

Kevin P. LeMaire

Prairieville, LA 70769

RECEIVED
FEDERAL ELECTION
COMMISSION

2011 DEC 21 AM 11:28

OFFICE OF GENERAL
COUNSEL

December 7, 2011

Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Enclosed Sworn Complaint
Calvin C. Fayard, Jr.
Cynthia Fayard
Chalyn Fayard
Carolyn Mistoler

MUR # 6519

Dear Ma'am/Sir:

Enclosed please find my Sworn Complaint regarding the individuals referenced above.

Should you find this matter warrants investigation, please take into consideration that Calvin Fayard, Jr., his law firm of Fayard & Honeycutt, and his law partner, D. Blayne Honeycutt, made campaign contributions to the US Attorney for the Middle District of Louisiana, Donald Cazayoux, in 2008 when Mr. Cazayoux was seeking a congressional seat. In order to avoid even the appearance of impropriety, it may be prudent to have a different office conduct the investigation.

Thank you for your attention to this matter.

Respectfully,


Kevin LeMaire

Enclosures

12044314270

2011 DEC 21 AM 11:28

OFFICE OF GENERAL
COUNSEL

SWORN COMPLAINT

STATE OF LOUISIANA

PARISH OF EAST BATON

BEFORE ME, the undersigned authority, personally came and appeared,

KEVIN P. LeMAIRE

MUR # 6519

("Complainant") herein, who, after being duly sworn, did depose and state:

Complainant resides at , Prairieville, Louisiana.

Complainant's telephone number is

Complainant submits this Sworn Complaint based upon his personal knowledge, his oral and written communications with others, documents attached as exhibits, and the existence of documentary evidence in the possession of others.

For the reasons that follow, Complainant reasonably believes violations of the Federal Election Campaign Laws or Commission Regulations have been committed by:

1. Calvin C. Fayard, Jr. who presently resides at New Orleans, Louisiana;
2. Cynthia Fayard, who lists her addresses as : Wilson, Wyoming and Post Office Box 968, Denham Springs, Louisiana; and,
3. Chalyn Fayard who lists her address as Post Office Box 968, Denham Springs, Louisiana;

Complainant also reasonably believes that Carolyn A. Mistoler (hereafter "Mistoler"), who once resided at Hammond, Louisiana, but may now reside at Walker, LA 70785 ; knowingly and willfully assisted the Fayards with the acts described herein. At various material and relevant times herein,

12044314272

Mistoler was the personal and business bookkeeper and office manager for Calvin Fayard and the law firms known as Calvin C. Fayard, Jr., APC; Fayard & Fayard Law Firm; and Fayard & Honeycutt, APC, and in such capacity, conducted or participated in the conduct of the affairs of the firms. Mistoler is also identified as the manager of several Louisiana limited liability companies.

Complainant was employed as a paralegal by Fayard in the law offices of Fayard & Honeycutt, APC, and Calvin Fayard, Jr., APC from January 3, 1996 through November 13, 2003. Complainant assisted Mistoler and other Fayard staff prepare for political fund raisers held by Fayard for candidates seeking or holding national and state offices.

The violations suspected by Complainant involve a \$10,000 contribution made on October 26, 2010 in the name of Chalyn Fayard to the Democratic State Central Committee of Louisiana ("DSCCLA") while the actual source of the funds used for Chalyn Fayard's contribution was Calvin Fayard and/or Cynthia Fayard. Exhibit 1, *Schedule A (FEC Form 3X)*.

According to Louisiana campaign finance reports filed by the Louisiana DEMOPAC ("the DEMOPAC"), contributions in the name of Chalyn Fayard were also made to the DEMOPAC in October 2011. On or about October 19, 2010, a contribution in the amount of \$50,000 was made in the name of Chalyn Fayard. Exhibit 2, *Committee's Special Report No. 22495, with Schedule A*. On October 28, 2010, another contribution, this time in the amount of \$30,000, was made in the name of Chalyn Fayard. Exhibit 3, *Committee's Special Report No. 22496, with Schedule A*.

Chalyn Fayard, as well as Calvin Fayard, Cynthia Fayard and other Fayard family members and friends, are being investigated by the Louisiana Board of Ethics for possible violations of the Louisiana Campaign Finance Disclosure Act, including possible violations of

12044314273

making contributions through or in the name of another which were used to support Caroline Fayard, a candidate for Lieutenant Governor in the October 2, 2010 election. Exhibit 4, June 16, 2011 *Certificates of Vote and Explanation*, Docket No. 2011-140. Complainant attests that he obtained the documents attached hereto as Exhibit 4 from the public suit record of *Louisiana Democrats f/k/a DEMOPAC, et al. v. The Louisiana Board of Ethics, et al.*, civil action number 603,810 in the 19th Judicial District Court for the Parish of East Baton Rouge, Louisiana. Mrs. Kathleen Allen, Esq. and Mr. Aaron Brooks, Esq. (1-800-842-6630) are managing the investigation and related litigation for the Louisiana Board of Ethics.

Based upon information and belief, Complainant reasonably believes the contributions to the DSCCLA by Chalyn Fayard in 2010 were impermissibly funded by Calvia C. Fayard, Jr. and/or Cynthia Fayard, directly or through another entity or individual acting at their direction, instruction, permission and/or authority. Complainant reasonably believes that a transfer of funds was made into an account bearing the name of Chalyn Fayard from accounts controlled by Calvin C. Fayard, Jr. and/or Cynthia Fayard, directly or through another entity or individual acting pursuant to their direction, instruction, permission and/or authority.

According to her own writings and personal information published on the Internet, Chalyn Fayard was unemployed in 2010 and several years prior as she was attending veterinary school in Glasgow, Scotland, UK. She graduated from veterinary school in or about August 2011 and is still seeking employment.

Attached as Exhibit 5 are copies of several 2011 Twitter messages from Chalyn Fayard publicly available through a name search on Google. In those "tweets", Chalyn Fayard repeatedly indicates she is unemployed throughout 2011. Twitter messages by Chalyn Fayard

from 2010 also publicly available on Google indicate she was outside the United States at the time of the contributions made in her name to the DSCCLA.


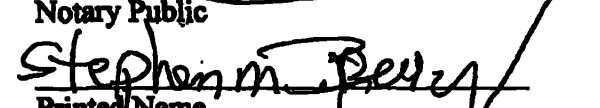
Complainant reasonably believes that Caroline A. Mistoler has knowledge and information regarding the identity of the actual source of the funds contributed to the DSCCLA in 2010 in the names of Chalyn Fayard, Calvin C. Fayard, Jr., and Cynthia F. Fayard, including knowledge and information regarding the existence, identity and location of corroborating written and electronic documents and records.

Complainant also reasonably believes that Caroline A. Mistoler has knowledge and information regarding the identity of the actual source(s) of the funds contributed to the DSCCLA in 2010 in the names of Cathryn Caroline Fayard, Calvin C. Fayard, III, D. Blayne Honeycutt, Valerie Honeycutt, and Francis Gray Fayard.

FURTHER COMPLAINANT SAYETH NAUGHT. .


Kevin LeMaire

Sworn to and subscribed before me this 6th day of December, 2011.


Notary Public

Printed Name
La Bar no 7120
Bar Roll No.

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 8 / 1009

(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17			

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

DEMOCRATIC STATE CENTRAL COMMITTEE OF LA

A.

Full Name (Last, First, Middle Initial)

Calvin C. Fayard, Jr.

Mailing Address PO Box 1180

City

Denham Springs

State

LA

Zip Code

70727-1180

FEC ID number of contributing
federal political committee.

C

Name of Employer
SelfOccupation
Attorney

Receipt For:

2010

☐ Primary☐ General☒ Other (specify) ▼

Aggregate Year-to-Date ▼

10000.00

Date of Receipt

10 / 19 / 2010

Transaction ID: C6371525

Amount of Each Receipt this Period

10000.00

B.

Full Name (Last, First, Middle Initial)

Cathryn Fayard

Mailing Address PO Box 13731

City

New Orleans

State

LA

Zip Code

70185

FEC ID number of contributing
federal political committee.

C

Name of Employer
RetiredOccupation
Homemaker

Receipt For:

2010

☐ Primary☐ General☒ Other (specify) ▼

Aggregate Year-to-Date ▼

10000.00

Date of Receipt

10 / 26 / 2010

Transaction ID: C6387612

Amount of Each Receipt this Period

10000.00

C.

Full Name (Last, First, Middle Initial)

Chalyn Fayard

Mailing Address P O Box 966

City

Denham Springs

State

LA

Zip Code

70727

FEC ID number of contributing
federal political committee.

C

Name of Employer
StudentOccupation
Student

Receipt For:

2010

☐ Primary☐ General☒ Other (specify) ▼

Aggregate Year-to-Date ▼

10000.00

Date of Receipt

10 / 26 / 2010

Transaction ID: C6387617

Amount of Each Receipt this Period

10000.00

SUBTOTAL of Receipts This Page (optional)

30000.00

TOTAL This Period (last page this line number only)

EXHIBIT 1

12044314275

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

12044514276

SCHEDULE A: CONTRIBUTIONS (Including In-Kind Contributions)

COMMITTEES SUPPORTING MAJOR OFFICE CANDIDATES: The following information must be reported for all contributions and in-kind contributions exceeding \$1,000 received during the last 20 days before the primary election, as well as those received in the last 20 days before the general election if the committee participates in the general election.

COMMITTEES SUPPORTING DISTRICT OFFICE CANDIDATES: The following information must be reported for all contributions and in-kind contributions exceeding \$500 received during the last 20 days before the primary election, as well as those received in the last 20 days before the general election if the committee participates in the general election.

COMMITTEES SUPPORTING ANY OTHER OFFICE CANDIDATES: The following information must be reported for all contributions and in-kind contributions exceeding \$250 received during the last 20 days before the primary election, as well as those received in the last 20 days before the general election if the committee participates in the general election.

1. Name and Address of Contributor (& description if in-kind)	2. Contributions this Reporting Period		3. Valuation if In-Kind
	a. Date(s)	b. Amount(s)	
FRANK DUDENHEFER, JR. 804 Poydras St Ste 2855 New Orleans, LA 70138-2419	10/21/2010	\$35,000.00	
MR. CALVIN C. FAYARD, III PO Box 988 Denham Springs, LA 70727-0988	10/19/2010	\$50,000.00	
CHALYN FAYARD P O Box 988 Denham Springs, LA 70727	10/19/2010	\$50,000.00	
BLAYNE HONEYCUTT 1211 S River Rd Denham Springs, LA 70728	10/21/2010	\$80,000.00	
KATHLEEN BLANCO CAMPAIGN FUND 701 Robley Dr Ste 200 Lafayette, LA 70503-5200	10/21/2010	\$11,000.00	
ROBERT A MAURIM, III P O Box 1457 Hammond, LA 70404	10/21/2010	\$40,000.00	

SCHEDULE A: CONTRIBUTIONS (Including In-Kind Contributions)

COMMITTEES SUPPORTING MAJOR OFFICE CANDIDATES: The following information must be reported for all contributions and in-kind contributions exceeding \$1,000 received during the last 20 days before the primary election, as well as those received in the last 20 days before the general election if the committee participates in the general election.

COMMITTEES SUPPORTING DISTRICT OFFICE CANDIDATES: The following information must be reported for all contributions and in-kind contributions exceeding \$500 received during the last 20 days before the primary election, as well as those received in the last 20 days before the general election if the committee participates in the general election.

COMMITTEES SUPPORTING ANY OTHER OFFICE CANDIDATES: The following information must be reported for all contributions and in-kind contributions exceeding \$250 received during the last 20 days before the primary election, as well as those received in the last 20 days before the general election if the committee participates in the general election.

1. Name and Address of Contributor (& description if in-kind)	2. Contributes this Reporting Period		3. Valuation if In-Kind
	a. Date(s)	b. Amount(s)	
DR. KOTI V SANGISETTY 1281 W. Tunnel Blvd. Houma, LA 70360	10/19/2010	\$80,000.00	
TBI PAC PO Box 416 Mansura, LA 71350-0416	10/21/2010	\$7,000.00	
WLISTON OIL & GAS PROPERTIES LLC P O Box 1180 Denham Springs, LA 70727	10/19/2010	\$25,000.00	

COMMITTEE'S SPECIAL REPORT

(Filed by committees that support or oppose one or more candidates and/or propositions and that are not candidate committees)

This form is filed during the 20 day period immediately preceding an election to report (1) all receipts from a single source in excess of \$1,000 by committees supporting/opposing major office candidates; in excess of \$500 by committees supporting/opposing district office candidates; or, in excess of \$250 by committees supporting/opposing any other office candidates, and/or (2) any payments exceeding \$200 to any person who endorses candidates and who is required to file campaign finance disclosure reports.

All committees who have had any such transactions within the 20 days immediately preceding an election are required to report any such transaction on this form within 48 hours of the time the transaction occurred.

1. Full Name and Address of Political Committee

LOUISIANA DEMOCRATS
POB 4385
Baton Rouge, LA 70821

OFFICE USE ONLY

Report Number: 22498

Date Filed: 2/10/2011

Report includes Schedules:
Schedule A

2. Name and address of Committee Chairperson

CLAUDE LEACH, JR
POB 4385
Baton Rouge, LA 70821

3. Date of Election 11/2/2010

Primary ☐ General ☒ (Check one)

4. a. Name of Person Preparing Report

TRACIE HAMPTON

b. Daytime Telephone (225) 338-4155

5. WE HEREBY CERTIFY that the information contained in this report and the attached schedules is true and correct to the best of our knowledge, information and belief, and that no expenditures have been made nor contributions received that are required to be disclosed, have not been reported herein, and that no information required to be reported by the Louisiana Campaign Finance Disclosure Act has been deliberately omitted.

This 10th day of February, 2011.

Claude Leach Jr.
Signature of Committee Chairperson

(225) 338-4155
Daytime Telephone Number

Signature of Treasurer, if any

(225) 338-4155
Daytime Telephone Number

Form 202, Rev. 8/04, Page Rev. 3/08

EXHIBIT 3

SCHEDULE A: CONTRIBUTIONS (Including In-Kind Contributions)

COMMITTEES SUPPORTING MAJOR OFFICE CANDIDATES: The following information must be reported for all contributions and in-kind contributions exceeding \$1,000 received during the last 20 days before the primary election, as well as those received in the last 20 days before the general election if the committee participates in the general election.

COMMITTEES SUPPORTING DISTRICT OFFICE CANDIDATES: The following information must be reported for all contributions and in-kind contributions exceeding \$500 received during the last 20 days before the primary election, as well as those received in the last 20 days before the general election if the committee participates in the general election.

COMMITTEES SUPPORTING ANY OTHER OFFICE CANDIDATES: The following information must be reported for all contributions and in-kind contributions exceeding \$250 received during the last 20 days before the primary election, as well as those received in the last 20 days before the general election if the committee participates in the general election.

1. Name and Address of Contributor (& description if in-kind)	2. Contributions for Reporting Period		3. Valuation if In-Kind
	a. Date(s)	b. Amount(s)	
BEN BARNES 98 San Jacinto Blvd Ste 1400 Austin, TX 78701	10/25/2010	\$2,500.00	
BRING IT HOME INC. PAC 868 N. 6th St Baton Rouge, LA 70802	10/25/2010	\$15,000.00	
COMMITTEE TO ELECT CAROLINE FAYARD 801 Howard Ave New Orleans, LA 70113	10/28/2010	\$8,113.55	
FAYARD & HONEYCUTT 519 Florida Ave S.W. Denham Springs, LA 70726	10/28/2010	\$10,000.00	
MR. CALVIN C. FAYARD, III PO Box 968 Denham Springs, LA 70727-0968	10/28/2010	\$30,000.00	
MR. CALVIN G. FAYARD, JR. PO Box 1180 Denham Springs, LA 70727-1180	10/28/2010	\$40,000.00	

SCHEDULE A: CONTRIBUTIONS (Including In-Kind Contributions)

COMMITTEES SUPPORTING MAJOR OFFICE CANDIDATES: The following information must be reported for all contributions and in-kind contributions exceeding \$1,000 received during the last 20 days before the primary election, as well as those received in the last 20 days before the general election if the committee participates in the general election.

COMMITTEES SUPPORTING DISTRICT OFFICE CANDIDATES: The following information must be reported for all contributions and in-kind contributions exceeding \$500 received during the last 20 days before the primary election, as well as those received in the last 20 days before the general election if the committee participates in the general election.

COMMITTEES SUPPORTING ANY OTHER OFFICE CANDIDATES: The following information must be reported for all contributions and in-kind contributions exceeding \$250 received during the last 20 days before the primary election, as well as those received in the last 20 days before the general election if the committee participates in the general election.

1. Name and Address of Contributor (& description if in-kind)	2. Contributions this Reporting Period		3. Valuation if In-Kind
	a. Date(s)	b. Amount(s)	
CHALYN FAYARD P O Box 968 Denham Springs, LA 70727	10/28/2010	\$30,000.00	
FRANCES E GRAY 5809 Saint Charles Ave New Orleans, LA 70115-5067	10/27/2010	\$30,000.00	
FRANCES E GRAY 5809 Saint Charles Ave New Orleans, LA 70115-5067	10/27/2010	\$30,000.00	
FRANCES E GRAY 5809 Saint Charles Ave New Orleans, LA 70115-5067	10/27/2010	\$30,000.00	
VALERIE HONEYCUTT 1211 South River Road Denham Springs, LA 70726	10/28/2010	\$50,000.00	
IMPERIAL PROPERTIES LLC 1805 W Thomas St Ste D Hammond, LA 70401	10/28/2010	\$25,500.00	

SCHEDULE A: CONTRIBUTIONS (Including In-Kind Contributions)

COMMITTEES SUPPORTING MAJOR OFFICE CANDIDATES: The following information must be reported for all contributions and in-kind contributions exceeding \$1,000 received during the last 20 days before the primary election, as well as those received in the last 20 days before the general election if the committee participates in the general election.

COMMITTEES SUPPORTING DISTRICT OFFICE CANDIDATES: The following information must be reported for all contributions and in-kind contributions exceeding \$500 received during the last 20 days before the primary election, as well as those received in the last 20 days before the general election if the committee participates in the general election.

COMMITTEES SUPPORTING ANY OTHER OFFICE CANDIDATES: The following information must be reported for all contributions and in-kind contributions exceeding \$250 received during the last 20 days before the primary election, as well as those received in the last 20 days before the general election if the committee participates in the general election.

1. Name and Address of Contributor (& description if in-kind)	2. Contributions this Reporting Period		3. Valuation if In-Kind
	a. Date(s)	b. Amount(s)	
IMPERIAL PROPERTIES LLC 1905 W Thomas St Ste D Hammond, LA 70401	10/28/2010	\$30,000.00	
IMPERIAL PROPERTIES LLC 1905 W Thomas St Ste D Hammond, LA 70401	10/28/2010	\$40,000.00	
CLAUDE LEACH, JR. 7777 Nelson Rd P.O. Box 997 Lake Charles, LA 70605	10/25/2010	\$11,357.53	
CLAUDE LEACH, JR. 7777 Nelson Rd P.O. Box 997 Lake Charles, LA 70605	10/28/2010	\$3,275.00	
LHC GROUP INC. 420 W Pinhook Rd # A Lafayette, LA 70503-2131	10/28/2010	\$2,000.00	
MITCH LANDRIEU CAMPAIGN FUND INC. 3421 North Causeway Blvd Ste 701 Metairie, LA 70002	10/28/2010	\$10,000.00	

SCHEDULE A: CONTRIBUTIONS (Including In-Kind Contributions)

COMMITTEES SUPPORTING MAJOR OFFICE CANDIDATES: The following information must be reported for all contributions and in-kind contributions exceeding \$1,000 received during the last 20 days before the primary election, as well as those received in the last 20 days before the general election if the committee participates in the general election.

COMMITTEES SUPPORTING DISTRICT OFFICE CANDIDATES: The following information must be reported for all contributions and in-kind contributions exceeding \$500 received during the last 20 days before the primary election, as well as those received in the last 20 days before the general election if the committee participates in the general election.

COMMITTEES SUPPORTING ANY OTHER OFFICE CANDIDATES: The following information must be reported for all contributions and in-kind contributions exceeding \$250 received during the last 20 days before the primary election, as well as those received in the last 20 days before the general election if the committee participates in the general election.

1. Name and Address of Contributor (& description if in-kind)	2. Contributions this Reporting Period		3. Valuation if In-Kind
	a. Date(s)	b. Amount(s)	
ROBERT RAMELL 5603 Saint Charles Ave New Orleans, LA 70115-5049	10/26/2010	\$50,000.00	
MICHAEL SMITH 3513 Bradley Lane Chevy Chase, MD 28015	10/25/2010	\$1,500.00	
ST. JAMES DEMOCRATIC EXECUTIVE COMMITTEE 21030 Hwy 20 Vacherie, LA 70090	10/25/2010	\$4,000.00	



chalyn_vet Chalyn Fayard

No job, but possibly some future relief work.

15 Nov



chalyn_vet Chalyn Fayard

Going to see a lady about a job. Wish me luck.

15 Nov



@chalyn_vet Chalyn Fayard

Can't seem to stop spending money. This would be less of a problem if I had a job.

30 Aug via TweetCaster for Android



@chalyn_vet Chalyn Fayard

@deadsquirrel! I might just have to do that! Need a job first though...

21 Aug via TweetCaster for Android



@chalyn_vet Chalyn Fayard

Need to buy a car, find a job and find a place to live. Any thoughts on the car? Needs room in the back for 3 dogs.

20 Aug via TweetCaster for Android



@chalyn_vet Chalyn Fayard

@thegeorg i am not. sadly. the moving thing is sucking all my funds currently. i plan to join once we're back in the US. and i'm employed.

29 Jul via web

12044314284



@chalyn_vet Chalyn Fayard

@jagamon ha. i have to pack interview clothes, because i'll be looking for a job.

29 Jul via web



@chalyn_vet Chalyn Fayard

@TsockTsarina @iesh no fair! wantwantWANT! but gotta be grownup and spend money on moving and a place to live, not spindles and fiber. boo.

8 Jul via web



@chalyn_vet Chalyn Fayard

not sure i like all this responsibility. travel and shipping taken care of. now we need a place to live. with 6 pets. oh, and i need a job

7 Jul via web



@chalyn_vet Chalyn Fayard

graduating from Glasgow University School of Veterinary Medicine TODAY!!!!

27 Jun via web



@chalyn_vet Chalyn Fayard

@holidayvams they all are things i don't have time or money for right now. miss you! i'm taking a sheep finger puppet to the exam tomorrow

1 Jun via web