



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

THIS IS THE BEGINNING OF MUR # 2424
DATE FILMED 11/25/87 CAMERA NO. 3
CAMERAMAN A.S.

87040664563

Public Record Index - MUR 2424

1. Memo, 10 Feb 87, John D. Gibson (Reports Analysis Division) to Charles N. Steele (General Counsel) subj: Referral of American Sugar Cane League PAC, w/atch (RAD Referral Package).
2. First General Counsel's Report, 18 May 87.
3. Certification of Commission Action, 22 May 87.
4. Ltr, 8 Jun 87, Scott E. Thomas (Chairman, FEC) to Thomas M. Warner (Treas, American Sugar Cane League Political Action Committee), w/encl.
5. Ltr, 22 Jun 87, Thomas M. Warner to FEC.
6. Ltr, 29 Jun 87, T.M. Warner to FEC, subj: Request for pre-probable cause conciliation.
7. General Counsel's Report, 22 Jul 87.
8. Certification of Commission Action, 24 Jul 87.
9. Ltr, 29 Jul 87, L.M. Noble to T.M. Warner, w/atch.
10. General Counsel's Report, 16 Sep 87.
11. Certification of Commission Action, 21 Sep 87.
12. Ltr, 23 Sep 87, Lawrence M. Noble (Acting General Counsel) to T.M. Warner, w/atch (Executed Conciliation Agreement).

- End -

NOTE: In preparing its file for the public record, O.G.C. routinely removes those documents in which it perceives little or no public interest, and those documents, or portions thereof, which are exempt from disclosure under the Freedom of Information Act.

87040664564

Attachment 1

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 10, 1987

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: NON-FILER REFERRALS OF MONTHLY UNAUTHORIZED COMMITTEES

Attached is a listing of thirty-four (34) monthly filers which failed to file a report covering the pre-election period by Election Day, November 4, 1986. In accordance with Standard 3 of the 1985-1986 RAD Review and Referral Procedures, further examination is required by your office.

On September 29, 1986, prior notification was sent to all unauthorized committees which specifically informed monthly filers of the requirement to file a 12 Day Pre-General Report by October 23, 1986 (Attachment 35). Each committee which failed to submit either a 12 Day Pre-General Report or a November Monthly Report was sent a Non-Filer Notice on November 14, 1986 (Attachment 36). The following six (6) committees were not sent Non-Filer Notices because a report covering the pre-election period was indexed by November 14, 1986:

- American Sugar Cane League Political Action Committee
(C00081414)

2

The attached printout lists the name, address and treasurer for each committee being referred. Any telephone conversations are referenced under Contacts with Filers. The Summary Pages of the late-filed reports and/or letters of explanation are included under Reports Filed/Response(s).

In addition, a "C" index has been included for each committee. Please note that the aggregate receipt and disbursement figures may be inflated in some cases because a) reports were submitted covering portions of the same period (e.g., a 12 Day Pre-General Report covering October 1, 1986 through October 15, 1986 and a November Monthly Report covering October 1, 1986 through October 31, 1986), or b) 1987 February Monthly Reports have been filed.

If you have any questions, please contact Lisa Stolaruk at 376-2480.

Attachments

87040664566

(3)

C00081414

American Sugar Cane League Political
Action Committee

87NF-12

87040364567

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32

87040664568

AMERICAN SUGAR CANE LEAGUE POLITICAL ACTION COMMITTEE

(Attachments 5a - 5c)

8 7 0 4 0 6 6 4 5 6 9
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 4FEB87
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
AMERICAN SUGAR CANE LEAGUE POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: SUGAR CANE LEAGUE OF THE USA, AMER				NON-PARTY QUALIFIED	ID #C00081414	
1985	FEBRUARY MONTHLY	4,438	3,609	1JAN85 -31JAN85	7	85FEC/366/5380
	MARCH MONTHLY	0	500	1FEB85 -28FEB85	4	85FEC/368/4075
	APRIL MONTHLY	518	7,100	1MAR85 -31MAR85	5	85FEC/371/1146
	MAY MONTHLY	41,739	14,400	1APR85 -30APR85	15	85FEC/374/2283
	JUNE MONTHLY	5,751	21,800	1MAY85 -31MAY85	11	85FEC/376/1284
	JULY MONTHLY	0	4,250	1JUN85 -30JUN85	4	85FEC/380/0183
	AUGUST MONTHLY	6,616	15,700	1JUL85 -31JUL85	9	85FEC/386/2960
	SEPTEMBER MONTHLY	15,874	2,000	1AUG85 -31AUG85	7	85FEC/387/4421
	OCTOBER MONTHLY	429	3,027	1SEP85 -30SEP85	7	85FEC/390/0536
	NOVEMBER MONTHLY	6,887	15,300	1OCT85 -31OCT85	10	85FEC/391/4916
	DECEMBER MONTHLY	2,058	15,519	1NOV85 -30NOV85	7	85FEC/393/0273
	YEAR-END	2,210	2,750	1DEC85 -31DEC85	4	86FEC/397/3145
1986	FEBRUARY MONTHLY	0	7,750	1JAN86 -31JAN86	4	86FEC/403/4167
	MARCH MONTHLY	20,353	2,750	1FEB86 -28FEB86	7	86FEC/405/4705
	APRIL MONTHLY	663	9,900	1MAR86 -31MAR86	5	86FEC/411/2335
	MAY MONTHLY	17,784	7,800	1APR86 -30APR86	7	86FEC/416/4892
	JUNE MONTHLY	1,767	5,800	1MAY86 -31MAY86	5	86FEC/416/5345
	JULY MONTHLY	7,016	3,850	1JUN86 -30JUN86	6	86FEC/422/3379
	AUGUST MONTHLY	5,201	2,050	1JUL86 -31JUL86	5	86FEC/428/2751
	SEPTEMBER MONTHLY	26,472	7,300	1AUG86 -31AUG86	9	86FEC/431/1867
	OCTOBER MONTHLY	991	5,850	1SEP86 -30SEP86	4	86FEC/434/0236
	PRE-GENERAL	0	2,250	1OCT86 -15OCT86	4	86FEC/443/5429
	POST-GENERAL	1,535	4,845	16OCT86 -24NOV86	4	86FEC/448/2322
	YEAR-END	3,973	1,750	25NOV86 -31DEC86	4	87FEC/458/2778
TOTAL		172,275	0	171,850	0	154 TOTAL PAGES

Ending cash-on-hand as of 12/31/86: \$88,095

Debts: \$0

All reports have been reviewed except the 1986 Year End Report.

ATTACHMENT 5a

(33)

AMERICAN SUGAR CANE LEAGUE
OF THE U. S. A., INC.
POLITICAL ACTION COMMITTEE

WILLARD E. BERRY
Chairman

Phone
(202) 525-5959
(202) 525-5965

610 Western Hwy.
New Orleans, LA 70119

FEC
HAND DELIVERED
26 NOV 10 12:12
THOMAS M. WARNER
Treasurer

34

November 7, 1986

Federal Election Commission
999 E Street NW
Washington, D.C. 20463

Gentlemen:

Enclosed is our Pre-General Election Report. I apologize for the report being late, but through an oversight, it was not mailed at the proper time.

Please excuse the delay.

Sincerely yours,

Thomas M. Warner
Thomas M. Warner
Treasurer

TMW/ch
Enclosure

057040664570

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REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee
(Summary Page)

HAND DELIVERED
NOV 10 12:12

1. Name of Committee (in Full) AMERICAN SUGAR CANE LEAGUE POLITICAL ACTION COMMITTEE Address (Number and Street) 416 Whitney Bldg. City, State and ZIP Code NEW ORLEANS, LA 70130 ☐ Check if address is different than previously reported. 2. FEC Identification Number C 000 81414 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) ☒ Pre-General Election Report ☐ 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
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35

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>10-1-86</u> Through <u>10-15-86</u>			
6. (a) Cash on Hand January 1, 19 <u>86</u>			\$ 88,229.85
(b) Cash on Hand at Beginning of Reporting Period	\$ 95,431.13		
(c) Total Receipts (from Line 18)	\$ - 0 -		\$ 82,251.35
(d) Subtotal: add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B	\$ 95,431.13		\$ 148,461.13
7. Total Disbursements (from Line 28)	\$ 2,250.00		\$ 55,300.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 93,161.13		\$ 93,161.13
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 202-633-4068

Thomas M. Warner
Type in Full Name of Treasurer

Thomas Warner
SIGNATURE OF TREASURER

10-15-86
Date

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

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

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FEC FORM 3a (3-86)

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SENSITIVE

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION _____

RAD REFERRALS 97NF-08 to 41
STAFF MEMBER
Deborah Curry

SOURCE OF MUR: INTERNALLY GENERATED
RESPONDENTS' NAMES:

American Sugar Cane League Political
Action Committee and Thomas M. Warner,
as treasurer

87040564572

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(B) and
11 C.F.R. 104.5(c)(3)(ii)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This matter was generated by the Reports Analysis Division ("RAD") after a review of the disclosure reports of the above-named committees. The RAD referral reveals that the above mentioned committees and their treasurers, may have violated 2 U.S.C. § 434(a)(4)(B) by failing to file the 1986 Pre-General Election Report in a timely manner.

II. FACTUAL AND LEGAL ANALYSIS

Attached is a listing of thirty-four (34) monthly filers which failed to file a report covering the pre-election period by Election Day, November 4, 1986. (Attachment 1) On September 29, 1986, prior notification was sent to all unauthorized committees which specifically informed monthly filers of the requirement to file a 12 Day Pre-General Report by October 23, 1986. (Attachment 1, page 137) Each committee which failed to submit either a 12 Day Pre-General Report or a November Monthly Report was sent a Non-Filer Notice on November 14, 1986. (Attachment 1, page 139)

The following six (6) committees were not sent Non-Filer Notices because a report covering the pre-election period was indexed by November 14, 1986:

- American Sugar Cane League Political
Action Committee

The attached printout lists the name, address and treasurer for each committee being referred. (Attachment 1, pages 5-10) Any telephone conversations are referenced under Contacts with Filers. The Summary Pages of the late-filed reports and/or letters of explanation are included under Reports Filed/Response(s).

In addition, a "C" index has been included for each committee. (Attachment 1) Please note that the aggregate receipt and disbursement figures may be inflated in some cases because (a) reports were submitted covering portions of the same period (e.g., a 12 Day Pre-General report covering October 1, 1986 through October 15, 1986 and a November Monthly Report covering October 1, 1986 through October 31, 1986), or (b) 1987 February Monthly Reports have been filed.

2 U.S.C. § 434(a)(4)(B) requires that monthly filers file a Pre-General Election Report, covering financial activity from October 1 through October 15, by October 23, 1986. The above

referenced committees failed to file the 1986 Pre-General Election Report by the required deadline. Therefore, though the Commission is in receipt of report(s) disclosing financial activity covering the pre-general election period, such report(s) were not filed in a timely manner.

With regard to thirty-two non-filers listed below, the Office of General Counsel recommends that the Commission open MURs and find reason to believe these committees and their treasurers violated 2 U.S.C. § 434(a)(4)(B).

on

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III. RECOMMENDATIONS

1. Open MURs with respect to those committees listed in Recommendation 2.
2. Find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(B):

American Sugar Cane League Political
Action Committee and Thomas M. Warner,
as treasurer

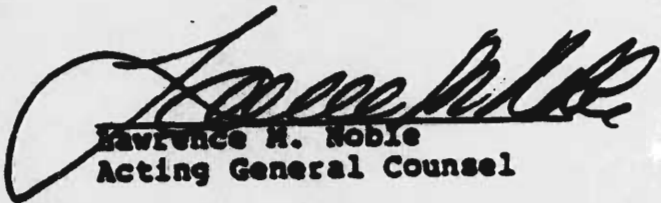
R 7 0 4 0 6 1 6 4 5 7 5

8704064576

3. Approve the attached sample letter and sample Factual and Legal Analysis to be sent to each committee listed in Recommendation 2.

Date

5/18/87


Lawrence M. Noble
Acting General Counsel

Attachments

1. Referral Materials
2. Sample Letter (1)
3. Sample Factual and Legal Analysis (1)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

RAD Ref. 87NF-08 to 41

American Sugar Cane League Political
Action Committee and Thomas M. Warner,
as treasurer

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(continued)

Federal Election Commission
Certification for RAD Ref. 87NF-08 to 41
May 21, 1987

Page 2.

87040564578

3

(continued)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 21, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 87NF-08 to 41:

1. Open MURs with respect to those committees listed in Recommendation 2.
2. Find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a) (4) (B):

American Sugar Cane League Political Action
Committee and Thomas M. Warner,
as treasurer

(continued)

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Federal Election Commission
Certification for RAD Ref. 87NF-08 to 41
May 21, 1987

Page 4

87040664580

3

(continued)

- 87040564581
3. Approve the sample letter and sample Factual and Legal Analysis to be sent to each committee listed in Recommendation 2, as recommended in the First General Counsel's Report signed May 18, 1987.
 - 4.

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

Attest:

5-22-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Tues.,	5-19-87,	9:00
Circulated on 48 hour tally basis:	Tues.,	5-19-87,	4:00
Deadline for vote:	Thurs.,	5-21-87,	4:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 8, 1987

Thomas M. Warner, Treasurer
American Sugar Cane League Political
Action Committee
416 Whitney Building
New Orleans, LA 70130

RE: MUR 2424
American Sugar Cane League
Political Action Committee
and Thomas M. Warner,
as treasurer

Dear Mr. Warner:

On May 21, 1987, the Federal Election Commission determined there is reason to believe American Sugar Cane League Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or

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recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and 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 Phillip Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Statement

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film

**FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS**

RESPONDENTS: American Sugar Cane League
Political Action Committee and
Thomas M. Warner, as treasurer

MUR 2424

The RAD referral reveals that the above-mentioned committee and treasurer, may have violated 2 U.S.C. § 434(a)(4)(B) by failing to file the 1986 Pre-General Election Report in a timely manner..

On September 29, 1986, prior notification was sent to all unauthorized committees which specifically informed monthly filers of the requirement to file a 12 Day Pre-General Election Report by October 23, 1986. The above-mentioned Committee failed to file a report covering the pre-election period by Election Day, November 4, 1986. Each Committee which failed to submit either a 12 Day Pre-General Election Report or a November Monthly Report was sent a Non-filer Notice on November 14, 1986, unless the Commission had received the reports by that date.

2 U.S.C. § 434(a)(4)(B) required that monthly filers file a Pre-General Election Report, covering financial activity from October 1 through October 15, by October 23, 1986. The above-referenced committee failed to file the 1986 Pre-General Election Report by the required deadline. Though the Committee may have filed a report which disclosed financial activity covering the pre-general election period, such report was not filed in a

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timely manner. Therefore, the Office of General Counsel recommends the Commission open a MUR in this matter and find reason to believe the above-mentioned Respondents have violated 2 U.S.C. § 434(a)(4)(B).

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AMERICAN SUGAR CANE LEAGUE
OF THE U.S.A., INC.

POLITICAL ACTION COMMITTEE

THOMAS M. WARNER
TREASURER

615 WHITNEY BUILDING
NEW ORLEANS, LA. 70130

PHONES:
(504) 525-3956
(504) 525-6848

June 22, 1987

Mr. Scott Thomas, Chairman
Federal Election Commission
999 E Street NW
Washington, D. C. 20463

RE: MUR 2424

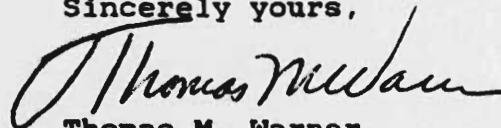
Dear Mr. Thomas:

I am in receipt of your June 8 letter, a copy of which is enclosed. Upon reading the letter, I immediately went to my file and pulled out the file copy of the Pre-General Election Report in question. The report is dated October 16, 1986.

Our committee has historically filed its reports on time and regrets that this late mailing occurred. Due to an oversight on my part, the Pre-General Election Report was Federal Expressed to the Commission on November 7, 1986. This late delivery was in no way intentional, as indicated by the October 16, 1986 date on the report. Measures are being taken to see that this does not happen again.

If you or the attorney assigned to this matter have any questions, feel free to call me.

Sincerely yours,



Thomas M. Warner
Treasurer

TMW/cb
Enclosure

97 JUN 23 P12:02

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

97 JUN 23 P3:59

5

AMERICAN SUGAR CANE LEAGUE
OF THE U.S.A., INC.

POLITICAL ACTION COMMITTEE

GCCH 3762

THOMAS M. WARNER
TREASURER

615 WHITNEY BUILDING
NEW ORLEANS, LA. 70130

PHONES:
(504) 525-3936
(504) 525-6848

June 29, 1987

87 JUN 30 4:18

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

Mr. Scott Thomas, Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2424

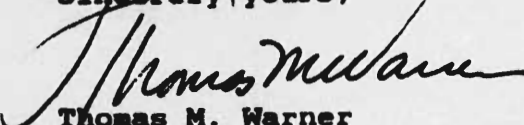
Dear Mr. Thomas:

This letter will serve as an official notice for our request in pursuing a pre-probable cause conciliation. As stated in my letter of June 22 addressed to you, the reason for the Pre-General Election Report being filed late was simply an oversight on my part. The report was prepared on October 16, 1986, but did not arrive in the FEC office until November 7, 1986.

The late filing was not deliberate. Measures are being taken to see that this does not happen again.

If you or the attorney assigned to this matter have any questions, feel free to call me.

Sincerely yours,


Thomas M. Warner
Treasurer

Tmw/cb

870040569587

6

CONFIDENTIAL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

American Sugar Cane League)
Political Action Committee and)
Thomas M. Warner, as treasurer)

MUR 2424

22 JUL 1987 11:37

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On May 21, 1987, the Commission found reason to believe that the American Sugar Cane League Political Action Committee and Thomas M. Warner, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) by failing to file the 1986 Pre-General Election Report in a timely manner. By letter dated June 29, 1987, respondents requested to settle this matter prior to a finding of probable cause to believe (Attachment 1).

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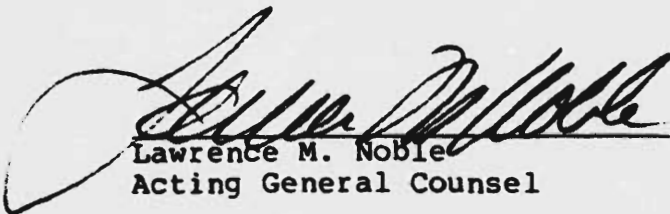
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III. RECOMMENDATION

1. Enter into conciliation with the American Sugar Cane League Political Action Committee and Thomas M. Warner, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Date

7/22/87


Lawrence M. Noble
Acting General Counsel

Attachments:

- 1) Request for conciliation
- 2) Proposed agreement and letter

Attachments to General
Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 1 see 6

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

American Sugar Cane League
Political Action Committee and
Thomas M. Warner, as treasurer

MUR 2424

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on July 24,
1987, the Commission decided by a vote of 6-0 to take
the following actions in MUR 2424:

1. Enter into conciliation with the American Sugar
Cane League Political Action Committee and Thomas
M. Warner, as treasurer, prior to a finding of
probable cause to believe.
2. Approve the proposed conciliation agreement and
letter, as recommended in General Counsel's Report
signed July 22, 1987.

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

Attest:

7-24-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Wed., 7-22-87, 11:37
Circulated on 48 hour tally basis: Wed., 7-22-87, 4:00
Deadline for vote: Fri., 7-24-87, 4:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 29, 1987

Thomas M. Warner, Treasurer
American Sugar Cane League Political
Action Committee
416 Whitney Building
New Orleans, Louisiana 70130

RE: MUR 2424
American Sugar Cane
League Political Action
Committee and Thomas M.
Warner, as treasurer

Dear Mr. Warner:

On May 21, 1987, the Federal Election Commission found reason to believe that the American Sugar Cane League Political Action Committee, and you as treasurer violated 2 U.S.C. § 434(a)(4)(B). At your request, on July 24, 1987, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

American Sugar Cane League
Political Action Committee and
Thomas M. Warner, as treasurer

MUR 2424

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed
by Thomas M. Warner, the treasurer of the American Sugar Cane
League Political Action Committee. (Attachment 1).

RECEIVED
FEDERAL ELECTION COMMISSION
SEP 16 1987
87 SEP 16 PM 3:52

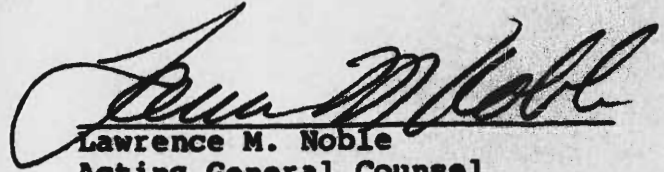
87040564593

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the American Sugar Cane League Political Action Committee and Thomas M. Warner, as treasurer.
2. Close the file.
3. Approve the attached letter.

Date

9/16/87

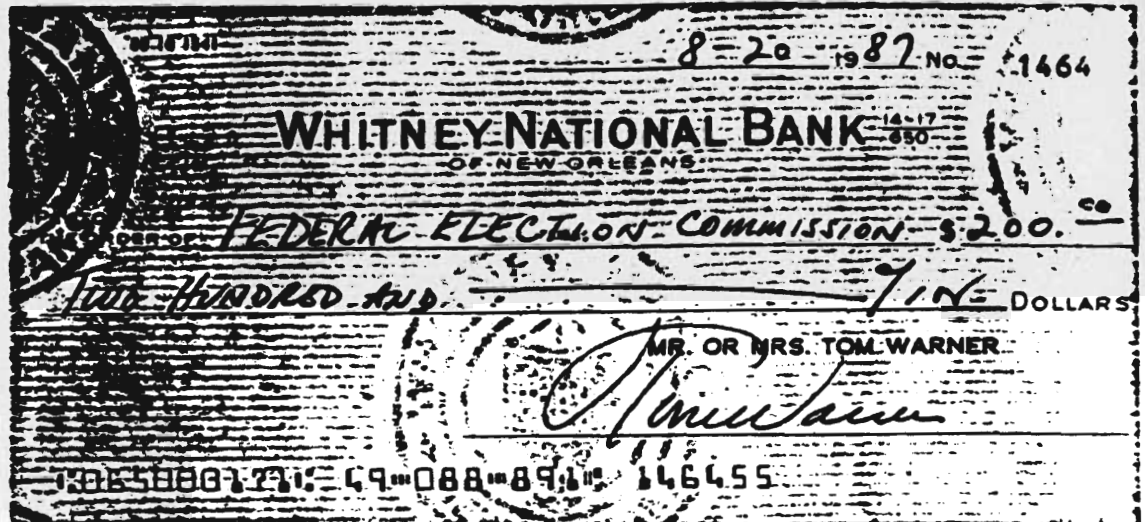

Lawrence M. Noble
Acting General Counsel

Attachments:

- 1) Conciliation Agreement
- 2) Photocopy of check
- 3) Letter to Respondent

8704064594

Wise



MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMIEW

CHECK NO. 1464 { A COPY OF WHICH IS ATTACHED } RELATING TO
American Sugar Cane League Political
FUR 2424 AND NAME Action Cmte., and Thomas M. Warner, as treas.

WAS RECIEVED ON 8/24/87. PLEASE INDICATE THE ACCOUNT INTO
WHICH IT SHOULD BE DEPOSITED:

- / ☒ / BUDGET CLEARING ACCOUNT { 95F3875.16 }
- / / CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- / / OTHER _____

SIGNATURE Debra A. Trimiew

DATE 8/25/87

Attachment 2

Attachments to General
Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 1 see 12

<u>3</u>	<u>12</u>
<u> </u>	<u> </u>
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

American Sugar Cane League
Political Action Committee and
Thomas M. Warner, as treasurer

MUR 2424

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on September 21,
1987, the Commission decided by a vote of 6-0 to take
the following actions in MUR 2424:

1. Accept the conciliation agreement with the
American Sugar Cane League Political Action
Committee and Thomas M. Warner, as treasurer,
as recommended in the General Counsel's Report
signed September 16, 1987.
2. Close the file.
3. Approve the letter, as recommended in the General
Counsel's Report signed September 16, 1987.

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

Attest:

9-21-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Wed., 9-16-87, 3:52
Circulated on 48 hour tally basis: Thurs., 9-17-87, 11:00
Deadline for vote: Mon., 9-21-87, 11:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 23, 1987

Thomas M. Warner, Treasurer
American Sugar Cane League Political
Action Committee
416 Whitney Building
New Orleans, Louisiana 70130

RE: MUR 2424
American Sugar Cane
League Political Action
Committee and Thomas M.
Warner, as treasurer

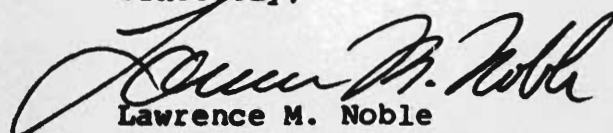
Dear Mr. Warner:

On September 21, 1987, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted by the American Sugar Cane League Political Action Committee, and Thomas M. Warner, as treasurer in settlement of a violation of 2 U.S.C. § 434(a)(4)(B) a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

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

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter at (202) 376-8200.

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

American Sugar Cane League)
Political Action Committee, and)
Thomas M. Warner, as treasurer)

MUR 2424

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that American Sugar Cane League Political Action Committee, and Thomas M. Warner, as treasurer violated 2 U.S.C. § 434(a)(4)(B).

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

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

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

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

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

1. Respondent, American Sugar Cane League Political Action Committee, is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent, Thomas M. Warner, is the treasurer of American Sugar Cane League Political Action Committee.

3. Respondents were required to file their 1986 12 Day Pre-General Election Report by October 23, 1986. This report was filed on November 10, 1986, 18 days late.

V. Respondents failed to file their 1986 12 Day Pre-General Election Report in a timely manner in violation of 2 U.S.C. §434(a)(4)(B).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Two hundred dollars (\$200.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

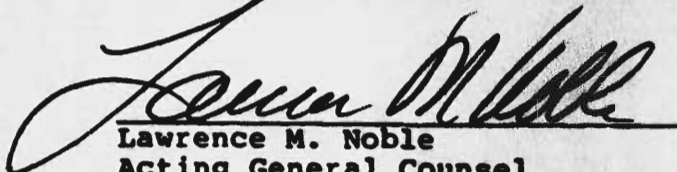
VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than 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.

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X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:


Lawrence M. Noble
Acting General Counsel

9/23/87
Date

FOR THE RESPONDENTS:


Thomas M. Warner
Treasurer

8-20-87
Date

87040364501



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

THIS IS THE END OF MUR # 2424

DATE FILMED 11/25/87 CAMERA NO. 3

CAMERAMAN AS

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