



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1683

Date Filmed 11/16/84 Camera No. --- 4

Cameraman JRL

840404190179

FEDERAL ELECTION COMMISSION

internal routing cards

FEC check receipt

Conciliation materials

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act; 5 U.S.C. Section 552(b):

- | | |
|--|---|
| ☐ (1) Classified Information | ☐ (6) Personal privacy |
| ☒ (2) Internal rules and practices | ☐ (7) Investigatory files |
| ☒ (3) Exempted by other statute | ☒ (8) Banking Information |
| ☐ (4) Trade secrets and commercial or financial information | ☐ (9) Well Information (geographic or geophysical) |
| ☒ (5) Internal Documents | |

Signed

Paul Reys

date

11/2/84

FEC 9-21-77

84040490180

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Louisiana State Medical
Society Political Action
Committee
Robert L. diBenedetto, M.D.,
Treasurer

MUR 1683

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 24, 1984, the Commission decided by a vote of 5-0 to take the following actions in MUR 1683:

1. Accept the conciliation agreement submitted with the General Counsel's Report signed October 19, 1984.
2. Approve and send the letter attached to the General Counsel's Report signed October 19, 1984.
3. Close the file.

Commissioners Aikens, Elliott, Harris, McGarry and Reiche voted affirmatively in this matter; Commissioner McDonald did not cast a vote.

Attest:

10-24-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

10-22-84, 8:45
10-22-84, 11:00

84040490181



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 29, 1984

Robert L. diBenedetto, M.D.
Treasurer Louisiana State Medical
Society Political Action Committee
1700 Josephine Street
New Orleans, Louisiana 70113

RE: MUR 1683

Dear Dr. diBenedetto:

On October 24, 1984, the Commission accepted the conciliation agreement signed by you, and a civil penalty in settlement of a violation of 2 U.S.C. §§ 434(a)(4)(A)(i), (iii) and (iv) provisions of the Federal Election Campaign Act of 1971, as amended.

Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: *[Signature]*
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

84040490182

84040490183

MUR 1683

84040490183

84040490183

84040490183

84040490183

84040490183

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

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

1. Respondent Louisiana State Medical Society Political Action Committee (LAMPAC) is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent Robert L. diBenedetto, M.D., currently serves as treasurer for respondent LAMPAC and did not serve as treasurer at the time LAMPAC filed reports in 1982.

3. Section 434(a)(4)(A) of Title 2, United States Code, requires timely filing of quarterly, mid-year, year-end and post-election reports by unauthorized political committees.

4. During the 1981-1982 election cycle, respondents filed quarterly, mid-year, year-end and post-election reports.

V. 1) Respondents filed the 1981 Year End Report 78 days late, and the 1982 April Quarterly Report 92 days late. The respondent's October Quarterly Report was filed 209 days late. The thirty day Post-General Election Report for Respondents was 149 days late and the 1982 Year End Report was 101 days late.

2) Respondents' 1983 MidYear and Year End Reports were timely filed.

3) Respondents' 1984 April Quarterly Report was timely filed.

4) Respondents have taken measures to ensure future timely filing of reports required by the Federal Election

84040490184

Campaign Act which include: (a) placing PAC functions under the supervision of a competent staff member; and (b) hiring an executive level staff member to oversee and promote the Committee.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Seven Hundred and Fifty Dollars (\$750), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

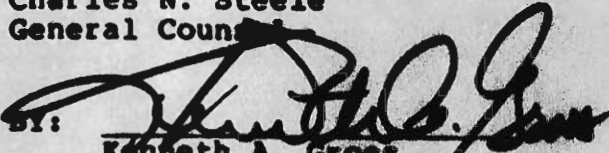
XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or

84040490185

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

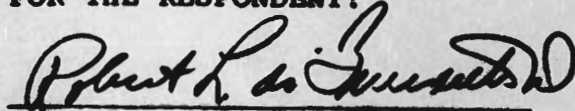
FOR THE COMMISSION:

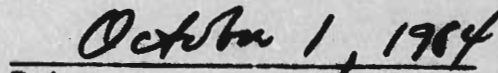
Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel


Date

FOR THE RESPONDENT:


Robert L. diBenedetto, M.D.,
Treasurer of the Louisiana
State Medical Society
Political Action Committee


Date

84040490186



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *CX*
DATE: October 22, 1984
SUBJECT: MUR 1683 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	☒	Compliance	☒
Sensitive	☒	Audit Matters	☐
Non-Sensitive	☐	Litigation	☐
24 Hour No Objection	☐	Closed MUR Letters	☐
Sensitive	☐	Status Sheets	☐
Non-Sensitive	☐	Advisory Opinions	☐
Information	☐	Other (see distribution below)	☐
Sensitive	☐		
Non-Sensitive	☐		
Other	☐		

84040490187

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

In the Matter of)

84 AUG 27 P 4: 28

Louisiana State Medical Society)

Political Action Committee)

Robert L. diBenedetto, M.D.)

Treasurer)

MUR 1683

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On March 2, 1984, the Commission's Reports Analysis Division referred this matter to the Office of General Counsel for review. The Louisiana State Medical Society Political Action Committee ("LAMPAC") had failed to timely file five (5) reports of receipts and disbursements for the 1981-82 election cycle.

On April 20, 1984, the Commission found that there was reason to believe that LAMPAC, and Dr. Howard A. Nelson, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (iii), and (iv). Respondents were notified of this determination by letter dated April 25, 1984.

LAMPAC responded to the Commission's notification by letter dated May 9, 1984. Dr. Nelson had become chairman of the committee by then and Dr. Robert L. diBenedetto had assumed the role of treasurer. In addition to explaining its reasons for lateness in filing,

84040490188

84040490189

84040490190

Charles N. Steele
General Counsel

Date August 27, 1984

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel



RECEIVED AT THE FBI
GCC #4322
84 AUG 13 PM 12:58

1700 Josephine St., New Orleans, LA 70113 (504) 361-1033 LA WATS 1-800-482-6506

August 1, 1984

Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street
Washington, D.C. 20463

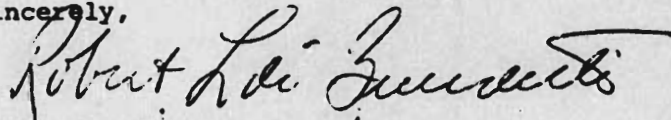
RE: MUR 1683

AUG 13 PM 12:40

84040490191

Thank you for your cooperation and consideration in this matter.

Sincerely,



Robert L. diBenedetto, M.D.
LAMPAC Treasurer

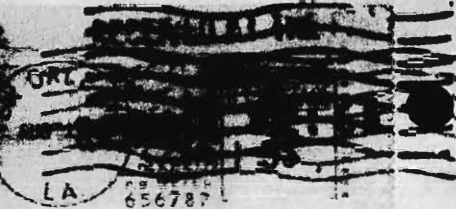
RLD/rm

84040490192

AMPAC

LOUISIANA NATIONAL
POLITICAL ACTION
COMMITTEE

1400 St., New Orleans, LA 70113



Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street
Washington, D.C. 20463

CERTIFIED

24063959

MAIL



BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

In the Matter of)

84 JUL 17 All : 07

Louisiana State Medical Society)
Political Action Committee)
Robert L. diBenedetto, M.D.)
Treasurer)

MUR 1683

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter was referred to the Office of General Counsel by the Reports Analysis Division. On April 20, 1984, the Commission determined that there is reason to believe that the Louisiana State Medical Society Political Action Committee ("the Committee") and Howard A. Nelson, Jr., M.D., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (iii) and (iv) of the Federal Election Campaign Act ("the Act") by failing to timely file the Committee's 1981 Year End, 1982 April and October Quarterly, the 1982 30 Day Post-General Election and the 1982 Year End Reports. The respondents were notified of this determination on April 25, 1984. A written response to this determination dated May 9, was received by the Commission on May 14, 1984, from Dr. Howard A. Nelson, Jr., as Chairman.

The Committee changed its treasurer by an amended Statement of Organization filed April 16, 1984. Dr. Nelson, the former treasurer, is now the Committee's Chairman. Dr. Robert L. diBenedetto now serves as the treasurer. Accordingly, this Office is making its recommendations against Dr. diBenedetto. The body of this report, however, refers to Dr. Nelson in his capacity as treasurer during the 1981-1982 election cycle.

84040490194

II. LEGAL ANALYSIS

Section 434, Title 2, United States Code, provides in part that quarterly reports, in a regular election year, shall be filed no later than the 15th day after the last day of the calendar quarter. 2 U.S.C. § 434(a)(4)(A)(i). A regularly scheduled general election was held in 1982 on November 2. A Post-General Election Report must be filed no later than the 30th day after the general election. 2 U.S.C. § 434(a)(4)(A)(iii). In a calendar year when no regularly scheduled general election is held, a report covering the period beginning July 1 and ending December 31 shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv). During a year in which a regularly scheduled general election is held, the report due for the quarter ending on December 31 shall be filed no later than January 31 of the following year. 2 U.S.C. § 434(a)(4)(A)(i).

The Committee and Dr. Howard A. Nelson, Jr., as treasurer, failed to file five (5) reports in a timely manner during the 1981-1982 election cycle. The filings were between 78 and 209 calendar days late.

Separate Committee reports were not filed for the April Quarterly, the October Quarterly and the 30 Day Post-General Reports. Financial activity for each of those periods was disclosed, respectively, on the 1982 July Quarterly and the 1982 Year End Reports. Non-filing notices were mistakenly sent to the Committee for the October Quarterly, 30 Day Post-General and the Year End Reports on May 27, 1983.

34040490195

On December 14, 1983, a chronic late filer notice was sent requesting reasons for lateness. On December 19, 1983, Ms. Ramona Meyers, the Committee secretary, inquired by phone as to how to respond to the notice. On December 28, 1983, the Committee's then Chairman, Dr. Daniel H. Johnson, Jr., responded in writing. According to Dr. Johnson, the personnel responsible for the filing of the 1981 Year End and the 1982 April Quarterly Reports were no longer with the Committee and lacking evidence to the contrary, he could only conclude that the late filings were caused by administrative oversight. He stated further that the 1982 October Quarterly and 30 Day Post-General Reports were prepared by a person unfamiliar with the requirements of the FECA who thought "if there was no political activity during the reporting period the reports were not required to be filed."

Dr. Johnson stated that the Committee's files indicate that the 1982 Year End Report was submitted in a timely fashion. Prepared on January 18, 1983, the Report was forwarded to the treasurer who, in turn, forwarded it to the FEC. He could not explain the difference between the due date and the date received by the FEC. Dr. Johnson further explained that the Committee staff now preparing FEC reports are "trained and familiar with the FEC requirements" and new administrative procedures have been put into effect to ensure the Committee's compliance with the Act.

The Committee's May 9, 1984, response to the Commission's reason to believe finding concedes that this finding is correct

84040490196

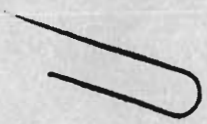
and admits that the Committee failed to timely file the reports at issue. The response reiterates that poor administrative procedures was the reason for missing filing deadlines.

Respondent explains that the Society had dismissed staff members for poor job performance who were responsible for filing these reports and others had voluntarily left at the time these reports were done. Those staffers who stepped in to assume these responsibilities, according to the respondent, were untrained and unfamiliar with the Act's requirements. The respondent acknowledges that these circumstances do not excuse this violation but offers them by way of exposition of the "dilemma" facing the Committee at the time. To correct these deficiencies the Committee has placed administrative PAC functions under a "knowledgeable and competent staff member," and "...authorized the hiring of an executive level staff member to oversee and promote the activities of [the Committee]". The Committee contends that the timely filing of its 1983 and 1984 reports to date evidences the improved administration of the Committee's activities.

84040490197

84040490198

84040490199



Charles W. Steele
General Counsel

July 17, 1984
Date

BY:

Kenneth A. Gross
Associate General Counsel

84040490200



1700 Josephine St., New Orleans, LA 70113 (504) 581-1033 LA WATS 1-800-462-8508

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

00043154

MUR 1683
Reyes

May 9, 1984

Ms. Lee Ann Elliott, Chairman
Federal Election Commission
1325 K Street
Washington, D.C. 20463

Identification Number: C00001008

Reference: MUR 1683 - Louisiana State Medical
Society Political Action Committee

MAY 14 P4:07

Dear Ms. Elliott:

Thank you for the opportunity to respond to the Commission's determination of the reason to believe that the Louisiana State Medical Society Political Action Committee (LAMPAC) has violated 2 U.S.C. 434(a) (4) (A) of the Federal Election Campaign Act by failure to timely file reports prescribed by the Act.

The determination of the Commission is correct and we did fail to file the reports innumarated in your letter according to the deadlines prescribed by FEC regulations. The subject of our failure to file the reports on a timely basis was discussed in our letter of December 20, 1983. As was pointed out in that letter, the reason for our missing required filing dates was poor administrative procedures. During the several months when the reports were due the medical society was going through considerable staff changes. The society had dismissed members of its staff for poor job performance and other members left voluntarily leaving the society woefully understaffed. Those members that were dismissed had as part of their job description the responsibility for LAMPAC administration. The remaining staff that assumed the responsibility for these functions was simply untrained and unfamiliar with the requirements of the Act. Additionally, their efforts were frustrated by the fact that copies of the rules and regulations of the Commission were missing. These circumstances do not excuse the responsibility for complying with the regulations but do expose the dilemma of the situation at the time the reports were to be filed. Let me emphasize, as was pointed out in the December letter, that at no time did LAMPAC attempt to purposefully evade its responsibility, but its failures were due strictly to poor administrative coordination.

84040490201

The medical society and LAMPAC have worked very hard to correct the staff problems that resulted in the violations. The medical society has completely reorganized its management staff, including the hiring of a full-time Executive Director, to improve its organization, and services to members and the public. Specifically in the area of the activities of LAMPAC, the administrative functions are in the hands of a knowledgeable and competent staff member who has been with the society for over four years. Additionally, the House of Delegates of the medical society has authorized the hiring of an executive level staff member to oversee and promote the activities of LAMPAC. As evidence of the improved administration of LAMPAC activities, the Commission will find that those reports required for 1983 and the first quarter report of 1984 were all filed in a timely fashion.

Many changes have occurred in the organization and structure of LAMPAC in order to improve its effectiveness. We feel these changes were necessary and we are proud of the results they have produced. It is our desire to continue to improve and promote the growth and influence of this very important activity. For this reason, we wish to cooperate

Sincerely,

Howard A. Nelson, Jr.
Howard A. Nelson, Jr., M.D.
Chairman

HANjr/rm

84040490202



LOUISIANA MEDICAL
POLITICAL ACTION
COMMITTEE

00 Josephine St., New Orleans, LA 70113

4049

CERTIFIED

P 433 813 838

MAIL



Ms. Lee Ann Elliott, Chairman
Federal Election Commission
1325 K Street
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

84 APR 25 PM 12: 32

April 25 , 1984

SENSITIVE

MEMORANDUM TO: The Commission
FROM: Charles N. Steele
General Counsel
By: Kenneth A. Gross
Associate General Counsel
SUBJECT: RAD Referral 84NF-18

On April 20, 1984 the Commission approved the recommendation that the subject RAD Referral be made a MUR. Therefore, all documents which had previously been identified as RAD Referral 84NF-18 should now become MUR # 1683.

Attachment
Copy of Certification

84040490204

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Louisiana State Medical Society)

Political Action Committee)

Dr. Howard A. Nelson, Jr., Treasurer)

RAD Referral 84NF-18

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 20, 1984, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 84NF-18:

1. Open a MUR.
2. Find reason to believe that the Louisiana State Medical Society Political Action Committee and Dr. Howard A. Nelson, as treasurer, violated Section 434(a)(4)(A)(i), (iii), and (iv) of the Federal Election Campaign Act of 1971, as amended.
3. Approve the letter as attached to the First General Counsel's Report dated April 18, 1984.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

4-22-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

4-18-84, 11:12
4-18-84, 4:00

84040490205



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 25, 1984

Howard A. Nelson, Jr., M.D., Treasurer
Louisiana State Medical Society
Political Action Committee
1700 Josephine Street
New Orleans, Louisiana 70113

RE: MUR 1683
Louisiana State Medical
Society Political Action
Committee

Dear Dr. Nelson:

On April 20, 1984, the Federal Election Commission determined that there is reason to believe that the Louisiana State Medical Society Political Action Committee and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a)(4)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") by failure to timely file reports of receipts and expenditures. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

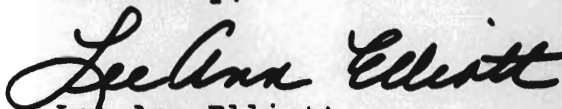
If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

84040490206

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Paul Reyes, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

84040490207

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Louisiana State Medical
Society Political Action
Committee
Dr. Howard A. Nelson, Jr.,
Treasurer

MUR NO. 1683
STAFF MEMBER & TEL. NO.
Paul Reyes
(202) 523-4175

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

SUMMARY OF ALLEGATIONS

The Louisiana State Medical Society Political Action Committee ("the Committee") and Dr. Howard A. Nelson, Jr., as treasurer, failed to file five (5) reports in a timely manner during the 1981-1982 election cycle. The filings were between 78 and 209 calendar days late.

On December 14, 1983, a chronic late filer notice was sent to the Committee requesting reasons for lateness. The Committee responded in writing on December 28, 1983, stating reasons for lateness and steps taken to prevent further late reporting.

FACTUAL AND LEGAL ANALYSIS

Listed below are the reports filed late, the date each report was due and the date each report was filed:

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Year End (7/1/81-12/31/81)	1/31/82	4/19/82
April Quarterly (1/1/82-3/31/82)	4/15/82	7/16/82
October Quarterly (7/1/82-9/30/82)	10/15/82	5/12/82
30 Day Post-General (10/1/82-11/22/82)	12/2/82	5/12/83
Year End (11/23/82-12/31/82)	1/31/83	5/12/83

Separate Committee reports were not filed for the April Quarterly, the October Quarterly and the 30 Day Post-General Reports. Financial activity for each of those periods was disclosed, respectively, on the 1982 July Quarterly and the 1982 Year End Reports. Non-filing notices were mistakenly sent to the Committee for the October Quarterly, 30 Day Post-General and the Year End Reports on May 27, 1983.

On December 14, 1983, a chronic late filer notice was sent requesting reasons for lateness. On December 19, 1983, Ms. Ramona Meyers, the Committee secretary, inquired by phone as to how to respond to the notice. On December 28, 1983, the Committee's Chairman, Dr. Daniel H. Johnson, Jr., responded in writing. According to Dr. Johnson, the personnel responsible for the filing of the 1981 Year End and the 1982 April Quarterly Reports were no longer with the Committee and lacking evidence to the contrary, he could only conclude that the late filings were caused by administrative oversight. He stated further that the 1982 October Quarterly and 30 Day Post-General Reports were prepared by a person unfamiliar with the requirements of the FECA who thought "if there was no political activity during the reporting period the reports were not required to be filed."

Dr. Johnson stated that the Committee's files indicate that the 1982 Year End Report was submitted in a timely fashion. Prepared on January 18, 1983, the Report was forwarded to the treasurer who, in turn, forwarded it to the FEC. He could not explain the difference between the due date and the date received

84040490209

by the FEC. Dr. Johnson further explained that the Committee staff now preparing FEC reports are "trained and familiar with the FEC requirements" and new administrative procedures have been put into effect to ensure the Committee's compliance with the Act.

Section 434, Title 2, United States Code, provides in part that quarterly reports, in a regular election year, shall be filed no later than the 15th day after the last day of the calendar quarter. 2 U.S.C. § 434(a)(4)(A)(i). A regularly scheduled general election was held in 1982 on November 2. A Post-General Election Report must be filed no later than the 30th day after the general election. 2 U.S.C. § 434(a)(4)(A)(iii). In a calendar year when no regularly scheduled general election is held, a report covering the period beginning July 1 and ending December 31 shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv). During a year in which a regularly scheduled general election is held, the report due for the quarter ending on December 31 shall be filed no later than January 31 of the following year. 2 U.S.C. § 434(a)(4)(A)(i).

The Committee's 1981 Year End, 1982 April and October Quarterly, the 1982 30 Day Post-General Election and the 1982 Year End Reports were filed between 78 to 209 calendar days late. Thus, the Committee has failed to comply with 2 U.S.C. § 434(a)(4)(A)(i), (iii), and (iv).

84040490210

In mitigation of this violation, Dr. Johnson explains that the Committee has taken steps to ensure future timely filing. Commission records indicate that the Committee's 1983 Mid-Year and Year End Reports were filed, respectively, on August 1, 1983, and January 30, 1984. Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the Louisiana State Medical Society Political Action Committee and Dr. Howard A. Nelson, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A).

84040490211



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cut*
DATE: April 18, 1984
SUBJECT: RAD Referral 84NF-18: First General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [x]
Sensitive [x]
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [x]
Audit Matters []

Litigation []
Closed MUR Letters []

Status Sheets []
Advisory Opinions []

Other (see distribution below) []

84040490212

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

84 APR 18 AM: 12

DATE AND TIME OF TRANSMITTAL BY OGC
TO THE COMMISSION 4/18/84 - 11:10

RAD REFERRAL NO. 84HF-18
STAFF MEMBER
Paul Reyes

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

RESPONDENT'S NAME: Louisiana State Medical Society
Political Action Committee
Dr. Howard A. Nelson, Jr., Treasurer

SENSITIVE

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(A) (1980)
11 C.F.R. § 104.5(c)(1) and (2) (1983)

INTERNAL REPORTS

CHECKED: Committee Reports

FEDERAL AGENCIES

CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Reports Analysis Division.

SUMMARY OF ALLEGATIONS

The Louisiana State Medical Society Political Action Committee ("the Committee") and Dr. Howard A. Nelson, Jr., as treasurer, failed to file five (5) reports in a timely manner during the 1981-1982 election cycle. The filings were between 78 and 209 calendar days late.

On December 14, 1983, a chronic late filer notice was sent to the Committee requesting reasons for lateness. The Committee responded in writing on December 28, 1983, stating reasons for lateness and steps taken to prevent further late reporting.

FACTUAL AND LEGAL ANALYSIS

Listed below are the reports filed late, the date each report was due and the date each report was filed:

84040490213

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Year End (7/1/81-12/31/81)	1/31/82	4/19/82
April Quarterly (1/1/82-3/31/82)	4/15/82	7/16/82
October Quarterly (7/1/82-9/30/82)	10/15/82	5/12/82
30 Day Post-General (10/1/82-11/22/82)	12/2/82	5/12/83
Year End (11/23/82-12/31/82)	1/31/83	5/12/83

Separate Committee reports were not filed for the April Quarterly, the October Quarterly and the 30 Day Post-General Reports. Financial activity for each of those periods was disclosed, respectively, on the 1982 July Quarterly and the 1982 Year End Reports. Non-filing notices were mistakenly sent to the Committee for the October Quarterly, 30 Day Post-General and the Year End Reports on May 27, 1983.

On December 14, 1983, a chronic late filer notice was sent requesting reasons for lateness. On December 19, 1983, Ms. Ramona Meyers, the Committee secretary, inquired by phone as to how to respond to the notice. On December 28, 1983, the Committee's Chairman, Dr. Daniel H. Johnson, Jr., responded in writing. According to Dr. Johnson, the personnel responsible for the filing of the 1981 Year End and the 1982 April Quarterly Reports were no longer with the Committee and lacking evidence to the contrary, he could only conclude that the late filings were caused by administrative oversight. He stated further that the 1982 October Quarterly and 30 Day Post-General Reports were prepared by a person unfamiliar with the requirements of the FECA

who thought "if there was no political activity during the reporting period the reports were not required to be filed."

Dr. Johnson stated that the Committee's files indicate that the 1982 Year End Report was submitted in a timely fashion. Prepared on January 18, 1983, the Report was forwarded to the treasurer who, in turn, forwarded it to the FEC. He could not explain the difference between the due date and the date received by the FEC. Dr. Johnson further explained that the Committee staff now preparing FEC reports are "trained and familiar with the FEC requirements" and new administrative procedures have been put into effect to ensure the Committee's compliance with the Act.

Section 434, Title 2, United States Code, provides in part that quarterly reports, in a regular election year, shall be filed no later than the 15th day after the last day of the calendar quarter. 2 U.S.C. § 434(a)(4)(A)(i). A regularly scheduled general election was held in 1982 on November 2. A Post-General Election Report must be filed no later than the 30th day after the general election. 2 U.S.C. § 434(a)(4)(A)(iii). In a calendar year when no regularly scheduled general election is held, a report covering the period beginning July 1 and ending December 31 shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv). During a year in which a regularly scheduled general election is held, the report due for the quarter ending on December 31 shall be filed

84040490215

no later than January 31 of the following year. 2 U.S.C.
§ 434(a)(4)(A)(i).

The Committee's 1981 Year End, 1982 April and October
Quarterly, the 1982 30 Day Post-General Election and the 1982
Year End Reports were filed between 78 to 209 calendar days late.
Thus, the Committee has failed to comply with 2 U.S.C.
§ 434(a)(4)(A)(i), (iii), and (iv).

In mitigation of this violation, Dr. Johnson explains that
the Committee has taken steps to ensure future timely filing.
Commission records indicate that the Committee's 1983 Mid-Year
and Year End Reports were filed, respectively, on August 1, 1983,
and January 30, 1984.

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Louisiana State Medical
Society Political Action Committee and Dr. Howard A. Nelson,
as treasurer, violated Section 434(a)(4)(A)(i), (iii), and
(iv) of the Federal Election Campaign Act of 1971, as
amended.
3. Approve the attached letter.

Charles N. Steele
General Counsel

April 18, 1984
Date

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments

RAD Referral
Letter (1)

General Counsel's Factual and Legal Analysis

84040490216

Attachment I

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: March 2, 1984

ANALYST: Mike Tangney

I. COMMITTEE:

Louisiana State Medical Society
Political Action Committee.
(C00001008)
Howard A. Nelson, Jr., M.D.
1700 Josephine Street
New Orleans, LA 70113

II. RELEVANT STATUTE:

2 U.S.C. 434(a) (4) (A)
11 CFR 104.5(c) (1) and (2)

III. BACKGROUND:

Failure to Timely File Reports - 2 U.S.C. 434(a) (4) (A);
11 CFR 104.5(c) (1) and (2)

The Louisiana State Medical Society Political Action Committee ("LAMPAC") failed to timely file five (5) Reports of Receipts and Disbursements for the 1981-82 election cycle (Attachments 2a-c). The filings were between 78 and 209 calendar days late. Listed below are the reports filed late, the date each report was due, and the date each report was filed.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Year End (7/1/81-12/31/81)	1/31/82	4/19/82
April Quarterly ^{1/} (1/1/82-3/31/82)	4/15/82	7/16/82
October Quarterly ^{2/} (7/1/82-9/30/82)	10/15/82	5/12/83 ^{3/}

1/ A separate report was not filed for the April Quarterly Report. Activity for the period was disclosed on the 1982 July Quarterly Report which covered January 1 through July 15, 1982.

2/ A separate report was not filed for the October Quarterly Report. Activity for this period was disclosed on the 1982 Year End Report which covered July 15 through December 31, 1982.

3/ A non-filing notice was mistakenly sent on May 27, 1983 (Attachment 3a).

84040490217

LOUISIANA STATE MEDICAL SOCIETY POLITICAL
ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
30 Day Post-General ^{4/} (10/1/82-11/22/82)	12/2/82	5/12/83 ^{5/}
Year End (11/23/82-12/31/82)	1/31/83	5/12/83 ^{6/}

A chronic late filing notice requesting reasons for the delays in filing was sent to LAMPAC on December 14, 1983 (Attachment 4). On December 19, 1983, Ms. Ramona Meyers (Secretary for LAMPAC), telephoned the Chief of the Party/Non-Party Branch to determine how to respond to the chronic late filing notice. Ms. Meyers was informed that the response should state the reasons for the late filing and what measures would be taken to ensure that future reports would be filed on time (Attachment 5).

On December 28, 1983, LAMPAC's Chairman, Dr. Daniel H. Johnson, Jr., filed a response with the Commission (Attachment 6). According to Dr. Johnson, the personnel who were responsible for filing the 1981 Year End and 1982 April Quarterly Reports were no longer with LAMPAC. He concluded, therefore, that the late filings were caused by an administrative oversight. The 1982 October Quarterly and 30 Day Post-General Reports were prepared by a staff person who was untrained and unfamiliar with the requirements of the FEC. The individual thought that "if there was no political activity during the reporting period the reports were not required to be filed."

With respect to the 1982 Year End Report, Dr. Johnson stated that LAMPAC's files indicate that it was submitted in a timely fashion. The report was prepared on January 18, 1983 and forwarded to the treasurer, who, in turn, forwarded it to the Federal Election Commission. Dr. Johnson could not explain the difference between the due date and the date received by the FEC. He did mention, however, that a new staff member "who is trained and familiar with FEC requirements" has been selected to handle all LAMPAC administrative responsibilities. In addition, new

4/ A separate report was not filed for the 30 Day Post-General Report. Activity for this period was disclosed on the 1982 Year End Report which covered July 15 through December 31, 1982.

5/ Non-filing notices were mistakenly sent on May 27, 1983 for the 1982 30 Day Post-General and Year End Reports (Attachments 3b and c).

6/ Ibid.

LOUISIANA STATE MEDICAL SOCIETY POLITICAL
ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 3

procedures have been put in place to ensure that LAMPAC complies with all Federal and State operational and reporting requirements. Dr. Johnson emphasized "that the failure to file required reports on the established deadlines was a matter of poor administrative procedure and in no way should be viewed as a disregard for FEC regulations or an attempt on the part of LAMPAC to conceal any improper activities." (Emphasis included.)

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

84040490219

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
LOUISIANA MEDICAL POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: MEDICAL ASS'N; LOUISIANA				NON-PARTY QUALIFIED		ID 0C00001000
1981	MID-YEAR REPORT	31,836	16,723	1JAN81 -30JUN81	3	01FEC/201/0026
	MID-YEAR REPORT - AMENDMENT	31,836	16,723	1JAN81 -30JUN81	6	01FEC/211/2000
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN81 -30JUN81	6	02FEC/245/5145
	YEAR-END	1,500	1,879	1JUL81 -31DEC81	4	02FEC/239/4999
	YEAR-END - AMENDMENT	1,500	1,879	1JUL81 -31DEC81	6	02FEC/249/4704
	YEAR-END - AMENDMENT	-	-	1JUL81 -31DEC81	6	02FEC/249/4720
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL81 -31DEC81	1	02FEC/246/4005
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31DEC81	1	02FEC/243/2634
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31DEC81	1	03FEC/290/0172
1982	MISCELLANEOUS REPORT			18OCT82 TO FEC	3	02FEC/249/4710
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -31MAR82	1	03FEC/290/0173
	JULY QUARTERLY	42,240	15,819	1JAN82 -15JUL82	3	02FEC/239/2595
	JULY QUARTERLY - AMENDMENT	42,240	15,819	1JAN82 -15JUL82	7	02FEC/249/4713
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -15JUL82	2	02FEC/243/2631
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN82 -15JUL82	1	02FEC/246/4004
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -30JUN82	2	02FEC/243/2636
	REQUEST FOR ADDITIONAL INFORMATION			1JUL82 -30SEP82	1	03FEC/290/0174
	REQUEST FOR ADDITIONAL INFORMATION			1OCT82 -22NOV82	1	03FEC/290/0175
	YEAR-END	3,897	6,930	15JUL82 -31DEC82	4	03FEC/271/4735
	YEAR-END - AMENDMENT	-	-	15JUL82 -31DEC82	3	03FEC/201/2739
	YEAR-END - AMENDMENT	-	-	23NOV82 -31DEC82	3	03FEC/209/5032
	1ST LETTER INFORMATIONAL NOTICE			15JUL82 -31DEC82	1	03FEC/277/2000
	REQUEST FOR ADDITIONAL INFORMATION			23NOV82 -31DEC82	1	03FEC/209/0202
1983	MISCELLANEOUS REPORT			27MAY83 FROM FEC	1	03FEC/272/4490
	MISCELLANEOUS REPORT			27MAY83 FROM FEC	1	03FEC/272/4500
	MISCELLANEOUS REPORT			27MAY83 FROM FEC	1	03FEC/272/4502
	TOTAL	79,473	0 41,351	0	76	TOTAL PAGES

All Reports Reviewed.

Ending Cash (12-31-82): \$ 46,355

Debits (12-31-82): \$ -0-

From 1 (Case 1-92)

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
LOUISIANA STATE MEDICAL SOCIETY POLITICAL ACTION COMM CONNECTED ORGANIZATION: MEDICAL ASS'N; LOUISIANA		[AMPAC]		NON-PARTY QUALIFIED		ID 0C00001008
1983	STATEMENT OF ORGANIZATION - AMENDMENT			6SEP83	2	83FEC/282/2436
	MID-YEAR REPORT	46,227	16,302	1JAN83 -15JUL83	5	83FEC/279/2928
	MID-YEAR REPORT - AMENDMENT	46,227	16,302	1JAN83 -15JUL83	7	84FEC/293/1768
	YEAR-END	38,776	87,614	15JUL83 -31DEC83	15	84FEC/293/1753
1984	STATEMENT OF ORGANIZATION - AMENDMENT			16JAN84	2	84FEC/291/2219
	TOTAL	85,003	0 103,916	0	31	TOTAL PAGES

(5)

No Refs Reviewed.

ENDING CASH (12-31-83): \$ 27,442

DEBTS (12-31-83) : \$ -0-

Amended (12-2-83)

RECEIVED
 82 APR 21 1982

Attachment 2A

1. Name of Committee (in Full)
 Louisiana State Med. Soc. Pol. Action
 Committee

Address (Number and Street)
 1700 Josephine Street

City, State and ZIP Code
 New Orleans, La. 70113

☐ Check if address is different than previously reported.

2. FEC Identification Number
 C00001008 (HP) 001767

3. ☐ This committee qualified as a multicandidate com-
 mittee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate box)

(a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☒ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Monthly Report for _____ (Type of Month)
 election on _____ in the State of _____
☐ Thirtieth day report following the General Election
 on _____ in the State of _____
☐ Termination Report

(b) Is this Report an Amendment?
☐ YES ☐ NO

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	7/1/81 Through 12/31/81		
6. (a) Cash on Hand January 1, 1981			\$ 8234.39
(b) Cash on Hand at Beginning of Reporting Period		\$ 5822.71	
(c) Total Receipts (from Line 10)		\$ 1500.00	\$ 33,311.87
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)		\$ 7322.71	\$ 41,546.26
7. Total Disbursements (from Line 20)		\$ 1879.79	\$ 18,603.34
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))		\$ 5442.92	\$ 22,942.92
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$	

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

For further information, contact:

Federal Election Commission
 Toll Free 800-424-9688
 Local 202-623-4888

Howard A. Nelson, Jr., M.D., Treasurer

Typed Print Name of Treasurer

Howard A. Nelson

SIGNATURE OF TREASURER

4-21-82
 Date

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

All previous versions of FEC FORM 2800 and FEC FORM 2800a are obsolete and should no longer be used.

--	--	--	--	--	--	--	--	--	--

FEC FORM 2800 (2/80)

6

REPORT OF RECEIPTS AND DISBURSEMENTS For a Political Committee Other Than an Authorized Committee

(Summary Page)

Attachment 2B
62 JUL 26 P2:15

1. Name of Committee (in Full)
Louisiana State Med. Soc. Pol. Action Committee

Address (Number and Street)
1700 Josephine Street

City, State and ZIP Code
New Orleans, La. 70113

☐ Check if address is different than previously reported.

2. FEC Identification Number
C00001008(HR)001767

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) ☐ April 15 Quarterly Report
☒ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
☐ Thirtieth day report following the General Election on _____ in the State of _____
☐ Termination Report

(b) Is this Report an Amendment?
☐ YES ☐ NO

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	1/1/82 Through 7/15/82		
6. (a) Cash on Hand January 1, 1982			\$ 22,942.92
(b) Cash on Hand at Beginning of Reporting Period		\$ 5442.92	
(c) Total Receipts (from Line 18)		\$ 42,240.00	\$ 42,240.00
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)		\$ 47,682.92	\$ 65,182.92
7. Total Disbursements (from Line 28)		\$ 15,819.31	\$ 15,819.31
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))		\$ 31,863.61	\$ 49,363.61
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9630
Local 202-423-4088

Howard A. Nelson, Jr. M.D.
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

Date

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

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

--	--	--	--	--	--	--	--	--	--

FEC FORM 3X (3/80)

7

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

83 MAY 12 AM: 22

(Summary Page)

Attachment 2C

1. Name of Committee (in Full)
**Louisiana State Med. Soc. Political
Action Committee**

Address (Number and Street)

**1700 Josephine Street
New Orleans, La. 70113**

City, State and ZIP Code

New Orleans, La. 70113

☐ Check if address is different than previously reported.

2. FEC Identification Number

C00001008 (HR) 001767

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

- (a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☒ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
☐ Thirtieth day report following the General Election
on _____ in the State of _____
☐ Termination Report

(b) Is this Report an Amendment?
☐ YES ☐ NO

SUMMARY

5. Covering Period 7/15/82 Through 12/31/82

6. (a) Cash on Hand January 1, 1982

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..

9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

Column A This Period	Column B Calendar Year-to-Date
	\$ 22,967.92
\$ 49,388.61	
\$ 3,897.00	\$ 46,137.00
\$ 53,285.61	\$ 69,104.92
\$ 6,930.45	\$ 22,749.76
\$ 46,355.16	\$ 46,355.16
\$	
\$	

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

For further information, contact:

Federal Election Commission
 Toll Free 800-424-9630
 Local 202-423-4088

Howard A. Nelson, Jr., M.D.

Type or Print Name of Treasurer

Howard A. Nelson M.D.

SIGNATURE OF TREASURER

5/2/83

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437b.

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

--	--	--	--	--	--	--	--	--	--

FEC FORM 3X (3/80)

8

840403490224



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

27 May 1983

MSF

Howard A. Nelson, M.D.
Louisiana Medical Political Action Committee
1700 Josephine Street
New Orleans, LA 70113

Identification Number: C00001008

Dear Dr. Nelson:

It has come to the attention of the Federal Election Commission that you may have failed to file the October Quarterly Report of Receipts and Disbursements as required by the Federal Election Campaign Act. Prior notice was sent to you advising you that this report (covering July 16, 1982 through September 30, 1982) was due on October 15, 1982.

It is important for your report to be available on a timely basis for the public record. The report should be filed immediately with the Federal Election Commission, 1325 K Street, N.W., Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in audit or legal enforcement action.

If you have any questions regarding this matter, please contact Mike Tangney on our toll-free number (800) 424-9530. Our local number is (202) 357-0026.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

27 May 1983

MSF

Howard A. Nelson, M.D.
Louisiana Medical Political Action Committee
1700 Josephine Street
New Orleans, LA 70113

Identification Number: C00001008

Dear Dr. Nelson:

It has come to the attention of the Federal Election Commission that you may have failed to file the 30 Day Post-General Report of Receipts and Disbursements as required by the Federal Election Campaign Act. Prior notice was sent to you advising you that this report (covering October 1, 1982 through November 22, 1982) was due on December 2, 1982.

It is important for your report to be available on a timely basis for the public record. The report should be filed immediately with the Federal Election Commission, 1325 K Street, N.W., Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in audit or legal enforcement action.

If you have any questions regarding this matter, please contact Mike Tangney on our toll-free number (800) 424-9530. Our local number is (202) 357-0026.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

84040490226
81031724499



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Attachments

27 May 1963

1997

Howard A. Nelson, M.D.
Louisiana Medical Political Action Committee
1700 Josephine Street
New Orleans, LA 70113

Identification Number: C00001008

Dear Dr. Nelson:

It has come to the attention of the Federal Election Commission that you may have failed to file the Year End Report of Receipts and Disbursements as required by the Federal Election Campaign Act. Prior notice was sent to you advising you that this report (covering November 23, 1982 through December 31, 1982) was due on January 31, 1983.

It is important for your report to be available on a timely basis for the public record. The report should be filed immediately with the Federal Election Commission, 1325 K Street, N.W., Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in audit or legal enforcement action.

If you have any questions regarding this matter, please contact Mike Tangney on our toll-free number (800) 424-9530. Our local number is (202) 357-0026.

Sincerely,

John D. Gibson
Assistant Staff Director

John D. Gibson
Assistant Staff Director
Reports Analysis Division

②



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachment 4
RQ-2
14 December 1983

D. H. Johnson, M.D.
Louisiana State Medical Society
Political Action Committee
1700 Josephine Street
New Orleans, LA 70113

Identification Number: C00001008

Reference: 1981-82 Election Cycle Reports

Dear Dr. Johnson:

This letter is prompted by the Commission's review of the reports filed by your committee for the 1981-82 election cycle. A review of the reports listed below indicates that your committee repeatedly failed to file reports in a timely manner. Timely filing is a specific requirement of the Federal Election Campaign Act and essential to fulfilling the public disclosure concept embodied in the law. The Commission views late filing as a serious violation of the Act.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Year End (7/1/81-12/31/81)	1/31/82	4/19/82
April Quarterly (1/1/82-3/31/82)	4/15/82	7/16/82
October Quarterly (7/1/82-4/30/82)	10/15/82	5/12/83
30 Day Post-General (10/1/82-11/22/82)	12/2/82	5/12/83
Year End (11/23/82-12/31/82)	1/31/83	5/12/83

This communication affords you the opportunity to present the reasons behind the late tenders noted above. Your response should be filed with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 within fifteen (15) days of the date of this letter. The Commission will consider your response to this notice before taking action in this matter. If you need assistance or have any questions regarding this matter, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Michael B. Filler
Chief
Party/Non-Party Branch
Reports Analysis Division

13

84040490228

Attachment 7/11/83
December 19, 1983

MEMORANDUM TO THE FILE

FROM : MICHAEL FILLER
COMMITTEE : LOUISIANA MEDICAL POLITICAL ACTION COMMITTEE
SUBJECT : CHRONIC LATE FILING

Ms. Rqmona Meyers, Secretary of the Louisiana Medical Political Action Committee ("LAMPAC"), called in response to a chronic late filing notice. She mentioned that LAMPAC had received a notice back in May of this year concerning non-filing of the 1982 October Quarterly, 30 Day Post-General and Year End Reports. According to Ms. Meyers, the non-filer notice was mailed on May 27, 1983, yet the chronic late filing notice revealed that the reports in question had been received on May 12, 1983. I stated that the reports may not have appeared on our computer at the time that the non-filer notice was sent.

Ms. Meyers then asked how she should respond to the chronic late filing notice. I instructed her to address the reasons for late filing, and the steps to be taken to ensure that future reports will be filed on time.

84040490229

Attachment 6



03 DEC 22 P2:45

1700 Josephine St., New Orleans, LA 70113 (504) 584-4333 LA 0075 1-800-452-6308

December 20, 1983

Michael B. Filler, Chief
Party/Non-Party Branch
Reports Analysis Division
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Filler:

This letter is in response to your communication of December 14, 1983 and subsequent telephone conference with Ramona Meyers of the LSMS staff. I requested the staff of the LSMS to review our LAMPAC files and provide me with any information concerning the filing of the required reports outlined in your letter. After a review of the information and circumstances during those filing periods I offer you the following comments regarding the filing dates.

In regards to the reports due on 1/31/82 and 4/15/82 the personnel responsible for the preparation and filing of the reports are no longer with the LSMS. Therefore, the only information available regarding these reports are the file copies of the reports submitted. There is little evidence as to why the filing deadlines were not met and I can only conclude that failure to comply with these deadlines was an administrative oversight on the part of those responsible for filing the reports.

In regards to the reports due on 10/15/82 and 12/2/82 the staff person that assumed the responsibility for the reports following the departure of the previous staff personnel was simply untrained and unfamiliar with the requirements of the FEC. Failure to submit these reports on a timely basis was the result of a misunderstanding on her part as to when they were to be filed. It was her understanding that if there was no political activity during the reporting period the reports were not required to be filed. This, of course, is an error and my apologies for not insuring that the staff had better direction for carrying out our filing responsibilities.

The report due on 1/31/83, according to our files, was submitted in a timely fashion and it is particularly puzzling to determine where the May 12, 1983 filing date was derived. Our files indicate that the report was prepared on January 18, 1983 and forwarded for signature of the Treasurer who in turn forwarded the report to the Federal Election Commission Office in Washington. I am sorry that

14

Letter to FEC
Page 2

I am unable to be of any assistance in explaining the difference between the due date and the date received by the FEC as noted in your letter. The preparation of this report was done by a new staff member selected to handle all LAMPAC administrative responsibilities. She is trained and familiar with FEC requirements and I am confident will adhere to the reporting requirements outlined in the FEC regulations.

I believe that further comments are in order regarding the circumstances contributing to the necessity of your letter. First, let me emphasize strongly that the failure to file required reports on the established deadlines was a matter of poor administrative procedure and in no way should be viewed as a disregard for FEC regulations or an attempt on the part of LAMPAC to conceal any improper activities. LAMPAC is firmly committed to the principles and ideals of responsible political involvement. We have always recognized and will continue to recognize the responsibility of the FEC in monitoring the involvement of political committees in the support of chosen candidates for public office.

LAMPAC has not been an active committee in the past few years and because of this has neglected its administrative and organizational structure. This has now changed. In 1983 the Board of Directors of LAMPAC initiated a complete review of the organization and purposes of LAMPAC, including its bylaws. The results are that LAMPAC will broaden its participation in state political races and has initiated reorganization of its structure to increase its membership and participation in the political process. This reorganization will be finalized with the approval of new bylaws at the March 1984 Annual Meeting. As mentioned previously, new staff and administrative procedures have already been put in place to accomplish these new objectives and to insure that LAMPAC complies with all federal and state operational and reporting requirements. As a part of these new procedures, all future reports filed with federal and state authorities will be by registered mail to insure proper delivery and documentation of submission of the required reports.

Thank you for the opportunity to respond to the noted discrepancies and again let me offer my apologies for our failure to properly meet our administrative responsibilities. I can assure you that this type of discrepancy will not occur in the future.

If I can be of further assistance to you, please feel free to contact me or the LAMPAC office.

Sincerely,



Daniel H. Johnson, Jr., M.D.
LAMPAC Chairman

MLJ/jr

15

Attachment II



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Howard A. Nelson, Jr., M.D., Treasurer
Louisiana State Medical Society
Political Action Committee
1700 Josephine Street
New Orleans, Louisiana 70113

RE: MUR
Louisiana State Medical
Society Political Action
Committee

Dear Dr. Nelson:

On , 1984, the Federal Election Commission determined that there is reason to believe that the Louisiana State Medical Society Political Action Committee and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a)(4)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") by failure to timely file reports of receipts and expenditures. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Paul Reyes, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

84040490233

Attachment III

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Louisiana State Medical
Society Political Action
Committee
Dr. Howard A. Nelson, Jr.,
Treasurer

RAD REFERRAL NO. 84NF-18
STAFF MEMBER & TEL. NO.
Paul Reyes
(202) 523-4175

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

SUMMARY OF ALLEGATIONS

The Louisiana State Medical Society Political Action Committee ("the Committee") and Dr. Howard A. Nelson, Jr., as treasurer, failed to file five (5) reports in a timely manner during the 1981-1982 election cycle. The filings were between 78 and 209 calendar days late.

On December 14, 1983, a chronic late filer notice was sent to the Committee requesting reasons for lateness. The Committee responded in writing on December 28, 1983, stating reasons for lateness and steps taken to prevent further late reporting.

FACTUAL AND LEGAL ANALYSIS

Listed below are the reports filed late, the date each report was due and the date each report was filed:

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Year End (7/1/81-12/31/81)	1/31/82	4/19/82
April Quarterly (1/1/82-3/31/82)	4/15/82	7/16/82
October Quarterly (7/1/82-9/30/82)	10/15/82	5/12/82
30 Day Post-General (10/1/82-11/22/82)	12/2/82	5/12/83
Year End (11/23/82-12/31/82)	1/31/83	5/12/83 -

Separate Committee reports were not filed for the April Quarterly, the October Quarterly and the 30 Day Post-General Reports. Financial activity for each of those periods was disclosed, respectively, on the 1982 July Quarterly and the 1982 Year End Reports. Non-filing notices were mistakenly sent to the Committee for the October Quarterly, 30 Day Post-General and the Year End Reports on May 27, 1983.

On December 14, 1983, a chronic late filer notice was sent requesting reasons for lateness. On December 19, 1983, Ms. Ramona Meyers, the Committee secretary, inquired by phone as to how to respond to the notice. On December 28, 1983, the Committee's Chairman, Dr. Daniel H. Johnson, Jr., responded in writing. According to Dr. Johnson, the personnel responsible for the filing of the 1981 Year End and the 1982 April Quarterly Reports were no longer with the Committee and lacking evidence to the contrary, he could only conclude that the late filings were caused by administrative oversight. He stated further that the 1982 October Quarterly and 30 Day Post-General Reports were prepared by a person unfamiliar with the requirements of the FECA who thought "if there was no political activity during the reporting period the reports were not required to be filed."

Dr. Johnson stated that the Committee's files indicate that the 1982 Year End Report was submitted in a timely fashion. Prepared on January 18, 1983, the Report was forwarded to the treasurer who, in turn, forwarded it to the FEC. He could not explain the difference between the due date and the date received

by the FEC. Dr. Johnson further explained that the Committee staff now preparing FEC reports are "trained and familiar with the FEC requirements" and new administrative procedures have been put into effect to ensure the Committee's compliance with the Act.

Section 434, Title 2, United States Code, provides in part that quarterly reports, in a regular election year, shall be filed no later than the 15th day after the last day of the calendar quarter. 2 U.S.C. § 434(a)(4)(A)(i). A regularly scheduled general election was held in 1982 on November 2. A Post-General Election Report must be filed no later than the 30th day after the general election. 2 U.S.C. § 434(a)(4)(A)(iii). In a calendar year when no regularly scheduled general election is held, a report covering the period beginning July 1 and ending December 31 shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv). During a year in which a regularly scheduled general election is held, the report due for the quarter ending on December 31 shall be filed no later than January 31 of the following year. 2 U.S.C. § 434(a)(4)(A)(i).

The Committee's 1981 Year End, 1982 April and October Quarterly, the 1982 30 Day Post-General Election and the 1982 Year End Reports were filed between 78 to 209 calendar days late. Thus, the Committee has failed to comply with 2 U.S.C. § 434(a)(4)(A)(i), (iii), and (iv).

In mitigation of this violation, Dr. Johnson explains that the Committee has taken steps to ensure future timely filing. Commission records indicate that the Committee's 1983 Mid-Year and Year End Reports were filed, respectively, on August 1, 1983, and January 30, 1984. Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the Louisiana State Medical Society Political Action Committee and Dr. Howard A. Nelson, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A).

84040490237

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: March 2, 1984

ANALYST: Mike Tangney

I. COMMITTEE: Louisiana State Medical Society
Political Action Committee
(C00001008)
Howard A. Nelson, Jr., M.D.
1700 Josephine Street
New Orleans, LA 70113

II. RELEVANT STATUTE: 2 U.S.C. 434(a)(4)(A)
11 CFR 104.5(c)(1) and (2)

III. BACKGROUND:

Failure to Timely File Reports - 2 U.S.C. 434(a)(4)(A);
11 CFR 104.5(c)(1) and (2)

The Louisiana State Medical Society Political Action Committee ("LAMPAC") failed to timely file five (5) Reports of Receipts and Disbursements for the 1981-82 election cycle (Attachments 2a-c). The filings were between 78 and 209 calendar days late. Listed below are the reports filed late, the date each report was due, and the date each report was filed.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Year End (7/1/81-12/31/81)	1/31/82	4/19/82
April Quarterly ^{1/} (1/1/82-3/31/82)	4/15/82	7/16/82
October Quarterly ^{2/} (7/1/82-9/30/82)	10/15/82	5/12/83 ^{3/}

^{1/} A separate report was not filed for the April Quarterly Report. Activity for the period was disclosed on the 1982 July Quarterly Report which covered January 1 through July 15, 1982.

^{2/} A separate report was not filed for the October Quarterly Report. Activity for this period was disclosed on the 1982 Year End Report which covered July 15 through December 31, 1982.

^{3/} A non-filing notice was mistakenly sent on May 27, 1983 (Attachment 3a).

84040490238

LOUISIANA STATE MEDICAL SOCIETY POLITICAL
ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
30 Day Post-General ^{4/} (10/1/82-11/22/82)	12/2/82	5/12/83 ^{5/}
Year End (11/23/82-12/31/82)	1/31/83	5/12/83 ^{6/}

A chronic late filing notice requesting reasons for the delays in filing was sent to LAMPAC on December 14, 1983 (Attachment 4). On December 19, 1983, Ms. Ramona Meyers (Secretary for LAMPAC), telephoned the Chief of the Party/Non-Party Branch to determine how to respond to the chronic late filing notice. Ms. Meyers was informed that the response should state the reasons for the late filing and what measures would be taken to ensure that future reports would be filed on time (Attachment 5).

On December 28, 1983, LAMPAC's Chairman, Dr. Daniel H. Johnson, Jr., filed a response with the Commission (Attachment 6). According to Dr. Johnson, the personnel who were responsible for filing the 1981 Year End and 1982 April Quarterly Reports were no longer with LAMPAC. He concluded, therefore, that the late filings were caused by an administrative oversight. The 1982 October Quarterly and 30 Day Post-General Reports were prepared by a staff person who was untrained and unfamiliar with the requirements of the FEC. The individual thought that "if there was no political activity during the reporting period the reports were not required to be filed."

With respect to the 1982 Year End Report, Dr. Johnson stated that LAMPAC's files indicate that it was submitted in a timely fashion. The report was prepared on January 18, 1983 and forwarded to the treasurer, who, in turn, forwarded it to the Federal Election Commission. Dr. Johnson could not explain the difference between the due date and the date received by the FEC. He did mention, however, that a new staff member "who is trained and familiar with FEC requirements" has been selected to handle all LAMPAC administrative responsibilities. In addition, new

^{4/} A separate report was not filed for the 30 Day Post-General Report. Activity for this period was disclosed on the 1982 Year End Report which covered July 15 through December 31, 1982.

^{5/} Non-filing notices were mistakenly sent on May 27, 1983 for the 1982 30 Day Post-General and Year End Reports (Attachments 3b and c).

^{6/} Ibid.

LOUISIANA STATE MEDICAL SOCIETY POLITICAL
ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 3

procedures have been put in place to ensure that LAMPAC complies with all Federal and State operational and reporting requirements. Dr. Johnson emphasized "that the failure to file required reports on the established deadlines was a matter of poor administrative procedure and in no way should be viewed as a disregard for FEC regulations or an attempt on the part of LAMPAC to conceal any improper activities." (Emphasis included.)

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

84040490240

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
LOUISIANA MEDICAL POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: MEDICAL ASS'N; LOUISIANA		[AMPAC]		NON-PARTY QUALIFIED	ID #C00001008	
1981	MID-YEAR REPORT	31,836	16,723	1JAN81 -30JUN81	5	81FEC/201/0826
	MID-YEAR REPORT - AMENDMENT	31,836	16,723	1JAN81 -30JUN81	6	81FEC/211/2085
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN81 -30JUN81	6	82FEC/245/5145
	YEAR-END	1,500	1,879	1JUL81 -31DEC81	4	82FEC/229/4999
	YEAR-END - AMENDMENT	1,500	1,879	1JUL81 -31DEC81	6	82FEC/249/4704
	YEAR-END - AMENDMENT	-	-	1JUL81 -31DEC81	6	82FEC/249/4720
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL81 -31DEC81	1	82FEC/246/4805
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31DEC81	1	82FEC/243/2634
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31DEC81	1	83FEC/290/0172
1982	MISCELLANEOUS REPORT			18OCT82 TO FEC	3	82FEC/249/4710
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -31MAR82	1	83FEC/290/0173
	JULY QUARTERLY	42,240	15,819	1JAN82 -15JUL82	5	82FEC/239/2593
	JULY QUARTERLY - AMENDMENT	42,240	15,819	1JAN82 -15JUL82	7	82FEC/249/4713
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -15JUL82	2	82FEC/243/2631
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN82 -15JUL82	1	82FEC/246/4804
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -30JUN82	2	82FEC/243/2636
	REQUEST FOR ADDITIONAL INFORMATION			1JUL82 -30SEP82	1	83FEC/290/0174
	REQUEST FOR ADDITIONAL INFORMATION			1OCT82 -22NOV82	1	83FEC/290/0175
	YEAR-END	3,897	6,930	15JUL82 -31DEC82	4	83FEC/271/4735
	YEAR-END - AMENDMENT	-	-	15JUL82 -31DEC82	5	83FEC/281/2759
	YEAR-END - AMENDMENT	-	-	23NOV82 -31DEC82	3	83FEC/289/5032
	1ST LETTER INFORMATIONAL NOTICE			15JUL82 -31DEC82	1	83FEC/277/2890
	REQUEST FOR ADDITIONAL INFORMATION			23NOV82 -31DEC82	1	83FEC/289/0282
1983	MISCELLANEOUS REPORT			27MAY83 FROM FEC	1	83FEC/272/4498
	MISCELLANEOUS REPORT			27MAY83 FROM FEC	1	83FEC/272/4500
	MISCELLANEOUS REPORT			27MAY83 FROM FEC	1	83FEC/272/4502
TOTAL		79,473	0 41,351	0	76	TOTAL PAGES

All Reports Reviewed.

Ending Cash (12-31-82): \$ 46,355

Debits (12-31-82) : \$ -0-

Amended 1 (Page 1 of 2)

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
LOUISIANA STATE MEDICAL SOCIETY POLITICAL ACTION COMM CONNECTED ORGANIZATION: MEDICAL ASS'N; LOUISIANA		[AMPAC]		NON-PARTY QUALIFIED		ID #C00001908
1983 STATEMENT OF ORGANIZATION - AMENDMENT				6SEP83	2	83FEC/282/3426
MID-YEAR REPORT	46,227	16,302	1JAN83 - 15JUL83	5	83FEC/279/2936	
MID-YEAR REPORT - AMENDMENT	46,227	16,302	1JAN83 - 15JUL83	7	84FEC/293/1768	
YEAR-END	38,776	87,614	15JUL83 - 31DEC83	15	84FEC/293/1758	
1984 STATEMENT OF ORGANIZATION - AMENDMENT			16JAN84	2	84FEC/291/2319	
TOTAL	85,003	0	103,916	0	31	TOTAL PAGES

No Reports Reviewed.

ENDING CASE (12-31-83): \$ 27,442

DEBTS (12-31-83) : \$ -0-

ENCLOSURE 1 (Pgs 2 & 2)

1. Name of Committee (in Full)

Louisiana State Med. Soc. Pol. Action Committee

Address (Number and Street)

1700 Josephine Street

City, State and ZIP Code

New Orleans, La. 70113

☐ Check if address is different than previously reported.

2. FEC Identification Number

C00001008 (HP) 001767

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (Check appropriate box)

- (a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☒ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ (Type of election) election on _____ in the State of _____
☐ Thirtieth day report following the General Election on _____ in the State of _____
☐ Termination Report

(b) Is this Report an Amendment?
☐ YES ☐ NO

SUMMARY

5. Covering Period 7/1/81 Through 12/31/81

6. (a) Cash on Hand January 1, 1981

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 20)

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))

9. Debts and Obligations Owed TO the Committee (Provide all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Provide all on Schedule C or Schedule D)

Column A This Period	Column B Calendar Year-to-Date
	\$ 8234.39
\$ 5822.71	
\$ 1500.00	\$ 33,311.87
\$ 7322.71	\$ 41,546.26
\$ 1879.79	\$ 18,603.34
\$ 5442.92	\$ 22,942.92
\$	
\$	

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

Howard A. Nelson, Jr., M.D., Treasurer

Type or Print Name of Treasurer

Howard A. Nelson, Jr.

SIGNATURE OF TREASURER

Date

4.21.82

For further information, contact:

Federal Election Commission
 Toll Free 800-424-6889
 Local 202-633-4000

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437b.

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

--	--	--	--	--	--	--	--	--	--

FEC FORM 3X (2/80)

82032204999

94040490243

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

62 JUL 26 P 2: 15

1. Name of Committee (in Full) Louisiana State Med. Soc. Pol. Action Committee Address (Number and Street) 1700 Josephine Street City, State and ZIP Code New Orleans, La. 70113 ☐ Check if address is different than previously reported. 2. FEC Identification Number C00001008(HR)001767 3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)	4. TYPE OF REPORT (check appropriate boxes) (a) ☐ April 15 Quarterly Report ☒ July 15 Quarterly Report ☐ October 15 Quarterly Report ☐ January 31 Year End Report ☐ July 31 Mid Year Report (Non-election Year Only) ☐ Monthly Report for _____ ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____ ☐ Thirtieth day report following the General Election on _____ in the State of _____ ☐ Termination Report (b) Is this Report an Amendment? ☐ YES ☐ NO
---	--

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>1/1/82</u> Through <u>7/15/82</u>			
6. (a) Cash on Hand January 1, 1982			\$ 22,942.92
(b) Cash on Hand at Beginning of Reporting Period	\$ 5442.92		
(c) Total Receipts (from Line 18)	\$ 42,240.00	\$ 42,240.00	
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 47,682.92	\$ 65,182.92	
7. Total Disbursements (from Line 28)	\$ 15,819.31	\$ 15,819.31	
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 31,863.61	\$ 49,363.61	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$		
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$		

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9630
Local 202-623-4088

Howard A. Nelson, Jr. MD
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

Date

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

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

--	--	--	--	--	--	--	--	--	--

FEC FORM 3X (3/80)

84040490244

11273239291

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

83 MAY 12 AM: 22

(Summary Page)

Attachment 2B

1. Name of Committee (in Full)
Louisiana State Med. Soc. Political
Action Committee

Address (Number and Street)
1700 Josephine Street
New Orleans, La. 70113

City, State and ZIP Code
New Orleans, La. 70113

☐ Check if address is different than previously reported.

2. FEC Identification Number
C00001008 (HR) 001767

3. ☐ This committee qualified as a multicandidate com-
mittee during this Reporting Period on _____
(date)

4. TYPE OF REPORT (check appropriate boxes)

- (a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☒ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____
(Type of Election)
election on _____ in the State of _____
☐ Thirtieth day report following the General Election
on _____ in the State of _____
☐ Termination Report

(b) Is this Report an Amendment?
☐ YES ☐ NO

SUMMARY

5. Covering Period 7/15/82 Through 12/31/82

6. (a) Cash on Hand January 1, 1982

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add lines 6(b) and 6(c) for Column A and
lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ...

9. Debts and Obligations Owed TO the Committee
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D)

Column A
This Period

Column B
Calendar Year-to-Date

\$ 22,967.92

\$ 49,388.61

\$ 3,897.00

\$ 46,137.00

\$ 53,285.61

\$ 69,104.92

\$ 6,930.45

\$ 22,749.76

\$ 46,355.16

\$ 46,355.16

\$

\$

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9630
Local 202-623-6888

Howard A. Nelson, Jr., M.D.

Type or Print Name of Treasurer

Howard A. Nelson, M.D.
SIGNATURE OF TREASURER

5/2/83
Date

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

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

--	--	--	--	--	--	--	--	--

FEC FORM 3X (3/80)

84040490245
6503171473



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

27 May 1983

NSF

Howard A. Nelson, M.D.
Louisiana Medical Political Action Committee
1700 Josephine Street
New Orleans, LA 70113

Identification Number: C00001008

Dear Dr. Nelson:

It has come to the attention of the Federal Election Commission that you may have failed to file the October Quarterly Report of Receipts and Disbursements as required by the Federal Election Campaign Act. Prior notice was sent to you advising you that this report (covering July 16, 1982 through September 30, 1982) was due on October 15, 1982.

It is important for your report to be available on a timely basis for the public record. The report should be filed immediately with the Federal Election Commission, 1325 K Street, N.W., Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in audit or legal enforcement action.

If you have any questions regarding this matter, please contact Mike Tangney on our toll-free number (800) 424-9530. Our local number is (202) 357-0026.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

84040490246
1033724500



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

27 May 1983

MSF

Howard A. Nelson, M.D.
Louisiana Medical Political Action Committee
1700 Josephine Street
New Orleans, LA 70113

Identification Number: C00001008

Dear Dr. Nelson:

It has come to the attention of the Federal Election Commission that you may have failed to file the 30 Day Post-General Report of Receipts and Disbursements as required by the Federal Election Campaign Act. Prior notice was sent to you advising you that this report (covering October 1, 1982 through November 22, 1982) was due on December 2, 1982.

It is important for your report to be available on a timely basis for the public record. The report should be filed immediately with the Federal Election Commission, 1325 K Street, N.W., Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in audit or legal enforcement action.

If you have any questions regarding this matter, please contact Mike Tangney on our toll-free number (800) 424-9530. Our local number is (202) 357-0026.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

84040490247
81032724499



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

27 May 1983

MEP

Howard A. Nelson, M.D.
Louisiana Medical Political Action Committee
1700 Josephine Street
New Orleans, LA 70113

Identification Number: C00001008

Dear Dr. Nelson:

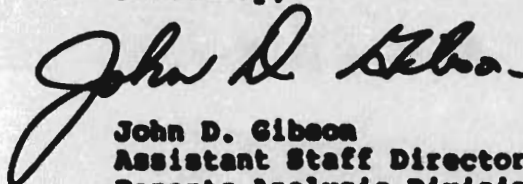
It has come to the attention of the Federal Election Commission that you may have failed to file the Year End Report of Receipts and Disbursements as required by the Federal Election Campaign Act. Prior notice was sent to you advising you that this report (covering November 23, 1982 through December 31, 1982) was due on January 31, 1983.

It is important for your report to be available on a timely basis for the public record. The report should be filed immediately with the Federal Election Commission, 1325 K Street, N.W., Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in audit or legal enforcement action.

If you have any questions regarding this matter, please contact Mike Tangney on our toll-free number (800) 424-9530. Our local number is (202) 357-0026.

Sincerely,


John D. Gibson
Assistant Staff Director
Reports Analysis Division

84040490248
03032724502



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

14 December 1983

D. H. Johnson, M.D.
Louisiana State Medical Society
Political Action Committee
1700 Josephine Street
New Orleans, LA 70113

Identification Number: C00001008

Reference: 1981-82 Election Cycle Reports

Dear Dr. Johnson:

This letter is prompted by the Commission's review of the reports filed by your committee for the 1981-82 election cycle. A review of the reports listed below indicates that your committee repeatedly failed to file reports in a timely manner. Timely filing is a specific requirement of the Federal Election Campaign Act and essential to fulfilling the public disclosure concept embodied in the law. The Commission views late filing as a serious violation of the Act.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Year End (7/1/81-12/31/81)	1/31/82	4/19/82
April Quarterly (1/1/82-3/31/82)	4/15/82	7/16/82
October Quarterly (7/1/82-4/30/82)	10/15/82	5/12/83
30 Day Post-General (10/1/82-11/22/82)	12/2/82	5/12/83
Year End (11/23/82-12/31/82)	1/31/83	5/12/83

This communication affords you the opportunity to present the reasons behind the late tenders noted above. Your response should be filed with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 within fifteen (15) days of the date of this letter. The Commission will consider your response to this notice before taking action in this matter. If you need assistance or have any questions regarding this matter, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Michael B. Filler
Chief
Party/Non-Party Branch
Reports Analysis Division

84040490249

Attachment

December 19, 1983

MEMORANDUM TO THE FILE

FROM : MICHAEL FILLER
COMMITTEE : LOUISIANA MEDICAL POLITICAL ACTION COMMITTEE
SUBJECT : CHRONIC LATE FILING

Ms. Rqmona Meyers, Secretary of the Louisiana Medical Political Action Committee ("LAMPAC"), called in response to a chronic late filing notice. She mentioned that LAMPAC had received a notice back in May of this year concerning non-filing of the 1982 October Quarterly, 30 Day Post-General and Year End Reports. According to Ms. Meyers, the non-filer notice was mailed on May 27, 1983, yet the chronic late filing notice revealed that the reports in question had been received on May 12, 1983. I stated that the reports may not have appeared on our computer at the time that the non-filer notice was sent.

Ms. Meyers then asked how she should respond to the chronic late filing notice. I instructed her to address the reasons for late filing, and the steps to be taken to ensure that future reports will be filed on time.

84040490250

TREATMENT 6

1700 Josephine St., New Orleans, LA 70113 (504) 581-1000 LA 9875 1-800-482-8608

0 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99

Dear Mr. Filler:

This letter is in response to your communication of December 14, 1983 and subsequent telephone conference with Ramona Meyers of the LSMS staff. I requested the staff of the LSMS to review our LAMPAC files and provide me with any information concerning the filing of the required reports outlined in your letter. After a review of the information and circumstances during those filing periods I offer you the following comments regarding the filing dates.

In regards to the reports due on 1/31/82 and 4/15/82 the personnel responsible for the preparation and filing of the reports are no longer with the LSMS. Therefore, the only information available regarding these reports are the file copies of the reports submitted. There is little evidence as to why the filing deadlines were not met and I can only conclude that failure to comply with these deadlines was an administrative oversight on the part of those responsible for filing the reports.

In regards to the reports due on 10/15/82 and 12/2/82 the staff person that assumed the responsibility for the reports following the departure of the previous staff personnel was simply untrained and unfamiliar with the requirements of the FEC. Failure to submit these reports on a timely basis was the result of a misunderstanding on her part as to when they were to be filed. It was her understanding that if there was no political activity during the reporting period the reports were not required to be filed. This, of course, is an error and my apologies for not insuring that the staff had better direction for carrying out our filing responsibilities.

The report due on 1/31/83, according to our files, was submitted in a timely fashion and it is particularly puzzling to determine where the May 12, 1983 filing date was derived. Our files indicate that the report was prepared on January 18, 1983 and forwarded for signature of the Treasurer who in turn forwarded the report to the Federal Election Commission Office in Washington. I am sorry that

Letter to FEC
Page 2

I am unable to be of any assistance in explaining the difference between the due date and the date received by the FEC as noted in your letter. The preparation of this report was done by a new staff member selected to handle all LAMPAC administrative responsibilities. She is trained and familiar with FEC requirements and I am confident will adhere to the reporting requirements outlined in the FEC regulations.

I believe that further comments are in order regarding the circumstances contributing to the necessity of your letter. First, let me emphasize strongly that the failure to file required reports on the established deadlines was a matter of poor administrative procedure and in no way should be viewed as a disregard for FEC regulations or an attempt on the part of LAMPAC to conceal any improper activities. LAMPAC is firmly committed to the principles and ideals of responsible political involvement. We have always recognized and will continue to recognize the responsibility of the FEC in monitoring the involvement of political committees in the support of chosen candidates for public office.

LAMPAC has not been an active committee in the past few years and because of this has neglected its administrative and organizational structure. This has now changed. In 1983 the Board of Directors of LAMPAC initiated a complete review of the organization and purposes of LAMPAC, including its bylaws. The results are that LAMPAC will broaden its participation in state political races and has initiated reorganization of its structure to increase its membership and participation in the political process. This reorganization will be finalized with the approval of new bylaws at the March 1984 Annual Meeting. As mentioned previously, new staff and administrative procedures have already been put in place to accomplish these new objectives and to insure that LAMPAC complies with all federal and state operational and reporting requirements. As a part of these new procedures, all future reports filed with federal and state authorities will be by registered mail to insure proper delivery and documentation of submission of the required reports.

Thank you for the opportunity to respond to the noted discrepancies and again let me offer my apologies for our failure to properly meet our administrative responsibilities. I can assure you that this type of discrepancy will not occur in the future.

If I can be of further assistance to you, please feel free to contact me or the LAMPAC office.

Sincerely,



Daniel H. Johnson, Jr., M.D.
LAMPAC Chairman

MLH:rr

84040490253



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR #

1683

Date Filmed

11/16/84

Camera No. ---

4

Cameraman

JRL