FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

APR 9 1997

Lloyd Lenard, Treasurer
Republican Party of Louisiana
2133 Silverside Drive, Suite B
Baton Rouge, LA 70808

Identification Number: C00187450

Reference: 12 Day Pre-General Report (9/2/96-10/16/96)

Dear Mr. Lenard:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule E discloses independent expenditures on behalf of federal candidates (pertinent portion(s) attached). Schedule F of your reports disclose coordinated expenditures on behalf of some of these same candidates (pertinent portions attached). Under 2 U.S.C. §431(17), an "independent expenditure" is defined as:

> ... an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate which is made without cooperation or consultation with any candidate, or any authorized committee or agent of such candidate, and which is not made in concert with, or at the request or suggestion of, any candidate, or any authorized committee or agent of such candidate.

The coordination involved in making coordinated expenditures for a candidate may preclude your committee from making an independent expenditure in support of the same candidate. Under 11 CFR §109.1(c), any expenditure which does not qualify as an independent expenditure is considered an in-kind contribution. Please amend your reports to disclose the aforementioned transactions as in-kind contributions (Schedule B supporting Line 23 of the Detailed Summary Page), or provide additional clarifying information concerning the independent expenditures made in support of Woody Jenkins and David Thibodaux.

If the reclassification of these expenditures as in-kind contributions results in excessive contributions, the Commission recommends that you notify the recipient(s) and request a refund of the amount in excess of $5,000 per election. Please inform the Commission immediately in writing and provide a photo copy of your refund request(s) sent to the recipient(s). In addition, any refund should be disclosed on Schedule A supporting Line 16 of your next report.

-Schedule H3 discloses receipt of $11,000 from your non-federal account for an exempt expenditure event(s) which is listed as 100% non-federal on Schedules H2 and H4. A committee is permitted to pay the entire amount of an allocable activity from its federal account and receive a transfer(s) from its non-federal account solely to cover the non-federal share of the allocable expense(s). 11 CFR §106.5(g)(i). However, a 100% non-federal exempt expenditure event does not fall within the definitions of an allocable expense, and constitutes an impermissible transfer of funds received by your federal account from your non-federal account.

The Commission recommends you immediately transfer the total amount received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-The beginning cash balance of this report should equal the ending balance of your Amended 12 Day Pre-Primary Report dated 1/8/97. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Line 24 of the Detailed Summary Page of your report discloses a total of $190,855 in independent expenditures. The sum of the entries itemized on Schedule E, however, indicates the total to be $195,526. Please amend your report to clarify the discrepancy.

-Please provide a Schedule C or D, as appropriate, to support the entry of $26,883 reported on Line 10 of the Summary Page. Loans and debts must be continuously reported until they are either repaid or settled. 11 CFR §104.3(d)

-You have previously indicated that your committee has been using "best efforts" to obtain the occupation and name of employer for each contributor. However, an increasing number of entries lack this information. Please amend your report by supplying the omitted information or providing an explanation of your efforts in this regard. 11 CFR §§104.3(a)(4)(i) and 104.7

-Your report includes computer produced formats of Schedules A, B and H4. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

-The totals listed on Lines 6(c) and 7, Column B of the Summay Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-The totals listed on Lines 11(a)(i), 11(a)(ii), 11(a)(iii), 11(d), 11(e), 15, 20, 21(a)(ii), 21(c), 30 and 31, Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-The coordinated expenditure schedule (Schedule F) should disclose the following information: identification of the authorizing committee, the payee's name and address, the purpose of the expenditure as well as identification of the candidate supported, the date and amount of the payment and the aggregate year-to-date total for each candidate supported. Please amend Schedule F by providing the identification of the candidate supported. 2 U.S.C. §441a(d)

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Andrew J. Dodson
Senior Reports Analyst
Reports Analysis Division

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ITEMIZED INDEPENDENT EXPENDITURES

REPUBLICAN PARTY OF LOUISIANA
[illegible]3 SILVERSIDE DRIVE, STE. B
[illegible]TON ROUGE, LA 70808

(See Reverse Side for Instructions)

Name of Committee (in Full): Republican Party of Louisiana

C00187450

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Courtney Communications 251 Florida St. #203 Baton Rouge, LA 70801	Media Buy + Production	9/13/96	$20,000	David Thibodaux (LA-07) Congress ☑ Support ☐ Oppose
Giles + Associates 1602 Coral Dr. Houma, LA 70360	Mailout, Processing + Postage	9/17/96	$10,260 (*)	David Thibodaux (LA-07) Congress ☑ Support ☐ Oppose
Baker Printing [illegible] 1618 Main St. Baker, LA 70714	Mailout Printing	9/17/96	$3240- (*)	David Thibodaux LA-07 Congress ☑ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
(*) Incurred but have not paid until invoice is received				☐ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures ..... $ 30,260

(b) SUBTOTAL of Unitemized Independent Expenditures ..... $ _____

(c) TOTAL Independent Expenditures ..... $ _____

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, consent with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Signature: [signature] Date: 9/19/96

Subscribed and sworn to before me this 19 day of Sept, 96

My Commission expires: Dec 4

NOTARY PUBLIC

96031222737

SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

REPUBLICAN PARTY OF LOUISIANA
2133 SILVERSIDE DRIVE, STE. B
BATON ROUGE, LA 70808

(See Reverse Side for Instructions)

Name of Committee (in Full): Republican Party of Louisiana

C00187450

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
WYES 916 Nairne Ave New Orleans, LA	Video Production Staff	9/13/96	$450.00	Woody Jenkins LA - U.S. Senate ☑ Support ☐ Oppose
KNOE-TV 1400 Oliver Rd Monroe, LA 71201	Media Air-Time Buy	9/13/96	3918.50	Woody Jenkins LA - US Senate ☑ Support ☐ Oppose
KALB-TV 605-11 Washington St. PO Box 951 Alexandria, LA 71301	Media " Buy	9/13/96	4662.25	Woody Jenkins LA US Senate ☑ Support ☐ Oppose
KATC-TV PO Box 98133 Lafayette, LA 70509	Media Buy	9/13/96	956.25	Woody Jenkins LA US Senate ☑ Support ☐ Oppose
CableVision-TCI of LA 5428 Florida Blvd. Baton Rouge LA 70806	" Media Buy	9/13/96	3761.00	Woody Jenkins LA - US Senate ☑ Support ☐ Oppose
WGMB-TV 5800 Florida Blvd Baton Rouge LA 70806	" Media Buy	9/13/96	2316.25	Woody Jenkins LA - US Senate ☑ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures ..... $ 16,274.25

(b) SUBTOTAL of Unitemized Independent Expenditures ..... $ _____

(c) TOTAL Independent Expenditures ..... $ _____

Under penalty of perjury I verify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agents.

Pierre Devin 9/19/96
Signature Date

Subscribed and sworn to before me this 19 day of Sept 1996

My Commission expires: Dec. 31

NOTARY PUBLIC

96031222738

SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

Page 4 of 6 Pages

REPUBLICAN PARTY OF LOUISIANA
2133 SILVERSIDE DRIVE, STE. B
BATON ROUGE, LA 70808

(See Reverse Side for Instructions)

Name of Committee (in Full): Republican Party of Louisiana

C00187450

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
WBTR-TV 914 Foster Dr. Baton Rouge, LA 70806	Media Buy	9/13/96	2252.50	Woody Jenkins LA - U.S. Senate ☑ Support ☐ Oppose
WWL-TV 1024 N. Rampart St New Orleans, LA 70116	Media Buy	9/13/96	13,999.50	Woody Jenkins LA - U.S. Senate ☑ Support ☐ Oppose
WWL-(15)-TV 1024 N. Rampart St. New Orleans 70116	Media Buy	9/13/96	1496.00	Woody Jenkins LA - U.S. Senate ☑ Support ☐ Oppose
WGNO World Trade Center S. 2800 New Orleans, 70130	Media Buy	9/13/96	3655.00	Woody Jenkins LA - U.S. Senate ☑ Support ☐ Oppose
WVUE-TV 1025 S Jeff. Davis Pkwy New Orleans LA 70125	Media Buy	9/13/96	5015.00	Woody Jenkins LA - U.S. Senate ☑ Support ☐ Oppose
Cable LEADS Inc 635 Stoner Ave. Shreveport LA 71101	Media Buy	9/13/96	748.00	Woody Jenkins LA. U.S. Senate ☑ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures ..... $ 25,670.

(b) SUBTOTAL of Unitemized Independent Expenditures ..... $

(c) TOTAL Independent Expenditures ..... $

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Phillip C. Davis 9/19/96

Signature Date

Subscribed and sworn to before me this 19 day of Sept 1996

My Commission expires: Dec 31

NOTARY PUBLIC

96031222739

SCHEDULE

ITEMIZED INDEPENDENT EXPENDITURES

Page 5 of 6 Pages

REPUBLICAN PARTY OF LOUISIANA
2133 SILVERSIDE DRIVE, STE. B
BATON ROUGE, LA 70808

(See Reverse Side for Instructions)

Name of Committee (In Full): Republican Party of Louisiana

C00187450

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
KTBS-TV 312 E. Kings Hwy Shreveport LA 71134	Media Air-Time	9/18/96	$5067.50	Woody Jenkins US Senate LA ☑ Support ☐ Oppose
KTVE-TV 2909 Kilpatrick Blvd. Monroe LA 71201	Media Air Time	9/13/96	4088.50	Woody Jenkins US Senate LA ☑ Support ☐ Oppose
Furlow + Associates 741 Royal St. Baton Rouge, LA 70802	Media Production + Placement Services	9/13/96	10,000.00 (*)	Woody Jenkins US Senate LA ☑ Support ☐ Oppose
Furlow + Associates 741 Royal St. Baton Rouge, LA 70802	Media Sheet, Production Placement Services	9/16/96	4900.00 (*)	Woody Jenkins US Senate LA ☑ Support ☐ Oppose
Giles + Associates 1602 Coral Dr. Houma, LA 70360	Direct Mail Processing + Postage	9/13/96	$26,600	Woody Jenkins US Senate LA ☑ Support ☐ Oppose
Giles + Associates 1602 Coral Dr. Houma, LA 70360	Direct Mail Processing + Postage	9/16/96	$12,350 (*)	Woody Jenkins US Senate LA ☑ Support ☐ Oppose

(*) Incurred but have not paid until invoices is received.

(a) SUBTOTAL of Itemized Independent Expenditures ..... 62,996.

(b) SUBTOTAL of Unitemized Independent Expenditures ..... $

(c) TOTAL Independent Expenditures ..... $

Under penalty of perjury I certify that the independent expenditures reported herein was not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agents.

Signature: [signature] Date: 9/19/96

Subscribed and sworn to before me this 19 day of Sept

My Commission expires: D.K.

NOTARY PUBLIC

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ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

REPUBLICAN PARTY OF LOUISIANA
2133 SILVERSIDE DRIVE, STE. B
BATON ROUGE, LA 70808

Name of Committee (in Full): Republican Party of Louisiana

C00187450

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Baker Printing PO Box Baker, LA 707	Direct Mail Printing	9/18/96	8400.00 (*)	Woody Jenkins LA Senate ☑ Support ☐ Oppose
Baker Printing 1618 Main St. Baker, LA 70714	Direct Mail Printing	9/18/96	$3900 (*)	Woody Jenkins LA US Senate ☑ Support ☐ Oppose
Monahan 1017 Magazine St. New Orleans LA 70130	Direct Mail Processing Postage	9/18/96	3700.00	Woody Jenkins LA US Senate ☑ Support ☐ Oppose
Monahan 1017 Magazine St. New Orleans, LA 70130	Direct Mail Processing Postage	9/18/96	$9600	Woody Jenkins LA US Senate ☑ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures ..... $ 25600 —

(b) SUBTOTAL of Unitemized Independent Expenditures ..... $ 65 —

(c) TOTAL Independent Expenditures ..... $ 190855.85

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, consent with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Signature [signature] Date 9/19/96

Subscribed and sworn to before me this 19 day of Sept, 1996

My Commission expires: Death

[signature] NOTARY PUBLIC

96030280064 SCHEDULE F

ITEMIZED COORDINATED EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE (2 U.S.C. §441a(d))

Page 1 of 1 LINE NUMBER 22

(To be used only by Political Committees in the General Election)

Name of Political Committee (In Full): Republican Party of Louisiana

Has your Committee been designated to make coordinated expenditures by a political party committee? ☑ YES ☐ NO

If YES, name the designating committee: Same

Full Name, Mailing Address and ZIP Code of Subordinate Committee:

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Giles + Associates 1602 Corals Houma, LA 70360	Woody Jenkins LA US Senate Aggregate General Election Expenditure for this Candidate—$ 7653.03	Mailout - Senate Comparison	8/9/96 8/21/96 8/22/96 8/29/96	$1000.00 2562.49 3090.54 1000.00
Full Name, Mailing Address and ZIP Code of Each Payee	**Name of Federal Candidate Supported, State, District & Office Sought**	**Purpose of Expenditure**	**Date (month, day, year)**	**Amount**
Postmaster Baton Rouge, LA 70826	Woody Jenkins LA US Senate Aggregate General Election Expenditure for this Candidate—$ 15853.03	Postage Senate Comparison	8/9/96 8/10/96	4200 - 4000 -
Full Name, Mailing Address and ZIP Code of Each Payee	**Name of Federal Candidate Supported, State, District & Office Sought**	**Purpose of Expenditure**	**Date (month, day, year)**	**Amount**
Giles + Associates 1602 Corals Houma, LA 70360	Woody Jenkins LA US Senate Aggregate General Election Expenditure for this Candidate—$ 18423.03	Advocacy Mailout Processing	7/25/96 7/26/96 8/1/96	370.00 1000.00 1200.00
Full Name, Mailing Address and ZIP Code of Each Payee	**Name of Federal Candidate Supported, State, District & Office Sought**	**Purpose of Expenditure**	**Date (month, day, year)**	**Amount**
Postmaster Baton Rouge, LA 70826	Woody Jenkins LA US Senate Aggregate General Election Expenditure for this Candidate—$ 27323.03	Advocacy Mailout Postage	7/28/96 7/28/96	4800 — 4100 —

SUBTOTAL of Expenditures This Page (optional)	27323.03
TOTAL This Period (last page this line number only)	27323.03

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SCHEDULE F

ITEMIZED COORDINATED EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE (2 U.S.C. §441a(d))

Page 1 of 2 for LINE NUMBER 25

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full): Republican Party of Louisiana

Has your Committee been designated to make coordinated expenditures by a political party committee? ☑ YES ☐ NO

If YES, name the designating committee: Same as Above

Full Name, Mailing Address and ZIP Code of Subordinate Committee:

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Giles & Associates 1602 Corals Houma, LA 70360	Republican Candidates Running in LA5 Aggregate General Election Expenditure for this Candidate—$ 5415.31	Direct Mail Expenses	9/12/96 9/3/96	1000 — 4415.31
Courtney Communications 251 Florida St. #203 Baton Rouge, LA 70801	Woody Jenkins LA-Senate Aggregate General Election Expenditure for this Candidate—$ 28323.03	Media Services	9/25/96	$1000 —
McRei Inc. 3112 Pines Rd. Shreveport, LA 71119	David Thibodaux LA7 Aggregate General Election Expenditure for this Candidate—$ 18096.38	Phonebank	9/25/96 10/15/96	10,000 — 5000 —
Mele Printing 100 Taylor Square Covington, LA 70433	Republican Candidates Running in LA5 Aggregate General Election Expenditure for this Candidate—$ 10200.35	Printing	9/7/96	$4785.04

SUBTOTAL of Expenditures This Page (optional) 26200.35

TOTAL This Period (last page this line number only) .....

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SCHEDULE F

ITEMIZED COORDINATED EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE (2 U.S.C. §441a(d))

Page 2 of 2
LINE NUMBER 25

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full): Republican Party of Louisiana

Has your Committee been designated to make coordinated expenditures by a political party committee? ☒ YES ☐ NO
If YES, name the designating committee: Same as Above

Full Name, Mailing Address and ZIP Code of Subordinate Committee:

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Courtney Communications 251 Florida St. #203 Baton Rouge, LA 70801	David Thibodaux LA7 Aggregate General Election Expenditure for this Candidate—$ 21,096.38	Media Services	9/25/96	$3000
Full Name, Mailing Address and ZIP Code of Each Payee	**Name of Federal Candidate Supported, State, District & Office Sought**	**Purpose of Expenditure**	**Date (month, day, year)**	**Amount**
BOINC Lake Charles, LA 70605	Woody Jenkins LA Senate Aggregate General Election Expenditure for this Candidate—$ 30,823.03	Phone Banks	9/12/96	$2500
Full Name, Mailing Address and ZIP Code of Each Payee	**Name of Federal Candidate Supported, State, District & Office Sought**	**Purpose of Expenditure**	**Date (month, day, year)**	**Amount**
	Aggregate General Election Expenditure for this Candidate—$			
Full Name, Mailing Address and ZIP Code of Each Payee	**Name of Federal Candidate Supported, State, District & Office Sought**	**Purpose of Expenditure**	**Date (month, day, year)**	**Amount**
	Aggregate General Election Expenditure for this Candidate—$			

SUBTOTAL of Expenditures This Page (optional)	5500—
TOTAL This Period (last page this line number only)	31700.35

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