

THIS IS THE BEGINNING OF ADMINSTRATIVE FINE CASE

# 1128

DATE FILMED 9/20/04 CAMERA NO. 1

CAMERAMAN ESS



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2004 JUN -4 P 3:50

June 4, 2004

**SENSITIVE**

MEMORANDUM

TO: THE COMMISSION

THROUGH: JAMES A. PEHRKON *[Signature]*  
STAFF DIRECTOR

ROBERT J. COSTA *[Signature]*  
DEPUTY STAFF DIRECTOR

FROM: JOHN D. GIBSON *[Signature]*  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

SUBJECT: REASON TO BELIEVE RECOMMENDATION - 2004 APRIL  
QUARTERLY REPORT FOR THE ADMINISTRATIVE  
FINES PROGRAM

Attached is a list of political committees and their treasurers who failed to file, or failed to timely file, the 2004 April Quarterly Report in accordance with 2 U.S.C. 434(a). On March 22, 2004, Prior Notice was sent to all political committees and their treasurers, informing them that the April Quarterly Report was due on April 15, 2004. The report should have covered the period ending on March 31, 2004.

The committees listed in the attached RTB Circulation Report either failed to file the report or filed the report more than five (5) days after the due date. In accordance with the schedule of civil money penalties located within 11 CFR §111.43, these committees should be assessed the civil money penalties highlighted on the report attached.

### **Recommendation**

- (1) Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Report violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
- (2) Send the appropriate letters.

FEDERAL ELECTION COMMISSION 2003-2004  
Reason to Believe Circulation Report  
2004 APRIL QUARTERLY

AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	DAYS LATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF01103	FRIENDS OF RON PACKARD	C00149732	DONALD J POLESE	04/27/2004	12	\$8,640	\$128,619	CA	PACKARD, RONALD C	No	0	\$110
AF01104	DANIEL WEBSTER FOR US SENATE	C00390120	NANCY H WATKINS	04/26/2004	11	\$601,000	\$1,293,917	FL	WEBSTER, DANIEL	No	0	\$5,200
AF01106	BROCK HILL CAMPAIGN	C00393587	JO SHADEN BOLIN	04/22/2004	7	\$37,274	\$162,634	TX	HILL, RICHARD	No	0	\$440
AF01108	COMMITTEE TO ELECT BILL KIRBY	C00370866	Tokutomi, E. Ken	Not Filed		\$29,130 (est)	\$100,920	CA	KIRBY, WILLIAM WALTER	No	0	\$900
AF01110	CLAY COX FOR CONGRESS	C00365187	MICHAEL J FORBETSON	Not Filed		\$97,417 (est)	\$189,669	CA	COX, JOHN CLAYTON	No	0	\$1,500

FEDERAL ELECTION COMMISSION 2003-2004  
Reason to Believe Circulation Report  
2004 APRIL QUARTERLY

AP #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	DAYS LATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
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AF01111	SKINNER FOR SENATE 2004	C00388843	NANCY YOUNG	05/19/2004	Not Filed	\$22,212	\$188,115	IL	SKINNER, NANCY	No	0	\$500
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AF01119	SUTTON FOR CONGRESS	C00383877	RUTH SCHIERMEYER		Not Filed	\$50,192 (c31)	\$112,769	TX	SUTTON, VICKIE	No	1	\$1,125
AF01120	STACE WILLIAMS FOR US CONGRESS	C00385047	CHARLES WADE DARTER JR		Not Filed	\$122,116 (c31)	\$234,297	TX	WILLIAMS, STACE LAWRENCE	No	2	\$6,750

FEDERAL ELECTION COMMISSION 2003-2004  
Reason to Believe Circulation Report  
2004 APRIL QUARTERLY

AF #	COMMITTEE NAME	COMMITTEE ID	RECEIPT DATE	TREASURER	DAYS LATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF01121	ALLEGIANCE TELECOM INC. PAC	C00336693	04/30/2004	Joseph, William M. Mr.	15	\$42,561	\$203,678	DC	No	No	0	\$500
AF01123	FRIENDS OF FERRIS	C00279182	04/22/2004	ROBERT A. BOYCE	7	\$98,727	\$200,822	MI	No	No	0	\$1,100
AF01124	GENERAL AVIATION MANUFACTURERS ASSOCIATION POLITICAL ACTION	C00014878	04/22/2004	JAVAN AHMAD	7	\$37,154	\$167,318	DC	No	No	0	\$340
AF01125	LINCOLN CLUB OF SAN DIEGO COUNTY	C00177766	05/06/2004	C APRIL BOLING	21	\$66,941	\$675,161	CA	No	No	0	\$1,875
AF01126	MCDERMOTT, WILL & EMERY PAC (MWAE PAC)	C00299701	05/14/2004	STANTON D ANDERSON	29	\$47,480	\$163,648	DC	No	No	0	\$780
AF01127	OWNER OPERATOR INDEPENDENT DRIVERS ASSN INC POLITICAL ACTION	C00236778	06/11/2004	PAUL D CULLEN SR	26	\$27,322	\$140,450	DC	No	No	0	\$720
AF01128	RESERVE HIDEPAK	C00252684	04/23/2004	R PAUL WAREHOUT JR	8	\$12,340	\$102,461	UT	No	No	0	\$140

FEDERAL ELECTION COMMISSION 2003-2004  
Reason to Believe Circulation Report  
2004 APRIL QUARTERLY

DATE 06/04/2004  
PAGE: 4

AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	DAYS LATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF01131	CONGRESSIONAL BLACK CAUCUS POLITICAL ACTION COMMITTEE(CBC-PAC)	C00147512	Arthur R. Collins			\$126,268 (est)		DC		No	2	\$6,750

Not Filed



FEDERAL ELECTION COMMISSION

Washington, DC 20463

**SENSITIVE**

DATE & TIME OF TRANSMITTAL: Monday, June 07, 2004 11:00

BALLOT DEADLINE: Thursday, June 10, 2004 4:00

COMMISSIONER: MASON, McDONALD, SMITH, THOMAS, TONER, WEINTRAUB

SUBJECT: Reason To Believe Recommendation - 2004 April Quarterly Report For the Administrative Fines Program. Memorandum from the Assistant Staff Director, Reports Analysis Division dated June 4, 2004.

- ( ) I approve the recommendation(s)
- ( ) I object to the recommendation(s)
- ( ) I approve the recommendations except those following  
to which I object (please insert AF#)
- \_\_\_\_\_
- \_\_\_\_\_
- ( ) I approve the recommendations except those following  
in which I abstain (please insert AF#)
- \_\_\_\_\_
- \_\_\_\_\_
- ( ) I approve the recommendations except those following  
in which I am recused (please insert AF#)
- \_\_\_\_\_
- \_\_\_\_\_
- ( ) I am not voting on this tally.

A definite vote is required. All ballots must be signed and dated. Please return ONLY THE BALLOT to the Commission Secretary. Please return ballot no later than date and time shown above.

DATE: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Reason To Believe Recommendation - 2004 )  
April Quarterly Report for the )  
Administrative Fines Program: )

FRIENDS OF RON PACKARD, and ) AF# 1103  
DONALD J POLESE as treasurer; )  
DANIEL WEBSTER FOR US SENATE. ) AF# 1104  
and NANCY H WATKINS as treasurer; )

BROCK HILL CAMPAIGN, and JO ) AF# 1106  
SHADDEN BOLIN as treasurer; )

COMMITTEE TO ELECT BILL KIRBY, ) AF# 1108  
and Tokutomi, E. Ken as treasurer; )  
CLAY COX FOR CONGRESS, and ) AF# 1110  
MICHAEL J ROBERTSON as treasurer; )  
SKINNER FOR SENATE 2004, and ) AF# 1111  
NANCY YOUNG as treasurer; )

SUTTON FOR CONGRESS, and RUTH ) AF# 1119  
SCHIERMEUER as treasurer; )  
STACE WILLIAMS FOR US ) AF# 1120  
CONGRESS, and CHARLES WADE )

DARTER JR as treasurer; )  
ALLEGIANCE TELECOM INC. PAC, and ) AF# 1121  
Joseph, Kevin M. Mr. as treasurer; )

FRIENDS OF FERRIS, and ROBERT A. ) AF# 1123  
BOYCE as treasurer; )  
GENERAL AVIATION ) AF# 1124  
MANUFACTURERS ASSOCIATION )  
POLITICAL ACTION COMMITTEE )  
(GAMAPAC), and JAHAN AHMAD as )  
treasurer; )  
LINCOLN CLUB OF SAN DIEGO ) AF# 1125  
COUNTY, and C APRIL BOLING as )  
treasurer; )  
MCDERMOTT, WILL & EMERY PAC ) AF# 1126  
(MW&E PAC), and STANTON D )  
ANDERSON as treasurer; )  
OWNER-OPERATOR INDEPENDENT ) AF# 1127  
DRIVERS ASSN INC POLITICAL )  
ACTION COMMITTEE (AKA OOIDA- )  
PAC), and PAUL D CULLEN SR as )  
treasurer; )  
REGENCE BLUEPAC, and R PAUL ) AF# 1128  
WARBURTON as treasurer; )

CONGRESSIONAL BLACK CAUCUS ) AF# 1131  
POLITICAL ACTION )  
COMMITTEE(CBC-PAC), and Arthur R. )  
Collins as treasurer; )

CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby certify that on June 10, 2004 the Commission took the following actions on the Reason To Believe Recommendation - 2004 April Quarterly Report for the Administrative Fines Program as recommended in the Reports Analysis Division's Memorandum dated June 04, 2004, on the following committees:

AF#1103 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF RON PACKARD, and DONALD J POLESE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1104 Decided by a vote of 6-0 to: (1) find reason to believe that DANIEL WEBSTER FOR US SENATE, and NANCY H WATKINS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report. (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1106 Decided by a vote of 6-0 to: (1) find reason to believe that BROCK HILL CAMPAIGN, and JO SHADDEN BOLIN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1108 Decided by a vote of 6-0 to: (1) find reason to believe that COMMITTEE TO ELECT BILL KIRBY, and Tokutomi, E. Ken as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1110 Decided by a vote of 6-0 to: (1) find reason to believe that CLAY COX FOR CONGRESS, and MICHAEL J ROBERTSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1111 Decided by a vote of 6-0 to: (1) find reason to believe that SKINNER FOR SENATE 2004, and NANCY YOUNG as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1119 Decided by a vote of 6-0 to: (1) find reason to believe that SUTTON FOR CONGRESS, and RUTH SCHIERMEUER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1120 Decided by a vote of 6-0 to: (1) find reason to believe that STACE WILLIAMS FOR US CONGRESS, and CHARLES WADE DARTER JR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1121 Decided by a vote of 6-0 to: (1) find reason to believe that ALLEGIANCE TELECOM INC. PAC, and Joseph, Kevin M. Mr. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1123 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF FERRIS, and ROBERT A. BOYCE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1124 Decided by a vote of 6-0 to: (1) find reason to believe that GENERAL AVIATION MANUFACTURERS ASSOCIATION POLITICAL ACTION COMMITTEE (GAMAPAC), and JAHAN AHMAD as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1125 Decided by a vote of 6-0 to: (1) find reason to believe that LINCOLN CLUB OF SAN DIEGO COUNTY, and C APRIL BOLING as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1126 Decided by a vote of 6-0 to: (1) find reason to believe that MCDERMOTT, WILL & EMERY PAC (MW&E PAC), and STANTON D ANDERSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1127 Decided by a vote of 6-0 to: (1) find reason to believe that OWNER-OPERATOR INDEPENDENT DRIVERS ASSN INC POLITICAL ACTION COMMITTEE (AKA OOIDA-PAC), and PAUL D CULLEN SR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1128 Decided by a vote of 6-0 to: (1) find reason to believe that REGENCE BLUEPAC, and R PAUL WARBURTON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1131 Decided by a vote of 6-0 to: (1) find reason to believe that CONGRESSIONAL BLACK CAUCUS POLITICAL ACTION COMMITTEE(CBC-PAC), and Arthur R. Collins as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

June 18, 2004  
Date

Mary W. Dove  
Mary W. Dove  
Secretary of the Commission

**WESTERN  
UNION**

CONFIRMATION OF CMGM

TO: R PAUL WARBURTON

REGENCE BLUEPAC

2890 E COTTONWOOD PKWY DEPT 8

SALT LAKE CITY UT 84121-7035

FEDERAL ELECTION COMMISSION

DAYNA BROWN

999 E ST NW # 709

WASHINGTON DC 20463

JUNE 15, 2004

R PAUL WARBURTON

REGENCE BLUEPAC

2890 E COTTONWOOD PARKWAY DEPT #8

SALT LAKE CITY UT 84121

C00252684

AF#: 1128

DEAR R PAUL WARBURTON:

THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED ("THE ACT"), REQUIRES THAT YOUR COMMITTEE FILE AN APRIL QUARTERLY REPORT OF RECEIPTS AND DISBURSEMENTS IN A CALENDAR YEAR DURING WHICH THERE IS A REGULARLY SCHEDULED ELECTION. THIS REPORT, COVERING THE PERIOD THROUGH MARCH 31ST, SHALL BE FILED NO LATER THAN APRIL 15TH. 2 U.S.C. 434(A). YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT. RECORDS AT THE FEDERAL ELECTION COMMISSION ("FEC") INDICATE THAT THIS REPORT WAS FILED ON 04/23/2004, 8 DAYS LATE.

THE ACT WAS FURTHER AMENDED IN 1999 TO PERMIT THE FEC TO IMPOSE CIVIL MONEY PENALTIES FOR VIOLATIONS OF THE REPORTING REQUIREMENTS OF 2 U.S.C. 434(A). 2 U.S.C. 437G(A)(4). ON 06/10/2004, THE FEC FOUND THAT THERE IS REASON TO BELIEVE ("RTB") THAT REGENCE BLUEPAC AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) BY FAILING TO FILE TIMELY THIS REPORT ON OR BEFORE APRIL 15TH. BASED ON THE FEC'S SCHEDULES OF CIVIL MONEY PENALTIES AT 11 C.F.R. 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT THE RTB STAGE IS \$140. IT IS DUE BY 07/20/2004 AND IS BASED ON THESE FACTORS:

ELECTION SENSITIVITY OF REPORT: NOT ELECTION SENSITIVE

LEVEL OF ACTIVITY: \$12240

NUMBER OF DAYS LATE: 8

NUMBER OF PREVIOUS CIVIL MONEY PENALTIES ASSESSED: 0

TO PAY THE CALCULATED CIVIL MONEY PENALTY

TO PAY THE CALCULATED CIVIL MONEY PENALTY, SEND THE ENCLOSED REMITTANCE AND YOUR PAYMENT TO THE FEC AT THE ADDRESS ON PAGE 3. UPON RECEIPT OF YOUR PAYMENT, THE FEC WILL SEND YOU A FINAL




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WESTERN UNION COMMERCIAL SERVICES

**DETERMINATION LETTER.**

TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY

TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY, YOU MUST SUBMIT A WRITTEN RESPONSE, INCLUDING THE AF# FOUND ON PAGE ONE, TO THE FEC'S OFFICE OF ADMINISTRATIVE REVIEW, 999 E STREET, NW, WASHINGTON, DC 20463. YOUR RESPONSE MUST BE RECEIVED BY 07/20/2004. YOUR WRITTEN RESPONSE MUST INCLUDE THE REASON(S) WHY YOU ARE CHALLENGING THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY. THE FEC WILL ONLY CONSIDER CHALLENGES THAT ARE BASED ON A FACTUAL ERROR, MISCALCULATION OF THE CALCULATED CIVIL MONEY PENALTY BY THE FEC, OR THE EXISTENCE OF EXTRAORDINARY CIRCUMSTANCES THAT PERSISTED FOR MORE THAN 48 HOURS THAT WERE BEYOND YOUR CONTROL AND PREVENTED YOU FROM FILING THE REPORT IN A TIMELY MANNER. YOUR RESPONSE MUST INCLUDE THE FACTUAL BASIS SUPPORTING THE REASON(S) AND SUPPORTING DOCUMENTATION. THE FEC STRONGLY ENCOURAGES THAT DOCUMENTS BE SUBMITTED IN THE FORM OF AFFIDAVITS OR DECLARATIONS. EXAMPLES OF CIRCUMSTANCES THAT WILL NOT BE CONSIDERED EXTRAORDINARY INCLUDE, BUT ARE NOT LIMITED TO, NEGLIGENCE, PROBLEMS WITH VENDORS OR CONTRACTORS, STAFF ILLNESS, COMPUTER FAILURES AND SIMILAR CIRCUMSTANCES. 11 C.F.R. 111.35(b)(1)(iii) AND (4).

YOUR FAILURE TO RAISE AN ARGUMENT IN A TIMELY FASHION DURING THE ADMINISTRATIVE PROCESS SHALL BE DEEMED A WAIVER OF YOUR RIGHT TO PRESENT SUCH ARGUMENT IN A PETITION TO THE DISTRICT COURT UNDER 2 U.S.C. 437G. 11 C.F.R. 111.38.

IF YOU INTEND TO BE REPRESENTED BY COUNSEL, PLEASE ADVISE THE OFFICE OF ADMINISTRATIVE REVIEW. YOU SHOULD PROVIDE, IN WRITING, THE NAME, ADDRESS AND TELEPHONE NUMBER OF YOUR COUNSEL AND AUTHORIZE COUNSEL TO RECEIVE NOTIFICATIONS AND COMMUNICATIONS RELATING TO THIS CHALLENGE AND IMPOSITION OF THE CALCULATED CIVIL MONEY PENALTY.

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A CHALLENGE

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A WRITTEN RESPONSE, THE FEC WILL ASSUME THAT THE PRECEDING FACTUAL ALLEGATIONS ARE TRUE AND MAKE A FINAL DETERMINATION THAT REGENCO BLUEPAC AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) AND ASSESS A CIVIL MONEY PENALTY.

UNPAID CIVIL MONEY PENALTIES ASSESSED THROUGH THE ADMINISTRATIVE FINE REGULATIONS WILL BE SUBJECT TO THE DEBT COLLECTION ACT OF 1982 ("DCA") AS AMENDED BY THE DEBT COLLECTION IMPROVEMENT ACT OF 1996, 31 U.S.C. 3701 ET SEQ. THE FEC MAY TAKE ANY AND ALL APPROPRIATE ACTION AUTHORIZED AND REQUIRED BY THE DCA, AS AMENDED, INCLUDING TRANSFER TO THE U.S. DEPARTMENT OF THE TREASURY FOR COLLECTION. 11 C.F.R. 111.45.

THIS MATTER WAS GENERATED BASED ON INFORMATION ASCERTAINED BY THE FEC IN THE NORMAL COURSE OF CARRYING OUT ITS SUPERVISORY RESPONSIBILITIES. 2 U.S.C. 437G(A)(2). IT WILL REMAIN CONFIDENTIAL IN ACCORDANCE WITH 2 U.S.C. 437G(A)(4)(B) AND 437G(A)(12)(A) UNTIL IT IS PLACED ON THE PUBLIC RECORD IN ACCORDANCE WITH 11 C.F.R. 111.42, UNLESS YOU NOTIFY THE FEC IN WRITING THAT YOU WISH THE MATTER TO BE MADE PUBLIC.

ADDITIONAL INFORMATION ON THE FEC'S ADMINISTRATIVE FINE PROGRAM, INCLUDING THE FINAL REGULATIONS, IS LOCATED AT THE FEC'S WEBSITE AT


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WWW.FEC.GOV. IF YOU HAVE QUESTIONS REGARDING THE PAYMENT OF THE CALCULATED CIVIL MONEY PENALTY, PLEASE CONTACT DAYNA C. BROWN IN THE REPORTS ANALYSIS DIVISION AT OUR TOLL FREE NUMBER (800)424-9530 (PRESS 1, THEN PRESS 2) OR (202)694-1130. IF YOU HAVE QUESTIONS REGARDING THE SUBMISSION OF A CHALLENGE, PLEASE CONTACT THE OFFICE OF ADMINISTRATIVE REVIEW AT OUR TOLL FREE NUMBER (800)424-9530 (PRESS 0, THEN EXT. 1660) OR (202)694-1660.

SINCERELY,

BRADLEY A. SMITH  
CHAIRMAN

\* \* \* \* \*  
ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R. 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT RTB IS \$140 FOR THE 2004 APRIL QUARTERLY REPORT.

PLEASE MAIL THIS REMITTANCE WITH A CHECK OR MONEY ORDER MADE PAYABLE TO THE FEDERAL ELECTION COMMISSION TO THE FOLLOWING ADDRESS:  
FEDERAL ELECTION COMMISSION  
P.O. BOX 952182  
ST. LOUIS, MO 63195-2182

IF YOU CHOOSE TO SEND YOUR REMITTANCE AND PAYMENT BY COURIER OR OVERNIGHT DELIVERY, PLEASE USE THIS ADDRESS:  
U.S. BANK - GOVERNMENT LOCKBOX  
FEC #952182  
1005 CONVENTION PLAZA  
ST. LOUIS, MO 63101

THE REMITTANCE AND YOUR PAYMENT ARE DUE BY 07/20/2004. UPON RECEIPT OF YOUR REMITTANCE AND PAYMENT, THE FEC WILL SEND YOU A FINAL DETERMINATION LETTER.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT  
-----

FOR: REGENCE BLUEPAC

FEC ID#: C00252684

AF#: 1128

PAYMENT DUE DATE: 07/20/2004

PAYMENT AMOUNT DUE: \$140



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2004 AUG -5 P 3: 35

August 5, 2004

**SENSITIVE**

MEMORANDUM

TO: THE COMMISSION *AC/fnp*

THROUGH: JAMES A. PEHRKON  
STAFF DIRECTOR

ROBERT J. COSTA *AK*  
DEPUTY STAFF DIRECTOR

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

SUBJECT: ADMINISTRATIVE FINES FINAL DETERMINATION  
RECOMMENDATION FOR THE 2004 APRIL QUARTERLY  
REPORT

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2004 April Quarterly Report. The first list represents the committees that have paid the civil money penalties and the second list represents the committees that have not paid. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 C.F.R. 111.34 and 11 C.F.R. 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

For your information, after the date of the RTB finding, Clay Cox for Congress (AF #1110) and Stace Williams for US Congress (AF #1120) filed their reports disclosing no activity, thus bringing their civil money penalties to zero. The Committee to Elect Bill Kirby (AF #1108) also filed its report after the RTB finding, disclosing no activity and thereby lowering the civil money penalty to zero. This committee paid the civil money penalty assessed at RTB; we will therefore issue a refund of the total fine amount.

The Sutton for Congress Committee and its treasurer, Ruth Schiermeyer, (AF#1119) filed the 2004 April Quarterly Report with a \$3.20 disbursement (loan repayment) to the candidate, in order to close the committee's bank account. The committee was assessed a \$312.00 administrative fine due to the fact that it had one prior administrative fine violation on file. Specifically, the committee paid the \$25.00 fee assessed in AF #1081 on 3/1/2004 for the late filing of their 2003 October Quarterly Report. We would recommend that no further action be taken concerning the committee due to the de minimis nature of the disbursement and the intent of the committee to close operations.

#### **RAD Recommendation**

- (1) Make final determinations that the political committees and their treasurers on the attached lists violated 2 U.S.C. 434(a) and assess the civil money penalties so indicated.
- (2) Take no further action against Sutton for Congress and treasurer, Ruth Schiermeyer (AF #1119).
- (3) Send the appropriate letters.

**COMMITTEES THAT HAVE PAID**

FEDERAL ELECTION COMMISSION 2003-2004  
FINAL DETERMINATION CIRCULATION REPORT

AF #	COMMITTEE NAME	CANDIDATE NAME	RECEIPT DATE	DAYS LATE	REASON TO BELIEVE DATE	COMMITTEE ID	TREASURER	LEVEL OF ACTIVITY	CIVIL MONEY PENALTY	STATE	DATE PAID	PREVIOUS VIOLATIONS	REPORT TYPE	AMOUNT PAID
AF1103	FRIENDS OF RON PACKARD	PACKARD, RONALD C	04/27/2004	12	06/10/2004	C00149732	DONALD J POLESE	\$8,640	\$110	CA	07/08/2004	0	2004 APRIL QUARTERLY	\$110
AF1104	DANIEL WEBSTER FOR US SENATE	WEBSTER, DANIEL	04/26/2004	11	06/10/2004	C00390120	NANCY H WATKINS	\$601,000	\$5,200	FL	07/19/2004	0	2004 APRIL QUARTERLY	\$5,200
AF1106	BROCK HILL CAMPAIGN	HILL, RICHARD	04/22/2004	7	06/10/2004	C00393587	JO SHADDEN BOLIN	\$37,274	\$340	TN	07/15/2004	0	2004 APRIL QUARTERLY	\$340
AF1108	COMMITTEE TO ELECT BILL KIRBY	KIRBY, WILLIAM WARNER	07/15/2004	Not Filed	06/10/2004	C00370866	Tokutomi, E. Ken	\$0	\$0	CA	07/20/2004	0	2004 APRIL QUARTERLY	\$900
AF1111	SKINNER FOR SENATE 2004	SKINNER, NANCY	05/19/2004	Not Filed	06/10/2004	C00188843	NANCY YOUNG	\$22,212	\$500	IL	08/02/2004	0	2004 APRIL QUARTERLY	\$500
AF1121	ALLEGANCE TELECOM INC. PAC		04/30/2004	15	06/10/2004	C00336693	DeLany, Morgan MB	\$42,561	\$500	DC	07/02/2004	0	2004 APRIL QUARTERLY	\$500
AF1123	FRIENDS OF FERRIS		04/22/2004	7	06/10/2004	C00279182	ROBERT A. FORTÉ	\$98,727	\$1,100	MI	07/06/2004	0	2004 APRIL QUARTERLY	\$1,100
AF1124	GENERAL AVIATION MANUFACTURERS ASSOCIATION POLITICAL ACTION COMMITTEE (GMAAC)		04/22/2004	7	06/10/2004	C00014878	JAHANI AHMAD	\$37,154	\$340	DC	07/22/2004	0	2004 APRIL QUARTERLY	\$340
AF1125	LINCOLN CLUB OF SAN DIEGO COUNTY		05/06/2004	21	06/10/2004	C00177760	C APRIL BOHRS	\$66,941	\$1,875	CA	07/23/2004	0	2004 APRIL QUARTERLY	\$1,875
AF1126	MCTERNOTT WILL & EMBRY LLP PAC		05/14/2004	29	06/10/2004	C00239704	Anderson, Stanton D. Esq.	\$47,480	\$780	DC	07/15/2004	0	2004 APRIL QUARTERLY	\$780

FEDERAL ELECTION COMMISSION 2003-2004  
FINAL DETERMINATION CIRCULATION REPORT

DATE 08/05/2004  
PAGE: 2

AF #	CANDIDATE NAME	COMMITTEE NAME	RECEIPT DATE	DAYS LATE	REASON TO BELIEVE DATE	COMMITTEE ID	TREASURER	STATE	REPORT TYPE	PREVIOUS VIOLATIONS	DATE PAID	AMOUNT PAID
AF1127	OWNER-OPERATOR INDEPENDENT DRIVERS ASSN INC	POLITICAL ACTION COMMITTEE (PAC)	05/11/2004	26		C00236778	PAUL D CULLEN SR	DC	2004 APRIL QUARTERLY	0	07/21/2004	\$720
			06/10/2004				\$27,222					
							\$720					
AF1128	REGENCE BLUEPAC		04/23/2004	8		C00252684	R PAUL WARBURTON	VT	2004 APRIL QUARTERLY	0	07/13/2004	\$140
			06/10/2004				\$12,240					
							\$140					
AF1131	CONGRESSIONAL BLACK CAUCUS	POLITICAL ACTION COMMITTEE (PAC)	Not Filed			C00147512	Arthur W. Collins	DC	2004 APRIL QUARTERLY	2	07/21/2004	\$6,750
			06/10/2004				\$136,268 (est)					
							\$6,750					

**COMMITTEES THAT HAVE NOT PAID**







FEDERAL ELECTION COMMISSION  
Washington, DC 20463

**SENSITIVE**

DATE & TIME OF TRANSMITTAL: Thursday, August 05, 2004 4:00

BALLOT DEADLINE: Tuesday, August 10, 2004 4:00

COMMISSIONER: MASON, McDONALD, SMITH, THOMAS, TONER, WEINTRAUB

SUBJECT: Administrative Fines Final Determination Recommendation For  
the 2004 April Quarterly Report. Memorandum from the Assistant  
Staff Director, Reports Analysis Division dated August 5, 2004.

( ) I approve the recommendation(s)

( ) I object to the recommendation(s)

( ) I approve the recommendations except those following  
to which I object (please insert AF#)

---

---

( ) I approve the recommendations except those following  
in which I abstain (please insert AF#)

---

---

( ) I approve the recommendations except those following  
in which I am recused (please insert AF#)

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( ) I am not voting on this ballot.

A definite vote is required. All ballots must be signed and dated. Please return  
ONLY THE BALLOT to the Commission Secretary. Please return ballot no later  
than date and time shown above.

DATE: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Administrative Fines Final Determination )  
Recommendation for the 2004 April )  
Quarterly Report.: )  
FRIENDS OF RON PACKARD, and ) AF# 1103  
DONALD J POLESE as treasurer; )  
DANIEL WEBSTER FOR US SENATE, ) AF# 1104  
and NANCY H WATKINS as treasurer; )  
BROCK HILL CAMPAIGN, and JO ) AF# 1106  
SHADDEN BOLIN as treasurer; )  
COMMITTEE TO ELECT BILL KIRBY, ) AF# 1108  
and Tokutomi, E. Ken as treasurer; )  
SKINNER FOR SENATE 2004, and ) AF# 1111  
NANCY YOUNG as treasurer; )  
ALLEGIANCE TELECOM INC. PAC. and ) AF# 1121  
Delany, Megan Ms as treasurer; )  
FRIENDS OF FERRIS, and ROBERT A. ) AF# 1123  
BOYCE as treasurer; )  
GENERAL AVIATION ) AF# 1124  
MANUFACTURERS ASSOCIATION )  
POLITICAL ACTION COMMITTEE )  
(GAMAPAC), and JAHAN AHMAD as )  
treasurer; )  
LINCOLN CLUB OF SAN DIEGO ) AF# 1125  
COUNTY, and C APRIL BOLING as )  
treasurer; )  
MCDERMOTT WILL & EMERY LLP ) AF# 1126  
PAC, and Anderson, Stanton D. Esq. as )  
treasurer; )  
OWNER-OPERATOR INDEPENDENT ) AF# 1127  
DRIVERS ASSN INC POLITICAL )  
ACTION COMMITTEE (AKA OOIDA- )  
PAC), and PAUL D CULLEN SR as )  
treasurer; )  
REGENCE BLUEPAC, and R PAUL ) AF# 1128  
WARBURTON as treasurer; )

CONGRESSIONAL BLACK CAUCUS ) AF# 1131  
POLITICAL ACTION )  
COMMITTEE(CBC-PAC), and Arthur R. )  
Collins as treasurer; )

AMENDED CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby certify that on August 10, 2004 the Commission took the following actions on the Administrative Fines Final Determination Recommendation for the 2004 April Quarterly Report, as recommended in the Reports Analysis Division's Memorandum dated August 05, 2004, on the following committees:

AF#1103 Decided by a vote of 5-0 to: (1) make a final determination that FRIENDS OF RON PACKARD, and DONALD J POLESE as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1104 Decided by a vote of 5-0 to: (1) make a final determination that DANIEL WEBSTER FOR US SENATE, and NANCY H WATKINS as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1106 Decided by a vote of 5-0 to: (1) make a final determination that BROCK HILL CAMPAIGN, and JO SHADDEN E OLIN as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1108 Decided by a vote of 5-0 to: (1) make a final determination that COMMITTEE TO ELECT BILL KIRBY, and Tokutomi, E. Ken as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1111 Decided by a vote of 5-0 to: (1) make a final determination that SKINNER FOR SENATE 2004, and NANCY YOUNG as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1121 Decided by a vote of 5-0 to: (1) make a final determination that ALLEGIANCE TELECOM INC. PAC, and Delany, Megan Ms as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1123 Decided by a vote of 5-0 to: (1) make a final determination that FRIENDS OF FERRIS, and ROBERT A. BOYCE as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1124 Decided by a vote of 5-0 to: (1) make a final determination that GENERAL AVIATION MANUFACTURERS ASSOCIATION POLITICAL ACTION COMMITTEE (GAMAPAC), and JAHAN AHMAD as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1125 Decided by a vote of 5-0 to: (1) make a final determination that LINCOLN CLUB OF SAN DIEGO COUNTY, and C APRIL BOLING as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1126 Decided by a vote of 5-0 to: (1) make a final determination that MCDERMOTT WILL & EMERY LLP PAC, and Anderson, Stanton D. Esq. as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1127 Decided by a vote of 5-0 to: (1) make a final determination that OWNER-OPERATOR INDEPENDENT DRIVERS ASSN INC POLITICAL ACTION COMMITTEE (AKA OOIDA-PAC), and PAUL D CULLEN SR as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1128 Decided by a vote of 5-0 to: (1) make a final determination that REGENCE BLUEPAC, and R PAUL WARBURTON as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

AF#1131 Decided by a vote of 5-0 to: (1) make a final determination that CONGRESSIONAL BLACK CAUCUS POLITICAL ACTION COMMITTEE(CBC-PAC), and Arthur R. Collins as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Mason, McDonald, Smith, Thomas, and Weintraub voted affirmatively for the decision. Commissioner Toner did not vote.

Attest:

August 11, 2004  
Date

Mary W. Dove  
Mary W. Dove  
Secretary of the Commission

**WESTERN  
UNION**

WESTERN UNION COMMERCIAL SERVICES  
CONFIRMATION OF MAILGRAM TO: R PAUL WARBURTON  
REGENCE BLUEPAC  
2890 E COTTONWOOD PKWY DEPT 8  
SALT LAKE CITY UT 84121-7035

FEDERAL ELECTION COMMISSION  
DAYNA BROWN  
999 E ST NW # 709  
WASHINGTON DC 20463

AUGUST 12, 2004

R PAUL WARBURTON  
REGENCE BLUEPAC  
2890 E COTTONWOOD PARKWAY DEPT #8  
SALT LAKE CITY UT 84121

C00252684  
AF#: 1128

DEAR R PAUL WARBURTON:

ON 06/10/2004, THE FEDERAL ELECTION COMMISSION ("FEC") FOUND REASON TO BELIEVE ("RTB") THAT REGENCE BLUEPAC AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) FOR FILING LATE OR FAILING TO FILE THE 2004 APRIL QUARTERLY REPORT. BY MAILGRAM DATED 06/15/2004, THE FEC SENT YOU NOTIFICATION OF THE RTB FINDING THAT INCLUDED A CIVIL MONEY PENALTY CALCULATED AT THE RTB STAGE OF \$140 IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R. 111.43.

ON 07/13/2004, THE FEC RECEIVED PAYMENT OF YOUR CIVIL MONEY PENALTY CALCULATED AT THE RTB STAGE. THEREFORE, THE FEC MADE A FINAL DETERMINATION ON 08/10/2004 THAT YOU, AS TREASURER, AND REGENCE BLUEPAC VIOLATED 2 U.S.C. 434(A), ASSESSED A CIVIL MONEY PENALTY IN THE AMOUNT OF \$140 IN ACCORDANCE WITH 11 C.F.R. 111.43, AND VOTED TO CLOSE THE FILE.

THE CONFIDENTIALITY PROVISIONS AT 2 U.S.C. 437G(A)(2) NO LONGER APPLY AND THIS MATTER IS NOW PUBLIC. THE FILE WILL BE MADE A PART OF THE PUBLIC RECORD PURSUANT TO 11 C.F.R. 111.42(B). ALTHOUGH THE FILE MUST BE PLACED ON THE PUBLIC RECORD WITHIN THIRTY (30) DAYS FROM THE DATE OF THE COMMISSION NOTIFICATION, THIS COULD OCCUR AT ANYTIME FOLLOWING CERTIFICATION OF THE COMMISSION VOTE.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT DAYNA C. BROWN ON OUR TOLL FREE NUMBER (800)424-9530 (AT THE PROMPT PRESS 5) OR (202)694-1130.

SINCERELY,  
BRADLEY A. SMITH  
CHAIRMAN

MAILING ADDRESS  
P. O. Box 30270  
Salt Lake City, Utah 84130-0270



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of Utah

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2890 East Cottonwood Parkway  
Salt Lake City, Utah 84121-7035  
Tel (801) 333-2000  
[www.ut.regence.com](http://www.ut.regence.com)

July 1, 2004

Federal Election Commission  
P.O. Box 952182  
St. Louis, MO 63195-2182

Re: Regence BluePAC  
FEC ID# C00252684  
AF#: 1128

Enclosed is a check in the amount of \$140.00, related to AF#1128, which found Regence BluePAC was eight days late in filling its April 2004 Quarterly report (Report). While we are not challenging the finding, we do what to clarify the Report was mailed on time by certified mail dated April 15, 2004. On April 20, 2004, Eliza Green advised me that the disk exploded when she tried to open the file. A replacement disk was sent by certified mail on April 21, 2004, and subsequently accepted by the FEC.

Sincerely,

Paul Warburton

Enclosure



QUALITY IS OUR PRIORITY FOR LOCKBOX 2182  
SEQ# 002 \$ 0000014000 BA# 1 07-13-04 20 9

**usbancorp.**  
The Bancorp.

<b>The Regence Group</b>		US BANK	175-1592912	0005013731
		8 GRAND FORKS, MN		
		DATE	JAN 01 2004	
ONE HUNDRED FORTY AND XXX/100 DOLLAR			\$	***140.00
TO THE	FEDERAL ELECTIONS COMMISSION			
Order Of	PO BOX 952182			
	ST LOUIS, MO 63193-2182			
			<i>Mark A. [Signature]</i>	Authorized Signature

THIS IS THE END OF ADMINISTRATIVE FINE CASE

# 1128

DATE FILMED 9/20/04 CAMERA NO. 1

CAMERAMAN SES