



THE FEDERAL ELECTION COMMISSION  
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MEMORANDUM

**SENSITIVE**

July 6, 2005

TO: The Commission

THROUGH: James A. Pehrkon  
Staff Director

FROM: Allan D. Silberman  
Director, ADR Office

BY: Lynn M. Fraser  
Assistant Director, ADR Office

SUBJECT: ADR 196 LeSueur for Congress '04, Eddie "Edie" Ingram, Treasurer and Clinton B. LeSueur  
ADR 198 LeSueur for Congress '04 and Eddie "Edie" Ingram, Treasurer  
ADR 199 LeSueur for Congress '04 and Eddie "Edie" Ingram, Treasurer  
ADR 200 LeSueur for Congress '04 and Eddie "Edie" Ingram, Treasurer  
ADR 213 LeSueur for Congress '04 and Eddie "Edie" Ingram, Treasurer  
Recommendation to approve Consolidated Settlement Agreement for ADR 196, ADR 198, ADR 200, ADR 213 and Dismiss ADR 199

Attached for your review is a consolidated, signed and negotiated ADR Settlement Agreement pertaining to LeSueur for Congress '04, Eddie "Edie" Ingram, Treasurer and Clinton B. LeSueur ("Respondents" or the "Committee"). These matters were received by the Commission, respectively, on March 15, 2004 (2), June 1, 2004 (2) and November 1, 2004 and assigned to the ADR Office on November 30, 2004

**SUMMARY:** The complaints, filed on behalf of Friends of Bennie Thompson, allege that the Committee made excessive salary payments to the candidate in February, March and August 2004, as well as a premature salary payment of \$600 on January 6, 2004. The total of the excessive salary payments total \$3,974.50. The Complainant contends that based on the candidate's 2003 financial disclosure report filed with the US House of Representatives reflecting earnings of \$18,000 in 2003, Respondents would be restricted to paying LeSueur a salary of no more than \$1,500 per month. The complaint states that the Pre-Primary, April Quarterly, and October Quarterly reports filed by Respondents disclose payments of \$3,200 to LeSueur in February, \$1,872.50 in March, and \$3,402 in August.

Respondents acknowledge that an inadvertent violation of the FECA occurred due to the Committee's misinterpretation of the regulations as to the maximum amount that

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could be paid as salary to the candidate during the campaign. Respondents contend that some of the payments designated as salary by the previous Treasurer were, in fact, reimbursement for expenses incurred by the candidate, and amended reports were filed to correct the information. The Committee confirmed that amended reports reflecting the campaign made disbursements designated as salary payments in the amounts of \$1700 for February 2004, \$1332.50 for March 2004, \$1500 for April 2004, \$1581.50 for May 2004, \$1290 for June 2004, \$3402 for August 2004 and \$1519 for October 2004. Salary payments aggregated \$12,125.22 for January 2004 through November 2, 2004. The premature salary payment of \$600 was refunded to the Committee in April 2004.

ADR 199 should be dismissed, as it is a duplicate of ADR 198 with the exception of the date of the payment is January 5, 2004.

**RECOMMENDATIONS:**

1. Approve the attached consolidated Settlement Agreement for LeSueur for Congress '04, Edie Ingram, Treasurer and Clinton B. LeSueur resolving ADR 196, ADR 198, ADR 200 and ADR 213.
2. Dismiss the complaint as it pertains to LeSueuer for Congress '04 and Eddie "Edie" Ingram, Treasurer in ADR 199.
3. Approve the appropriate letters.
4. Close the file on these matters.

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