as treasurer; )

FRIENDS OF PAUL DEWEESE FOR ) AF# 1359  
CONGRESS, and KEVIN BROWNLOW )  
as treasurer; )

SMITH FOR CONGRESS LLC, and ) AF# 1361  
HENRY F LUEPKE as treasurer; )

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COMMITTEE TO ELECT WILLIAM ) AF# 1376  
 (WILLIE) VADEN FOR CONGRESS, and )  
 WILLIAM ROSS VADEN as treasurer; )

EMPIRE DISTRICT ELECTRIC ) AF# 1380  
 COMPANY POLITICAL ACTION )  
 COMMITTEE, and JAY WILLIAMS as )  
 treasurer; )

INTERNATIONAL CHIROPRACTORS ) AF# 1381  
 ASSOCIATION-POLITICAL ACTION )  
 COMMITTEE, and TIMOTHY E MENG )  
 as treasurer; )

MCKENNA LONG AND ALDRIDGE ) AF# 1382  
 LLP POLITICAL ACTION COMMITTEE, )  
 and EDGAR H SIMS as treasurer; )

METRO-GOLDWYN-MAYER ) AF# 1383  
 POLITICAL ACTION COMMITTEE, and )  
 DEBORAH J ARVESEN as treasurer; )

U S IMMIGRATION REFORM PAC, and ) AF# 1385  
 WILLIAM W CHIP as treasurer; )

SOUTHEAST ANESTHESIA ) AF# 1387  
 ASSOCIATES POLITICAL ACTION )  
 COMMITTEE, and H ARTHUR )  
 MCCULLOCH MD as treasurer; )

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COLONIAL BANCGROUP INC	)	AF# 1388
FEDERAL POLITICAL ACTION	)	
COMMITTEE (COLONIAL FED PAC),	)	
and GLENDA ALLRED as treasurer;	)	
CONGRESSIONAL BLACK CAUCUS	)	AF# 1389
POLITICAL ACTION	)	
COMMITTEE(CBC-PAC), and Arthur R.	)	
Collins as treasurer;	)	

PLUMBERS LOCAL 519 POLITICAL	)	AF# 1391
ACTION COMMITTEE, and PHIL	)	
TRUCKS JR as treasurer;	)	

CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby certify that on April 27, 2005 the Commission took the following actions on the Reason To Believe Recommendation - 2004 Year End Report for the Administrative Fines Program as recommended in the Reports Analysis Division's Memorandum dated April 21, 2005, on the following committees:

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AF#1343 Decided by a vote of 5-0 to: (1) find reason to believe that MAC COLLINS FOR SENATE, and WANDA TSCHUDY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1344 Decided by a vote of 5-0 to: (1) find reason to believe that JOHN KENNEDY FOR US SENATE INC, and WILLIAM C POTTER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1345 Decided by a vote of 5-0 to: (1) find reason to believe that CHASE COMMITTEE, and NAZMUL HUQ as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1346 Decided by a vote of 5-0 to: (1) find reason to believe that AL GREEN FOR CONGRESS, and WILLIAM A LAWSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1349 Decided by a vote of 5-0 to: (1) find reason to believe that CAMPBELL FOR SENATE, and CHARLES P ZAHL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated

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on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1350 Decided by a vote of 5-0 to: (1) find reason to believe that SITTER FOR CONGRESS, and BRAD TAFOYA OF BROWN WHEELDON TAFOYA & as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1352 Decided by a vote of 5-0 to: (1) find reason to believe that CHRIS JENNINGS FOR CONGRESS, and SUSAN K FLYNN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1353 Decided by a vote of 5-0 to: (1) find reason to believe that SAULL FOR SENATE, and ALICE THORNTON STANLEY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1354 Decided by a vote of 5-0 to: (1) find reason to believe that CLAY FOR CONGRESS.COM, and Thomas Rogers as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

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AF#1356 Decided by a vote of 5-0 to: (1) find reason to believe that SCOTT FOR CONGRESS, and STEPHEN R FURR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1358 Decided by a vote of 5-0 to: (1) find reason to believe that JOHN MCKINNIS FOR CONGRESS INC, and WILLIAM L CALLAHAN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1359 Decided by a vote of 5-0 to: (1) find reason to believe that FRIENDS OF PAUL DEWEESE FOR CONGRESS, and KEVIN BROWNLOW as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1361 Decided by a vote of 5-0 to: (1) find reason to believe that SMITH FOR CONGRESS LLC, and HENRY F LUEPKE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

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AF#1376 Decided by a vote of 5-0 to: (1) find reason to believe that COMMITTEE TO ELECT WILLIAM (WILLIE) VADEN FOR CONGRESS, and WILLIAM ROSS VADEN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1380 Decided by a vote of 5-0 to: (1) find reason to believe that EMPIRE DISTRICT ELECTRIC COMPANY POLITICAL ACTION COMMITTEE, and JAY WILLIAMS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1381 Decided by a vote of 5-0 to: (1) find reason to believe that INTERNATIONAL CHIROPRACTORS ASSOCIATION-POLITICAL ACTION COMMITTEE, and TIMOTHY E MENG as treasurer violated 2 U.S.C. 434(a) and make

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a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1382 Decided by a vote of 5-0 to: (1) find reason to believe that MCKENNA LONG AND ALDRIDGE LLP POLITICAL ACTION COMMITTEE, and EDGAR H SIMS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1383 Decided by a vote of 5-0 to: (1) find reason to believe that METRO-GOLDWYN-MAYER POLITICAL ACTION COMMITTEE, and DEBORAH J ARVESEN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1385 Decided by a vote of 5-0 to: (1) find reason to believe that U S IMMIGRATION REFORM PAC, and WILLIAM W CHIP as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1387 Decided by a vote of 5-0 to: (1) find reason to believe that SOUTHEAST ANESTHESIA ASSOCIATES POLITICAL ACTION COMMITTEE, and H ARTHUR MCCULLOCH MD as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report;

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(2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1388 Decided by a vote of 5-0 to: (1) find reason to believe that COLONIAL BANGROUP INC FEDERAL POLITICAL ACTION COMMITTEE (COLONIAL FED PAC), and GLENDA ALLRED as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1389 Decided by a vote of 5-0 to: (1) find reason to believe that CONGRESSIONAL BLACK CAUCUS POLITICAL ACTION COMMITTEE(CBC-PAC), and Arthur R. Collins as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1391 Decided by a vote of 5-0 to: (1) find reason to believe that PLUMBERS LOCAL 519 POLITICAL ACTION COMMITTEE, and PHIL TRUCKS JR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

Attest:

April 27 2005  
 Date

Mary W. Dove  
 Mary W. Dove  
 Secretary of the Commission

25092580794

**WESTERN  
UNION.**

CONFIRMATION OF CMGM

WESTERN UNION COMMERCIAL SERVICES  
TO: DEBORAH J ARVESEN  
METRO-GOLDWYN-MAYER POLITICAL ACTION COM  
10250 CONSTELLATION BLVD  
LOS ANGELES CA 90067-6200

FEDERAL ELECTION COMMISSION  
DAYNA BROWN  
999 E ST NW # 709  
WASHINGTON DC 20463

APRIL 28, 2005

DEBORAH J ARVESEN  
METRO-GOLDWYN-MAYER POLITICAL ACTION COM  
10250 CONSTELLATION BLVD  
LOS ANGELES CA 90067

C00207589  
AF#: 1383

DEAR DEBORAH J ARVESEN:

THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED ("THE ACT"), REQUIRES THAT YOUR COMMITTEE FILE A YEAR END REPORT OF RECEIPTS AND DISBURSEMENTS EVERY CALENDAR YEAR. THIS REPORT, COVERING THE PERIOD THROUGH DECEMBER 31ST, SHALL BE FILED NO LATER THAN JANUARY 31ST. 2 U.S.C. 434(A). YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT. RECORDS AT THE FEDERAL ELECTION COMMISSION ("FEC") INDICATE THAT THIS REPORT WAS FILED ON 02/14/2005, 14 DAYS LATE.

THE ACT WAS FURTHER AMENDED IN 1999 TO PERMIT THE FEC TO IMPOSE CIVIL MONEY PENALTIES FOR VIOLATIONS OF THE REPORTING REQUIREMENTS OF 2 U.S.C. 434(A). 2 U.S.C. 437G(A)(4). ON 04/27/2005, THE FEC FOUND THAT THERE IS REASON TO BELIEVE ("RTB") THAT METRO-GOLDWYN-MAYER POLITICAL ACTION COM AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) BY FAILING TO FILE TIMELY THIS REPORT ON OR BEFORE JANUARY 31ST. BASED ON THE FEC'S SCHEDULES OF CIVIL MONEY PENALTIES AT 11 C.F.R. 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT THE RTB STAGE IS \$118. IT IS DUE BY 06/06/2005 AND IS BASED ON THESE FACTORS:

ELECTION SENSITIVITY OF REPORT: NOT ELECTION SENSITIVE  
LEVEL OF ACTIVITY: \$285  
NUMBER OF DAYS LATE: 14  
NUMBER OF PREVIOUS CIVIL MONEY PENALTIES ASSESSED: 1

TO PAY THE CALCULATED CIVIL MONEY PENALTY  
TO PAY THE CALCULATED CIVIL MONEY PENALTY, SEND THE ENCLOSED REMITTANCE AND YOUR PAYMENT TO THE FEC AT THE ADDRESS ON PAGE 3.

20090580795

WESTERN UNION



## WESTERN UNION COMMERCIAL SERVICES

UPON RECEIPT OF YOUR PAYMENT, THE FEC WILL SEND YOU A FINAL DETERMINATION LETTER.

TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY, YOU MUST SUBMIT A WRITTEN RESPONSE, INCLUDING THE AF# FOUND ON PAGE ONE, TO THE FEC'S OFFICE OF ADMINISTRATIVE REVIEW, 999 E STREET, NW, WASHINGTON, DC 20463. YOUR RESPONSE MUST BE RECEIVED BY 06/06/2005. YOUR WRITTEN RESPONSE MUST INCLUDE THE REASON(S) WHY YOU ARE CHALLENGING THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY. THE FEC WILL ONLY CONSIDER CHALLENGES THAT ARE BASED ON A FACTUAL ERROR, MISCALCULATION OF THE CALCULATED CIVIL MONEY PENALTY BY THE FEC, OR THE EXISTENCE OF EXTRAORDINARY CIRCUMSTANCES THAT PERSISTED FOR MORE THAN 48 HOURS THAT WERE BEYOND YOUR CONTROL AND PREVENTED YOU FROM FILING THE REPORT IN A TIMELY MANNER. YOUR RESPONSE MUST INCLUDE THE FACTUAL BASIS SUPPORTING THE REASON(S) AND SUPPORTING DOCUMENTATION. THE FEC STRONGLY ENCOURAGES THAT DOCUMENTS BE SUBMITTED IN THE FORM OF AFFIDAVITS OR DECLARATIONS. EXAMPLES OF CIRCUMSTANCES THAT WILL NOT BE CONSIDERED EXTRAORDINARY INCLUDE, BUT ARE NOT LIMITED TO, NEGLIGENCE, PROBLEMS WITH VENDORS OR CONTRACTORS, STAFF ILLNESS, COMPUTER FAILURES AND SIMILAR CIRCUMSTANCES. 11 C.F.R. 111.35(B)(1)(III) AND (4).

YOUR FAILURE TO RAISE AN ARGUMENT IN A TIMELY FASHION DURING THE ADMINISTRATIVE PROCESS SHALL BE DEEMED A WAIVER OF YOUR RIGHT TO PRESENT SUCH ARGUMENT IN A PETITION TO THE DISTRICT COURT UNDER 2 U.S.C. 437G. 11 C.F.R. 111.38.

IF YOU INTEND TO BE REPRESENTED BY COUNSEL, PLEASE ADVISE THE OFFICE OF ADMINISTRATIVE REVIEW. YOU SHOULD PROVIDE, IN WRITING, THE NAME, ADDRESS AND TELEPHONE NUMBER OF YOUR COUNSEL AND AUTHORIZE COUNSEL TO RECEIVE NOTIFICATIONS AND COMMUNICATIONS RELATING TO THIS CHALLENGE AND IMPOSITION OF THE CALCULATED CIVIL MONEY PENALTY.

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A CHALLENGE

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A WRITTEN RESPONSE, THE FEC WILL ASSUME THAT THE PRECEDING FACTUAL ALLEGATIONS ARE TRUE AND MAKE A FINAL DETERMINATION THAT METRO-GOLDWYN-MAYER POLITICAL ACTION COM AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) AND ASSESS A CIVIL MONEY PENALTY.

UNPAID CIVIL MONEY PENALTIES ASSESSED THROUGH THE ADMINISTRATIVE FINE REGULATIONS WILL BE SUBJECT TO THE DEBT COLLECTION ACT OF 1982("DCA")AS AMENDED BY THE DEBT COLLECTION IMPROVEMENT ACT OF 1996, 31 U.S.C. 3701 ET SEQ. THE FEC MAY TAKE ANY AND ALL APPROPRIATE ACTION AUTHORIZED AND REQUIRED BY THE DCA, AS AMENDED, INCLUDING TRANSFER TO THE U.S. DEPARTMENT OF THE TREASURY FOR COLLECTION. 11 C.F.R. 111.45.

THIS MATTER WAS GENERATED BASED ON INFORMATION ASCERTAINED BY THE FEC IN THE NORMAL COURSE OF CARRYING OUT ITS SUPERVISORY RESPONSIBILITIES. 2 U.S.C. 437G(A)(2). IT WILL REMAIN CONFIDENTIAL IN ACCORDANCE WITH 2 U.S.C. 437G(A)(4)(B) AND 437G(A)(12)(A) UNTIL IT IS PLACED ON THE PUBLIC RECORD IN ACCORDANCE WITH 11 C.F.R. 111.42, UNLESS YOU NOTIFY THE FEC IN WRITING THAT YOU WISH THE MATTER TO BE MADE PUBLIC.

ADDITIONAL INFORMATION ON THE FEC'S ADMINISTRATIVE FINE PROGRAM,



WESTERN UNION COMMERCIAL SERVICES

INCLUDING THE FINAL REGULATIONS, IS LOCATED AT THE FEC'S WEBSITE AT WWW.FEC.GOV. IF YOU HAVE QUESTIONS REGARDING THE PAYMENT OF THE CALCULATED CIVIL MONEY PENALTY, PLEASE CONTACT DAYNA C. BROWN IN THE REPORTS ANALYSIS DIVISION AT OUR TOLL FREE NUMBER (800)424-9530 (AT THE PROMPT, PRESS 5) OR (202)694-1130. IF YOU HAVE QUESTIONS REGARDING THE SUBMISSION OF A CHALLENGE, PLEASE CONTACT THE OFFICE OF ADMINISTRATIVE REVIEW AT OUR TOLL FREE NUMBER (800)424-9530 (PRESS 0, THEN EXT. 1660) OR (202)694-1660.

SINCERELY,

SCOTT E. THOMAS  
CHAIRMAN

\* \* \* \* \*  
ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R. 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT RT8 IS \$118 FOR THE 2004 YEAR-END REPORT.

PLEASE MAIL THIS REMITTANCE WITH A CHECK OR MONEY ORDER MADE PAYABLE TO THE FEDERAL ELECTION COMMISSION TO THE FOLLOWING ADDRESS:  
FEDERAL ELECTION COMMISSION  
P.O. BOX 952182  
ST. LOUIS, MO 63195-2182

IF YOU CHOOSE TO SEND YOUR REMITTANCE AND PAYMENT BY COURIER OR OVERNIGHT DELIVERY, PLEASE USE THIS ADDRESS:  
U.S. BANK - GOVERNMENT LOCKBOX  
FEC #952182  
1005 CONVENTION PLAZA  
ST. LOUIS, MO 63101

THE REMITTANCE AND YOUR PAYMENT ARE DUE BY 06/06/2005. UPON RECEIPT OF YOUR REMITTANCE AND PAYMENT, THE FEC WILL SEND YOU A FINAL DETERMINATION LETTER.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT  
-----

FOR: METRO-GOLDWYN-MAYER POLITICAL ACTION COM  
FEC ID#: C00207589  
AF#: 1383  
PAYMENT DUE DATE: 06/06/2005  
PAYMENT AMOUNT DUE: \$118

20090580797

DATE RECEIVED



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463



RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT


June 16, 2005 7: A 9: 32  
2005 JUN 17

MEMORANDUM

**SENSITIVE**

TO: THE COMMISSION

THROUGH: JAMES A. PEHRKON  
STAFF DIRECTOR   
ROBERT J. COSTA  
DEPUTY STAFF DIRECTOR 

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

SUBJECT: ADMINISTRATIVE FINES FINAL DETERMINATION  
RECOMMENDATION FOR THE 2004 YEAR END REPORT

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at the RTB stage for failure to file the 2004 Year End Report. The first list represents committees that have paid the civil money penalties and the second list represents the committees that have not paid. The committees that have not paid have been given at least forty (40) days from the date of the RTB notification to remit payment.

In accordance with 11 C.F.R. §111.34 and 11 C.F.R. §111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

For your information one of the committees that paid the fine assessed at RTB will require a refund. Scott for Congress (AF #1356) filed the Year End Report after the RTB finding. The report disclosed a lower level of activity than reported at the time of RTB, thereby lowering the civil money penalty from \$2,700 to \$250. The committee paid the civil money penalty assessed at RTB; we will therefore issue a refund of \$2,450.

Additionally, the civil money penalties for two committees have been reduced to \$0. Saull for Senate (AF #1353) and John McKinnis for Congress Inc. (AF #1358) each filed the Year End Report after the RTB finding, disclosing zero activity.

25092580798

**RAD Recommendation**

- (1) Make final determinations that the political committees and their treasurers on the attached lists violated 2 U.S.C. §434(a) and assess the civil money penalties so indicated.
- (2) Send the appropriate mailgrams.
- (3) Issue a \$2,450 refund to Scott for Congress (AF #1356).

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**COMMITTEES THAT HAVE PAID**

25092580801

DATE 06/15/2005  
PAGE: 1

FEDERAL ELECTION COMMISSION 2005-2006  
FINAL DETERMINATION CIRCULATION REPORT

AF #	CANDIDATE NAME	RECEIPT DATE	COMMITTEE NAME	DAYS LATE	REASON TO BELIEVE DATE	COMMITTEE ID	TREASURER	STATE	REPORT TYPE	PREVIOUS VIOLATIONS	DATE PAID	AMOUNT PAID
✓ AF1343	MAC COLLINS FOR SENATE					C00387340	WANDA TSCHUDY	GA	2004 YEAR-END	0	06/01/2005	\$1,475
	COLLINS, MICHAEL ALLEN (MAC)	02/07/2005		7		\$135,999						
		04/27/2005				\$1,475						
✓ AF1344	JOHN KENNEDY FOR US SENATE INC					C00396044	WILLIAM C POTTER	LA	2004 YEAR-END	0	05/09/2005	\$560
	KENNEDY, JOHN NEELY	02/18/2005		18		\$46,040						
		04/27/2005				\$560						
✓ AF1345	CHASE COMMITTEE					C00399527	NAZMUL HUQ	MA	2004 YEAR-END	0	06/10/2005	\$100
	CHASE, KENNETH G	02/10/2005		10		\$6,710						
		04/27/2005				\$100						
✓ AF1349	CAMPBELL FOR SENATE					C00350942	CHARLES P ZAHL	CA	2004 YEAR-END	2	06/10/2005	\$5,250
	CAMPBELL, TOM	Not Filed				\$86,664 (est)						
		04/27/2005				\$5,250						
✓ AF1350	SITTER FOR CONGRESS					C00392027	BRAD TAFOYA OF BROWN WHEELDON TAFOYA &	CO	2004 YEAR-END	1	05/11/2005	\$312
	SITTER, DOUGLAS RICHARD	04/06/2005		Not Filed		\$275						
		04/27/2005				\$312						
✓ AF1354	CLAY FOR CONGRESS.COM					C00388280	Thomas Rogers	GA	2004 YEAR-END	0	06/06/2005	\$250
	CLAY, CHARLES COMMANDER	03/21/2005		Not Filed		\$3,323						
		04/27/2005				\$250						
✓ AF1356	SCOTT FOR CONGRESS					C00403659	STEPHEN R FURR	LA	2004 YEAR-END	0	06/07/2005	\$2,222
	SCOTT, JOHN WYETH	04/21/2005		Not Filed		\$2,222						
		04/27/2005				\$250						
✓ AF1359	FRIENDS OF PAUL DEWEESE FOR CONGRESS					C00386623	KEVIN BROWNLOW	MI	2004 YEAR-END	0	06/07/2005	\$87,045
	DEWEESE, PAUL	05/04/2005		Not Filed		\$87,045						
		04/27/2005				\$3,500						
✓ AF1361	SMITH FOR CONGRESS LLC					C00389759	HENRY F LUJEPKE	MO	2004 YEAR-END	0	06/09/2005	\$1,268
	SMITH, MARK	05/11/2005		Not Filed		\$1,268						
		04/27/2005				\$250						
✓ AF1376	COMMITTEE TO ELECT WILLIAM (WILLIE) VADEN FOR CONGRESS					C00394692	WILLIAM ROSS VADEN	TX	2004 YEAR-END	0	06/06/2005	\$16,701 (est)
	VADEN, WILLIAM R	Not Filed				\$16,701 (est)						
		04/27/2005				\$500						

25092580802

DATE 06/15/2005  
PAGE: 2

FEDERAL ELECTION COMMISSION 2005-2006  
FINAL DETERMINATION CIRCULATION REPORT

AF #	CANDIDATE NAME	RECEIPT DATE	COMMITTEE NAME	COMMITTEE ID	TREASURER	STATE	REPORT TYPE	PREVIOUS VIOLATIONS	DATE PAID	AMOUNT PAID
AF1380	EMPIRE DISTRICT ELECTRIC COMPANY	03/02/2005	POLITICAL ACTION COMMITTEE	C00208249	JAY WILLIAMS	MO	2004 YEAR-END	0	06/01/2005	\$200
		04/27/2005			\$6,334					
					\$200					
AF1382	MCKENNA LONG AND ALDRIDGE LLP	02/11/2005	POLITICAL ACTION COMMITTEE	C00391383	EDGAR H SIMS	GA	2004 YEAR-END	0	06/06/2005	\$155
		04/27/2005			\$21,000					
					\$155					
AF1387	SOUTHEAST ANESTHESIA ASSOCIATES	03/23/2005	POLITICAL ACTION COMMITTEE	C00306878	H ARTHUR MCCULLOCH MD	NC	2004 YEAR-END	1	06/09/2005	\$375
		04/27/2005			\$6,990					
					\$375					
AF1388	COLONIAL BANCGROUP INC	Not Filed	FEDERAL POLITICAL ACTION COMMITTEE (COLONIAL FED PAC	C00309526	HARLAN PARRISH	AL	2004 YEAR-END	3	06/10/2005	\$1,575
		04/27/2005			\$35,427 (est)					
					\$1,575					
AF1391	PLUMBERS LOCAL 519	Not Filed	POLITICAL ACTION COMMITTEE	C00143362	PHIL TRUCKS JR	FL	2004 YEAR-END	0	05/10/2005	\$250
		04/27/2005			\$3,737					
					\$250					

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**COMMITTEES THAT HAVE NOT PAID**

25092580804

DATE 06/15/2005  
PAGE: 1

FEDERAL ELECTION COMMISSION 2005-2006  
FINAL DETERMINATION CIRCULATION REPORT  
NOT PAID

AP #	CANDIDATE NAME	RECEIPT DATE	RTB DATE	COMMITTEE NAME	DAYS LATE	RTB PENALTY	LEVEL OF ACTIVITY	TREASURER	STATE	COMMITTEE ID	DAYS SINCE RTB	PREVIOUS VIOLATIONS	REPORT TYPE
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AF1346	AL GREEN FOR CONGRESS	03/01/2005	04/27/2005	GREEN, ALEXANDER	29	\$3,300	C00396028	WILLIAM A LAWSON	TX	0	2004 YEAR-END	\$3,300
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AF1352	CHRIS JENNINGS FOR CONGRESS	03/08/2005	04/27/2005	JENNINGS, CHRISTINE	Not Filled	\$250	C00398305	SUSAN K FLYNN	FL	0	2004 YEAR-END	\$250
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AF1353	SAULL FOR SENATE	05/13/2005	04/27/2005	SAULL, KAREN	Not Filled	\$11,500	C00401398	ALICE THORNTON STANLEY	FL	0	2004 YEAR-END	\$0
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AF1358	JOHN MCKINNIS FOR CONGRESS INC	04/28/2005	04/27/2005	MCKINNIS, JOHN R II	Not Filled	\$900	C00391268	WILLIAM L CALLAHAN	MD	0	2004 YEAR-END	\$0
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25092580805

DATE 06/15/2005  
PAGE: 2

FEDERAL ELECTION COMMISSION 2005-2006  
FINAL DETERMINATION CIRCULATION REPORT  
NOT PAID

AP #	CANDIDATE NAME	RECEIPT DATE	COMMITTEE NAME	RTB DATE	DAYS LATE	COMMITTEE ID	TREASURER	STATE	LEVEL OF ACTIVITY	PREVIOUS VIOLATIONS	REPORT TYPE
										FINAL CIVIL MONEY PENALTY	

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FEDERAL ELECTION COMMISSION 2005-2006  
FINAL DETERMINATION CIRCULATION REPORT

AF #	COMMITTEE NAME	STATE	REPORT TYPE
CANDIDATE NAME	COMMITTEE ID	TREASURER	PREVIOUS VIOLATIONS
RECEIPT DATE	LEVEL OF ACTIVITY	DAYS SINCE RTB	FINAL CIVIL MONEY PENALTY
RTB DATE	RTB PENALTY	RTB DATE	

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AF1381	INTERNATIONAL CHIROPRACTORS ASSOCIATION-POLITICAL ACTION COMMITTEE	VA	2004 YEAR-END
	C00329920 GARY L WALSEMANN DC FICA		0 \$520
	02/16/2005 16 \$520		04/27/2005 49 \$520
AF1383	METRO-GOLDWYN-MAYER POLITICAL ACTION COMMITTEE	CA	2004 YEAR-END
	C00207589 DEBORAH J ARVESEN		1 \$118
	02/14/2005 14 \$118		04/27/2005 49 \$118
AF1385	U S IMMIGRATION REFORM PAC	DC	2004 YEAR-END
	C00253906 WILLIAM W CHIP		0 \$135
	02/22/2005 22 \$135		04/27/2005 49 \$135
AF1389	CONGRESSIONAL BLACK CAUCUS POLITICAL ACTION COMMITTEE (CBC-PAC)	DC	2004 YEAR-END
	C00147512 Arthur R. Collins		5 \$10,125
	Not Filed		04/27/2005 49 \$10,125



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

**SENSITIVE**

DATE & TIME OF TRANSMITTAL: Friday, June 17, 2005 12:00

BALLOT DEADLINE: Wednesday, June 22, 2005 4:00

COMMISSIONER: MASON, McDONALD, SMITH, THOMAS, TONER, WEINTRAUB

SUBJECT: **Administrative Fines Final Determination Recommendation  
For The 2004 Year End Report. Memorandum from the Assistant  
Staff Director, Reports Analysis Division dated  
June 17, 2005.**

- ( ) I approve the recommendation(s)
- ( ) I object to the recommendation(s)
- ( ) I approve the recommendations except those following  
to which I object (please insert AF#)  
\_\_\_\_\_
- ( ) I approve the recommendations except those following  
in which I abstain (please insert AF#)  
\_\_\_\_\_
- ( ) I approve the recommendations except those following  
in which I am recused (please insert AF#)  
\_\_\_\_\_
- ( ) I am not voting on this tally.

A definite vote is required. All ballots must be signed and dated. Please return ONLY THE BALLOT to the Commission Secretary. Please return ballot no later than date and time shown above.

DATE: \_\_\_\_\_ SIGNATURE: \_\_\_\_\_

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION

25092580807

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
 Administrative Fines Final Determination )  
 Recommendation for the 2004 Year End )  
 Report.: )

CHRIS JENNINGS FOR CONGRESS, and ) AF# 1352  
 SUSAN K FLYNN as treasurer; )  
 SAULL FOR SENATE, and ALICE ) AF# 1353  
 THORNTON STANLEY as treasurer; )

JOHN MCKINNIS FOR CONGRESS INC, ) AF# 1358  
 and WILLIAM L CALLAHAN as treasurer; )

25092580808

Federal Election Commission  
Certification for Administrative Fines  
June 23, 2005

METRO-GOLDWYN-MAYER ) AF# 1383  
POLITICAL ACTION COMMITTEE, and )  
DEBORAH J ARVESEN as treasurer; )

U S IMMIGRATION REFORM PAC, and ) AF# 1385  
WILLIAM W CHIP as treasurer; )  
CONGRESSIONAL BLACK CAUCUS ) AF# 1389  
POLITICAL ACTION )  
COMMITTEE(CBC-PAC), and Arthur R. )  
Collins as treasurer; )

25092580809

CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby certify that on June 23, 2005 the Commission took the following actions on the Administrative Fines Final Determination Recommendation for the 2004 Year End Report. as recommended in the Reports Analysis Division's Memorandum dated June 23, 2005, on the following committees:

AF#1352 Decided by a vote of 6-0 to: (1) make a final determination that CHRIS JENNINGS FOR CONGRESS, and SUSAN K FLYNN as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1353 Decided by a vote of 6-0 to: (1) make a final determination that SAULL FOR SENATE, and ALICE THORNTON STANLEY as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

25092580810

Federal Election Commission  
Certification for Administrative Fines  
June 23, 2005

Page 4

AF#1358 Decided by a vote of 6-0 to: (1) make a final determination that JOHN MCKINNIS FOR CONGRESS INC, and WILLIAM L CALLAHAN as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

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Federal Election Commission  
Certification for Administrative Fines  
June 23, 2005

25092580812

Federal Election Commission  
Certification for Administrative Fines  
June 23, 2005

Page 6

AF#1383 Decided by a vote of 6-0 to: (1) make a final determination that METRO-GOLDWYN-MAYER POLITICAL ACTION COMMITTEE, and DEBORAH J ARVESEN as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1385 Decided by a vote of 6-0 to: (1) make a final determination that U S IMMIGRATION REFORM PAC, and WILLIAM W CHIP as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1389 Decided by a vote of 6-0 to: (1) make a final determination that CONGRESSIONAL BLACK CAUCUS POLITICAL ACTION COMMITTEE(CBC-PAC), and Arthur R. Collins as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate mailgram. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

25092580813

Federal Election Commission  
Certification for Administrative Fines  
June 23, 2005

Attest:

June 23, 2005  
Date

Mary W. Dove  
Mary W. Dove  
Secretary of the Commission

25092580814

**WESTERN  
UNION.**

CONFIRMATION OF CMGM

WESTERN UNION COMMERCIAL SERVICES  
TO: DEBORAH J ARVESEN  
METRO-GOLDWYN-MAYER POLITICAL ACTION COM  
10250 CONSTELLATION BLVD  
LOS ANGELES CA 90067-6200

FEDERAL ELECTION COMMISSION  
DAYNA BROWN  
999 E ST NW # 709  
WASHINGTON DC 20463

JUNE 24, 2005

DEBORAH J ARVESEN  
METRO-GOLDWYN-MAYER POLITICAL ACTION COM  
10250 CONSTELLATION BLVD  
LOS ANGELES CA 90067

C00207589  
AF# 1383

DEAR DEBORAH J ARVESEN,

ON 04/27/2005, THE FEDERAL ELECTION COMMISSION ("FEC") FOUND REASON TO BELIEVE ("RTB") THAT METRO-GOLDWYN-MAYER POLITICAL ACTION COM AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) FOR FAILING TO TIMELY FILE THE 2004 YEAR-END REPORT. BY MAILGRAM DATED 04/28/2005, THE FEC SENT YOU NOTIFICATION OF THE RTB FINDING THAT INCLUDED A CIVIL MONEY PENALTY CALCULATED AT THE RTB STAGE OF \$118 IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R. 111.43. WITHIN 40 DAYS OF THE FEC'S RTB FINDING, YOU WERE REQUIRED TO EITHER TRANSMIT PAYMENT OF THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A WRITTEN RESPONSE CHALLENGING EITHER THE RTB FINDING OR THE CALCULATED CIVIL MONEY PENALTY.

THE FEC DID NOT RECEIVE PAYMENT OF THE CALCULATED CIVIL MONEY PENALTY OR YOUR WRITTEN RESPONSE WITHIN THE TIME PERMITTED. THEREFORE, THE FEC MADE A FINAL DETERMINATION ON 06/23/2005 THAT YOU, AS TREASURER, AND METRO-GOLDWYN-MAYER POLITICAL ACTION COM VIOLATED 2 U.S.C. 434(A) AND ASSESSED A CIVIL MONEY PENALTY IN THE AMOUNT OF \$118 IN ACCORDANCE WITH 11 C.F.R. 111.43. THE CIVIL MONEY PENALTY IS BASED ON THESE FACTORS:

ELECTION SENSITIVITY OF REPORT: NOT ELECTION SENSITIVE

LEVEL OF ACTIVITY: \$285

NUMBER OF PREVIOUS VIOLATIONS: 1      NUMBER OF DAYS LATE: 14

TO PAY THE CIVIL MONEY PENALTY

TO PAY THE CIVIL MONEY PENALTY, SEND THE ENCLOSED FORM AND YOUR PAYMENT TO THE ADDRESS ON PAGE 3 WITHIN 30 DAYS OF RECEIPT OF THIS LETTER.

20090580815



WESTERN UNION COMMERCIAL SERVICES

IF YOU DO NOT PAY THE CIVIL MONEY PENALTY

UNPAID CIVIL MONEY PENALTIES ASSESSED THROUGH THE ADMINISTRATIVE FINE REGULATIONS WILL BE SUBJECT TO THE DEBT COLLECTION ACT OF 1982 ("DCA"), AS AMENDED BY THE DEBT COLLECTION IMPROVEMENT ACT OF 1996 ("DCIA"), 31 U.S.C. 3701 ET SEQ. IF YOU DO NOT PAY THIS DEBT WITHIN 30 DAYS (OR FILE A WRITTEN PETITION TO A FEDERAL DISTRICT COURT - SEE BELOW), THE FEC WILL TRANSFER THE DEBT TO THE U.S. DEPARTMENT OF THE TREASURY ("TREASURY") FOR COLLECTION. WITHIN 5 DAYS OF ITS TRANSFER TO TREASURY, TREASURY WILL CONTACT THE DEBTOR AND REQUEST PAYMENT. TREASURY CURRENTLY CHARGES A FEE OF 18% OF THE CIVIL MONEY PENALTY FOR ITS COLLECTION SERVICES. THE FEE WILL BE ADDED TO THE AMOUNT OF THE CIVIL MONEY PENALTY THAT YOU OWE. SHOULD TREASURY ATTEMPTS FAIL, TREASURY WILL TRANSFER THE DEBT TO A PRIVATE COLLECTION AGENCY ("PCA"). IF THE DEBT IS REFERRED TO A PCA, THE TREASURY AND PCA COLLECT A FEE OF 28% OF THE CIVIL MONEY PENALTY AMOUNT WHICH WILL BE ADDED TO THE AMOUNT OF THE CIVIL MONEY PENALTY. IF THE DEBT REMAINS UNPAID, TREASURY MAY RECOMMEND THAT THE FEC REFER THE MATTER TO THE DEPARTMENT OF JUSTICE FOR LITIGATION.

IF YOU CHOOSE TO APPEAL THE FINAL DETERMINATION OR CIVIL MONEY PENALTY

IF YOU CHOOSE TO APPEAL THE FINAL DETERMINATION, YOU SHOULD SUBMIT A WRITTEN PETITION, WITHIN 30 DAYS OF RECEIPT OF THIS LETTER, TO THE DISTRICT COURT OF THE UNITED STATES FOR THE DISTRICT IN WHICH THE COMMITTEE OR YOU RESIDE, OR TRANSACT BUSINESS, REQUESTING THAT THE FINAL DETERMINATION BE MODIFIED OR SET ASIDE. SEE 2 U.S.C. 437G(A)(4)(C)(III). YOUR FAILURE TO RAISE AN ARGUMENT IN A TIMELY FASHION DURING THE ADMINISTRATIVE PROCESS SHALL BE DEEMED A WAIVER OF THE RESPONDENT RIGHT TO PRESENT SUCH ARGUMENT IN A PETITION TO THE DISTRICT COURT UNDER 2 U.S.C. 437G. 11 C.F.R. 111.38.

THE CONFIDENTIALITY PROVISIONS AT 2 U.S.C. 437G(A)(12) NO LONGER APPLY AND THIS MATTER IS NOW PUBLIC. THE FILE WILL BE MADE A PART OF THE PUBLIC RECORD PURSUANT TO 11 C.F.R. 111.42(B). ALTHOUGH THE FILE MUST BE PLACED ON THE PUBLIC RECORD WITHIN THIRTY (30) DAYS FROM THE DATE OF THE COMMISSION NOTIFICATION, THIS COULD OCCUR AT ANYTIME FOLLOWING CERTIFICATION OF THE COMMISSION VOTE.

IF YOU HAVE ANY QUESTIONS REGARDING THE PAYMENT OF THE CIVIL MONEY PENALTY, PLEASE CONTACT DAYNA BROWN AT FEDERAL ELECTION COMMISSION, 999 E ST., NW, WASHINGTON, DC 20463, OR ON OUR TOLL FREE NUMBER (800)424-9530 (AT THE PROMPT, PRESS 5) OR (202)694-1130.

SINCERELY,

SCOTT E. THOMAS  
CHAIRMAN

ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R. 111.43, THE CIVIL MONEY PENALTY IS \$118 FOR THE 2004 YEAR-END REPORT.

25092580816

DIME FILE 000249011

**WESTERN  
UNION.**

WESTERN UNION COMMERCIAL SERVICES

THIS PENALTY SHOULD BE PAID BY CHECK OR MONEY ORDER MADE PAYABLE TO THE FEDERAL ELECTION COMMISSION. IT SHOULD BE SENT BY MAIL TO:

FEDERAL ELECTION COMMISSION  
PO BOX 952182  
ST. LOUIS, MO 63195-2182

IF YOU CHOOSE TO SEND YOUR PAYMENT BY COURIER OR OVERNIGHT DELIVERY, PLEASE USE THIS ADDRESS:

U.S. BANK - GOVERNMENT LOCKBOX  
FEC #952182  
1005 CONVENTION PLAZA  
ST. LOUIS, MO 63101

THE FORM AND PAYMENT ARE DUE WITHIN 30 DAYS OF RECEIPT OF THIS LETTER.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: METRO-GOLDWYN-MAYER POLITICAL ACTION COM

FEC ID#: C00207589

AF#: 1383

PAYMENT AMOUNT DUE: \$118

20992580817

WESTERN UNION COMMERCIAL SERVICES

SUBSEQUENT TO THE JUNE 16, 2005 MEMORANDUM TO THE COMMISSION IN WHICH THEY WERE LISTED AS NOT HAVING PAID, THE COMMITTEE IN THE FOLLOWING CASE HAS PAID ADMINISTRATIVE FINES:

1383

25092580818

FOR: METRO-GOLDWYN-MAYER POLITICAL ACTION COM

FEC ID#: C00207589

AF#: 1383

PAYMENT AMOUNT DUE: \$118

MGMCOMP 18:11 EST

To reply by Mailgram Message, see reverse side for Western Union's toll-free number.

QUALITY IS OUR PRIORITY FOR LOCKBOX 2182  
SEQ# 002 \$ 000011800 BA# 1 08-03-05 20 3

THE SECURITY FEATURES ON THIS CHECK INCLUDE A COLORED LOGO BACKGROUND, AND A SIGNATURE PROTECTION PANEL WITH A MICRO-PRINT BORDER.



MGM and UA Services Company  
10250 Constellation Blvd.  
Los Angeles, Ca. 90067



DATE  
07-31-05

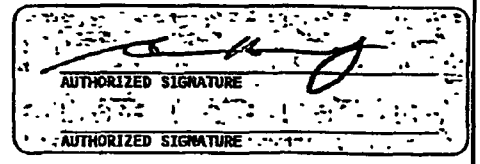
Bank of America  
Commercial Disbursement  
Northbrook, IL

70-2328  
719

NOT VALID OVER 180 DAYS  
CHECK NO. 30238815  
AMOUNT \*\*\*\*\*118.00\*

PAY ONE HUNDRED EIGHTEEN 00 / 100 USD

TO THE  
ORDER OF  
FEDERAL ELECTION COMMISSION  
U.S. BANK - GOVERNMENT LOCKBOX  
FEC# 952182  
1005 CONVENTION PLAZA  
ST. LOUIS, MO 63101



FEC ID No. 00207589 Metro-Goldwyn-Mayer Political Action Committee A.F. 1383

WARNING: DO NOT CASH THIS CHECK UNLESS YOU CAN SEE AN ARTIFICIAL WATERMARK ON THE BACK. HOLD AT AN ANGLE TO VIEW.



usbancorp.  
The Star Family Company

25092580819



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 1383

DATE SCANNED 9/13/05

SCANNER NO. 1

SCAN OPERATOR S.E.G

25092580820