



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

MAR - 2 2004

Thomas R. Nienaber
The Horowitz Law Firm, P.S.C.
541 Buttermilk Pike, Suite 305
Crescent Springs, KY 41017-1689

RE: MUR 5335R
Bill Shehan, Jr.

Dear Mr. Nienaber:

As part of its investigation in the above-captioned matter, the Federal Election Commission requests that your client, Bill Shehan, Jr., submit answers in writing and under oath to the questions set forth below and produce the documents specified below within 15 days of your receipt of this request. In answering the questions below, please identify any individuals who are able to verify the information contained in your client's response by providing their full names, addresses and phone numbers through which we can reach them.

The questions and document requests directed at your client are as follows:


1. Provide duplicates or legible copies of the birth certificates for your daughters Georgia and Susan Shehan. In lieu of producing the originals, any copies provided should show both sides of the original documents.
2. Describe the circumstances surrounding the contributions made by you and your daughters to the Geoff Davis for Congress Committee (a.k.a. Geoff Davis 2002) ("the Committee").
 - a. Describe where and when your and your daughters' contributions were made to the Committee.
 - b. What was the source of the funds used to make Georgia and Susan Shehan's contributions? In answering this question please specify what type of account(s), if any, held those funds prior to making the contributions and state who had control over and authority to manage the account(s). Provide copies of documentation to verify this information.

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3. Describe the nature of any and all communications you had with the Committee concerning your and your daughters' contributions.
 - a. Describe what you said and how the Committee's representative responded.
 - b. Identify the individual(s) you spoke with concerning the contributions.
 - c. Specify what information, if any, the Committee requested concerning your and your daughters' contributions. What information was provided to the Committee in response to their request?
 - d. Explain what identification information you provided to the Committee with regard to your and your daughters' contributions. Specifically, what were the full names, addresses and occupation information provided to the Committee? Did you indicate to the Committee that Georgia Shehan's occupation was that of "Homemaker?" If so, please explain your reasons for that indication. If not, please explain what was the occupation information that you provided for both Georgia and Susan Shehan.
 - e. Provide copies of any documentation, including but not limited to letters or other correspondence, that relate to your and your daughters' contributions.

Feel free to provide any additional information or documentation your client would like the Commission to consider in investigating this matter. If you have any questions regarding this request, do not hesitate to contact me at (202) 694-1650.

Sincerely,



Ana J. Peña-Wallace
Attorney