



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 1761 .

85040554180

MMAHAT & DUFFY

ATTORNEYS & COUNSELORS AT LAW

SUITE 300

5500 VETERANS MEMORIAL BOULEVARD

METairie, LOUISIANA 70003

TELEPHONE (504) 867-6962

JOHN A. MMAHAT*
PETER E. DUFFY
VALLERIE OXNER*
MARVIN OPOTOWSKY*
ANNABELLE H. WALKER

GARY J. BEAUCHAMP
NOEL E. VARGAS II
CAROL S. PATTERSON

*A PROFESSIONAL LAW CORPORATION

RECEIVED AT THE FEC
GCC# 8743
85 OCT 15 49:02

W. W. THIMMESCH (1924-1978)

OF COUNSEL
NICHOLAS J. GAGLIANO

October 8, 1985

Judy Thedford, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: MUR 1761
Mortgage Attorneys Political Action Committee

Dear Ms. Thedford:

Enclosed is MAPAC's check in the amount of \$200.00 as the civil penalty required under the Conciliation Agreement regarding MUR 1761. I believe this concludes all pending matters regarding MAPAC; I am sure you will be as glad as I am to close our respective files in this matter.

Thank you very much for your patience and cooperation in resolving these MURs. It was a pleasure to work with you.

Sincerely,

Annabelle H. Walker
Annabelle H. Walker

/wac

Enclosure

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
5 OCT 16 P 2:27

85040554181

MAPAC, INC.
5500 VETERANS BLVD. SUITE 300
METAIRIE, LA 70003

Nº 250

October 4, 1985

149
880

PAY TO THE
ORDER OF

Federal Election Commission

\$ 200.00

REGISTERED
8P77644 200 DOLLARS



HIBERNIA
National Bank

New Orleans, Louisiana 70161

in settlement of MUR 1761

⑈00000250⑈ ⑆065000090⑆02 62⑈0627 8⑈

DOLLARS

CCC # 8743

MEMORANDUM

TO: RETHA DIXON

TO: JOAN HARRIS

FROM: JOAN HARRIS

FROM: RETHA DIXON

CHECK NO. 250 (a copy of which is attached) RELATING
TO MUR 1761 AND NAME Mortgage Attorneys Political Action Committee
WAS RECEIVED ON 10-16-85. PLEASE INDICATE THE ACCOUNT INTO
WHICH IT SHOULD BE DEPOSITED:

/ / BUDGET CLEARING ACCOUNT (#95F3875.16)

/ * / CIVIL PENALTIES ACCOUNT (#95-1092.160)

/ / OTHER

SIGNATURE

Robyn M. Bishop

DATE

10-16-85



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1761

Date Filmed 11/14/85 Camera No. --- 2

Cameraman AS

85040560039

12 Day Report12 Day The Buy RptConculation InformationRouting SlipsMemor. from RAD

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552 (b):

 (1) Classified Information (6) Personal privacy✓ (2) Internal rules and practices (7) Investigatory files✓ (3) Exempted by other statute (FECA) (8) Banking information (4) Trade secrets and commercial or financial information (9) Well Information (geographic or geophysical)✓ (5) Internal DocumentsSigned date

FEC 9-21-77

85040560040

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Mortgage Attorneys Political) MUR 1761
Action Committee)
Kent Nicaud, treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 25, 1985, the Commission decided by a vote of 4-0 to take the following actions in MUR 1761:

1. Accept the conciliation agreement submitted with the General Counsel's Report signed September 19, 1985.
2. Close the file.
3. Send the letter attached to the General Counsel's Report signed September 19, 1985.

Commissioners Elliott, Josefiak, McDonald and McGarry voted affirmatively in this matter; Commissioners Aikens and Harris did not cast a vote.

Attest:

9-25-85
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Fri., 9-20-85,	4:44
Circulated on 48 hour tally basis:	Mon., 9-23-85,	11:00
Deadline for vote	Wed., 9-25-85,	11:00

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Mortgage Attorneys Political) MUR 1761
Action Committee)
Kent Nicaud, treasurer)

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Commissioners Elliott, Josefiak, McDonald and McGarry voted affirmatively in this matter; Commissioners Aikens and Harris did not cast a vote.

Attest:

9-25-85
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Fri., 9-20-85,	4:44
Circulated on 48 hour tally basis:	Mon., 9-23-85,	11:00
Deadline for vote	Wed., 9-25-85,	11:00

35040560042



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 2, 1985

Annabelle H. Walker, Esquire
Mmahat & Duffy
Suite 300
500 Veterans Memorial Blvd.
Metairie, LA 70003

RE: MUR 1761
Mortgage Attorneys Political
Action Committee

Dear Ms. Walker:

On September 25, 1985, the Commission accepted the conciliation agreement signed by your client and a civil penalty in settlement of violations of 2 U.S.C. § 433(c), 434(a)(1), and 434(a)(4)(A)(i), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: *Kenneth A. Gross*
Associate General Counsel

Enclosure
Conciliation Agreement

85040560043



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Annabelle H. Walker, Esquire
Mmahat & Duffy
Suite 300
500 Veterans Memorial Blvd.
Metairie, LA 70003

RE: MUR 1761
Mortgage Attorneys Political
Action Committee

Dear Ms. Walker:

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Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

J 10/1/85

185040560044



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Annabelle H. Walker, Esquire
Mmahat & Duffy
Suite 300
500 Veterans Memorial Blvd.
Metairie, LA 70003

RE: MUR 1761
Mortgage Attorneys Political
Action Committee

Dear Ms. Walker:

On 1985, the Commission accepted the conciliation agreement signed by your client and a civil penalty in settlement of violations of 2 U.S.C. § 433(c), 434(a)(1), and 434(a)(4)(A)(i), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

185040560045

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Mortgage Attorneys Political) MUR 1761
Action Committee, Inc.)
Kent Nicaud, Treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Mortgage Attorneys Political Action Committee, Inc. and Kent Nicaud, as treasurer, ("Respondents") violated 2 U.S.C. Section 433, Section 434(a)(1), and Section 434(a)(4)(A)(i).

NOW, THEREFORE, the Commission and 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 into pursuant to 2 U.S.C. Section 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, Mortgage Attorneys Political Action Committee, Inc., is a political committee registered with the

Commission.

2. Respondent, Kent Nicaud, is treasurer of Mortgage Attorneys Political Action Committee, Inc.

3. Respondents' 1984 April Quarterly Report was due on April 15, 1984.

4. Respondents filed its 1984 April Quarterly Report on July 23, 1984, 99 days late.

5. 2 U.S.C. Section 434(a)(4)(A)(i) provides that all political committees other than the authorized committees of a candidate shall file quarterly reports, in a calendar year in which a regularly scheduled general election is held, which shall be filed no later than the 15th day after the last day of each calendar quarter, except that the report for the final calendar quarter of the year shall be filed on January 31 of the following calendar year.

6. Cathy Durapau was appointed to the position of Assistant Treasurer of Mortgage Attorneys Political Action Committee, Inc. in December of 1983.

7. The Respondents have failed to notify the Commission of the changes in the office of the assistant treasurer.

8. Pursuant to 2 U.S.C. Section 433(c), any change in any information previously submitted in a Statement of Organization shall be reported no later than 10 days after the date of the change.

9. The Respondents' 1984 April, July, October, and Year-End reports were not signed by the treasurer.

10. Pursuant to 2 U.S.C. Section 434(a)(1), the treasurer shall sign each report.

V. Respondents violated 2 U.S.C. Section 434(a)(4)(A)(i) by filing the 1984 April Quarterly Report late.

VI. Respondents violated 2 U.S.C. Section 433(c) by failing to notify the Commission of a change in assistant treasurer within ten days of such change.

VII. Respondents violated 2 U.S.C. Section 434(a)(1) by failing to have the treasurer sign each report.

VIII. Respondents agree to file an amended Statement of Organization disclosing the current assistant treasurer.

IX. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of two hundred dollars (\$200), pursuant to 2 U.S.C. Section 437g(a)(5)(A).

X. Respondents agree not to undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. Section 431, et seq.

XI. The Commission, on request of anyone filing a complaint under 2 U.S.C. Section 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.

XII. This agreement shall become effective as of the date all parties hereto have executed the same and the Commission

has approved the entire agreement.

XIII. 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.

XIV. 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 valid.

FOR THE COMMISSION:

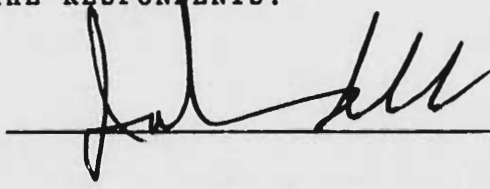
Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel


Date

FOR THE RESPONDENTS:


August 30, 1985
Date

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Mortgage Attorneys Political) MUR 1761
Action Committee, Inc.)
Conrad Meyers, III, Treasurer)

CERTIFICATION

8 5 0 4 0 5 6 0 0 5 0
I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of July 23,
1985, do hereby certify that the Commission decided by a
vote of 5-0 to take the following actions in MUR 1761:

1. Find no probable cause to believe that
Mortgage Attorneys Political Action
Committee and Conrad Meyers, III, as
treasurer, violated 2 U.S.C. § 432(a).
2. Enter into conciliation prior to a finding
of probable cause with Mortgage Attorneys
Political Action Committee and Conrad
Meyers, III, as treasurer.
3. Approve and send the letter and conciliation
agreement to the respondents as recommended
in the General Counsel's report dated
July 15, 1985.

Commissioners Aikens, Elliott, Harris, McDonald, and
McGarry voted affirmatively for the decision; Commissioner
Reiche was not present at the time of the vote.

Attest:

7/23/85
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 31 1985

Annabelle H. Walker, Esquire
Mmahat & Duffy
Suite 300
N.B.C. Bank Building
5500 Veterans Memorial Blvd.
Metairie, LA 70003

Re: MUR 1761
Mortgage Attorneys Political
Action Committee
Conrad A. Meyers, Treasurer

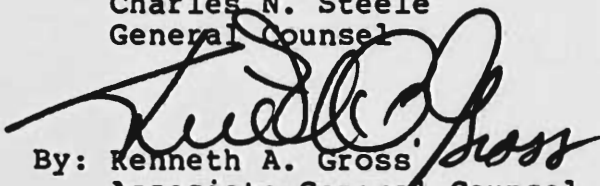
Dear Ms. Walker:

On August 6, 1984, and June 3, 1985, the Commission found reason to believe that Mortgage Attorneys Political Action Committee and Conrad Meyers, III, as treasurer, violated 2 U.S.C. §§ 433(c), 434(a)(1), and 434(a)(4)(A)(i). At your request, the Commission determined on July 23, 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Additionally, the Commission found no probable cause to believe that your clients violated 2 U.S.C. § 432(a).

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients 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 Judy Thedford, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

85040560051



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Annabelle H. Walker, Esquire
Mmahat & Duffy
Suite 300
N.B.C. Bank Building
5500 Veterans Memorial Blvd.
Metairie, LA 70003

Re: MUR 1761
Mortgage Attorneys Political
Action Committee
Conrad A. Meyers, Treasurer

Dear Ms. Walker:

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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

7/29/85
Enclosure

Conciliation Agreement



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Annabelle H. Walker, Esquire
Mmahat & Duffy
Suite 300
N.B.C. Bank Building
5500 Veterans Memorial Blvd.
Metairie, LA 70003

Re: MUR 1761
Mortgage Attorneys Political
Action Committee
Conrad A. Meyers, Treasurer

Dear Ms. Walker:

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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *pld*
DATE: July 16, 1985
SUBJECT: MUR 1761 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of July 23, 1985

Open Session _____
Closed Session XX

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other [x]

DISTRIBUTION

Compliance [X]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

SENSITIVE

CIRCULATE ON BLUE PAPER

ON AGENDA 7-23-85

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

In the Matter of)
Mortgage Attorneys Political)
Action Committee, Inc.)
Conrad Meyers, III, Treasurer)

MUR 1761

05 JUL 18 09:59

EXECUTIVE SESSION

GENERAL COUNSEL'S REPORT

JUL 23 1985

I. BACKGROUND

On May 29, 1985, the Office of General Counsel forwarded a brief to the respondent which stated the General Counsel's intention to recommend to the Commission that a finding of no probable cause be found against the respondents with regard to the possible violation of 2 U.S.C. § 432(a) for failure to have a treasurer.

On June 3, 1985, the Commission found reason to believe the respondents violated 2 U.S.C. § 433(c) and § 434(a)(1). A letter notifying the respondents of new Commission's determinations was sent on June 12, 1985. At this same time, the Commission denied the respondents' request for pre-probable cause conciliation pending notification to them of the new findings. No response was filed in reply to the June 12, 1985 letter.

The Office of General Counsel recommends that the Commission find no probable cause to believe Mortgage Attorneys Political Action Committee, Inc. and Conrad A. Meyers, III, as treasurer, ("MAPAC") violated 2 U.S.C. § 432(a) and to enter into pre-probable cause conciliation with MAPAC at this time concerning the outstanding violations of 2 U.S.C. §§ 433(c), 434(a)(1), and 434(a)(4)(A)(i).

85040560055

11 222

III. RECOMMENDATIONS

1. Find no probable cause to believe that Mortgage Attorneys Political Action Committee and Conrad Meyers, III, as treasurer, violated 2 U.S.C. § 432(a).

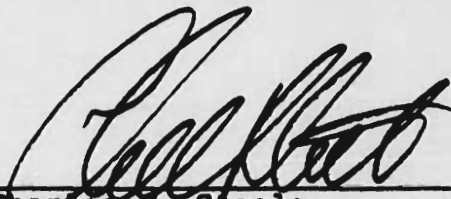
2. Enter into conciliation prior to a finding of probable cause with Mortgage Attorneys Political Action Committee and Conrad Meyers, III, as treasurer.

3. Approve and send the attached letter and conciliation agreement to the respondents.

15 July 1985
Date

Attachments

1. Agreement
2. Letter


Charles N. Steele
General Counsel

85040560036

RECEIVED
GENERAL COUNSEL

MMAHAT & DUFFY

ATTORNEYS & COUNSELORS AT LAW
SUITE 300, N. B. C. BANK BUILDING
5500 VETERANS MEMORIAL BOULEVARD
METAIRIE, LOUISIANA 70003

TELEPHONE (504) 887-6962

85 MAY 20 10 A 9: 58

JOHN A. MMAHAT*
PETER E. DUFFY*
VALLERIE OXNER*
MARVIN OPOTOWSKY*
GARY J. BEAUCHAMP
NOEL E. VARGAS II
CAROL (SALLY) MERIWETHER

*A PROFESSIONAL LAW CORPORATION

W. W. THIMMESCH (1924-1978)

OF COUNSEL
NICHOLAS J. GAGLIANO

May 14, 1985

Judy Thedford, Esq.
Federal Election Commission
1325 K. Street, N.W.
Washington, D.C. 20463

RE: MUR 1761

Dear Ms. Thedford:

Enclosed is a copy of the formal resolution sent out to MAPAC's board members last spring to confirm the appointment of Conrad Meyer as Treasurer, following the death of Robert Jeffers. I am also enclosing a copy of the cover letter which was sent with a second original of the resolution, the first one having apparently been lost in the mail as it passed from one board member to another. I could not find a copy of the letter which was sent with the first resolution, but the date on the cover letter sent with the second copy of the resolution helps to confirm that MAPAC did take action to fill the post of Treasurer in the Spring of 1984.

I understand that you will be amending MUR 1761 to allege a failure to file an amended statement of organization. Meanwhile, I hope that Mr. Meyer will sign the statement I have provided to him, as I realize must be done before we can resolve this matter.

Sincerely,

Annabelle H. Walker

Annabelle H. Walker

/wac

85040560057



Mortgage Attorneys Political Action Committee
May 28, 1984

JOHN A. MMAHAT
President /
Chairman of the Board
JACK L. CAPELL
Vice President
JOHN D. WALT
Vice President
JOHN G. KOPP
Secretary
ALLAN C. ARBET, III
Treasurer
EDDY MUNEZ
Executive Advisor
•
ANNA ATCHLEY
Executive Director

Mr. Jack L. Capell
Attorneys at Law
P.O. Box 2069
57 Adams Avenue
Montgomery, Alabama 36103

Dear Mr. Capell:

As per our telephone conversation of May 23, 1984, I enclose herewith a duplicate original of the Unanimous Consent of Directors of Mapac, Inc. since the one previously forwarded has apparently been lost in the mail.

As I explained to you, this Resolution is necessary due to the untimely death of Bobby Jeffers, our Treasurer and the resignation of Anna Atchley as Assistant Treasurer.

I have enclosed two pre-addressed envelopes to John D. Walt and John G. Kopp, along with a letter to them which I would appreciate your forwarding after you have signed the Resolution. Please send the signed original and the letter in the pre-addressed envelope to either Mr. Walt or Mr. Kopp who will then send the package to the remaining director for his signature.

I thank you in advance for your cooperation and attention.

Sincerely,

CATHY H. DURAPAU
Assistant to John A. Mmahat

/c

enc.

cc: John D. Walt, Esq.
John G. Kopp, Esq.

UNANIMOUS CONSENT OF DIRECTORS
OF MAPAC, INC.

Pursuant to Louisiana R.S. 12:201, et seq., and in lieu of a meeting of the Board of Directors for such purposes, the undersigned, being all of the Directors of this Corporation, do hereby take and authorize by unanimous written consent each and all of the following actions for appointment of officers and directors and the transaction of all such other business as hereinafter set forth:

WHEREAS Robert Jeffers was previously elected as Director and Treasurer of this Corporation and through his untimely death, is no longer able to serve in said capacities; and

WHEREAS Conrad Meyer, IV, is desirous of accepting the appointment of Director and the nomination to the office of Treasurer of this Corporation;

NOW, THEREFORE,

BE IT RESOLVED that Conrad Meyer, IV, be and he is hereby appointed Director of this Corporation and is elected to the office of Treasurer of Mapac, Inc. to serve in said capacity until his successor is chosen and has qualified; and

BE IT FURTHER RESOLVED that Conrad Meyer, IV, in his capacity as Director and Treasurer of MAPAC, INC. be allowed to execute any and all documents which may require his signature, including but not limited to the signing of reports, minutes, bank drafts, etc., as may be required.

WHEREAS, Anna Atchley was previously elected to the office of Assistant Treasurer but has not rendered any services in behalf of the Corporation since August, 1983 and is no longer desirous of holding said office and the Corporation is agreeable to this; and

WHEREAS, Cathy H. DuRapau is available for services in this position and possesses excellent qualifications to fill this position;

NOW, THEREFORE, " "

BE IT RESOLVED that Anna Atchley be removed as Assistant Treasurer having no further authority relative to the day to day operation of the Corporation and Cathy H. DuRapau be and she is hereby elected as Assistant Treasurer of this Corporation.

IN WITNESS WHEREOF, this Action by Unanimous Consent has been signed by each Director of the Corporation on the date indicated below, and this Action by Unanimous Written Consent shall be filed with or otherwise entered on the minutes or other appropriate records of the Corporation.

_____, 19____
John A. Mmahat, Director

_____, 19____
John D. Walt, Director

_____, 19____
Jack L. Capell, Director

_____, 19____
John G. Kopp, Director

MMAHAT, DUFFY & RICHARDS

ATTORNEYS & COUNSELORS AT LAW

SUITE 300, N. B. C. BANK BUILDING

5500 VETERANS MEMORIAL BOULEVARD

METAIRIE, LOUISIANA 70003



Judy Thedford, Esq.
Federal Election Commission
1325 K. Street, N.W.
Washington, D.C. 20463



UNITED STATES POSTAL SERVICE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Mortgage Attorneys Political) MUR 1761
Action Committee)
Conrad A. Meyers, III,)
treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 3, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 1761:

1. Find reason to believe Mortgage Attorneys Political Action Committee, Inc. and Conrad Meyers, III, as treasurer, violated 2 U.S.C. §§ 433(c) and 434(a)(1).
2. Deny pre-probable cause conciliation with the respondents at this time.
3. Deny the request for the merger of this matter with MUR 1947.
4. Approve and send the letter and legal and factual analysis attached to the General Counsel's Report signed May 29, 1985.

Commissioners Aikens, Elliott, McDonald, McGarry and Reiche voted affirmatively in this matter; Commissioner Harris did not cast a vote.

Attest:

6-4-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

35040560062



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 12, 1985

Annabelle H. Walker, Esquire
Mmahat, Duffy & Richards
Suite 300
5500 Veterans Memorial Blvd.
Metairie, LA 70003

RE: MUR 1761
Mortgage Attorneys Political
Action Committee, Inc.
Conrad Meyers, III, Treasurer

Dear Ms. Walker:

On June 3, 1985, the Federal Election Commission determined that there is reason to believe Mortgage Attorneys Political Action Committee and Conrad Meyers, III, as treasurer, violated 2 U.S.C. §§ 433(c) and 434(a)(1), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information. The Commission also denied your request for pre-probable cause conciliation at this time and determined not to merge this matter with MUR 1947.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your clients. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your clients, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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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 Judy Thedford, at (202) 523-4000.

Sincerely,



John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures

95040560061

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1761

RESPONDENTS Mortgage Attorneys Political Action
 Committee, Inc.
 Conrad Meyers, III, Treasurer

SUMMARY OF ALLEGATIONS

On February 27, 1985, the Commission found reason to believe that Mortgage Attorneys Political Action Committee, Inc. ("MAPAC") violated 2 U.S.C. § 432(a) by failing to have a treasurer and accepting contributions and making expenditures while the office of the treasurer was vacant. A letter and legal and factual analysis were sent to MAPAC on March 5, 1985 notifying it of the Commission's action.

On March 25, 1985, MAPAC responded to the 2 U.S.C. § 432(a) reason to believe determination. Through counsel, MAPAC stated that the assistant treasurer position has been held by Cathy Durapau since December of 1983 and the treasurer position has been held by Conrad A. Meyers, III since the end of April, 1984. An affidavit confirming these appointments was submitted by John Mmahat, President of MAPAC and Cathy Durapau, assistant treasurer of MAPAC. MAPAC requested the appropriate FEC forms to reflect the appointments. The letter also requested pre-probable cause conciliation.

On March 20, 1985, the Commission, in another matter concerning the same respondent, MUR 1947, found reason to believe that MAPAC violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii) by filing the 1984 July and October Quarterly and 30 Day Post-General Election reports late. MAPAC was notified of this action by a letter dated March 26, 1985. MAPAC responded on April 9,

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and April 24, 1985. The April 24, 1985 letter requests that MURs 1761 and 1947 be consolidated and that pre-probable cause conciliation be entered into concerning both matters.

FACTUAL BASIS AND LEGAL ANALYSIS

The evidence submitted by the respondent in MUR 1761 demonstrates that the positions of treasurer and assistant treasurer were not vacant at the same time. Assistant treasurer Anna Atchley left in the fall of 1983; Cathy Durapau was appointed to her position of assistant treasurer in December of 1983. Treasurer Robert Jeffers died in February of 1984 and Conrad Meyers, III was appointed to his position of treasurer at the end of April, 1984. Pursuant to 11 C.F.R. § 102.7, an assistant treasurer shall assume the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office. Therefore, upon Mr. Jeffers' death in February of 1984, Cathy Durapau, the assistant treasurer, assumed the office of treasurer until Mr. Meyers' was designated treasurer at the end of May, 1984.

In the light of the above factual situation, MAPAC would not be in violation of 2 U.S.C. § 432(a) for having a vacancy in the office of the treasurer. Instead, the evidence describes violations of 2 U.S.C. § 433(c) for failing to notify the Commission of a change in treasurers within ten days, and 2 U.S.C. § 434(a)(1) by failing to have the new treasurer sign each report. The reports filed by MAPAC after Mr. Jeffers' death were signed by John DeVay; the reports were required to be signed by Conrad Meyers, III or Cathy Durapau.

The Office of General Counsel recommends finding reason to believe MAPAC and Conrad Meyers, III, as treasurer, violated 2 U.S.C. §§ 433(c) and 434(a)(1).

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DESCRIPTION OF PRELIMINARY PROCEDURES
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE
FEDERAL ELECTION COMMISSION

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of General Counsel where they are assigned a MUR (Matter Under Review) number, and assigned to a staff member.

Following review of the information which generated the MUR, a recommendation on how to proceed on the matter, which shall include preliminary legal and factual analysis, and any information compiled from materials available to the Commission shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act (FECA) may have occurred or is about to occur and that the Commission conduct an investigation of the matter; or (b) that the Commission find no reason to believe that a possible violation of the FECA has occurred and that the Commission close the file on the matter.

Thereafter, if the Commission decides by an affirmative vote of four (4) Commissioners that there is reason to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed, the Office of the General Counsel shall open an investigation into the matter. Upon notification of the Commission's finding(s), within 15 days a respondent(s) may submit any factual or legal materials relevant to the allegations. During the investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order answers to interrogatories. The respondent(s) may be contacted more than once by the Commission in its investigation.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Annabelle Walker
Mmahat, Duffy and Richards
Suite 300
5500 Veterans Memorial Blvd.
Metairie, Louisiana 70003

RE: MUR 1761
Mortgage Attorneys Political
Action Committee, Inc.
Conrad Meyers, III, Treasurer

Dear Ms. Walker:

On May , 1985, the Federal Election Commission determined that there is reason to believe Mortgage Attorneys Political Action Committee, Inc. and Conrad Meyers, III, as treasurer, violated 2 U.S.C. §§ 433(c) and 434(a)(1), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information. The Commission also denied your request for pre-probable cause conciliation at this time and determined not to merge this matter with MUR 1947.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your clients. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your clients, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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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 Judy Thedford, at (202) 523-4000.

Sincerely,

John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures

25040560070



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Annabelle Walker
Minahat, Duffy and Richards
Suite 300
5500 Veterans Memorial Blvd.
Metairie, Louisiana 70003

RE: MUR 1761
Mortgage Attorneys Political
Action Committee, Inc.
Conrad Meyers, III, Treasurer

Dear Ms. Walker:

On May , 1985, the Federal Election Commission determined that there is reason to believe Mortgage Attorneys Political Action Committee, Inc. and Conrad Meyers, III, as treasurer, violated 2 U.S.C. §§ 433(c) and 434(a)(1), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information. The Commission also denied your request for pre-probable cause conciliation at this time and determined not to merge this matter with MUR 1947.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your clients. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your clients, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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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 Judy Thedford, at (202) 523-4000.

Sincerely,

John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures

85040560072



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cot*
DATE: May 29, 1985
SUBJECT: MUR 1761 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote ☒
Sensitive ☒
Non-Sensitive ☐

24 Hour No Objection ☐
Sensitive ☐
Non-Sensitive ☐

Information ☐
Sensitive ☐
Non-Sensitive ☐

Other ☐

DISTRIBUTION

Compliance ☒
Audit Matters ☐

Litigation ☐
Closed MUR Letters ☐

Status Sheets ☐
Advisory Opinions ☐

Other (see distribution
below) ☐

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Mortgage Attorneys Political) MUR 1761
Action Committee)
Conrad A. Meyers, III,)
Treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On February 27, 1985, the Commission found reason to believe that Mortgage Attorneys Political Action Committee ("MAPAC") violated 2 U.S.C. § 432(a) by failing to have a treasurer and accepting contributions and making expenditures while the office of the treasurer was vacant. A letter and legal and factual analysis were sent to MAPAC on March 5, 1985 notifying it of the Commission's action.

The Commission had previously found reason to believe that MAPAC and Anna Atchley, as assistant treasurer, violated 2 U.S.C. § 434(a) by filing its 1984 April Quarterly Report late. A brief concerning the 2 U.S.C. § 434(a) violation was forwarded to MAPAC on November 20, 1984. On January 15, 1985, the Commission determined to delay the finding of probable cause against MAPAC for the 434(a) violation pending the reason to believe determination for a vacancy in the office of the treasurer.

On March 25, 1985, MAPAC responded to the 2 U.S.C. § 432(a) reason to believe determination. Through counsel, MAPAC stated that the assistant treasurer position has been held by Cathy Durapau since December of 1983 and the treasurer position has been held by Conrad A. Meyers, III since the end of April, 1984.

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An affidavit confirming these appointments was submitted by John Mmahat, President of MAPAC and Cathy Durapau, assistant treasurer of MAPAC. MAPAC requested the appropriate FEC forms to reflect the appointments. The letter also requested pre-probable cause conciliation.

On March 20, 1985, the Commission, in another matter concerning the same respondent, MUR 1947, found reason to believe that MAPAC violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii) by filing the 1984 July and October Quarterly and 30 Day Post-General Election reports late. MAPAC was notified of this action by a letter dated March 26, 1985. MAPAC responded on April 9, and April 24, 1985. The April 24, 1985 letter requests that MURs 1761 and 1947 be consolidated and that pre-probable cause conciliation be entered into concerning both matters.

II. LEGAL ANALYSIS

The evidence submitted by the respondent in MUR 1761 demonstrates that the positions of treasurer and assistant treasurer were not vacant at the same time. Assistant treasurer Anna Atchley left in the fall of 1983; Cathy Durapau was appointed to her position of assistant treasurer in December of 1983. Treasurer Robert Jeffers died in February of 1984 and Conrad Meyers, III was appointed to his position of treasurer at the end of April, 1984. Pursuant to 11 C.F.R. § 102.7, an assistant treasurer shall assume the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office. Therefore, upon Mr. Jeffers' death in February of

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1984, Cathy Durapau, the assistant treasurer, assumed the office of the treasurer until Mr. Meyers was designated treasurer at the end of May, 1984.

In light of the above factual situation, MAPAC would not be in violation of 2 U.S.C. § 432(a) for having a vacancy in the office of the treasurer. Instead, the evidence describes violations of 2 U.S.C. § 433(c) for failing to notify the Commission of a change in treasurers within ten days, and 2 U.S.C. § 434(a)(1) by failing to have the new treasurer sign each report. The reports filed by MAPAC after Mr. Jeffers' death were signed by John DeVay; the reports were required to be signed by Conrad Meyers, III or Cathy Durapau.

The Office of General Counsel recommends finding reason to believe MAPAC and Conrad Meyers, III, as treasurer, violated 2 U.S.C. §§ 433(c) and 434(a)(1).

The pre-probable cause conciliation request and possible consolidation of the matters should be denied due to the new reason to believe findings.

Additionally, MAPAC has not filed a Statement of Organization amendment as of this writing. Counsel for MAPAC has stated some reluctance on the part of the new treasurer to submit the amendment until an internal audit of MAPAC has been conducted. The Office of General Counsel, therefore, recommends continuing its investigation by making these additional reason to believe determinations and including the filing of a Statement of Organization amendment as a requirement of a conciliation

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agreement in order that the matter not be delayed unnecessarily.

III. RECOMMENDATIONS

1. Find reason to believe Mortgage Attorneys Political Action Committee, Inc. and Conrad Meyers, III, as treasurer, violated 2 U.S.C. §§ 433(c) and 434(a)(1).
2. Deny pre-probable cause conciliation with the respondents at this time.
3. Deny the request for the merger of this matter with MUR 1947.
4. Approve and send the attached letter and legal and factual analysis.

Charles N. Steele
General Counsel

May 29, 1985
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

Letters from MAPAC
General Counsel's Factual and Legal Analysis
Proposed Letter

85040560077

Ad # 6923
Thrufiled

MMAHAT, DUFFY & RICHARDS

ATTORNEYS & COUNSELORS AT LAW

SUITE 300, N. B. C. BANK BUILDING

5500 VETERANS MEMORIAL BOULEVARD

METAIRIE, LOUISIANA 70003

TELEPHONE (504) 887-6962

JOHN A. MMAHAT*
PETER E. DUFFY
MARTA ALISON RICHARDS*
VALLERIE OXNER*
MARVIN OPOTOWSKY*

GARY J. BEAUCHAMP
NOEL E. VARGAS II

*A PROFESSIONAL LAW CORPORATION

W. W. THIMMESCH (1924-1978)

OF COUNSEL
NICHOLAS J. GAGLIANO

March 20, 1985

John Warren McGarry
Chairman
Federal Election Commission
Washington, D.C. 20463

MR: 50

RE: MUR 1761

Dear Mr. McGarry:

I am writing in response to your letter of March 5, 1985 (received on March 11th), regarding your finding of reason to believe that the Mortgage Attorneys Political Action Committee (MAPAC) has violated 2 U.S.C. Sec. 432(a). Enclosed is a Statement of Designation of Counsel, appointing me to represent MAPAC in this matter.

Also enclosed is an Affidavit executed by John A. Mmahat and Cathy H. Durapau, giving facts pertinent to the question whether MAPAC has violated Sec. 432 (a) by failing to have a treasurer and for accepting contributions and making expenditures while the treasurer's office was vacant. As the Affidavit reveals, Ms. Durapau was appointed by Mr. Mmahat to replace Anna Atchley as assistant treasurer, who ceased to function as such in late fall of 1983. Mrs. Durapau has held the position of assistant treasurer since December of 1983.

As you have already been informed, Robert E. Jeffers, Jr., the treasurer, died in February, 1984. As the Affidavit describes subsequent events, there was a delay of approximately six weeks following the sudden death of Mr. Jeffers before Mr. Conrad Meyers was asked to accept the post of treasurer. Mr. Jeffers committed suicide by hanging himself with a coat hanger. The shocking and tragic manner of his death, as well as its untimeliness, caused such grief and shock in the social and legal community of which he was a member, including MAPAC, that the attention of MAPAC's officers was, I am told, distracted by other matters attending the death, for some period of time, and it was not until nearly the end of March, 1984 that Mr. Mmahat turned his attention to the need to replace Mr. Jeffers as Treasurer for MAPAC.

(1)

John Warren McGarry
March 20, 1985

page 2

As stated in the Affidavit Mr. Conrad A. Meyers III has actually held the treasurer's post since the end of April, 1984. Mr. John deVay's letter to you dated July 13, 1984 referred only to the formal process of having a resolution signed to confirm the appointment, which was a lengthy procedure requiring the conveyance of the formal document to members of the Board in several different states.

The Affidavit should serve as adequate proof for your purposes that, at least by the end of April, 1984, Mr. Meyers had accepted the post of treasurer and has served in that capacity ever since.

I understand that MAPAC should amend its Statement of Organization to reflect the changes in appointments for the offices of treasurer and assistant treasurer. If you have a form available for this amendment, I would appreciate your forwarding it to me, so that it can be executed and returned to you as soon as possible.

I have found in earlier correspondence from your office a letter dated October 17, 1984, in which you requested of Mr. John deVay, Bookkeeper, not only an amendment to the Statement of Organization, but a Schedule A regarding an entry on line 13 of the Detailed Summary Page submitted with the July quarterly report for 1984, and a schedule C and D regarding line 10 of the Summary Page of that report. Mr. deVay is no longer the bookkeeper, but I have contacted him by telephone. He does not recall providing any of these documents to you in response to this letter. I have requested him to assist us in providing the appropriate schedules to support entries on that report, and he has agreed to come to my office tomorrow, March 21th, to prepare the missing schedules. These will be forwarded to you without delay.

John Warren McGarry
March 20, 1985

page 3

I would like to request on behalf of MAPAC that conciliation be undertaken prior to proceeding to a finding of probable cause, pursuant to 11 C.F.R. Sec. 111.18(d).

Please inform me regarding any other past or present violations which need explanation or which MAPAC can now correct, so that it can be brought into complete compliance with the rules of the Commission.

Sincerely,

Annabelle H. Walker

Annabelle H. Walker

/wac

Enclosures

cc: John A. Mmahat

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(3)

STATE OF LOUISIANA
PARISH OF JEFFERSON

BEFORE ME, the undersigned Notary Public, duly commissioned and qualified for the aforesaid State and Parish, personally came and appeared:

JOHN A. MMAHAT, President of Mortgage Attorneys
Political Action Committee and

CATHY H. DURAPAU, Assistant Treasurer of Mortgage
Attorneys Political Action Committee

who, having been duly sworn, declared that:

John A. Mmahat appointed Cathy E. Durapau as Assistant Treasurer for the Mortgage Attorneys Political Action Committee (MAPAC) in late fall of 1983, to replace Anna Atchley, upon Mr. Mmahat's discovery that Ms. Atchley was no longer functioning as such. Mrs. Durapau has, in truth and in fact, served as Assistant Treasurer to MAPAC since December of 1983 until present.

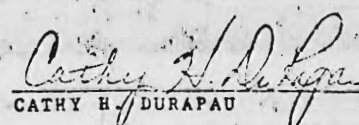
John A. Mmahat further declared that he first consulted with other members of MAPAC regarding appointment of a new Treasurer to replace Mr. Robert E. Jeffers, Jr. sometime during the month of March, 1984;

That by verbal agreement among members of the Board of Directors, the post of Treasurer was offered to Mr. Conrad A. Meyers, III;

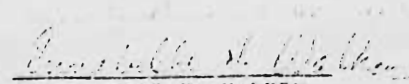
That Mr. Meyers informed Mr. Mmahat by the end of April, 1984 that he would accept the post of Treasurer;

That Mr. Conrad A. Meyers, III has, in truth and in fact, served as Treasurer of MAPAC since May 1, 1984, and is presently serving in that position.


JOHN A. MMAHAT


CATHY H. DURAPAU

SWORN TO AND SUBSCRIBED
before me, Notary, this
the 20th day of March,
1985, at Metairie, LA.


ANNABELLE E. WALKER
Notary Public

(4)

85040560031

STATE OF LOUISIANA
PARISH OF JEFFERSON

BEFORE ME, the undersigned Notary Public, duly commissioned and qualified for the aforesaid State and Parish, personally came and appeared:

JOHN A. MMAHAT, President of Mortgage Attorneys
Political Action Committee and

CATHY H. DURAPAU, Assistant Treasurer of Mortgage
Attorneys Political Action Committee

who, having been duly sworn, declared that:

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That by verbal agreement among members of the Board of Directors, the post of Treasurer was offered to Mr. Conrad A. Meyers, III;


That Mr. Meyers informed Mr. Mmahat by the end of April, 1984 that he would accept the post of Treasurer;

That Mr. Conrad A. Meyers, III has, in truth and in fact, served as Treasurer of MAPAC since May 1, 1984, and is presently serving in that position.


JOHN A. MMAHAT


CATHY H. DURAPAU

SWORN TO AND SUBSCRIBED
before me, Notary, this
the 23rd day of March,
1985, at Metairie, LA.


ANNABELLE E. VALLEE
Notary Public

MMAHAT, DUFFY & RICHARDS

ATTORNEYS & COUNSELORS AT LAW

SUITE 300, N. B. C. BANK BUILDING

5500 VETERANS MEMORIAL BOULEVARD

METairie, LOUISIANA 70003

TELEPHONE (504) 867-6962

JOHN A. MMAHAT*
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GARY J. BEAUCHAMP
NOEL E. VARGAS II

* A PROFESSIONAL LAW CORPORATION

GCC# 75
85 APR 29 A 8

W. W. THIMMESCH (1924-1975)

OF COUNSEL
NICHOLAS J. GAGLIANO

April 24, 1985

Judy Thedford, Esq.
Federal Election Commission
1325 K Street, N. W.
Washington, D.C. 20463

RE: MUR 1947 and MUR 1761

Dear Ms. Thedford:

An amended statement of organization for MAPAC, reflecting the appointment of a new Treasurer and Assistant Treasurer, is being prepared.

As we discussed in our earlier telephone conversation, I hereby request that MUR 1761 and MUR 1947 be consolidated, and request pre-probable cause conciliation as to both MURs, on behalf of MAPAC.

Sincerely,

Annabelle H. Walker

Annabelle H. Walker

/wac

Enclosure

APR 29 A 9:30

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(5)

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1761

RESPONDENTS Mortgage Attorneys Political Action
 Committee, Inc.
 Conrad Meyers, III, Treasurer

SUMMARY OF ALLEGATIONS

On February 27, 1985, the Commission found reason to believe that Mortgage Attorneys Political Action Committee, Inc. ("MAPAC") violated 2 U.S.C. § 432(a) by failing to have a treasurer and accepting contributions and making expenditures while the office of the treasurer was vacant. A letter and legal and factual analysis were sent to MAPAC on March 5, 1985 notifying it of the Commission's action.

On March 25, 1985, MAPAC responded to the 2 U.S.C. § 432(a) reason to believe determination. Through counsel, MAPAC stated that the assistant treasurer position has been held by Cathy Durapau since December of 1983 and the treasurer position has been held by Conrad A. Meyers, III since the end of April, 1984. An affidavit confirming these appointments was submitted by John Mmahat, President of MAPAC and Cathy Durapau, assistant treasurer of MAPAC. MAPAC requested the appropriate FEC forms to reflect the appointments. The letter also requested pre-probable cause conciliation.

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and April 24, 1985. The April 24, 1985 letter requests that MURs 1761 and 1947 be consolidated and that pre-probable cause conciliation be entered into concerning both matters.

FACTUAL BASIS AND LEGAL ANALYSIS

8 5 0 4 0 5 6 0 0 8 5
The evidence submitted by the respondent in MUR 1761 demonstrates that the positions of treasurer and assistant treasurer were not vacant at the same time. Assistant treasurer Anna Atchley left in the fall of 1983; Cathy Durapau was appointed to her position of assistant treasurer in December of 1983. Treasurer Robert Jeffers died in February of 1984 and Conrad Meyers, III was appointed to his position of treasurer at the end of April, 1984. Pursuant to 11 C.F.R. § 102.7, an assistant treasurer shall assume the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office. Therefore, upon Mr. Jeffers' death in February of 1984, Cathy Durapau, the assistant treasurer, assumed the office of treasurer until Mr. Meyers' was designated treasurer at the end of May, 1984.

In the light of the above factual situation, MAPAC would not be in violation of 2 U.S.C. § 432(a) for having a vacancy in the office of the treasurer. Instead, the evidence describes violations of 2 U.S.C. § 433(c) for failing to notify the Commission of a change in treasurers within ten days, and 2 U.S.C. § 434(a)(1) by failing to have the new treasurer sign each report. The reports filed by MAPAC after Mr. Jeffers' death were signed by John DeVay; the reports were required to be signed by Conrad Meyers, III or Cathy Durapau.

(7)

The Office of General Counsel recommends finding reason to believe MAPAC and Conrad Meyers, III, as treasurer, violated 2 U.S.C. §§ 433(c) and 434(a)(1).

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Annabelle Walker
Mmahat, Duffy and Richards
Suite 300
5500 Veterans Memorial Blvd.
Metairie, Louisiana 70003

RE: MUR 1761
Mortgage Attorneys Political
Action Committee, Inc.
Conrad Meyers, III, Treasurer

Dear Ms. Walker:

On May , 1985, the Federal Election Commission determined that there is reason to believe Mortgage Attorneys Political Action Committee, Inc. and Conrad Meyers, III, as treasurer, violated 2 U.S.C. §§ 433(c) and 434(a)(1), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information. The Commission also denied your request for pre-probable cause conciliation at this time and determined not to merge this matter with MUR 1947.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your clients. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your clients, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

(9)

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 Judy Thedford, at (202) 523-4000.

Sincerely,

John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures

85040560033

10



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cut*
DATE: May 29, 1985
SUBJECT: MUR 1761 - Memorandum and GC's Brief

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information [X]
Sensitive [X]
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

85040560037



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 29, 1985

MAY 29 4 8: 59

MEMORANDUM

TO : The Commission

FROM : Charles N. Steele
General Counsel

SENSITIVE

SUBJECT: MUR 1761

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of no probable cause to believe was mailed on May 29, 1985. Following receipt of the respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

8 12 0 4 0 5 6 0 0 0 0

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1761
Mortgage Attorneys Political)
Action Committee, Inc.)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On February 27, 1985, the Commission found reason to believe that Mortgage Attorneys Political Action Committee, Inc. ("MAPAC") violated 2 U.S.C. § 432(a) by failing to have a treasurer and accepting contributions and making expenditures while the office of the treasurer was vacant. A letter and legal and factual analysis were sent to MAPAC on March 5, 1985 notifying it of the Commission's action.

On March 25, 1985, MAPAC responded to the 2 U.S.C. § 432(a) reason to believe determination. Through counsel, MAPAC stated that the assistant treasurer position has been held by Cathy Durapau since December of 1983 and the treasurer position has been held by Conrad A. Meyers, III since the end of April, 1984. An affidavit confirming these appointments was submitted by John Mmahat, President of MAPAC and Cathy Durapau, assistant treasurer of MAPAC.

II. LEGAL ANALYSIS

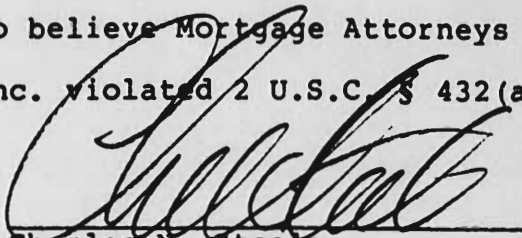
The evidence submitted by the respondent demonstrates that the positions of treasurer and assistant treasurer were not vacant at the same time. Assistant treasurer Anna Atchley left in the fall of 1983; Cathy Durapau was appointed to her position of assistant treasurer in December of 1983. Treasurer Robert

Jeffers died in February of 1984 and Conrad Meyers, III was appointed to his position of treasurer at the end of April, 1984. Pursuant to 11 C.F.R. § 102.7, an assistant treasurer shall assume the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office of the treasurer. Therefore, upon Mr. Jeffers' death in February of 1984, Cathy Durapau, the assistant treasurer, assumed the role of treasurer until Mr. Meyers' appointment at the end of May, 1984.

III. GENERAL COUNSEL'S RECOMMENDATION

Find no probable cause to believe Mortgage Attorneys Political Action Committee, Inc. violated 2 U.S.C. § 432(a).

28 May 1985
Date


Charles N. Steele
General Counsel

35040560072



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 29, 1985

Annabelle Walker
Mmahat, Duffy and Richards
Suite 300
N.B.C. Bank Building
5500 Veterans Memorial Boulevard
Metairie, Louisiana 70003

RE: MUR 1761

Dear Ms. Walker:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your client, the Federal Election Commission, on February 27, 1985, found reason to believe that the Mortgage Attorneys Political Action Committee, Inc. violated 2 U.S.C. § 432(a), a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's recommendation.

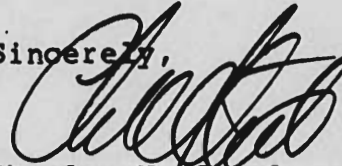
Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

35040560095

Annabelle Walker
Page 2

Should you have any questions, please contact Judy
Thedford, the staff member assigned to handle this matter,
at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

35040560091



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*

DATE: MAY 7, 1985

SUBJECT: MUR 1761 - Comprehensive Investigative
Report #1 signed May 2, 1985

The above-captioned matter was circulated to the Commission on a 24 hour no-objection basis at 2:00, May 3, 1985.

There were no objections to the Comprehensive Investigative Report at the time of the deadline.

85040560095



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel
DATE: May 2, 1985
SUBJECT: MUR 1761 - Comprehensive Investigative Rpt. #1

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []

24 Hour No Objection [xx]
Sensitive [xx]
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [xx]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Mortgage Attorneys Political)
Action Committee)
Conrad A. Meyers, III,)
Treasurer)

MUR 1761

25 MAY 22 PM 4:33
SENSITIVE

COMPREHENSIVE INVESTIGATIVE REPORT #1

On February 27, 1985, the Commission found reason to believe that Mortgage Attorneys Political Action Committee ("MAPAC") violated 2 U.S.C. § 432(a) by failing to have a treasurer and accepting contributions and making expenditures while the office of the treasurer was vacant. A letter and legal and factual analysis were sent to MAPAC on March 5, 1985, notifying it of the Commission's action.

The Commission had previously found reason to believe that MAPAC and Anna Atchley, as assistant treasurer, violated 2 U.S.C. § 434(a) by filing its 1984 April Quarterly Report late. A brief concerning the 2 U.S.C. § 434(a) violation was forwarded to MAPAC on November 20, 1984. On January 15, 1985, the Commission determined to delay the finding of probable cause against MAPAC for the § 434(a) violation pending the reason to believe determination for a vacancy in the office of the treasurer.

On March 25, 1985, MAPAC responded to the 2 U.S.C. § 432(a) reason to believe determination. Through counsel, MAPAC stated that the assistant treasurer position has been held by Cathy Durapau since December of 1983 and the treasurer position has been held by Conrad A. Meyers, III since the end of April, 1984. An affidavit confirming these appoints was submitted by

John Mmahat, President of MAPAC and Cathy Durapau, assistant treasurer of MAPAC. MAPAC requested the appropriate FEC forms to reflect the appointments.

Additionally, the letter requested pre-probable cause conciliation and information regarding violations by MAPAC which can now be corrected and brought into compliance.

The Office of General Counsel has requested MAPAC to file an amended Statement of Organization disclosing its new officers for the public record. We feel this information needs to be on the public record before proceeding to the pre-probable cause conciliation stage. We are also preparing a response to MAPAC's request for information on past and present violations.

Upon receipt of MAPAC's Statement of Organization amendment and preparation of a report, the Commission will be presented with recommendations concerning further action against MAPAC.

Charles N. Steele
General Counsel

Date

May 2, 1995

BY:

Kenneth A. Gross
Associate General Counsel

85040560098

MMAHAT, DUFFY & RICHARDS

ATTORNEYS & COUNSELORS AT LAW

SUITE 300, N. B. C. BANK BUILDING

5500 VETERANS MEMORIAL BOULEVARD

METairie, LOUISIANA 70003

TELEPHONE (504) 887-6902

JOHN A. MMAHAT*
PETER E. DUFFY
MARTA ALISON RICHARDS*
VALLERIE OXNER*
MARVIN OPOTOWSKY*

GARY J. BEAUCHAMP
NOEL E. VARGAS II

*A PROFESSIONAL LAW CORPORATION

W. W. THIMMESCH (1924-1978)

OF COUNSEL
NICHOLAS J. GAGLIANO

March 20, 1985

John Warren McGarry
Chairman
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1761

Dear Mr. McGarry:

I am writing in response to your letter of March 5, 1985 (received on March 11th), regarding your finding of reason to believe that the Mortgage Attorneys Political Action Committee (MAPAC) has violated 2 U.S.C. Sec. 432(a). Enclosed is a Statement of Designation of Counsel, appointing me to represent MAPAC in this matter.

Also enclosed is an Affidavit executed by John A. Mmahat and Cathy H. Durapau, giving facts pertinent to the question whether MAPAC has violated Sec. 432 (a) by failing to have a treasurer and for accepting contributions and making expenditures while the treasurer's office was vacant. As the Affidavit reveals, Ms. Durapau was appointed by Mr. Mmahat to replace Anna Atchley as assistant treasurer, who ceased to function as such in late fall of 1983. Mrs. Durapau has held the position of assistant treasurer since December of 1983.

As you have already been informed, Robert E. Jeffers, Jr., the treasurer, died in February, 1984. As the Affidavit describes subsequent events, there was a delay of approximately six weeks following the sudden death of Mr. Jeffers before Mr. Conrad Meyers was asked to accept the post of treasurer. Mr. Jeffers committed suicide by hanging himself with a coat hanger. The shocking and tragic manner of his death, as well as its untimeliness, caused such grief and shock in the social and legal community of which he was a member, including MAPAC, that the attention of MAPAC's officers was, I am told, distracted by other matters attending the death, for some period of time, and it was not until nearly the end of March, 1984 that Mr. Mmahat turned his attention to the need to replace Mr. Jeffers as Treasurer for MAPAC.

John Warren McGarry
March 20, 1985

page 2

As stated in the Affidavit Mr. Conrad A. Meyers III has actually held the treasurer's post since the end of April, 1984. Mr. John deVay's letter to you dated July 13, 1984 referred only to the formal process of having a resolution signed to confirm the appointment, which was a lengthy procedure requiring the conveyance of the formal document to members of the Board in several different states.

The Affidavit should serve as adequate proof for your purposes that, at least by the end of April, 1984, Mr. Meyers had accepted the post of treasurer and has served in that capacity ever since.

I understand that MAPAC should amend its Statement of Organization to reflect the changes in appointments for the offices of treasurer and assistant treasurer. If you have a form available for this amendment, I would appreciate your forwarding it to me, so that it can be executed and returned to you as soon as possible.

I have found in earlier correspondence from your office a letter dated October 17, 1984, in which you requested of Mr. John deVay, Bookkeeper, not only an amendment to the Statement of Organization, but a Schedule A regarding an entry on line 13 of the Detailed Summary Page submitted with the July quarterly report for 1984, and a schedule C and D regarding line 10 of the Summary Page of that report. Mr. deVay is no longer the bookkeeper, but I have contacted him by telephone. He does not recall providing any of these documents to you in response to this letter. I have requested him to assist us in providing the appropriate schedules to support entries on that report, and he has agreed to come to my office tomorrow, March 21st, to prepare the missing schedules. These will be forwarded to you without delay.

85040560100

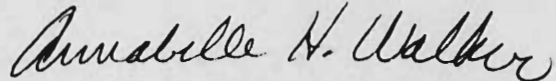
John Warren McGarry
March 20, 1985

page 3

I would like to request on behalf of MAPAC that conciliation be undertaken prior to proceeding to a finding of probable cause, pursuant to 11 C.F.R. Sec. 111.18(d).

Please inform me regarding any other past or present violations which need explanation or which MAPAC can now correct, so that it can be brought into complete compliance with the rules of the Commission.

Sincerely,



Annabelle H. Walker

/wac

Enclosures

cc: John A. Mahat

85040560101

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1761

NAME OF COUNSEL: Annabelle H. Walker

ADDRESS: 5500 Veterans Memorial Blvd.

Ste. 300

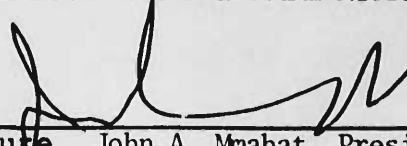
Metairie, LA 70003

TELEPHONE: (504) 887-6962

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

MORTGAGE ATTORNEYS POLITICAL ACTION COMMITTEE

March 18, 1985
Date

BY: 
Signature John A. Mahat, President

RESPONDENT'S NAME: MAPAC

ADDRESS: 5500 Veterans Memorial Blvd.

Ste. 300

Metairie, LA 70003

HOME PHONE:

BUSINESS PHONE: (504) 887-6962

85040560102

AFFIDAVIT

STATE OF LOUISIANA

PARISH OF JEFFERSON

BEFORE ME, the undersigned Notary Public, duly commissioned and qualified for the aforesaid State and Parish, personally came and appeared:

JOHN A. MMAHAT, President of Mortgage Attorneys
Political Action Committee and

CATHY H. DURAPAU, Assistant Treasurer of Mortgage
Attorneys Political Action Committee

who, having been duly sworn, declared that:


John A. Mmahat appointed Cathy H. Durapau as Assistant Treasurer for the Mortgage Attorneys Political Action Committee (MAPAC) in late fall of 1983, to replace Anna Atchley, upon Mr. Mmahat's discovery that Ms. Atchley was no longer functioning as such. Mrs. Durapau has, in truth and in fact, served as Assistant Treasurer to MAPAC since December of 1983 until present.

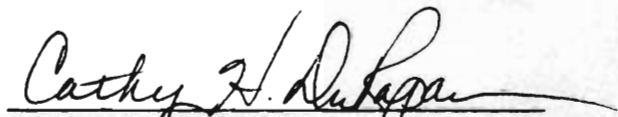
John A. Mmahat further declared that he first consulted with other members of MAPAC regarding appointment of a new Treasurer to replace Mr. Robert E. Jeffers, Jr. sometime during the month of March, 1984;

That by verbal agreement among members of the Board of Directors, the post of Treasurer was offered to Mr. Conrad A. Meyers, III;

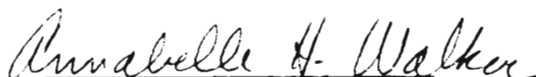
That Mr. Meyers informed Mr. Mmahat by the end of April, 1984 that he would accept the post of Treasurer;

That Mr. Conrad A. Meyers, III has, in truth and in fact, served as Treasurer of MAPAC since May 1, 1984, and is presently serving in that position.


JOHN A. MMAHAT


CATHY H. DURAPAU

SWORN TO AND SUBSCRIBED
before me, Notary, this
the 20th day of March,
1985, at Metairie, LA.


ANNABELLE H. WALKER
Notary Public

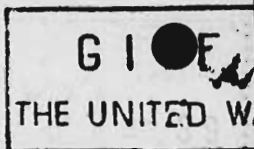
3 5 0 4 0 5 6 0 1
MMAHAT, DUFFY & RICHARDS

ATTORNEYS & COUNSELORS AT LAW

SUITE 300, N. B. C. BANK BUILDING

5500 VETERANS MEMORIAL BOULEVARD

METAIRIE, LOUISIANA 70003



John Warren McGarry
Chairman
Federal Election Commission
Washington, D.C. 20463

05 MAR 25



48:00

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Mortgage Attorneys Political) MUR 1761
Action Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 27, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1761:

1. Find reason to believe Mortgage Attorneys Political Action Committee violated 2 U.S.C. § 432(a).
2. Send the letter and Legal and Factual Analysis attached to the General Counsel's Report signed February 15, 1985.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

2-27-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

2-25-85, 8:36
2-25-85, 11:00

85040560105



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 5, 1985

Mortgage Attorneys Political
Action Committee
5500 Veterans Memorial Boulevard
Suite 300
Metairie, Louisiana 70003

RE: MUR 1761

Dear Madam or Sir:

On February 27, 1985, the Federal Election Commission determined that there is reason to believe Mortgage Attorneys Political Action Committee, violated 2 U.S.C. § 432(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's 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 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 ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against the committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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.

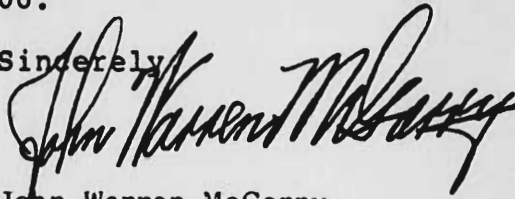
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Mortgage Attorneys Political
Action Committee
Page 2

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 Judy Thedford, at (202) 523-4000.

Sincerely,



John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

85040560107



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mortgage Attorneys Political
Action Committee
5500 Veterans Memorial Boulevard
Suite 300
Metairie, Louisiana 70003

RE: MUR 1761

Dear Madam or Sir:

On January , 1985, the Federal Election Commission determined that there is reason to believe Mortgage Attorneys Political Action Committee, violated 2 U.S.C. § 432(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's 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 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 ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against the committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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.

85040560108

**Mortgage Attorneys Political
Action Committee
Page 2**

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 Judy Thedford, at (202) 523-4000.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

9
3/1/85

85040560102

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: _____

ADDRESS: _____

TELEPHONE: _____

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

Date

Signature

RESPONDENT'S NAME: _____

ADDRESS: _____

HOME PHONE: _____

BUSINESS PHONE: _____

85040560110

DESCRIPTION OF PRELIMINARY PROCEDURES
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE
FEDERAL ELECTION COMMISSION

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of General Counsel where they are assigned a MUR (Matter Under Review) number, and assigned to a staff member.

Following review of the information which generated the MUR, a recommendation on how to proceed on the matter, which shall include preliminary legal and factual analysis, and any information compiled from materials available to the Commission shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act (FECA) may have occurred or is about to occur and that the Commission conduct an investigation of the matter; or (b) that the Commission find no reason to believe that a possible violation of the FECA has occurred and that the Commission close the file on the matter.

Thereafter, if the Commission decides by an affirmative vote of four (4) Commissioners that there is reason to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed, the Office of the General Counsel shall open an investigation into the matter. Upon notification of the Commission's finding(s), within 15 days a respondent(s) may submit any factual or legal materials relevant to the allegations. During the investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order answers to interrogatories. The respondent(s) may be contacted more than once by the Commission in its investigation.

If, during this period of investigation, the respondent(s) indicate a desire to enter into conciliation, the Office of General Counsel staff may begin the conciliation process prior to a finding of probable cause to believe a violation has been committed. Conciliation is an informal method of conference and persuasion to endeavor to correct or prevent a violation of the Federal Election Campaign Act (FECA). Most often, the result of conciliation is an agreement signed by the Commission and the respondent(s). The Conciliation Agreement must be adopted by four votes of the Commission before it becomes final. After signature by the Commission and the respondent(s), the Commission shall make public the Conciliation Agreement.

[If the investigation warrants], and no conciliation agreement is entered into prior to a probable cause to believe finding, the General Counsel must notify the respondent(s) of his intent to proceed to a vote on probable cause to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed. Included with the notification to the respondent(s) shall be a brief setting forth the position of the General Counsel on the legal and factual issues of the case. Within 15 days of receipt of such brief, the respondent(s) may submit a brief posing the position of respondent(s) and replying to the brief of the General Counsel. Both briefs will then be filed with the Commission Secretary and will be considered by the Commission. Thereafter, if the Commission determines by an affirmative vote of four (4) Commissioners, that there is probable cause to believe that a violation of the FECA has been committed or is about to be committed conciliation must be undertaken for a period of at least 30 days but not more than 90 days. If the Commission is unable to correct or prevent any violation of the FECA through conciliation the Office of General Counsel may recommend that the Commission file a civil suit against the respondent(s) to enforce the Federal Election Campaign Act (FECA). Thereafter, the Commission may, upon an affirmative vote of four (4) Commissioners, institute civil action for relief in the District Court of the United States.

See 2 U.S.C. § 437g, 11 C.F.R. Part 111.

November 1980

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1761
Staff MEMBER(S) & TEL. NO.
Judy Thedford (202) 523-4000

RESPONDENT Mortgage Attorneys Political Action Committee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

13
11
11
0
5
3
0
4
0
5
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8
Mortgage Attorneys Political Action Committee ("MAPAC") and Anna Atchley, as assistant treasurer, was referred to the Office of General Counsel by the Reports Analysis Division on July 5, 1984, for its failure to file the 1984 April Quarterly Report. The referral noted that the assistant treasurer was being named since the treasurer, Robert E. Jeffers, Jr., had passed away in February of 1984.

The Commission has previously found reason to believe MAPAC and Anna Atchley, as assistant treasurer, violated the Act by failing to timely file its 1984 April Quarterly report. A brief concerning the 2 U.S.C. § 434(a) violation was forwarded to the respondents on November 20, 1984.

This report will recommend finding reason to believe against MAPAC for its failure to have a treasurer and for accepting contributions and making expenditures while the treasurer's office was vacant.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 432(a) requires every political committee to have a treasurer. No contributions or expenditures are to be accepted or made by or on behalf of a political committee at a time when there is a vacancy in the office of the treasurer. Additionally, no expenditures shall be made for or on behalf of a political

committee without the authorization of its treasurer or an agent authorized orally or in writing by the treasurer.

11 C.F.R. § 102.6 allows a committee to designate an assistant treasurer who shall assume the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office of the treasurer.

In this case, Robert Jeffers, Jr. and Anna Atchley are the last designated treasurer and assistant treasurer, respectively. The amendment disclosing this information was dated February 24, 1982. No additional amendments have been filed.

In a letter dated July 13, 1984, John DeVay, a bookkeeper with MAPAC, disclosed that the treasurer had died and the assistant treasurer had left MAPAC in the late fall of 1983. Therefore, since February of 1984, MAPAC has not had a treasurer and the assistant treasurer position has been vacant since the fall of 1983. Accordingly, MAPAC should not have accepted contributions or made expenditures since February of 1984. MAPAC's reports disclose \$4,548 in receipts and \$6,013 in expenditures since January of 1984.

The Office of General Counsel recommends finding reason to believe MAPAC violated 2 U.S.C. § 432(a) by failing to have a treasurer and accepting contributions and making expenditures while the office of the treasurer was vacant.

85040560114



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cx*
DATE: February 26, 1985
SUBJECT: MUR 1761 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote ☒]
Sensitive ☒]
Non-Sensitive ☐]

24 Hour No Objection ☐]
Sensitive ☐]
Non-Sensitive ☐]

Information ☐]
Sensitive ☐]
Non-Sensitive ☐]

Other ☐]

DISTRIBUTION

Compliance ☒]
Audit Matters ☐]

Litigation ☐]
Closed MUR Letters ☐]

Status Sheets ☐]
Advisory Opinions ☐]

Other (see distribution
below) ☐]

35040560115

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Mortgage Attorneys Political)
Action Committee)

MUR 1761

FILED
OFFICE OF THE FEC
COMMISSION SECRETARY

25 FEB 25 A 0:36

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Mortgage Attorneys Political Action Committee ("MAPAC") and Anna Atchley, as assistant treasurer, was referred to the Office of General Counsel by the Reports Analysis Division on July 5, 1984, for its failure to file the 1984 April Quarterly Report. The referral noted that the assistant treasurer was being named since the treasurer, Robert E. Jeffers, Jr., had passed away in February of 1984.

The Commission has previously found reason to believe MAPAC and Anna Atchley, as assistant treasurer, violated the Act by failing to timely file its 1984 April Quarterly report. A brief concerning the 2 U.S.C. § 434(a) violation was forwarded to the respondents on November 20, 1984.

This report will recommend finding reason to believe against MAPAC for its failure to have a treasurer and for accepting contributions and making expenditures while the treasurer's office was vacant.

II. LEGAL AND FACTUAL ANALYSIS

2 U.S.C. § 432(a) requires every political committee to have a treasurer. No contributions or expenditures are to be accepted or made by or on behalf of a political committee at a time when there is a vacancy in the office of the treasurer. Additionally, no expenditures shall be made for or on behalf of a political

85040560116

committee without the authorization of its treasurer or an agent authorized orally or in writing by the treasurer.

11 C.F.R. § 102.6 allows a committee to designate an assistant treasurer who shall assume the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office of the treasurer.

In this case, Robert Jeffers, Jr. and Anna Atchley are the last designated treasurer and assistant treasurer, respectively. The amendment disclosing this information was dated February 24, 1982. No additional amendments have been filed.

In a letter dated July 13, 1984, John DeVay, a bookkeeper with MAPAC, disclosed that the treasurer had died and the assistant treasurer had left MAPAC in the late fall of 1983. Therefore, since February of 1984, MAPAC has not had a treasurer and the assistant treasurer position has been vacant since the fall of 1983. Accordingly, MAPAC should not have accepted contributions or made expenditures since February of 1984. MAPAC's reports disclose \$4,800 in receipts and \$6,013 in expenditures since January of 1984.

The Office of General Counsel recommends finding reason to believe MAPAC violated 2 U.S.C. § 432(a) by failing to have a treasurer and accepting contributions and making expenditures while the office of the treasurer was vacant.

35040560117

III RECOMMENDATIONS

- 1) Find reason to believe Mortgage Attorneys Political Action Committee violated 2 U.S.C. § 432(a).
2. Send the attached letter and Legal and Factual Analysis.

Charles N. Steele
General Counsel

Date

February 15, 1995

By:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments:

Letter
Legal and Factual Analysis

85040560118



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mortgage Attorneys Political
Action Committee
5500 Veterans Memorial Boulevard
Suite 300
Metairie, Louisiana 70003

RE: MUR 1761

Dear Madam or Sir:

On January , 1985, the Federal Election Commission determined that there is reason to believe Mortgage Attorneys Political Action Committee, violated 2 U.S.C. § 432(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's 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 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 ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against the committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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.

①

Mortgage Attorneys Political
Action Committee
Page 2

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 Judy Thedford, at (202) 523-4000.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

85040560120

(2)

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1761
Staff MEMBER(S) & TEL. NO.
Judy Thedford (202) 523-4000

RESPONDENT Mortgage Attorneys Political Action Committee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Mortgage Attorneys Political Action Committee ("MAPAC") and Anna Atchley, as assistant treasurer, was referred to the Office of General Counsel by the Reports Analysis Division on July 5, 1984, for its failure to file the 1984 April Quarterly Report. The referral noted that the assistant treasurer was being named since the treasurer, Robert E. Jeffers, Jr., had passed away in February of 1984.

The Commission has previously found reason to believe MAPAC and Anna Atchley, as assistant treasurer, violated the Act by failing to timely file its 1984 April Quarterly report. A brief concerning the 2 U.S.C. § 434(a) violation was forwarded to the respondents on November 20, 1984.

This report will recommend finding reason to believe against MAPAC for its failure to have a treasurer and for accepting contributions and making expenditures while the treasurer's office was vacant.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 432(a) requires every political committee to have a treasurer. No contributions or expenditures are to be accepted or made by or on behalf of a political committee at a time when there is a vacancy in the office of the treasurer. Additionally, no expenditures shall be made for or on behalf of a political

committee without the authorization of its treasurer or an agent authorized orally or in writing by the treasurer.

11 C.F.R. § 102.6 allows a committee to designate an assistant treasurer who shall assume the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office of the treasurer.

In this case, Robert Jeffers, Jr. and Anna Atchley are the last designated treasurer and assistant treasurer, respectively. The amendment disclosing this information was dated February 24, 1982. No additional amendments have been filed.

In a letter dated July 13, 1984, John DeVay, a bookkeeper with MAPAC, disclosed that the treasurer had died and the assistant treasurer had left MAPAC in the late fall of 1983. Therefore, since February of 1984, MAPAC has not had a treasurer and the assistant treasurer position has been vacant since the fall of 1983. Accordingly, MAPAC should not have accepted contributions or made expenditures since February of 1984. MAPAC's reports disclose \$4,548 in receipts and \$6,013 in expenditures since January of 1984.

The Office of General Counsel recommends finding reason to believe MAPAC violated 2 U.S.C. § 432(a) by failing to have a treasurer and accepting contributions and making expenditures while the office of the treasurer was vacant.

35040560122
(4)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Mortgage Attorneys Political)
Action Committee and) MUR 1761
Anna Atchley, as Assistant)
Treasurer)

CERTIFICATION

8 5 0 4 0 5 6 0 1 2 3
I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of January 15, 1985, do hereby certify that the Commission decided by a vote of 5-0 to return the January 7, 1985 report on MUR 1761 to the Office of General Counsel in order that it be revised to include a finding of reason to believe the Mortgage Attorneys Political Action Committee has violated the Act for failure to have named a treasurer since the departure of Anna Atchley.

Commissioners Aikens, Elliott, Harris, McGarry, and Reiche voted affirmatively for the decision; Commissioner McDonald was not present at the time of the vote.

Attest:

1-17-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cut*
DATE: January 7, 1985
SUBJECT: MUR 1761 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of January 15, 1985

Open Session _____

Closed Session XX

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other [X]

DISTRIBUTION

Compliance [X]
Audit Matters []
Litigation []
Closed MUR Letters []
Status Sheets []
Advisory Opinions []
Other (see distribution below) []

SENSITIVE

CIRCULATE ON BLUE PAPER

ON AGENDA - 1/15/85

85040560124

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEC
COMMISSION SECRETARY

Mortgage Attorneys Political
Action Committee and
Anna Atchley, as Assistant Treasurer

RECEIVED
FEC
COMMISSION SECRETARY
JAN 17 1985 11:04

GENERAL COUNSEL'S REPORT

EXECUTIVE SESSION

JAN 15 1985

I. BACKGROUND

On July 5, 1984, the Reports Analysis Division ("RAD") referred to the Office of General Counsel the Mortgage Attorneys Political Action Committee ("MAPAC") for its failure to file the 1984 April Quarterly Report of Receipts and Disbursements.

On July 23, 1984, MAPAC filed the 1984 April Quarterly Report.

On August 6, 1984, the Commission found reason to believe that MAPAC and Anna Atchley, as assistant treasurer^{*/}, violated 2 U.S.C. § 434(a)(4)(A)(i) by not filing a timely quarterly report of receipts and disbursements. On August 8, 1984, MAPAC was notified of the Commission's finding. MAPAC did not respond to the Commission's reason to believe finding. On November 20, 1984, the Commission sent a brief stating the position of the Office of General Counsel on the legal and factual issues of the case to the respondent. To date, MAPAC has not responded to the brief.

^{*/} Anna Atchley, the assistant treasurer, was named in this matter at the reason to believe stage because the treasurer, Robert Jeffers, had passed away. Pursuant to 11 C.F.R. § 102.7(a), an assistant treasurer assumes the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office. In a cover letter accompanying the 1984 April Quarterly Report, John DeVay noted that Anna Atchley had left MAPAC and that MAPAC was in the process of appointing a new treasurer. John DeVay signed the 1984 April Quarterly Report as "Preparer." MAPAC has not amended its Statement of Organization naming a new treasurer, thus Anna Atchley is still the Assistant Treasurer of record.

II. LEGAL ANALYSIS

The Office of General Counsel's analysis is contained in its brief of November 20, 1984.

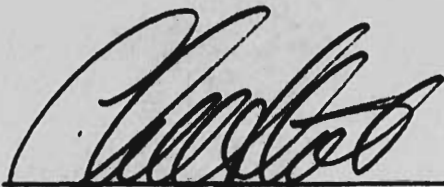
IV. RECOMMENDATION

1. Find probable cause to believe that Mortgage Attorneys Political Action Committee and Anna Atchley, as Assistant Treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) by not filing a timely quarterly report of receipts and disbursements.

35040560126

2. Approve the attached proposed conciliation agreement.
3. Approve and send the attached letters.

7 January 1945
Date


Charles N. Steele
General Counsel

Attachments:

1. Proposed conciliation agreement
2. Letter to Respondent

85040560127



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

NOV 20 12:14

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cut*
DATE: November 20, 1984
SUBJECT: MUR 1761 - Memorandum and General Counsel's Brief

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []
24 Hour No Objection []
Sensitive []
Non-Sensitive []
Information [X]
Sensitive [X]
Non-Sensitive []
Other []

DISTRIBUTION

Compliance [X]
Audit Matters []
Litigation []
Closed MUR Letters []
Status Sheets []
Advisory Opinions []
Other (see distribution below) []

8504050123



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE FEC
SECRETARY

04 NOV 20 P12:14

November 20, 1984

MEMORANDUM TO: The Commission

FROM:

Charles N. Steele
General Counsel

SUBJECT:

MUR 1761
Mortgage Attorneys Political Action Committee
and Anna Atchley, as Assistant Treasurer

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on November 20, 1984. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

35040560129

BEFORE THE FEDERAL ELECTION COMMISSION

Mortgage Attorneys Political)
 Action Committee and) MUR 1761
 Anna Atchley, Assistant Treasurer)

GENERAL COUNSEL BRIEF

I. STATEMENT OF THE CASE

On July 5, 1984, the Reports Analysis Division ("RAD") referred to the Office of General Counsel the Mortgage Attorneys Political Action Committee ("MAPAC") for its failure to file the 1984 April Quarterly Report of Receipts and Disbursements.

The Reports Analysis Division notified MAPAC on March 22, 1984, that the 1984 Quarterly Report was due on April 15, 1984. MAPAC was sent a Non-Filer Notice on May 8, 1984. No response was received.

The Reports Analysis Division analyst called on June 5, 1984, to speak to the treasurer, Robert Jeffers, Jr. The receptionist informed the RAD analyst that Mr. Jeffers died in February. The RAD analyst was then referred to John Mmahat and given another telephone number. The RAD analyst called Mr. Mmahat but he was not available. A message was left with the receptionist to have someone return the call.

On June 6, 1984, the RAD analyst received a message that John DeVay, a MAPAC representative had called. The call was returned, but Mr. DeVay was not available. The RAD analyst called again on June 7 and 8, but Mr. DeVay did not return the calls.

On July 23, 1984, MAPAC filed the 1984 April Quarterly Report.

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On August 6, 1984, the Commission found reason to believe that MAPAC and Anna Atchley, as assistant treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) by not filing a timely quarterly report of receipts and disbursements. On August 8, 1984, MAPAC was notified of the Commission's finding. MAPAC did not respond to the Commission's reason to believe finding.

II. LEGAL ANALYSIS

2 U.S.C. § 434(a)(4)(A)(i) provides that all political committees other than the authorized committees of a candidate shall file a quarterly report, in a calendar year in which a regularly scheduled general election is held, which shall be filed no later than the 15th day after the last day of each calendar quarter, except that the report for the final calendar quarter of the year shall be filed on January 31 of the following calendar year.

Therefore, the Office of General Counsel recommends finding probable cause to believe that MAPAC and Anna Atchely, as assistant treasurer^{*/}, violated 2 U.S.C. § 434(a)(4)(A)(i) by not filing a timely 1984 April Quarterly Report of receipts and disbursements.

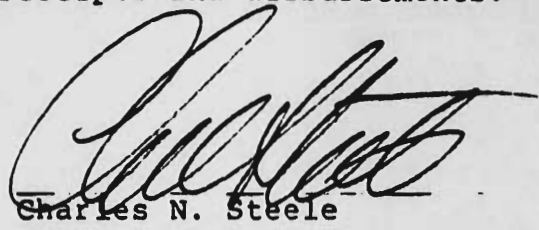
^{*/} Anna Atchley, the assistant treasurer, was named in this matter at the reason to believe stage because the treasurer, Robert Jeffers, had passed away. Pursuant to 11 C.F.R. § 102.7(a), an assistant treasurer assumes the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office. In a cover letter accompanying the 1984 April Quarterly Report, John DeVay noted that Anna Atchley had left MAPAC and that MAPAC was in the process of appointing a new treasurer. John DeVay signed the 1984 April Quarterly Report as "Preparer." MAPAC has not amended its Statement of Organization naming a new treasurer, thus Anna Atchley is still the Assistant Treasurer of record.

15040560131

III. RECOMMENDATION

1. Find probable cause to believe that Mortgage Attorneys Political Action Committee and Anna Atchley, as Assistant Treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) by not filing a timely quarterly report of receipts and disbursements.

20 Nov. 1981
Date

By: 
Charles N. Steele
General Counsel

85040560132



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 20, 1984

Anna Atchley, Assistant Treasurer
c/o John DeVay
Mortgage Attorneys Political Action Committee
5500 Veterans Memorial Boulevard, Suite 300
Metairie, Louisiana 70003

RE: MUR 1761
Mortgage Attorneys Political
Action Committee

Dear Ms. Atchley:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on August 6, 1984, found reason to believe that MAPAC had violated 2 U.S.C. § 434(a)(4)(A)(i), and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

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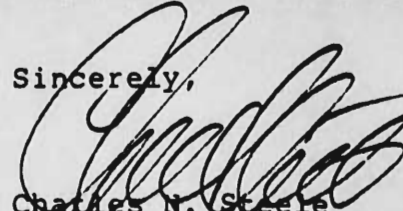
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Anna Atchley, Assistant Treasurer
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Martha Romney, the staff member assigned to handle this matter, at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

85040560134



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

OFFICE OF THE FEC
COMMISSION SECRETARY

84 AUG 8 AIO: 16

August 8, 1984

SENSITIVE

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

SUBJECT: RAD Referral 84NF-45

On August 6, 1984 the Commission approved the recommendation that the subject RAD Referral be made a MUR. Therefore, all documents which had previously been identified as RAD Referral 84NF-45 should now become MUR 1761.

Attachment
Copy of Certification

35040560135

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Mortgage Attorneys Political)
Action Committee)

RAD Referral 84NF-45

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 6, 1984, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral 84NF-45:

1. Open a MUR.
2. Find reason to believe that MAPAC and Anna Atchley, as assistant treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), and 11 C.F.R. § 104.5(c)(1)(i) by not filing a timely quarterly report of receipts and disbursements.
3. Approve the letter attached to the First General Counsel's Report dated August 2, 1984.

Commissioners Aikens, Elliott, Harris, McDonald and McGarry voted affirmatively in this matter; Commissioner Reiche did not cast a vote.

Attest:

8-7-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

35040560136

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Mortgage Attorneys Political) RAD Referral 84NF-45
Action Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 6, 1984, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral 84NF-45:

1. Open a MUR.
2. Find reason to believe that MAPAC and Anna Atchley, as assistant treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), and 11 C.F.R. § 104.5(c)(1)(i) by not filing a timely quarterly report of receipts and disbursements.
3. Approve the letter attached to the First General Counsel's Report dated August 2, 1984.

Commissioners Aikens, Elliott, Harris, McDonald and McGarry voted affirmatively in this matter; Commissioner Reiche did not cast a vote.

Attest:

8-7-84

Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

85040560137



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 8, 1984

Anna Atchley, Assistant Treasurer
MAPAC, Inc.
5500 Veterans Memorial Boulevard
Suite 300
Metairie, Louisiana 70003

Re: MUR 1761
Mortgage Attorneys Political
Action Committee

Dear Ms. Atchley:

On August 6, 1984, the Federal Election Commission determined that there is reason to believe that Mortgage Attorneys Political Action Committee and you, as assistant treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 104.5(c)(1)(i). The General Counsel's 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 ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as assistant treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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.

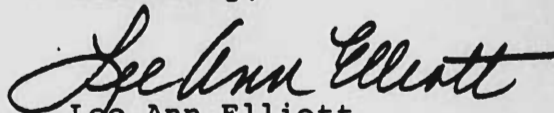
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Anna Atchley, Assistant Treasurer
Page 2

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 Martha Romney, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,


Lee Ann Elliott
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

85040560139

85040560140

RESPONDENT **Mortgage Attorneys Political Action
Committee**

On July 5, 1984, the Reports Analysis Division ("RAD") referred to the Office of General Counsel the Mortgage Attorneys Political Action Committee ("MAPAC") for its failure to file the 1984 April Quarterly Report of Receipts and Disbursements.

The Reports Analysis Division notified MAPAC on March 22, 1984, that the 1984 Quarterly Report was due on April 15, 1984.

The Report Analysis Division analyst called on June 5, 1984, to speak to the treasurer, Robert Jeffers, Jr. The receptionist informed the RAD analyst that Mr. Jeffers died in February.* / The RAD analyst was then referred to John Mmahat and given another telephone number. The RAD analyst called Mr. Mmahat but he was not available. A message was left with the receptionist to have someone return the call.

*/ Reports filed with the Commission indicate that MAPAC has an assistant treasurer, Anna Atchley. Pursuant to 11 C.F.R. § 102.7(a), an assistant treasurer assumes the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office. Therefore, we have substituted Anna Atchley for Robert Jeffers, Jr., as the named treasurer of MAPAC.

returned, but Mr. DeVay was not available. The RAD analyst called again on June 7 and 8, but Mr. DeVay did not return the calls.

2 U.S.C. § 434(a)(4)(A)(i) provides that all political committees other than the authorized committees of a candidate shall file a quarterly report, in a calendar year in which a regularly scheduled general election is held, which shall be filed no later than the 15th day after the last day of each calendar quarter, except that the report for the final calendar quarter of the year shall be filed on January 31 of the following calendar year.

Therefore, the Office of General Counsel recommends finding reason to believe that MAPAC violated 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i) by not filing a timely 1984 April Quarterly Report of receipts and disbursements.

85040560141



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Anna Atchley, Assistant Treasurer
MAPAC, Inc.
5500 Veterans Memorial Boulevard
Suite 300
Metairie, Louisiana 70003

Re: MUR 1761 *mk*
Mortgage Attorneys Political
Action Committee

Dear Ms. Atchley:

On August 6, 1984, the Federal Election Commission determined that there is reason to believe that Mortgage Attorneys Political Action Committee and you, as assistant treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 104.5(c)(1)(i). The General Counsel's 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 ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as assistant treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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.

85040560142

Anna Atchley, Assistant Treasurer
Page 2

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 Martha Romney, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Lee Ann Elliott
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

85040560143



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cit*
DATE: August 2, 1984
SUBJECT: RAD Referral 84NF-45: First General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [X]
Sensitive [X]
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]
Audit Matters []

Litigation []
Closed MUR Letters []

Status Sheets []
Advisory Opinions []

Other (see distribution below) []

85040560144

SENSITIVE

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

84 AUG 2 AIO: 23

DATE & TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION

8-2-84 10:25

RAD 84NF-45

STAFF MEMBER Marty Romney

SOURCE OF REFERRAL: Internally Generated

RESPONDENT'S NAME: Mortgage Attorneys Political Action
Committee

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(A)(i)
11 C.F.R. § 104.5(c)(1)(i)

INTERNAL REPORTS CHECKED: MUR 1679

FEDERAL AGENCIES CHECKED: None

BACKGROUND

On July 5, 1984, the Reports Analysis Division ("RAD") referred to the Office of General Counsel the Mortgage Attorneys Political Action Committee ("MAPAC") for its failure to file the 1984 April Quarterly Report of Receipts and Disbursements.

FACTUAL AND LEGAL ANALYSIS

The Reports Analysis Division notified MAPAC on March 22, 1984, that the 1984 Quarterly Report was due on April 15, 1984.

MAPAC was sent a Non-Filer Notice on May 8, 1984. No response was received.

The Report Analysis Division analyst called on June 5, 1984, to speak to the treasurer, Robert Jeffers, Jr. The receptionist informed the RAD analyst that Mr. Jeffers died in February.* / The RAD analyst was then referred to John Mmahat and given

* / Reports filed with the Commission indicate that MAPAC has an assistant treasurer, Anna Atchley. Pursuant to 11 C.F.R. § 102.7(a), an assistant treasurer assumes the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office. Therefore, we have substituted Anna Atchley for Robert Jeffers, Jr., as the named treasurer of MAPAC.

35040560145

another telephone number. The RAD analyst called Mr. Mmahat but he was not available. A message was left with the receptionist to have someone return the call.

On June 6, 1984, the RAD analyst received a message that John DeVay, a MAPAC representative had called. The call was returned, but Mr. DeVay was not available. The RAD analyst called again on June 7 and 8, but Mr. DeVay did not return the calls.

2 U.S.C. § 434(a)(4)(A)(i) provides that all political committees other than the authorized committees of a candidate shall file a quarterly report, in a calendar year in which a regularly scheduled general election is held, which shall be filed no later than the 15th day after the last day of each calendar quarter, except that the report for the final calendar quarter of the year shall be filed on January 31 of the following calendar year.

Therefore, the Office of General Counsel recommends finding reason to believe that MAPAC violated 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i) by not filing a timely 1984 April Quarterly Report of receipts and disbursements.

RECOMMENDATION

1. Open a MUR.
2. Find reason to believe that MAPAC and Anna Atchley, as assistant treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), and 11 C.F.R. § 104.5(c)(1)(i) by not filing a timely quarterly report of receipts and disbursements.

85040560146

3. Approve attached letter.

Charles N. Steele
General Counsel

August 1, 1984
Date

Kenneth A. Gross
By: Kenneth A. Gross
Associate General Counsel

Attachments
RAD Referral
G.C. Legal & Factual Analysis
Letter

85040560147

REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: 5 July 1984

ANALYST: Theresa Harley

I. COMMITTEE: Mortgage Attorneys Political Action
Committee (C00120659)
Anna Atchley, Assistant Treasurer*/
5500 Veterans Memorial Blvd.,
Suite 300
Metairie, LA 70003

II. RELEVANT STATUTE: 2 U.S.C. 434(a)(4)(A)(i)
11 CFR 104.5(c)(1)(i)

III. BACKGROUND:

Non-filing of the 1984 April Quarterly Report

The Mortgage Attorneys Political Action Committee ("MAPAC") failed to file the 1984 April Quarterly Report of Receipts and Disbursements. MAPAC was notified on March 22, 1984 that the report was due on April 15, 1984 (Attachment 2).

MAPAC was sent a Non-Filer Notice on May 8, 1984 (Attachment 3). No response was received.

The Reports Analysis Division ("RAD") analyst called on June 5, 1984 to speak to the treasurer, Robert Jeffers, Jr. The receptionist informed the RAD analyst that Mr. Jeffers died in February. The RAD analyst was then referred to John Mmahat and given another telephone number. The RAD analyst called Mr. Mmahat but he was not available. A message was left with the receptionist to have someone return the call (Attachment 4).

*/ The treasurer, Robert E. Jeffers Jr., is deceased and MAPAC has not filed a statement designating a new treasurer.

85040560148

MORTGAGE ATTORNEYS POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

On June 6, 1984, the RAD analyst received a message that John DeVay, a MAPAC representative had called. The call was returned, but Mr. DeVay was not available. The RAD analyst called again on June 7 and 8, but Mr. DeVay did not return the calls (Attachment 5).

As of this date, the 1984 April Quarterly Report has not been received.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

85040560149

85040560150

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 3JUL84
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
HAPAC INC CONNECTED ORGANIZATION: NONE				NON-PARTY QUALIFIED		ID #C00120659
1983	MID-YEAR REPORT	10,322	13,445	1JAN83 -30JUN83	9	83FEC/280/1828
	REQUEST FOR ADDITIONAL INFORMATION			1JAN83 -30JUN83	1	84FEC/313/1662
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN83 -30JUN83	2	84FEC/315/3977
	YEAR-END	12,371	9,178	1JUL83 -31DEC83	9	84FEC/295/4184
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31DEC83	2	84FEC/314/2131
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL83 -31DEC83	3	84FEC/316/2928
1984	NOTICE OF FAILURE TO FILE			1JAN84 -31MAR84	1	84FEC/313/4759
TOTAL		22,693	0 22,623	0	27	TOTAL PAGES

All reports have received review

Cash on hand as of 12/31/83 \$3,278
Debts (owed by) as of 12/31/83 \$2,568

ATTACHMENT 1
(PAGE 1 of 3)

85040560151

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 3JUL84
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
MAPAC INC CONNECTED ORGANIZATION: NONE				NON-PARTY QUALIFIED		ID #C00120659
1981	STATEMENT OF ORGANIZATION - AMENDMENT MISCELLANEOUS REPORT MID-YEAR REPORT REQUEST FOR ADDITIONAL INFORMATION REQUEST FOR ADDITIONAL INFORMATION 2ND REQUEST FOR ADDITIONAL INFORMATION REQUEST FOR ADDITIONAL INFORMATION 2ND YEAR-END YEAR-END - AMENDMENT REQUEST FOR ADDITIONAL INFORMATION REQUEST FOR ADDITIONAL INFORMATION 2ND	11,418 8,612 8,612	9,946 15,406 15,406	4JUL81 12AUG81 TO FEC 1JAN81 -30JUN81 1JAN81 -30JUN81 1JAN81 -30JUN81 1JAN81 -30JUN81 1JAN81 -30JUN81 1JUL81 -31DEC81 1JUL81 -31DEC81 1JUL81 -31DEC81	2 3 11 1 1 1 3 9 10	81FEC/203/3427 81FEC/204/1268 81FEC/204/3427 83FEC/274/0673 83FEC/276/0734 83FEC/290/0158 84FEC/290/0839 82FEC/223/3444 83FEC/280/1837 83FEC/274/0357
1982	STATEMENT OF ORGANIZATION - AMENDMENT STATEMENT OF ORGANIZATION - AMENDMENT FEBRUARY MONTHLY REQUEST FOR ADDITIONAL INFORMATION REQUEST FOR ADDITIONAL INFORMATION 2ND REQUEST FOR ADDITIONAL INFORMATION REQUEST FOR ADDITIONAL INFORMATION 2ND MARCH MONTHLY APRIL MONTHLY REQUEST FOR ADDITIONAL INFORMATION REQUEST FOR ADDITIONAL INFORMATION 2ND REQUEST FOR ADDITIONAL INFORMATION REQUEST FOR ADDITIONAL INFORMATION 2ND MAY MONTHLY MAY MONTHLY - AMENDMENT REQUEST FOR ADDITIONAL INFORMATION REQUEST FOR ADDITIONAL INFORMATION 2ND REQUEST FOR ADDITIONAL INFORMATION REQUEST FOR ADDITIONAL INFORMATION 2ND JUNE MONTHLY JUNE MONTHLY - AMENDMENT REQUEST FOR ADDITIONAL INFORMATION REQUEST FOR ADDITIONAL INFORMATION 2ND REQUEST FOR ADDITIONAL INFORMATION REQUEST FOR ADDITIONAL INFORMATION 2ND JULY MONTHLY JULY MONTHLY - AMENDMENT REQUEST FOR ADDITIONAL INFORMATION REQUEST FOR ADDITIONAL INFORMATION 2ND AUGUST MONTHLY AUGUST MONTHLY - AMENDMENT SEPTEMBER MONTHLY REQUEST FOR ADDITIONAL INFORMATION	4,794 2,766 299 1,289 3,289 1,039 1,522 4,194 4,194 9,789 9,789 2,706	3,628 0 3,746 3,573 3,573 1,477 1,477 935 2,679 7,103 7,843 2,140	4FEB82 4MAR82 1JAN82 -31JAN82 1JAN82 -31JAN82 31JAN82 -31JAN82 1JAN82 -31JAN82 1JAN82 -31JAN82 1FEB82 -28FEB82 1MAR82 -31MAR82 1MAR82 -31MAR82 1MAR82 -31MAR82 1MAR82 -31MAR82 1MAR82 -31MAR82 1APR82 -30APR82 1APR82 -30APR82 1APR82 -30APR82 1APR82 -30APR82 1APR82 -30APR82 1MAY82 -31MAY82 1MAY82 -31MAY82 1MAY82 -30MAY82 1MAY82 -30MAY82 1MAY82 -31MAY82 1MAY82 -31MAY82 1JUN82 -30JUN82 1JUN82 -30JUN82 1JUN82 -30JUN82 1JUN82 -30JUN82 1JUL82 -31JUL82 1JUL82 -31JUL82 1AUG82 -31AUG82 1AUG82 -31AUG82	1 2 6 1 1 1 1 4 4 1 1 1 1 5 6 1 1 1 1 7 7 1 1 2 1 7 9 1 1 9 11 6 1	82FEC/223/3443 82FEC/225/0024 82FEC/224/5287 83FEC/274/0674 83FEC/276/0733 83FEC/290/0157 84FEC/290/1170 82FEC/225/4533 82FEC/230/5398 83FEC/274/0673 83FEC/276/0732 83FEC/290/0156 84FEC/290/1171 82FEC/234/209 83FEC/280/1847 83FEC/274/0352 83FEC/276/0735 83FEC/290/0155 84FEC/290/1172 82FEC/240/0022 83FEC/280/1853 83FEC/290/0159 84FEC/290/1173 83FEC/274/0346 83FEC/276/0737 82FEC/240/0029 83FEC/280/1860 83FEC/274/0672 83FEC/276/0731 82FEC/242/1946 83FEC/280/1869 82FEC/253/2007 83FEC/290/0161

ATTACHMENT 1
(PAGE 2 of 3)

85040560152

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 3JUL84
PAGE 2

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1AUG82 -31AUG82	1	84FEC/290/1174
	OCTOBER MONTHLY	489	1,680	1SEP82 -30SEP82	6	82FEC/253/2013
	REQUEST FOR ADDITIONAL INFORMATION			1SEP82 -30SEP82	1	83FEC/290/0160
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1SEP82 -30SEP82	1	84FEC/290/1175
	PRE-GENERAL	914	500	1OCT82 -13OCT82	6	82FEC/255/1492
	PRE-GENERAL - AMENDMENT	914	500	1OCT82 -13OCT82	6	83FEC/280/1899
	REQUEST FOR ADDITIONAL INFORMATION			1OCT82 -13OCT82	2	83FEC/274/0360
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT82 -13OCT82	1	83FEC/276/0736
	REQUEST FOR ADDITIONAL INFORMATION			1OCT82 -13OCT82	2	83FEC/289/0275
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT82 -13OCT82	1	84FEC/290/1176
	POST-GENERAL	2,002	1,400	14OCT82 -22NOV82	6	82FEC/258/0180
	POST-GENERAL - AMENDMENT	2,002	1,736	14OCT82 -22NOV82	7	83FEC/280/1896
	REQUEST FOR ADDITIONAL INFORMATION			14OCT82 -22NOV82	3	83FEC/274/0360
	REQUEST FOR ADDITIONAL INFORMATION 2ND			14OCT82 -22NOV82	13	83FEC/275/4327
	YEAR-END	209	1,252	22NOV82 -31DEC82	7	83FEC/264/2595
	YEAR-END - AMENDMENT	209	1,252	22NOV82 -31DEC82	7	83FEC/280/1893
	REQUEST FOR ADDITIONAL INFORMATION			22NOV82 -31DEC82	2	83FEC/274/0354
	REQUEST FOR ADDITIONAL INFORMATION 2ND			22NOV82 -31DEC82	1	83FEC/276/0730
	TOTAL	53,003	0	55,606	0	221 TOTAL PAGES

All reports have received review

Cash on hand as of 12/31/82 \$3,208
Debts (owed by) as of 12/31/82 \$2,300

ATTACHMENT 1
(PAGE 3 OF 3)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 22, 1984

APRIL REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES

WHO MUST FILE

ALL unauthorized political committees, except those that file monthly, must file a quarterly report by April 15, 1984. (See below)

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through March 31, 1984. Political committees which have not previously filed a financial disclosure report covering any period in 1984 should report all financial activity from the later of January 1, 1984, or date of registration,* through March 31, 1984.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than April 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business April 15, 1984.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

MONTHLY FILERS

Committees that file on a monthly schedule must file their next report by April 20, 1984, and disclose all financial activity of their committee from March 1 through March 31, 1984. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month.

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

*The first report filed by a committee shall include all amounts received or disbursed in 1984, and prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b) Activity which occurred prior to 1984 should be reported separately.

-over-



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

May 8, 1984

Robert E. Jeffers, Jr., Treasurer
MAPAC, Inc.
5500 Veterans Mem Boulevard
Suite 300
Metairie, LA 70003

Identification Number: C00120659

Reference: April Quarterly Report (1/1/84-3/31/84)

Dear Mr. Jeffers:

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 Disbursements as required by the Federal Election Campaign Act. 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, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Theresa Harley on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson", is written over the typed name.

John D. Gibson
Assistant Staff Director
Reports Analysis Division

85040560154

FROM: Theresa Harley

DATE : 6/6/84

TO: Receptionist

TELEPHONE: (504) 566-1667

NAME OF COMMITTEE: Mortgage Attorneys Political Action Committee

Today I called to speak to Mr. Jeffers about the non-filing of the 1984 April Quarterly report. The receptionist told me Mr. Jeffers died in February. She then referred me to John Mmahat and gave me his telephone number. I called the office to speak to Mr. Mmahat but he was not available. I left a message with the secretary to have him return my call.

85040560155

FROM: Theresa Harley

DATE : June 6,7,8, 1984

TO: John Devay

TELEPHONE: (504) 887-6962

NAME OF COMMITTEE: Mortgage Attorneys Political Action Committee

Today, 6/6 I received a message that Mr. Devay had called. I returned the call but Mr. Devay was not available.

I called again on June 7th and 8th but Mr. Devay was not available. I left messages for him to return my call but he never did.

85040560156

*/ Reports filed with the Commission indicate that MAPAC has an assistant treasurer, Anna Atchley. Pursuant to 11 C.F.R. § 102.7(a), an assistant treasurer assumes the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office. Therefore, we have substituted Anna Atchley for Robert Jeffers, Jr., as the named treasurer of MAPAC.

returned, but Mr. DeVay was not available. The RAD analyst called again on June 7 and 8, but Mr. DeVay did not return the calls.

2 U.S.C. § 434(a)(4)(A)(i) provides that all political committees other than the authorized committees of a candidate shall file a quarterly report, in a calendar year in which a regularly scheduled general election is held, which shall be filed no later than the 15th day after the last day of each calendar quarter, except that the report for the final calendar quarter of the year shall be filed on January 31 of the following calendar year.

Therefore, the Office of General Counsel recommends finding reason to believe that MAPAC violated 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i) by not filing a timely 1984 April Quarterly Report of receipts and disbursements.

85040560153



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Anna Atchley, Assistant Treasurer
MAPAC, Inc.
5500 Veterans Memorial Boulevard
Suite 300
Metairie, Louisiana 70003

Re: MUR
Mortgage Attorneys Political
Action Committee

Dear Ms. Atchley:

On , 1984, the Federal Election Commission determined that there is reason to believe that Mortgage Attorneys Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 104.5(c)(1)(i). The General Counsel's 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 ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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.

85040560159

Anna Atchley, Assistant Treasurer
Page 2

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 Martha Romney, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

85040560160

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 5 July 1984

ANALYST: Theresa Harley

I. COMMITTEE: Mortgage Attorneys Political Action
Committee (C00120659)
Anna Atchley, Assistant Treasurer*/
5500 Veterans Memorial Blvd.,
Suite 300
Metairie, LA 70003

II. RELEVANT STATUTE: 2 U.S.C. 434(a)(4)(A)(i)
11 CFR 104.5(c)(1)(i)

III. BACKGROUND:

Non-filing of the 1984 April Quarterly Report

The Mortgage Attorneys Political Action Committee ("MAPAC") failed to file the 1984 April Quarterly Report of Receipts and Disbursements. MAPAC was notified on March 22, 1984 that the report was due on April 15, 1984 (Attachment 2).

MAPAC was sent a Non-Filer Notice on May 8, 1984 (Attachment 3). No response was received.

The Reports Analysis Division ("RAD") analyst called on June 5, 1984 to speak to the treasurer, Robert Jeffers, Jr. The receptionist informed the RAD analyst that Mr. Jeffers died in February. The RAD analyst was then referred to John Mmahat and given another telephone number. The RAD analyst called Mr. Mmahat but he was not available. A message was left with the receptionist to have someone return the call (Attachment 4).

*/ The treasurer, Robert E. Jeffers Jr., is deceased and MAPAC has not filed a statement designating a new treasurer.

85040560161

**MORTGAGE ATTORNEYS POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2**

On June 6, 1984, the RAD analyst received a message that John DeVay, a MAPAC representative had called. The call was returned, but Mr. DeVay was not available. The RAD analyst called again on June 7 and 8, but Mr. DeVay did not return the calls (Attachment 5).

As of this date, the 1984 April Quarterly Report has not been received.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

85040560162

8 5 0 4 0 5 6 0 1 6 3

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 3JUL84
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
-----------	----------	----------	---------------	---------------------------------	---------------	-----------------------

HAPAC INC
CONNECTED ORGANIZATION: NONE

NON-PARTY QUALIFIED

ID #C00120659

1983 MID-YEAR REPORT	10,322	13,445	1JAN83 -30JUN83	9	83FEC/280/1828
REQUEST FOR ADDITIONAL INFORMATION			1JAN83 -30JUN83	1	84FEC/313/1662
REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN83 -30JUN83	2	84FEC/315/3977
YEAR-END	12,371	9,178	1JUL83 -31DEC83	9	84FEC/295/4184
REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31DEC83	2	84FEC/314/2131
REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL83 -31DEC83	3	84FEC/316/2928
1984 NOTICE OF FAILURE TO FILE			1JAN84 -31MAR84	1	84FEC/313/4759
TOTAL	22,693	0		27	TOTAL PAGES

All reports have received review

Cash on hand as of 12/31/83 \$3,278
Debts (owed by) as of 12/31/83 \$2,568

85040560164

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)DATE 3JUL84
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
MAPAC INC CONNECTED ORGANIZATION: NONE				NON-PARTY QUALIFIED	ID #C00120659	
1981	STATEMENT OF ORGANIZATION - AMENDMENT			4JUL81	2	81FEC/203/3427
	MISCELLANEOUS REPORT			12AUG81 TO FEC	3	81FEC/204/1268
	MID-YEAR REPORT	11,418	9,946	1JAN81 -30JUN81	11	81FEC/204/3655
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -30JUN81	1	83FEC/274/0675
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN81 -30JUN81	1	83FEC/276/0734
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -30JUN81	1	83FEC/290/0158
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN81 -30JUN81	3	84FEC/290/0839
	YEAR-END	8,612	15,406	1JUL81 -31DEC81	9	82FEC/223/3444
	YEAR-END - AMENDMENT	8,612	15,406	1JUL81 -31DEC81	10	83FEC/280/1837
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31DEC81	2	83FEC/274/0357
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL81 -31DEC81	1	83FEC/276/0729
1982	STATEMENT OF ORGANIZATION - AMENDMENT			4FEB82	1	82FEC/223/3443
	STATEMENT OF ORGANIZATION - AMENDMENT			4MAR82	2	82FEC/225/0024
	FEBRUARY MONTHLY	4,794	3,628	1JAN82 -31JAN82	6	82FEC/224/5287
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -31JAN82	1	83FEC/274/0674
	REQUEST FOR ADDITIONAL INFORMATION 2ND			31JAN82 -31JAN82	1	83FEC/276/0733
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -31JAN82	1	83FEC/290/0157
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN82 -31JAN82	1	84FEC/290/1170
	MARCH MONTHLY	2,766	0	1FEB82 -28FEB82	4	82FEC/225/4533
	APRIL MONTHLY	299	3,746	1MAR82 -31MAR82	4	82FEC/230/5398
	REQUEST FOR ADDITIONAL INFORMATION			1MAR82 -31MAR82	1	83FEC/274/0673
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAR82 -31MAR82	1	83FEC/276/0732
	REQUEST FOR ADDITIONAL INFORMATION			1MAR82 -31MAR82	1	83FEC/290/0156
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAR82 -31MAR82	1	84FEC/290/1171
	MAY MONTHLY	1,289	3,573	1APR82 -30APR82	5	82FEC/234/2091
	MAY MONTHLY - AMENDMENT	3,289	3,573	1APR82 -30APR82	6	83FEC/280/1847
	REQUEST FOR ADDITIONAL INFORMATION			1APR82 -30APR82	1	83FEC/274/0352
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR82 -30APR82	1	83FEC/276/0735
	REQUEST FOR ADDITIONAL INFORMATION			1APR82 -30APR82	1	83FEC/290/0155
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR82 -30APR82	1	84FEC/290/1172
	JUNE MONTHLY	1,039	1,477	1MAY82 -31MAY82	7	82FEC/240/0022
	JUNE MONTHLY - AMENDMENT	1,522	1,477	1MAY82 -31MAY82	7	83FEC/280/1853
	REQUEST FOR ADDITIONAL INFORMATION			1MAY82 -30MAY82	1	83FEC/290/0159
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAY82 -30MAY82	1	84FEC/290/1173
	REQUEST FOR ADDITIONAL INFORMATION			1MAY82 -31MAY82	2	83FEC/274/0346
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAY82 -31MAY82	1	83FEC/276/0737
	JULY MONTHLY	4,194	935	1JUN82 -30JUN82	7	82FEC/240/0029
	JULY MONTHLY - AMENDMENT	4,194	2,679	1JUN82 -30JUN82	9	83FEC/280/1860
	REQUEST FOR ADDITIONAL INFORMATION			1JUN82 -30JUN82	1	83FEC/274/0672
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUN82 -30JUN82	1	83FEC/276/0731
	AUGUST MONTHLY	9,789	7,103	1JUL82 -31JUL82	9	82FEC/242/1946
	AUGUST MONTHLY - AMENDMENT	9,789	7,843	1JUL82 -31JUL82	11	83FEC/280/1869
	SEPTEMBER MONTHLY	2,706	2,140	1AUG82 -31AUG82	6	82FEC/253/2007
	REQUEST FOR ADDITIONAL INFORMATION			1AUG82 -31AUG82	1	83FEC/290/0161

ATTACHMENT 1
(PAGE 2 of 3)

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 3JUL84
PAGE 2

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	REQUEST FOR ADDITIONAL INFORMATION 2ND OCTOBER MONTHLY	489	1,680	1AUG82 -31AUG82	1	84FEC/290/1174
	REQUEST FOR ADDITIONAL INFORMATION			1SEP82 -30SEP82	6	82FEC/253/2013
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1SEP82 -30SEP82	1	83FEC/290/0160
	PRE-GENERAL	914	500	1SEP82 -30SEP82	1	84FEC/290/1175
	PRE-GENERAL - AMENDMENT	914	500	1OCT82 -13OCT82	6	82FEC/255/1492
	REQUEST FOR ADDITIONAL INFORMATION			1OCT82 -13OCT82	6	83FEC/280/1880
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT82 -13OCT82	2	83FEC/274/0349
	REQUEST FOR ADDITIONAL INFORMATION			1OCT82 -13OCT82	1	83FEC/276/0736
	REQUEST FOR ADDITIONAL INFORMATION			1OCT82 -13OCT82	2	83FEC/289/0275
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT82 -13OCT82	1	84FEC/290/1176
	POST-GENERAL	2,002	1,400	14OCT82 -22NOV82	6	82FEC/258/0180
	POST-GENERAL - AMENDMENT	2,002	1,736	14OCT82 -22NOV82	7	83FEC/280/1886
	REQUEST FOR ADDITIONAL INFORMATION			14OCT82 -22NOV82	3	83FEC/274/0360
	REQUEST FOR ADDITIONAL INFORMATION 2ND			14OCT82 -22NOV82	13	83FEC/275/4327
	YEAR-END	209	1,252	22NOV82 -31DEC82	7	83FEC/264/2595
	YEAR-END - AMENDMENT	209	1,252	22NOV82 -31DEC82	7	83FEC/280/1893
	REQUEST FOR ADDITIONAL INFORMATION			22NOV82 -31DEC82	2	83FEC/274/0354
	REQUEST FOR ADDITIONAL INFORMATION 2ND			22NOV82 -31DEC82	1	83FEC/276/0730
	TOTAL	53,003	0 55,606	0	221	TOTAL PAGES

All reports have received review

Cash on hand as of 12/31/82 \$3,208
Debts (owed by) as of 12/31/82 \$2,300

ATTACHMENT 1
(PAGE 3 of 3)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 22, 1984

APRIL REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES

WHO MUST FILE

ALL unauthorized political committees, except those that file monthly, must file a quarterly report by April 15, 1984. (See below)

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through March 31, 1984. Political committees which have not previously filed a financial disclosure report covering any period in 1984 should report all financial activity from the later of January 1, 1984, or date of registration,* through March 31, 1984.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than April 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business April 15, 1984.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

MONTHLY FILERS

Committees that file on a monthly schedule must file their next report by April 20, 1984, and disclose all financial activity of their committee from March 1 through March 31, 1984. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month.

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

*The first report filed by a committee shall include all amounts received or disbursed in 1984, and prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b) Activity which occurred prior to 1984 should be reported separately.

-over-

65040560165



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-7

May 8, 1984

Robert E. Jeffers, Jr., Treasurer
MAPAC, Inc.
5500 Veterans Mem Boulevard
Suite 300
Metairie, LA 70003

Identification Number: C00120659

Reference: April Quarterly Report (1/1/84-3/31/84)

Dear Mr. Jeffers:

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 Disbursements as required by the Federal Election Campaign Act. 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, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Theresa Harley on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

A handwritten signature in cursive script, reading "John D. Gibson", is written over the typed name.

John D. Gibson
Assistant Staff Director
Reports Analysis Division

85040560167

MEMORANDUM TO FILE:

ATTACHMENT 4

FROM: Theresa Harley

DATE : 6/5/84

TO: Receptionist

TELEPHONE: (504) 566-1667

NAME OF COMMITTEE: Mortgage Attorneys Political Action Committee

Today I called to speak to Mr. Jeffers about the non-filing of the 1984 April Quarterly report. The receptionist told me Mr. Jeffers died in February. She then referred me to John Mahat and gave me his telephone number. I called the office to speak to Mr. Mahat but he was not available. I left a message with the secretary to have him return my call.

85040560163

MEMORANDUM TO FILE:

ATTACHMENT 5

FROM: Theresa Harley

DATE : June 6,7,8, 1984

TO: John Devay

TELEPHONE: (504) 887-6962

NAME OF COMMITTEE: Mortgage Attorneys Political Action Committee

Today, 6/6 I received a message that Mr. Devay had called. I returned the call but Mr. Devay was not available.

I called again on June 7th and 8th but Mr. Devay was not available. I left messages for him to return my call but he never did.

85040560169



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1761

Date Filmed 11/14/85 Camera No. ---2

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