

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: April 16 1999

ANALYST: Scott Francis

I. COMMITTEE: Halter Marine Group, Inc. Political Action Committee
(HALPAC)
(C00321802)
James Ogden, Treasurer
13085 Seaway Road, P.O. Box 3029
Gulfport, MS 39505

II. RELEVANT STATUTE: 2 USC §434(a)(4)(A)(i)
11 CFR 104.5(c)(1)(i)(A)

III. BACKGROUND:

Failure to Timely File the 1998 October Quarterly Report

The Halter Marine Group, Inc. Political Action Committee (HALPAC) ("the Committee") failed to timely file the 1998 October Quarterly Report of Receipts and Disbursements covering the period from July 1, 1998 to September 30, 1998.

On December 29, 1997 and September 18, 1998, Prior Notices were sent to the Committee informing it that the 1998 October Quarterly Report was due on October 15, 1998 (Attachment 2). A Non-Filer Notice was sent to the Committee via mailgram on November 4, 1998 (Attachment 3).

The Reports Analysis Division ("RAD") analyst contacted James Ogden, treasurer of the Committee, on December 1, 1998. The RAD analyst informed the

treasurer that failure to file a report covering activity conducted between July 1 and September 30, 1998 could result in legal action. The treasurer stated that he had been in the hospital and would file the reports as soon as he returned to work (Attachment 4).

On January 25, 1999, the RAD analyst left a message for the treasurer informing him that the 1998 October Quarterly Report had still not been filed with the Commission (Attachment 5).

On February 3, 1999, the Committee hand delivered the 1998 October Quarterly Report to the Commission (Attachment 6). The treasurer reiterated in a cover letter that he had been out on medical leave.

FEDERAL ELECTION COMMISSION
1997-1998
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

ATTACHMENT 2

DATE 4/16/1999

PAGE 2

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	IMAGE LOCATION
					TYPE OF FILER	
HALTER MARINE GROUP INC POLITICAL ACTION COMMITTEE (HALPAC)				ID #C00321882	NON-PARTY QUALIFIED	
CONNECTED ORGANIZATION: HALTER MARINE GROUP INC						
	1997 STATEMENT OF ORGANIZATION - AMENDMENT			28OCT97	2	97FEC/245/4372
	MID-YEAR REPORT	23,573	9,500	1JAN97 - 30JUN97	6	97FEC/222/2469
	YEAR-END	46,631	20,600	1JAN97 - 31DEC97	13	98FEC/269/2767
	YEAR-END - AMENDMENT	23,057	11,100	1JUL97 - 31DEC97	13	98FEC/304/2515
	YEAR-END - AMENDMENT	23,057	11,100	1JUL97 - 31DEC97	12	98FEC/327/0804
	REQUEST FOR ADDITIONAL INFORMATION			1JAN97 - 31DEC97	3	98FEC/287/3779
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN97 - 31DEC97	4	98FEC/292/1741
	1'ST LETTER INFORMATIONAL NOTICE			1JUL97 - 31DEC97	3	98FEC/322/1436
1998	APRIL QUARTERLY	15,287	4,000	1JAN98 - 31MAR98	6	98FEC/310/0556
	NOTICE OF FAILURE TO FILE			1JAN98 - 31MAR98	2	98FEC/309/9154
	JULY QUARTERLY	8,166	10,200	1APR98 - 30JUN98	8	98FEC/327/0796
	JULY QUARTERLY - AMENDMENT	8,166	10,200	1APR98 - 30JUN98	8	98FEC/354/4821
	REQUEST FOR ADDITIONAL INFORMATION			1APR98 - 30JUN98	2	98FEC/351/0516
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR98 - 30JUN98	3	98FEC/357/2601
	OCTOBER QUARTERLY	18,044	8,500	1JUL98 - 30SEP98	10	99FEC/428/4003
	NOTICE OF FAILURE TO FILE			1JUL98 - 30SEP98	2	98FEC/391/2214
	REQUEST FOR ADDITIONAL INFORMATION			1JUL98 - 30SEP98	1	99FEC/437/3130
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL98 - 30SEP98	2	99FEC/442/1080
	POST-GENERAL	5,951	2,000	1OCT98 - 23NOV98	15	99FEC/428/4013
	NOTICE OF FAILURE TO FILE			1OCT98 - 23NOV98	2	99FEC/416/0608
	REQUEST FOR ADDITIONAL INFORMATION			1OCT98 - 23NOV98	1	99FEC/437/3131
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT98 - 23NOV98	2	99FEC/442/1082
	YEAR-END	5,578	0	24NOV98 - 31DEC98	15	99FEC/428/4028
	REQUEST FOR ADDITIONAL INFORMATION			24NOV98 - 31DEC98	2	99FEC/437/3132
	REQUEST FOR ADDITIONAL INFORMATION 2ND			24NOV98 - 31DEC98	3	99FEC/442/1084
1999	MISCELLANEOUS NOTICE FROM FEC			15JAN99	3	99FEC/410/2514
	TOTAL	99,656	0	45,300	0	143 TOTAL PAGES

All reports have been reviewed.

Ending cash-on-hand as of 12/31/98: \$57,685

Outstanding debts owed to/by the committee as of 12/31/98: \$0

YEAR-END REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 29, 1997

WHO MUST FILE

Party committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file a Year-End Report on January 31, 1998.

I. Semi-annual Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	07/01/97 - 12/31/97	01/31/98	01/31/98

II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	12/01/97 - 12/31/97	01/31/98	01/31/98

LABEL

Committees should affix the peel-off label from the envelope to line 1 of the report. Corrections should be made on the label.

COMPLIANCE

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

ELECTRONIC FILING

For reports covering activity occurring in 1997 (and later), political committees have the option of filing electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing Gets Underway at FEC," and call the Data Division at (800) 424-9530 or (202) 219-3730.

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

** Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

(over)

PARTIES AND PACS

YEAR-END

1998 FILING SCHEDULE

I. QUARTERLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April Quarterly	01/01/98 - 03/31/98	04/15/98	04/15/98
July Quarterly	04/01/98 - 06/30/98	07/15/98	07/15/98
October Quarterly	07/01/98 - 09/30/98	10/15/98	10/15/98
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98
Year-End	11/24/98 - 12/31/98	01/31/99	01/31/99

II. MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
February	01/01/98 - 01/31/98	02/20/98	02/20/98
March	02/01/98 - 02/28/98	03/20/98	03/20/98
April	03/01/98 - 03/31/98	04/20/98	04/20/98
May	04/01/98 - 04/30/98	05/20/98	05/20/98
June	05/01/98 - 05/31/98	06/20/98	06/20/98
July	06/01/98 - 06/30/98	07/20/98	07/20/98
August	07/01/98 - 07/31/98	08/20/98	08/20/98
September	08/01/98 - 08/31/98	09/20/98	09/20/98
October	09/01/98 - 09/30/98	10/20/98	10/20/98
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98
Year-End	11/24/98 - 12/31/98	01/31/99	01/31/99

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement is triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election.

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

** Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 18, 1998

WHO MUST FILE

Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) filing on a quarterly basis must file a Quarterly Report in October.

REPORT	REPORTING PERIOD*	REG./CERT.	FILING
		MAILING	DATE
		DATE**	DATE
October Quarterly	07/01/98 - 09/30/98	10/15/98	10/15/98

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any Party Committee or PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1998 Record.

LABEL

Committees should affix the peel-off label from the envelope to line 1 of the report. Corrections should be made on the label.

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

** Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

(over)

PARTIES AND PACS

October Quarterly

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

ELECTRONIC FILING

Political committees have the option of filing their reports electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing of Disclosure Reports," and call the Data Division at (800) 424-9530 or (202) 694-1250.

COMPLIANCE

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

**WESTERN
UNION**

CONFIRMATION OF MAILGRAM TO: JAMES OGDEN
HALTER MARINE GROUP INC PAC
13085 SEAWAY ROAD
GULFPORT MS 39505

FEDERAL ELECTION COMMISSION
SHAWN WERTH
999 E ST. NW.
WASHINGTON DC 204630001

NOVEMBER 4, 1998

IDENTIFICATION NUMBER: C00321802

REFERENCE: OCTOBER QUARTERLY (07/01/1998 - 09/30/1998)

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT.

IT IS IMPORTANT THAT YOU FILE THIS REPORT IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION, 999 E STREET, N.W., WASHINGTON, D.C., 20463. A COPY OF THE REPORT OR RELEVANT PORTIONS SHOULD ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER.

ALTHOUGH THE COMMISSION MAY INITIATE AN AUDIT OR LEGAL ENFORCEMENT ACTION CONCERNING THIS MATTER, YOUR PROMPT RESPONSE AND A LETTER OF EXPLANATION WILL BE TAKEN INTO CONSIDERATION.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT SCOTT A. FRANCIS ON OUR TOLL FREE NUMBER (800)424-9530. OUR LOCAL NUMBER IS (202)694-1130.

SINCERELY,

JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

Telecon

Name: James Ogden, Treasurer

Date: December 1

Subject: Non-Filing of October Quarterly Report

Notes: Treasurer stated that the reason the report had not been filed was that he has been in the hospital for some time and would be returning to work when his doctor said his health was good enough to return. He said that the PAC has had little activity, since he was hospitalized. He would file the report as soon as possible.

Telecon

Name: James Ogden, Treasurer

Date: January 25, 1999

Subject: Non-Filing of October Quarterly Report

Notes: Left treasurer message that the October Quarterly Report still has not been filed.

2000-01-25 14:00

**HALTER**From The Desk Of
Jim OgdenELECTION
COMMISSION MAIL ROOM

FEB 3 9 05 AM '99

Say these are
late I have
been out on
medical leave
and in the hospital
John

99034284003

REPORT OF RECEIPTS AND DISBURSEMENTSFor Other Than An Authorized Committee
(Summary Page)Attachment #6
Page 2 of 2FEB 3 9 05 AM
FEDERAL ELECTION COMMISSION MAIL ROOMUSE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE AS LISTED C00321802 081898 P 268 JAMES OGDEN HALTER MARINE GROUP INC POLITI CAL ACTION COMMITTEE (HALPAC) 13083 SEAWAY ROAD PO BOX 3029 GULFPORT MS 39305		2. FEC IDENTIFICATION NUMBER C00321802
		3. <input type="checkbox"/> This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

4. TYPE OF REPORT(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)☐ Termination Report

Monthly Report Due On:

<input type="checkbox"/> February 20	<input type="checkbox"/> June 20	<input type="checkbox"/> October 20
<input type="checkbox"/> March 20	<input type="checkbox"/> July 20	<input type="checkbox"/> November 20
<input type="checkbox"/> April 20	<input type="checkbox"/> August 20	<input type="checkbox"/> December 20
<input type="checkbox"/> May 20	<input type="checkbox"/> September 20	<input type="checkbox"/> January 31

☐ 12-Day Pre-Election Report for the _____
(Type of Election)

election on _____ in the State of _____

☐ 30-Day Post-Election Report following the General Election

on _____ in the State of _____

(b) Is this Report an Amendment?

☐ YES☒ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	7-1-98 through 9-30-98		
6. (a) Cash on Hand January 1, 1998			\$29,356.14
(b) Cash on Hand at Beginning of Reporting Period		\$38,610.24	
(c) Total Receipts (from Line 10)		\$18,644.88	\$41,498.98
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$56,655.12	\$70,855.12
7. Total Disbursements (from Line 30)		\$8,500.00	\$27,700.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$48,155.12	\$48,155.12
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-694-1100
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/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.

Type or Print Name of Treasurer

JIM OGDEN

Signature of Treasurer

Date

2-1-99

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

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FEC FORM 3X
(revised 8/93)