

FEDERAL ELECTION COMMISSION

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):

- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy |
| <input type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input type="checkbox"/> (3) Exempted by other statute | <input type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents | |

Signed

Mama White

date

3/31/80



FEDERAL ELECTION COMMISSION

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

March 4, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William A. McKenzie, Chairman
Republican Party of Dallas County
5010 Greenville Avenue, Suite 101
Dallas, Texas 75206

Re: MUR 1111

Dear Mr. McKenzie:

On February 12, 1979, you were notified that the Commission found reason to believe that the Republican Primary Account may have violated §§ 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Upon notification you were given an opportunity to demonstrate that no further action should be taken in this matter. After considering the information you provided, the Commission determined on February 26, 1980, to take no further action in this matter. Accordingly, the Commission has closed its file in this matter.

If you have any questions please contact Maura White, the staff member assigned to this matter, at 202-523-4060.

Sincerely,


Charles W. Steele
General Counsel

PS Form 3811, Aug 1978

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one):
 Show to whom and date delivered
 Show to whom date and address of delivery
 RESTRICTED DELIVERY
 Show to whom and date delivered
 RESTRICTED DELIVERY
 Show to whom date and address of delivery \$ _____
 (CONSULT POSTMASTER FOR THIS)

2. ARTICLE ADDRESSED TO:
 Wm. A. McKenzie
 5010 Greenville Avenue, Suite 101
 Dallas TX 75206

3. ARTICLE DESCRIPTION:
 REGISTERED NO. 944102 INSURED NO.

4. I have received the article described above.
 SIGNATURE Address Authorized agent
 Edith S. Schuler

5. DATE OF DELIVERY 3-7-80 POSTMARK

6. ADDRESS (Complete only if requested)

7. UNABLE TO DELIVER BECAUSE

8. CLERK'S INITIALS

MUR 1111 (MW)



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William A. McKenzie, Chairman
Republican Party of Dallas County
5010 Greenville Avenue, Suite 101
Dallas, Texas 75206

Re: MUR 1111

Dear Mr. McKenzie:

On February 12, 1979, you were notified that the Commission found reason to believe that the Republican Primary Account may have violated §§ 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Upon notification you were given an opportunity to demonstrate that no further action should be taken in this matter. After considering the information you provided, the Commission determined on _____, to take no further action in this matter. Accordingly, the Commission has closed its file in this matter.

If you have any questions please contact Maura White, the staff member assigned to this matter, at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

DB
2-24-80



FEDERAL ELECTION COMMISSION

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

March 4, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jack Scaggs
Cameron County Democratic Executive
Committee--Primary Fund
P.O. Box 2999
Harlingen, Texas 78550

Re: MUR 1111

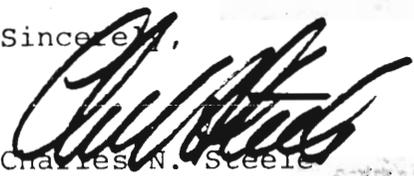
Dear Mr. Scaggs:

On February 26, 1980, the Commission determined that there is no reason to believe that the Cameron County Democratic Executive Committee--Primary Fund ("CCDEC-PF") may have violated §§ 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act") by its failure to register and report as a political committee.

In your letter of July 18, 1979, you stated that the CCDEC-PF is not a political committee but a bank account which holds those monies supplied by the state of Texas for the purpose of conducting the primary elections. You further stated that the transfer of \$2,002.32 from the CCDEC-PF to the Cameron County Democratic Executive Committee ("CCDEC") on August 3, 1978, was the transfer of the five percent fee entitled the chairman of the CCDEC under Texas state law. Rather than receive the five percent personally you transferred it to the CCDEC.

On the basis of this information the Commission determined to take no further action and close the file in regard to the CCDEC-PF. This matter will become part of the public record within 30 days. If you have any questions please contact Maura White, the staff member assigned to this matter, at 202-523-4060.

Sincerely,


Charles N. Steele
General Counsel

PS Form 3811 Aug. 1978

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

● **SENDER** Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
 REGISTERED MAIL Show to whom, date delivered, and address of delivery.
 REGISTERED MAIL DELIVERY Show to whom and date delivered.
 RESTRICTED DELIVERY Show to whom, date, and address of delivery.

2. **ARTICLE ADDRESSED TO:**
 Jack Scaggs
 P.O. Box 2999
 Dallas, TX 75250

3. **ARTICLE DESCRIPTION:**

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	944099	

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent

4. **DAY OF DELIVERY:** 3-11-80 **POSTMARK:** [Stamp]

5. **ADDRESS** (Complete only if requested)

6. **UNABLE TO DELIVER BECAUSE:** [Blank] **CLERK'S INITIALS:** [Stamp]

RECEIVED
 FEDERAL ELECTION
 COMMISSION
 MAR 14 AM 11:02

MUR III (MLU)



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jack Scaggs
Cameron County Democratic Executive
Committee--Primary Fund
P.O. Box 2999
Harlingen, Texas 78550

Re: MUR 1111

Dear Mr. Scaggs:

On _____, the Commission determined that there is no reason to believe that the Cameron County Democratic Executive Committee--Primary Fund ("CCDEC-PF") may have violated §§ 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act") by its failure to register and report as a political committee.

In your letter of July 18, 1979, you stated that the CCDEC-PF is not a political committee but a bank account which holds those monies supplied by the state of Texas for the purpose of conducting the primary elections. You further stated that the transfer of \$2,002.32 from the CCDEC-PF to the Cameron County Democratic Executive Committee ("CCDEC") on August 3, 1978, was the transfer of the five percent fee entitled the chairman of the CCDEC under Texas state law. Rather than receive the five percent personally you transferred it to the CCDEC.

On the basis of this information the Commission determined to take no further action and close the file in regard to the CCDEC-PF. This matter will become part of the public record within 30 days. If you have any questions please contact Maura White, the staff member assigned to this matter, at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

BB
2-24-80

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84976
001010



FEDERAL ELECTION COMMISSION

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

February 29, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William A. McKenzie, Chairman
Republican Party of Dallas County
5010 Greenville Avenue, Suite 101
Dallas, Texas 75206

Re: MUR 1111

Dear Mr. McKenzie:

On February 26, 1980, the Commission found reason to believe that the Republican Finance Committee--Dallas County may have violated § 441a(a)(1)(C) of the Federal Election Campaign Act of 1971, as amended ("the Act"). However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file in this matter. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that it is nevertheless a violation of 2 U.S.C. § 441a for a political committee to receive contributions from a "person" in excess of \$5,000 per calendar year.

A report on the Commission's finding is attached for your information.

In addition, on February 12, 1979, you were notified that the Commission found reason to believe that you may have violated § 432 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Upon notification you were given an opportunity to demonstrate that no further action should be taken in this matter. After considering the information you provided, and other information available, the Commission determined, on February 26, 1980, to take no further action in this

matter. Accordingly, the Commission has closed its file in this matter.

If you have any questions please direct them to Maura White, the staff member assigned to this matter, at 202-523-4060.

Sincerely,



ROBERT O. TIERNAN
Chairman

Enclosure

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE _____

MUR NO. 1111
STAFF MEMBER(S) & TEL. NO.
M. White/ D. Branch

RESPONDENT Republican Finance Committee--
Dallas County

202-523-4060

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

BACKGROUND

The Republican Finance Committee--Dallas County ("RFC-DC") was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") of the Commission for the receipt of an excessive contribution in apparent violation of 2 U.S.C. § 441a.

On its July 10, 1979, Quarterly Report, the RFC-DC reported the receipt, on April 16, 1979, of a \$5,500 loan from McKenzie and Baer. The October 10, 1979, Quarterly Report reported the repayment of this loan on August 23, 1979.

FACTUAL BASIS AND LEGAL ANALYSIS

Section 441a(a)(1)(c) of the Act limits contributions from persons to political committees to \$5,000 per political committee per calendar year. Section 431 of the Act includes a loan in the definition of a contribution. Section 431 defines "person" to include a partnership.

By accepting a \$5,500 loan from an apparent partnership, McKenzie and Baer, the RFC-DC may have violated 2 U.S.C. § 441a.

Based on the foregoing analysis, the Federal Election Commission has found:

1. Reason to believe that the RFC-DC may have violated 2 U.S.C. § 441a.
2. Determined to take no further action and close the file in this matter.

0040184979



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William A. McKenzie, Chairman
Republican Party of Dallas County
5010 Greenville Avenue, Suite 101
Dallas, Texas 75206

Re: MUR 1111

Dear Mr. McKenzie:

On _____, 1980, the Commission found reason to believe that the Republican Finance Committee--Dallas County may have violated § 441a(a)(1)(C) of the Federal Election Campaign Act of 1971, as amended ("the Act"). However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file in this matter. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that it is nevertheless a violation of 2 U.S.C. § 441a for a political committee to receive contributions from a "person" in excess of \$5,000 per calendar year.

A report on the Commission's finding is attached for your information.

In addition, on February 12, 1979, you were notified that the Commission found reason to believe that you may have violated § 432 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Upon notification you were given an opportunity to demonstrate that no further action should be taken in this matter. After considering the information you provided, and other information available, the Commission determined, on _____, to take no further action in this

DB
2-23-80

-2-

matter. Accordingly, the Commission has closed its file in this matter.

If you have any questions please direct them to Maura White, the staff member assigned to this matter, at 202-523-4060.

Sincerely,

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1111
Cameron County Democratic)
Executive Committee)
Primary Fund)
Republican Primary Account)
Republican Finance Committee --)
Dallas County

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 26, 1980, the Commission decided by a vote of 5-0 to take the following actions regarding the above-captioned matter:

1. Find NO REASON TO BELIEVE that the Cameron County Democratic Executive Committee-Primary Fund violated 2 U.S.C. §§ 433 and 434. Close the file in this matter. Send the letter as attached to the First General Counsel's Report dated February 15, 1980.
2. Take no further action in regard to the Republican Primary Account. Close the file in this matter. Send the letter as attached to the above-named report.
3. Find REASON TO BELIEVE that the Republican Finance Committee--Dallas County may have violated 2 U.S.C. § 441a. Take no further action and close the file in this matter. Send the letter as attached to the above-named report.
4. Take no further action in regard to McKenzie and Baer. Close the file in this matter.

(Continued)

20010184982

CERTIFICATION
MUR 1111
First General Counsel's Report
Dated: February 15, 1980

Page 2

5. Take no further action against the Republican Finance Committee--Dallas County in regard to a possible violation of 2 U.S.C. §432 and 11 C.F.R. §102.7(a). Close the file in this matter. Send the letter as attached to the above-named report.
6. Direct the FEC Reports Analysis Division to contact the respondent committees advising how transfers of funds should be reported in the future.

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

Attest:

2/27/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 2-15-80, 1:42
Circulated on 48 hour vote basis: 2-19-80, 11:00
Objection filed. Acted upon at Executive Session of 2/26/80.

0040184983



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE *MWE*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: FEBRUARY 21, 1980
SUBJECT: OBJECTION - MUR 1111 - First General
Counsel's Report dated 2-15-80;
Received in OCS 2-15-80, 1:42

The above-named document was circulated on a 48 hour vote basis at 11:00, Tuesday, February 19, 1980.

Commissioner Tiernan submitted an objection at 7:43, February 21, 1980, thereby placing MUR 1111 on the Executive Session Agenda for Tuesday, February 26, 1980.

Attached is a copy of Commissioner Tiernan's vote sheet with his comments.

ATTACHMENT:
Copy of Vote Sheet

60040181984



FEDERAL ELECTION COMMISSION

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

30 FEB 21 A 7:44

Date and Time Transmitted: TUESDAY, 2-19-80, 11

Commissioner FRIEDERSDORF, AIKENS, TIERNAN, McGARRY, REICHE, HARRIS

RETURN TO OFFICE OF COMMISSION SECRETARY BY: THURSDAY, FEBRUARY 21, 1980
11:00

MUR No. 1111 - First General Counsel's Report dated 2-15-80

~~(X)~~ I approve the recommendation

(4) I object to the recommendation

COMMENTS: Objection directed to the proposed letters,
in particular, CC DCC - PC should be informed
as to importance of the Commission's contribution.

Date: 2/20/1980 Signature: Robert O. Tiernan

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.

60040181985

February 15, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1111

Please have the attached First GC Report on MUR 1111 distributed to the Commission on a 48 hour tally basis.

Than kyou.

00040184986

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20003

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 2-15-80

MUR # 1111
STAFF MEMBER(S) M. White

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

RESPONDENT'S NAME: Cameron County Democratic Executive Committee
Primary Fund
Republican Primary Account
Republican Finance Committee--Dallas County

RELEVANT STATUTE: 2 U.S.C. §§ 433 and 434
2 U.S.C. §§ 433 and 434
2 U.S.C. §§ 432 and 441a

INTERNAL REPORTS CHECKED: Committee reports

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

On December 21, 1979, the Reports Analysis Division referred the names of the Cameron County Democratic Executive Committee, the Republican Primary Account, and the Republican Finance Committee-Dallas County to the Office of General Counsel for possible violations of the Act (Attachments 1,2 and 3).

Cameron County Democratic Executive Committee-Primary Fund ("CCDEC-PF")

On June 28, 1979, the Commission mailed a surface violation letter to the CCDEC-PF (Attachment 4). This letter was prompted by the CCDEC-PF having transferred over \$1,000 to the Cameron County Democratic Executive Committee during 1978. The CCDEC-PF responded to the Commission's letter on July 23, 1979 (Attachment 5). The matter was subsequently referred to the Office of General Counsel for failure to register as a political committee and file reports with the Commission in possible violation of 2 U.S.C. §§ 433 and 434.

Republican Primary Account ("RPA")

On October 17, 1978, the Commission mailed a surface violation letter to the RPA. This letter was prompted by the RPA having transferred over \$1,000 to the Republican Finance Committee of Dallas County during 1978. The RPA responded to the Commission's letter on November 3, 1978 (Attachment 6). This response was deemed inadequate by the Commission and a "RTB" notification letter was mailed on February 12, 1979 (Attachment 7). On April 5, 1979, the RPA responded to the Commission's letter of February 12, 1979

80 FEB 15 11:42

(Attachment 8). The matter was subsequently referred to the Office of General Counsel for failure to register as a political committee and file reports with the Commission in possible violation of 2 U.S.C. §§ 433 and 434.

Republican Finance Committee--Dallas County ("RFC-DC")

On August 11, 1978, the Reports Analysis Division mailed a "RFAI" to the RFC-DC in regard to an incorrect signature on an election report. The Commission received a response to the RFAI on October 6, 1978; this response, which stated that the committee chairman and treasurer were the same individual, prompted the mailing of a "RTB" notification letter, for possible violation of 2 U.S.C. § 432, on February 12, 1979 (Attachment 9).

In addition, this referral includes a possible § 441a violation. No letters were sent as the excessive contribution (a loan) was reported received and repaid during the time period that the Reports Analysis Division were reviewing the committee's reports. Both matters were subsequently referred to the Office of General Counsel.

FACTUAL AND LEGAL ANALYSIS

Cameron County Democratic Executive Committee-Primary Fund("CCDEC-PF")

On August 3, 1978, the Cameron County Democratic Executive Committee reported the receipt of a \$2,002.32 transfer from the CCDEC-PF. The CCDEC-PF is not registered with the FEC as a political committee. If the CCDEC-PF is a political committee, it could be in violation of 2 U.S.C. §§ 433 and 434 for failing to register as a political committee and file reports with the Commission. 2 U.S.C. §§ 433 and 434 require all political committees which anticipate receiving contributions or making expenditures during the calendar year in an aggregate amount exceeding \$1,000 to register with and report to the Commission.

According to the Chairman of the Cameron County Democratic Executive Committee, the CCDEC-PF is not a separate political committee, but a bank account maintained by the CCDEC. This account is established under the state laws of Texas, and is restricted exclusively to those monies supplied by the state for the purpose of conducting the primary elections (Attachment 5). The county party committees in Texas are charged with the responsibility of conducting the primary elections and the chairmen are entitled to charge the accounts for their personal services in an amount up to 5% of the cost of administering the elections. As the \$2,002.32 transfer was the 5% reimbursement entitled the chairman, in compensation for the performance of duties placed upon him by the state of Texas, the CCDEC-PF should not be required to report as a political committee.

As the chairman transferred the \$2,002.32 directly to the committee which he could have retained for his personal use, the transfer should be considered a contribution from the chairman to the Cameron County Democratic Executive Committee. As a contribution, it is within the statutory limits of 2 U.S.C. § 441a. The CCDEC-PF is not a political committee.

Republican Primary Account ("RPA")

On February 10, 1978, March 9, 1978, August 18, 1978, and September 6, 1978, the Republican Finance Committee of Dallas County reported the receipt of \$2,000, \$7,000, \$15,000, and \$2,000, respectively, from the RPA (Attachment 2). The RPA is not registered with the Commission as a political committee. 2 U.S.C. §§ 433 and 434 require all political committees which anticipate receiving contributions or making expenditures during the calendar year in an aggregate amount exceeding \$1,000 to register and report to the Commission. Possible violations are whether the RPA is a political committee and therefore in violation of 2 U.S.C. §§ 433 and 434 for failing to register as a political committee and file reports with the Commission.

The RPA is not a political committee according to the Chairman of the Republican Finance Committee of Dallas County ("RFC-DC") but is one of two bank accounts maintained by the RFC-DC. It is used solely for reporting to the state of Texas funds received and expended during the primary elections (Attachment 6). (The role of the county party committee in Texas, in regard to elections, has been discussed in the preceding analysis of Cameron County.) The RPA has filed reports with the Commission and the state of Texas which show, as of June 23, 1978, \$23,992.90 in election expenses owed to the RFC-DC. The transfers in the sum of \$26,000.00, were in reimbursement to the RFC-DC for expenses incurred in conducting the primaries. Since the transfers are not contributions, and since the primary fund is not a political committee, the RPA should not be required to report to and register with the Commission.

Republican Finance Committee of Dallas County ("RFC-DC")

On October 6, 1978, the RFC-DC responded to the Commission's RFAI of August 11, 1978. This response stated that the chairman of the RFC-DC also served as the committee's treasurer. In response to a RTB notification letter the treasurer resigned effective April 5, 1979 (Attachment 10). No new treasurer was subsequently appointed and the committee terminated on September 24, 1979. In addition, the RFC-DC received a \$5,500 loan from an apparent partnership on April 16, 1979. This loan was repaid in full on August 23, 1979 (Attachment 11).

Prior to the 1979 amendments to the Act, 2 U.S.C. § 432 required all political committees to have a chairman and a treasurer and 11 C.F.R. § 102.7(a) required that these two officers not be the same individual.

2 U.S.C. § 441a limits contributions by individuals to \$5,000 per political committee per calendar year. 2 U.S.C. § 431 includes a loan in the definition of a contribution. Therefore, it appears that the RFC-DC may have violated 2 U.S.C. §§ 441a and 432, and 11 C.F.R. § 102.7(a).

Because the RFC-DC has terminated, because the treasurer of the committee resigned immediately upon notification of the illegality of dual positions, because the excessive contribution is a minimal amount, and the loan has been repaid, we recommend that the Commission take no further action in this matter and close the file.

RECOMMENDATIONS

1. Find no reason to believe that the Cameron County Democratic Executive Committee-Primary Fund violated 2 U.S.C. §§ 433 and 434. Close the file in this matter. Send the attached letter.
2. Take no further action in regard to the Republican Primary Account. Close the file in this matter. Send the attached letter.
3. Find reason to believe that the Republican Finance Committee-Dallas County may have violated 2 U.S.C. § 441a. Take no further action and close the file in this matter. Send the attached letter.
4. Take no further action in regard to McKenzie and Baer. Close the file in this matter.
5. Take no further action against the Republican Finance Committee-Dallas County in regard to a possible violation of 2 U.S.C. § 432 and 11 C.F.R. § 102.7(a). Close the file in this matter. Send the attached letter.

Attachments

1. Referrals from RAD (Exhibits 1-11)
2. Letter to Jack Scaggs, Cameron County Democratic Exec. Cmte-PF
3. Letter to McKenzie, Republican Primary Account
4. Letter to McKenzie, RFC-DC

00040184990

0040184991

D
RAD

7-2-83

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/21/79 ANALYST Dug Greevy
 TO: Office of General Counsel TEAM CHIEF Bobby Werfel
 THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW PS: CB
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE/COMMITTEE: Cameron County Democratic Executive Committee
 TREASURER: Primary Fund
 ADDRESS: Jack Skaggs
 P.O. Box 2999
 Harlingen, TX 78550

AFFILIATE(S):

ALLEGATION(S): Unregistered Political Committee CITE: 2 U.S.C. 433 and 434 ATTACHMENT(S) 1

MUR IIII

DATE INITIATED: 6/28/79

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other:
 Special Project:

ATTACHMENT

0010: 84993

RAD 4/2-2/8

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/21/77 ANALYST Dug Greevy
 TO: Office of General Counsel TEAM CHIEF Bobby Werfel
 THROUGH: STAFF DIRECTOR [Signature] COMPLIANCE REVIEW B/CB
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE/COMMITTEE: Republican Primary Account
 TREASURER: William A. McKenzie, Chairman
 ADDRESS: 26th Floor, LTV Tower
 AFFILIATE(S): Dallas, Texas 75201

MUR 1111

ALLEGATION(S): Unregistered Political Committee CITE: 2 U.S.C. 433 and 434 ATTACHMENT(S): 1

Note: The receipts were reported on the recipient committee's first report for 1978. It is not known why the aggregate year to date receipt is greater than the amount reported received.
 DATE INITIATED: 9/5/78

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other:
 Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM _____ TO _____

TOTAL RECEIPTS \$ _____ TOTAL EXPENDITURES \$ _____

CASH ON HAND \$ _____ DEBTS \$ _____

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

3SV1/78-129, 10/17/78 2
3SV2/78-129, 2/12/79 (For inadequate response) 3

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon: Greevy with McKenzie, 4/7/79 4

REASON(S) FOR REFERRAL:

ATTACHMENT

Response received, 10/27/78 5

Response received, 3/19/79 6

Note: The other letter of 2/12/79 was 3R02/78-118 sent to recipient committee on another matter.

Response received, 4/5/79 (Question of adequacy of response) 7

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None

OTHER RELEVANT INFORMATION:

ATTACHMENT

Exhibit A referred to in responses of 10/27/78 and 4/5/79 8

Letter of 10/23/78 referred to in response of 10/27/78 9

Contributions made to Federal candidates by recipient committee 10

For comparison, see referral for Cameron County Democratic Executive Committee, Primary Fund

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

See appropriate sections of Texas Elections Code-
Article 13.08(i) and 13.08a(d) 11

NO PREVIOUS OGC/AUDIT REFERRALS FROM RAD

Attachment 2

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Line Number 15a

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

REPUBLICAN FINANCE COMMITTEE

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Republican Primary Account William A. McKenzie, Chairman 26th Floor LTV Tower Dallas, Texas 75201	Same		
	Attorney	2/10/78	2,000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 10,015.00	Occupation	3/9/78	7,000.00
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$	Occupation		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$	Occupation		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$	Occupation		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$	Occupation		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$	Occupation		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$	Occupation		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$	Occupation		
SUBTOTAL of receipts this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 9,000.00

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)
 Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Use Separate Schedule
 each numbered 14

Name of Candidate or Committee in Full
 REPUBLICAN FINANCE COMMITTEE

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of this P.
Republican Primary Account William A. McKenzie, Chairman 26th Floor LTV Tower Dallas, Texas 75202	SAME Occupation: Attorney	8/18/78 9/6/78	\$ 15,00 2,00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date: \$ 26,000.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of this P.
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date: \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of this P.
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date: \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of this P.
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date: \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of this P.
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date: \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of this P.
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date: \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of this P.
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date: \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of this P.
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date: \$		
SUBTOTAL of receipts this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 17,00

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D 557
RAD 12-21-79

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/21/79 ANALYST Dug Greevy
TO: Office of General Counsel TEAM CHIEF Bobby Werfel
THROUGH: STAFF DIRECTOR OSP COMPLIANCE REVIEW BUB
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE/COMMITTEE: Republican Finance Committee - Dallas County
TREASURER: None
ADDRESS: William A. McKenzie, Chairman
5010 Greenville Avenue, Suite 101
AFFILIATE(S): Dallas, TX 75206

MUR 1111

ALLEGATION(S): McKenzie served as both chairman and treasurer of committee, then resigned as treasurer, leaving a vacancy Receipt of excessive contribution
CITE: 2 U.S.C. 432(a) & 11 CFR 102.7(a) 2 U.S.C. 441a
ATTACHMENT(S): 2,3,4 5
DATE INITIATED: 8/11/78

MANNER IN WHICH REVIEW WAS INITIATED:

- Normal Review
- Other:
- Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 1/1/78 TO 9/15/79

TOTAL RECEIPTS \$ 322,781 TOTAL EXPENDITURES \$ 325,425

1/1/78-\$2,106
CASH ON HAND \$ 9/15/79-\$934 DEBTS \$ 9/15/79-\$0

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

RFAI, 8/11/78 (30 Day Post-Election) 6
3RQ2/78-118, 2/12/79 for inadequate response (30 Day Post-Election) 7
Note: Because the excessive contribution (loan) was reported received and repaid at the time that review was done on both the July 10 and October 10 reports no letter was sent.

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon: Greevy with McKenzie, 9/27/78 8
Telecon: Greevy with McKenzie, 4/7/79 9

REASON(S) FOR REFERRAL:

ATTACHMENT

Memo to the File: Sims, 5/1/79 10
Amount of excessive contribution meets RAD threshold for OGC review
Response to RFAI of 8/11/78, 10/3/78 11
Letter from Executive Secretary, 3/19/79 12
Response to 3RQ2/78-118, 4/5/79 13

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None

OTHER RELEVANT INFORMATION:

ATTACHMENT

Loan Repaid 14
Telecon: Greevy, Partnership is not incorporated 15
Note: Termination request will be accepted once disposition of residual funds is provided
Please note that 2 U.S.C. 431(e)(1) very clearly states that the definition of contribution includes loans received.

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None

Attachment 3

2

LAW OFFICES OF
JACK SKAGGS
SKAGGS & KOPPEL BUILDING
312 EAST VAN BUREN AVENUE
P. O. BOX 2999
HARLINGEN, TEXAS 78550
TELEPHONE (512) 425-6122
(512) 425-2000

RECEIVED
FEDERAL ELECTION
COMMISSION

1979 JUL 23 AM 10 46
MEXICO CITY OFFICE
CAJALCANTO AVENUE 203
MEXICO D. F.
TELEPHONE (905) 585-06-88
(905) 584-40-48

Jack Skaggs
Alex Huddleston

July 18, 1979

Mr. Orlando R. Potter, Staff Director
FEDERAL ELECTION COMMISSION
1325 "K" Street, N.W.
Washington, D.C. 20463

RE: 3SV1/79-65

Dear Mr. Potter:

The "Cameron County Democratic Executive Committee, Primary Fund" has received your letter of June 28, 1979, in which you raise the question as to whether the "Primary Fund" should be classified or considered as a "political committee" for the purpose of registration, reporting, and contribution limitation under the Federal Election Campaign Act.

Please be advised as follows:

1. Under Texas law, each county has an elected Executive Committee for each of the organized political parties. Each county's Democratic and Republican Executive Committees are composed of elected precinct chairmen for each of the county's voting precincts. The chairman of the County Executive Committees are elected on a county-wide basis in their Party's primary elections.

2. I was the duly elected Chairman of the Cameron County Democratic Executive Committee from 1960 through the primary elections in May of 1978.

3. The Cameron County Democratic Executive Committee, during my years of office, maintained two (2) separate bank accounts. One of these accounts was carried as the "Cameron County Democratic Executive Committee" and represented the funds belonging to the statutory committee itself.

The Cameron County Democratic Executive Committee, Primary Fund, is a separate bank account into which was deposited all monies

Attachment 5

Mr. Orlando R. Potter, Staff Director
July 18, 1979
Page Two

supplied by the State of Texas for the purpose of conducting the primaries. All primary expenses (election judges, supplies, etc.) are paid from the Primary Fund. The Primary Fund is not used for any purpose except the actual conduct of the primaries. That is to say, the Primary Fund is not used for political purposes.

4. Under the provisions of the Texas law, the Chairman of the Executive Committee is in general charge of conducting the primaries, and he is entitled, under the statutes, to charge 5% of the amount expended to conduct the primaries for the conduct of the primaries.

5. Over the years that I was Democratic Chairman, I took the position that since many of the members of the Executive Committee were involved in the conduct of the elections, that the 5% allotted to the Chairman should actually belong to the Committee. The Committee has never had any other source of income and had numerous expenses. Accordingly, rather than receive this 5% myself, I would customarily simply transfer the 5% from the Primary Fund to the Cameron County Democratic Executive Committee.

This is what was done in 1978 when \$2,002.32 was transferred from the Primary Fund to the Cameron County Democratic Executive Committee.

Under no stretch of the imagination could the Primary Fund be considered to be a "political committee" since it is only a bank account.

I hope that this satisfactorily answers the questions raised by your letter of June 28, 1979, and that you will agree that the "Primary Fund" is not a political committee.

If you require any further information in regard to the above, please let me know.

Yours very truly,

Jack Skaggs

Jack Skaggs

JS:nlv

00000185003



Republican Party OF DALLAS COUNTY

6010 GREENVILLE AVE., SUITE 101 DALLAS, TEXAS 75206 (214) 369-9555

78 NOV 3 PM 12:30

October 27, 1978

Mr. Orlando B. Potter Staff Director Federal Election Commission 1325 K Street N.W. Washington, D.C. 20463

Re: 3SV1/78-129

Dear Mr. Potter:

This statement is being sent to you in reply to your letters of October 17 and October 23, 1978. I have carefully reviewed the law that you quote, namely 2 U.S.C. 433, as well as other laws pertaining to the Federal Election Commission. If you would kindly examine the first report that we filed, it gives in detail the fact that the Dallas County Republican Party has two bank accounts, (1) our regular bank account and (2) a bank account which we set up to conduct the primary election. Following the primary election the Primary Account was for all practical purposes closed and the funds from that account were transferred to our operational account. It is not a political committee -- it is a part of the Dallas County Republican Party and, in fact, it is nothing but a bank account used solely to clarify for reporting purposes to the State of Texas funds received and expended during the primary election.

The monies reported as coming from our Primary Account were not contributions, but were funds received from filing fees and reimbursements to our regular account from funds received from the State of Texas to reimburse us for the cost of conducting a primary election.

If your report analyst who handles this matter would be so kind as to refer to our initial report, I think the matter can be clarified to your complete satisfaction. In the meantime, there is no Republican Primary Account Committee, party, entity, other than a checking account, as explained above.

Please do not consider this as a criticism, but it appears to me that the weight of the paper expended in reports, etc., as well as correspondence with the F.E.C. is going to soon sink Washington

Attachment 6

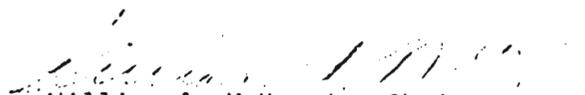
WILLIAM A. MCKENZIE, COUNTY CHAIRMAN, 26TH FLOOR LTV TOWER, DALLAS, TEXAS 75201 TODDIE L. WYNNE, JR., FINANCE CHAIRMAN, 4100 FIRST NATIONAL BANK, DALLAS, TEXAS 75202 CLAIRE A. SANDLESKY, EXECUTIVE SECRETARY, 9302 W. LAKE HIGHBANDS, DALLAS, TEXAS 75210 REBECCA SHAW, SECRETIARY-OFFICE MANAGER, 5010 GREENVILLE AVENUE, DALLAS, TEXAS 75200

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Mr. Orlando B. Potter
October 27, 1978
Page Two

into the Potomac. The foregoing facetious statement is made in jest,
but I am confident that you would agree.

Sincerely and respectfully yours,


William A. McKenzie, Chairman
Republican Party of Dallas County

WAMCK/cs

000491850957



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20543

2/12/79

Mr. William A. McKenzie, Chairman
Republican Primary Account
26th Floor LTV Tower
Dallas, TX 75201

Dear Mr. McKenzie:

On October 17, 1978, you were notified that our review of the receipts reported by the Republican Finance Committee indicated that your organization may have made contributions which total in excess of \$1,000 during the calendar year, thereby making the Republican Primary Account a political committee, subject to the registration and reporting requirements of the Federal Election Campaign Act, as amended.

We received a response from you on November 3, 1978, however, we found your response to be inadequate. Your failure to provide an adequate response gives the Commission reason to believe that you are in violation of 2 U.S.C. 433 and 434.

Although we are aware of the nature of the Republican Primary Account with respect to the organization of the Republican Finance Committee, it continues to be necessary to:

- 1) Register the Republican Primary Account with, and report its activities to, the Federal Election Commission; or
- 2) Transfer from the Republican Finance Committee to an account not used to influence Federal elections, such an amount that the total remaining amount received from the Republican Primary Account and retained by the Republican Finance Committee does not exceed \$1,000.

As an alternative, because the Republican Primary Account is part of the organization of the Republican Finance Committee, the Republican Finance Committee may amend its reports to include the activities of the Republican Primary Account. These amendments should begin with the first report filed by the Republican Finance Committee, the 30 Day Post-Primary Election Report. In addition, the sources of any additional cash on hand, January 1, 1978, reported by the Republican Finance Committee due to the inclusion of the activities of the Republican Primary Account, should be disclosed.

We note further that the October 10 Quarterly Report filed by the Republican Finance Committee discloses an additional \$17,000 in contributions from the Republican Primary Account. Enclosed is a copy of the page in which these additional contributions are listed.

Attachment 7

60040185006

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days of receipt of this letter.

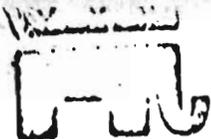
If you require additional information, please contact David Greevy, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is 523-1472.

Sincerely,

John W. McGarry
Commissioner

Certified Mail
Return Receipt Requested

60040185007



Part
OF DALLAS COUNTY

5010 GREENVILLE AVE., SUITE 101

DALLAS, TEXAS 75206

(214) 369-9555

April 5, 1979

901954

Commissioner John W. McGary
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. McGary:

We have sought in every instance to fully and completely answer and report the facts relative to each contribution made by the Dallas County Republican Party. We have filed with your Commission a complete report of all reports filed with the Secretary of State of Texas, being reports relative to the primary elections in Texas. At no time have I ever intentionally or deliberately failed to respond so that I would be in violation of any provision of the federal law. Also, we have responded both by phone and by letter to your office trying to clear any problems or questions.

In a telephone conversation with your Mr. Greevy today, it was explained in detail the nature of our Republican Primary Account. It is our understanding that it is required of the Dallas County Republican Party to set up a separate primary account under the provisions of the Texas Election Code. The primary account receives its money from filing fees of candidates and from reimbursements from the State of Texas for conducting the primary elections. No contributions go into such account, as the money, as previously stated, comes solely from filing fees of candidates and from reimbursements from the State of Texas.

When the primary elections are over and all costs have been determined, the Dallas County Republican Party then pays all of the expenses out of the Republican Primary Account, including the cost of voting machines, rental of polling places, cost of transport of voting machines, payments to election judges and clerks, and all costs attendant to the primary elections. The Texas Election Code provides for certain fees to be paid to those officers within the party that are charged with the responsibility of conducting the elections, a certain percentage for an office, certain percentage for telephone, postage, printing, clerical help and secretarial help, all of which was itemized on the report previously furnished to you which you state to be an inadequate explanation.

That amount provided for in the Texas Election Code to be paid to the Dallas County Republican Party is then transferred from the Republican Primary Account to the Republican Finance Committee (the operating account of the Republican Party of Dallas County) in payment of its actual costs,

Attachment 8

WILLIAM A. MCKENZIE, COUNTY CHAIRMAN, 26TH FLOOR ETV TOWER, DALLAS, TEXAS 75201
TODDIE L. WYNNE, JR., FINANCE CHAIRMAN, 4100 FIRST NATIONAL BANK, DALLAS, TEXAS 75202
GLENN A. SANDRICKY, EXECUTIVE SECRETARY, 9002 W. LAKE HIGHLANDS, DALLAS, TEXAS 75218
REBECCA SHAW, SECRETARY-OFFICE MANAGER, 5010 GREENVILLE AVENUE, DALLAS, TEXAS 75206

again as itemized in the statement of actual costs of primary elections filed with the Secretary of State of Texas, all of which has been reported to the FEC as exhibits to our original filing of FEC Form 3 on June 28, 1978. The actual cost of the 1978 primary elections owed to the Dallas County Republican Party was \$27,283.62 and the actual receipts by the Dallas County Republican Party at the time of the October 1978 quarterly report to the FEC totalled \$26,000.00, leaving a balance of \$1,283.62 which had not been paid at the time of the report. These amounts have previously been reported to your Commission and I believe satisfy your item No. 2, to-wit: "Transfer ... such an amount that the total remaining amount received from the Republican Primary Account and retained by the Republican Finance Committee does not exceed \$1,000." Thus we believe and hope that we have satisfied the requirement set forth in your letter of February 12, 1979.

I emphasize once again that all of the above has been previously reported to the FEC. In your first paragraph following the numbered paragraphs, the Republican Primary Account is not part of the organization of the Republican Finance Committee, but only a separate bank account to handle filing fees and reimbursements from the State, although our reports to the FEC have included the activities of the Republican Primary Account, as Mr. Greevy affirmed to us today. In effect, every source of monies received has been disclosed and reported to you, whether same was from contributions to the Republican Finance Committee or from filing fees and reimbursements from the State of Texas. In the October 10, 1978 quarterly report filed by the Republican Finance Committee, it shows \$17,000 being deposited from the Republican Primary Account in the Republican Finance Committee account. You sent me a copy of that page. Such \$17,000 was a partial payment to the Dallas County Republican Party for expenses incurred (two payments totalling \$9,000.00 had previously been transferred, bring the total reimbursement as of October 10, 1978 to \$26,000.00) and all of these payments were from monies received from the State of Texas as reimbursement to the County party.

At that time, the only remaining amount left in the Republican Primary Account was an amount sufficient to cover the outstanding checks. Since the report of October 10, 1978, we have closed the Republican Primary Account, having beforehand ascertained that the election judges and clerks who had not cashed their checks did not intend to cash their checks from the Primary Account, and we accordingly closed the account by transferring the balance of \$682.77 to the Republican Finance Committee account, which in turn will be reported in our next report to the FEC.

We are trying to make a final report to the Commission and we will not be making any further contributions to any federal candidates! Moreover, every detail in this letter was discussed with Mr. Greevy today and I am hopeful that through that discussion and through this letter, our reports can be deemed to have been adequate. If a study is made of the reports heretofore made, I believe and am hopeful that you will find that the reports previously made to the State of Texas and included in our reports to your Commission set forth in adequate detail the matters detailed herein.

Lastly, we are most desirous of closing out our federal political committee, although it is my understanding that we cannot do so until such

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time as we have paid off the remaining balance owed to the bank here in Dallas. If I am wrong in that regard, please notify me immediately and, if so, we will gladly file a final report. As indicated in my other letter to the Commission today, the cost involved both at your end and at our end, considering the small amounts of money contributed to federal candidates, in making the reports is overwhelming and certainly we are desirous of reporting fully, but mainly reporting finally!

Trusting that the above, coupled with my conversation with Mr. Greevy, is fully and completely adequate and that upon review of the reports heretofore made, our conversation with your excellent Reports Analyst, Mr. Greevy, and this letter, all of your questions will be answered, I am

Sincerely,

William A. McKenzie, esq.

William A. McKenzie, Chairman
Republican Party of Dallas County

WAMcK/cs

00040185011



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

2/12/79

William A. McKenzie, Chairman
Republican Finance Committee
26th Floor LTV Tower
Dallas, Texas 75202

Dear Mr. McKenzie:

On August 11, 1978, you were notified that the 30 Day Post-Primary Election Report of Receipts and Expenditures filed by your committee omitted certain required information.

We received a response from you on October 6, 1978, however, we found your response to be inadequate. Your failure to provide an adequate response gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 432.

Specifically, your letter of October 6, 1978, states that you serve as both Chairman and Treasurer of the Republican Finance Committee. Please be advised that 2 U.S.C. 432(a) states in part, "Every political committee shall have a chairman and a treasurer." Section 102.7(a) of the FEC Regulations states further that, "Every political committee shall have a chairman and a treasurer, who shall not be the same individual."

Thus, your serving as chairman and treasurer of the Republican Finance Committee would appear to be a violation of these provisions.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you require additional information, please contact David Greevy, our Reports Analyst assigned to you on our toll free number (800) 424-9530. Our local number is 523-4048.

Sincerely,

Thomas S. Harris

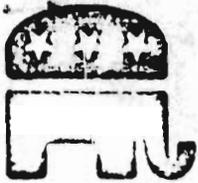
Commissioner

Certified Mail:
Return Receipt Requested.



Attachment 9

00041185012



**Republican
Party**
OF DALLAS COUNTY

5010 GREENVILLE AVE., SUITE 101
DALLAS, TEXAS 75206
COMMISSION (214) 669-9555

April 5, 1979 '79 APR 10 AM 9:29

Commissioner Thomas E. Harris
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: 3RQ/78-118

Dear Mr. Harris:

In reply to your letter of February 12, 1978, I have not been in the office for the past several weeks, mainly due to the fact that I was travelling outside of the State of Texas. Be that as it may, I have discussed the matter with your Mr. Greevy today and at his suggestion I am replying to your letter.

In my letter of October 6, 1978, I responded to each question raised by Mr. Greevy and attempted to answer in detail. You do not say, however, in which manner you find my response to be inadequate. If it was inadequate, it was certainly inadvertent and not intentional. Further, I have never been accused before of violating any provision of the federal law and I will say unqualifiedly that I have not intended nor do I now intend to violate the law.

Your Commission assumed, by virtue of the fact that it stated on our letterhead that Toddie L. Wynne, Jr. was Finance Chairman, that as Finance Chairman he was also the Treasurer, which was not so. I am the elected Chairman of the Dallas County Republican Party. In order to make contributions to federal candidates, namely Senator Tower and Congressman Collins as well as several other candidates for Congressional offices, we followed the procedures to qualify as a federal political committee. Since I set up the bank accounts as Chairman of the party, I was the signatory on the bank accounts, I raise the money and the Executive Committee within the party's operations determined which candidates were to receive what amount of money and, again in accordance with that committee's directions, certain contributions were made. At all times we made a full and complete report to the State of Texas and to the Federal Election Commission.

Since I in effect appointed myself as Treasurer, I hereby resign and will not serve as Treasurer in the future, effective as of this date. I will continue to serve as Chairman of the Republican Party of Dallas County, inasmuch as I have been elected to such exalted position. Secondly, the Dallas County Republican Party has borrowed

Attachment 10

WILLIAM A. MCKENZIE, COUNTY CHAIRMAN, 26TH FLOOR LTV TOWER, DALLAS, TEXAS 75201
TODDIE L. WYNNE, JR., FINANCE CHAIRMAN, 4100 FIRST NATIONAL BANK, DALLAS, TEXAS 75202
CLAIRE A. SANDUSKY, EXECUTIVE SECRETARY, 9302 W. LAKE HIGHLANDS, DALLAS, TEXAS 75218
REBECCA SHAW, SECRETARY-OFFICE MANAGER, 5010 GREENVILLE AVENUE, DALLAS, TEXAS 75206

00010185012

Commissioner Thomas E. Harris
April 5, 1979
Page Two

\$15,000 from a bank in Dallas to maintain itself after our contributions ceased. As soon as that bank loan is paid, we shall file a final report with your Commission, which we have been wishing to do for a number of months, but could not do so because of the fact that we had a bank loan outstanding.

I discussed with Mr. Greevy the fact that I would resign as Treasurer immediately after my discussion with him. In the meantime, we have further responded to Mr. Greevy about your previous request for information and I took it from our telephone conversation that our responses and statements over the telephone clarified and satisfied the problem. At his request, I am writing a separate letter in answer to Commissioner McGary's letter of the same date as yours. I might also add that as long as I am Chairman, the Dallas County Republican Party will refrain from making any contributions to any federal candidate, mainly due to the fact that the paperwork involved in making a \$1,000 contribution costs far more than the contribution itself, which I am confident that you can appreciate.

Thanking you, and if there are any further questions I will try my best to respond to you immediately, I am

Sincerely,


William A. McKenzie, Chairman
Republican Party of Dallas County

WAMcK/cs

CERTIFIED MAIL NO. 343400

004018014

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 1 of 1 for

Line Number 17a

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Republican Finance Committee

16
4
0
1
5
7
0
1
8
1
5
0
0

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
McKenzie and Baer 26th Floor LTV Tower Dallas, Texas 75201	Same	4/16/79	\$ 5,500.00
Occupation Attorneys			
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ 5,500.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$		
SUBTOTAL of receipts this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 5,500.00

DEBTS AND OBLIGATIONS

**Supporting Line Numbers 12 and 13
of FEC FORM 3**

Page 1 of 1 for

Line Number 13

(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

Republican Finance Committee

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
First National Bank in Dallas P. O. Box 6031 Dallas, Texas 75283	12/18/78	\$15,000.00	\$1,000.00	\$14,000.00
<input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		\$	\$	\$

NATURE OF OBLIGATION (Details of Debt):

Loan

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
McKenzie and Baer 26th Floor LTV Tower Dallas, Texas 75201	4/16/79	\$ 5,500.00	-0-	\$5,500.00
<input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		\$	\$	\$

NATURE OF OBLIGATION (Details of Debt):

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		\$	\$	\$

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional)	\$	\$	\$
TOTAL this period (last page this line number only)	\$	\$	\$19,500.00

Carry outstanding balance only to appropriate line of summary.

6 8 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50

FEDERAL ELECTION COMMISSION
 400 K Street, N.W.
 Washington, D.C. 20543

RECEIVED BY THE FEDERAL ELECTION COMMISSION
 RECEIVED BY THE FEDERAL ELECTION COMMISSION
 RECEIVED BY THE FEDERAL ELECTION COMMISSION
 Supporting Lines 2(a), 2(b), and 2(c), 2(d), and 2(e)
of FEC FORM 3

(Instructions on reverse side)
 (See instructions on reverse side)

790313049583017

Name of Candidate or Committee in Full			
REPUBLICAN FINANCE COMMITTEE			
Full Name, Mailing Address and ZIP Code First National Bank in Dallas Dallas, Texas 75202	Particulars of Expenditure Payment in full of loan - \$14,000 prin.; \$473.50 int.	Date (month, day, year) 8/8/79	Amount of each exp- sure this period \$14,473.50
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code McKenzie and Baer 26th Floor LTV Tower Dallas, Texas 75201	Particulars of Expenditure Full payment of loan	Date (month, day, year) 8/23/79	Amount of each exp- sure this period \$ 5,500.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each exp- sure this period
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each exp- sure this period
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each exp- sure this period
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each exp- sure this period
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each exp- sure this period
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jack Scaggs
Cameron County Democratic Executive
Committee--Primary Fund
P.O. Box 2999
Harlingen, Texas 78550

Re: MUR 1111

Dear Mr. Scaggs:

On _____, the Commission determined that there is no reason to believe that the Cameron County Democratic Executive Committee--Primary Fund ("CCDEC-PF") may have violated §§ 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act") by its failure to register and report as a political committee.

In your letter of July 18, 1979, you stated that the CCDEC-PF is not a political committee but a bank account which holds those monies supplied by the state of Texas for the purpose of conducting the primary elections. You further stated that the transfer of \$2,002.52 from the CCDEC PF to the Cameron County Democratic Executive Committee ("CCDEC") on August 3, 1978, was the transfer of the five percent fee entitled the chairman of the CCDEC under Texas state law. Rather than receive the five percent personally you transferred it to the CCDEC.

On the basis of this information the Commission determined to take no further action and close the file in regard to the CCDEC-PF. This matter will become part of the public record within 30 days. If you have any questions please contact Maura White, the staff member assigned to this matter, at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William A. McKenzie, Chairman
Republican Party of Dallas County
5010 Greenville Avenue, Suite 101
Dallas, Texas 75206

Re: MUR 1111

Dear Mr. McKenzie:

On February 12, 1979, you were notified that the Commission found reason to believe that the Republican Primary Account may have violated §§ 433 and 434 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Upon notification you were given an opportunity to demonstrate that no further action should be taken in this matter. After considering the information you provided, the Commission determined on , to take no further action in this matter. Accordingly, the Commission has closed its file in this matter.

If you have any questions please contact Maura White, the staff member assigned to this matter, at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William A. McKenzie, Chairman
Republican Party of Dallas County
5010 Greenville Avenue, Suite 101
Dallas, Texas 75206

Re: MUR 1111

Dear Mr. McKenzie:

On _____, 1980, the Commission found reason to believe that the Republican Finance Committee--Dallas County may have violated § 441a(a)(1)(C) of the Federal Election Campaign Act of 1971, as amended ("the Act"). However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file in this matter. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that it is nevertheless a violation of 2 U.S.C. § 441a for a political committee to receive contributions from a "person" in excess of \$5,000 per calendar year.

A report on the Commission's finding is attached for your information.

In addition, on February 12, 1979, you were notified that the Commission found reason to believe that you may have violated § 432 of the Federal Election Campaign Act of 1971, as amended ("the Act"). Upon notification you were given an opportunity to demonstrate that no further action should be taken in this matter. After considering the information you provided, and other information available, the Commission determined, on _____, to take no further action in this

matter. Accordingly, the Commission has closed its file in this matter.

If you have any questions please direct them to Maura White, the staff member assigned to this matter, at 202-523-4060.

Sincerely,

Enclosure

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE _____ MUR NO. 1111
STAFF MEMBER(S) & TEL. NO.
M. White/ D. Branch
RESPONDENT Republican Finance Committee--
Dallas County 202-523-4060

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

BACKGROUND

The Republican Finance Committee--Dallas County ("RFC-DC") was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") of the Commission for the receipt of an excessive contribution in apparent violation of 2 U.S.C. § 441a.

On its July 10, 1979, Quarterly Report, the RFC-DC reported the receipt, on April 16, 1979, of a \$5,500 loan from McKenzie and Baer. The October 10, 1979, Quarterly Report reported the repayment of this loan on August 23, 1979.

FACTUAL BASIS AND LEGAL ANALYSIS

Section 441a(a)(1)(c) of the Act limits contributions from persons to political committees to \$5,000 per political committee per calendar year. Section 431 of the Act includes a loan in the definition of a contribution. Section 431 defines "person" to include a partnership.

By accepting a \$5,500 loan from an apparent partnership, McKenzie and Baer, the RFC-DC may have violated 2 U.S.C. § 441a.

Based on the foregoing analysis, the Federal Election Commission has found:

1. Reason to believe that the RFC-DC may have violated 2 U.S.C. § 441a.
2. Determined to take no further action and close the file in this matter.

0040185022

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE January 11, 1980

ANALYST Dug Greevy

TO: Office of General Counsel
ATTENTION:

TEAM CHIEF Bobby Werfel

THROUGH: STAFF DIRECTOR

COMPLIANCE REVIEW CB/RS

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

MUR No. not yet assigned

DATE OF ORIGINAL REFERRAL 12/21/79

Republican Finance Committee-Dallas County

**PURPOSE: Information

A Request for Additional Information was sent to the committee on 8/2/79 for the April 10 Report. No response has been received to the request, but the matter is being discontinued by this Division because:

1. The committee has filed an acceptable termination.
2. The cash discrepancy is insignificant in terms of the committee's total cash flow.
3. The loan has been repaid in full.

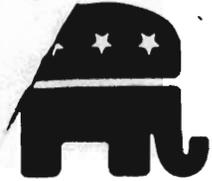
Attachments

Letter regarding cash discrepancy, 4/12/79	1
Schedule C showing outstanding loan owed, April 10 Report	2
Request for Additional Information regarding these matters, 8/2/79	3
Loan repaid in full, July 10 and Termination Reports	4

OUTCOME: (if applicable)

00040185023

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
 **INFORMATION, or RESULTS OF RAD ACTION, as appropriate.



**Republican
Party**
OF DALLAS COUNTY

5010 GREENVILLE AVE., SUITE 101
DALLAS, TEXAS 75206
(214) 369-9555

79 APR 10 AM 1.05

April 12, 1979

Mr. David Greevy
Reports Analyst
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: Republican Finance Committee

Dear David:

Enclosed herewith for filing please find the April 10 Quarterly Report of the Republican Finance Committee. Pursuant to my telephone conversation with you today, we are filing the enclosed report with the knowledge that there is an error of \$1,472.52, we believe in the receipts reported. However, we believe this error occurred in some prior reporting period, possibly even in the first report filed with the FEC, and has been carried forward with each subsequent report. We are attempting to locate the error by reviewing our prior reports; however, this will be quite time-consuming and, at your suggestion, we are filing the enclosed quarterly report with this letter of explanation. When we discover where the error first occurred, we will file whatever amended reports are necessary to correct the situation.

Inasmuch as we do not have a Treasurer at this time, I have signed the report as Chairman.

Thanking you for your courtesies and assistance, I am

Sincerely,


William A. McKenzie, Chairman
Republican Party of Dallas County

WAMcK/cs
encl.

CERTIFIED MAIL
NO. 868243

WILLIAM A. MCKENZIE, COUNTY CHAIRMAN, 26TH FLOOR LTV TOWER, DALLAS, TEXAS 75201
TODDIE L. WYNNE, JR., FINANCE CHAIRMAN, 4100 FIRST NATIONAL BANK, DALLAS, TEXAS 75202
CLAIRE A. SANDUSKY, EXECUTIVE SECRETARY, 9302 W. LAKE HIGHLANDS, DALLAS, TEXAS 75218
REBECCA SHAW, SECRETARY-OFFICE MANAGER, 5010 GREENVILLE AVENUE, DALLAS, TEXAS 75206

790040185043423

DEBTS AND OBLIGATIONS
Supporting Line Numbers 12 and 13
of FEC FORM 3

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full
Republican Finance Committee

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
First National Bank in Dallas P. O. Box 6031 Dallas, Texas 75283	12/18/78	\$15,000.00	-0-	\$15,000.00
<input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other				
		\$	\$	\$

NATURE OF OBLIGATION (Details of Debt):
 Loan

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional)	\$	\$	\$
TOTAL this period (last page this line number only)	\$	\$	\$ 15,000.00

Carry outstanding balance only to appropriate line of summary

0719101825032500





FEDERAL ELECTION COMMISSION

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

August 2, 1979

William A. McKenzie, Chairman
Republican Finance Committee-Dallas County
5010 Greenville Avenue, Suite 101
Dallas, TX 75206

Dear Mr. McKenzie:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the April 10 Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact David Greevy in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

70 20 00 3 10 33 48 15 30 32 35

3

FEDERAL ELECTION COMMISSION

1325 K Street, N.W.
Washington, D.C. 20463

Republican Finance Committee

DATE: August 2, 1979

I.D. NO.: C00098707

REQUEST FOR ADDITIONAL INFORMATION FOR THE April 10 REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 1/1/79 THROUGH 3/31/79, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

Coverage Dates: omitted or incorrect

Summary Page Line(s): Column(s): Totals: omitted or incorrect

Detailed Summary (Page 2) Line(s): Column(s): Totals: omitted or incorrect

Schedule Totals: disagree with Detailed Summary (Page 2) or omitted

Date(s): omitted or inadequate for Schedule(s) Line(s)

Full Name(s)/Mailing Address(es): omitted or inadequate for Schedule(s) Line(s)

Occupation/Principal Place(s) of Business: omitted or inadequate for Schedule(s) Line(s)

Election Designation: omitted or inadequate for Schedule(s) Line(s)

Aggregate Year-to-Date Totals: omitted or inadequate for Schedule(s) Line(s)

Nature or Purpose of Expenditure: omitted or inadequate for Schedule(s) Line(s)

Nature or Purpose of Receipt: omitted or inadequate for Schedule(s) Line(s)

Inadequate Description of: proceeds dates events location of Schedule

Signature: omitted inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

Other: Please See Page Two

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 357-0023 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

Republican Finance Committee-Dallas County
April 10-1979

The committee has indicated that it is researching the error of \$1,472.52, with respect to the committee's cash on hand. Please notify the Commission when the circumstances of the error are discovered.

Please provide the nature of the debt or obligation owed to the First National Bank in Dallas. This information should include the duration of the debt, interest, interest rate, source, whether or not secured, terms of repayments, and where applicable, collateral and terms of extension. Also, if this loan has been guaranteed or endorsed, please provide the name(s), address(es), occupation(s), and principal place(s) of business of those individual(s) who have endorsed the loan. In addition, the amount each individual has guaranteed should be provided.

7 9 0 0 3 1 3 8 4 0 2 2 0

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made) Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

(Use Separate Schedules for each numbered line)

Commission
et, N.W.
ington, D.C. 20463

Name of Candidate or Committee in Full Republican Finance Committee

009034285

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
John S. Aronson 6207 Park Lane Dallas, Texas 75225	Salary	4/6/79	\$ 148.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		
Southwestern Bell Telephone Co. Dallas, Texas 75202	Telephone service	4/9	\$ 475.31
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	5/15	\$ 238.14
R. L. Polk & Co. 7168 Envoy Court Dallas, Texas 75247	City directories	4/9/79	\$ 208.45
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		
First National Bank in Dallas Dallas, Texas 75202	Loan payment - \$1,000.00 principal; \$517.81 interest	4/16/79	\$ 1,517.81
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		
Acers Investment Co. 5920 Sherry Lane Dallas, Texas 75225	Rent and utilities	4/25/79	208.67
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	4/16/79 5/1/79	\$ 4,305.48 176.63
Rebecca Shaw 6722 Northport Dallas, Texas 75230	Salary	semi-monthly	\$ 2,351.88
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		
Texas Bank & Trust Co. One Main Place Dallas, Texas 75250	Payroll taxes	4/16/79	\$ 418.78
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		
Postmaster Dallas, Texas	Postage	6/18/79	\$ 100.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 10,149.15

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Name of Candidate or Committee in Full			
REPUBLICAN FINANCE COMMITTEE			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
First National Bank in Dallas Dallas, Texas 75202	Payment in full of loan - \$14,000 prin.; \$473.50 int.	8/8/79	\$14,473.50
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
McKenzie and Baer 26th Floor LTV Tower Dallas, Texas 75201	Full payment of loan	8/23/79	\$ 5,500.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 19,973.50

9131830
 00183030



December 21, 1979

MEMORANDUM

TO: Charles Steele
THROUGH: Orlando B. Potter *O.B.P.*
FROM: TOM HASELHORST
SUBJECT: Referrals for Republican Primary Account and Cameron
County Democratic Executive Committee

Please note that the attached referrals for the above mentioned committees are concerned with the same transaction and should be reviewed and handled simultaneously.

In addition, a referral for Republican Finance Committee-Dallas County is included in this package, as the committee has the same treasurer as the Republican Primary Account and the Republican Primary Account is a separate account of the Republican Finance Committee-Dallas County.

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0040195032

D 556
RAD 46-218

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE FILING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/21/79 ANALYST Dug Greevy
 TO: Office of General Counsel TEAM CHIEF Bobby Werfel
 THROUGH: STAFF DIRECTOR [Signature] COMPLIANCE REVIEW R/CB
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE/COMMITTEE: Republican Primary Account
 TREASURER: William A. McKenzie, Chairman
 ADDRESS: 26th Floor, LTV Tower
 Dallas, Texas 75201
 AFFILIATE(S):

MUR IIII

ALLEGATION(S): Unregistered Political Committee CITE: 2 U.S.C. 433 and 434 ATTACHMENT(S): 1

Note: The receipts were reported on the recipient committee's first report for 1978. It is not known why the aggregate year to date receipt is greater than the amount reported received.
 DATE INITIATED: 9/5/78

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other:
 Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM _____ TO _____

TOTAL RECEIPTS \$ _____ TOTAL EXPENDITURES \$ _____

CASH ON HAND \$ _____ DEBTS \$ _____

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

3 SV1/78-129, 10/17/78 2
0 3 SV2/78-129, 2/12/79 (For inadequate response) 3

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

9 Telecon: Greevy with McKenzie, 4/7/79 4

REASON(S) FOR REFERRAL:

ATTACHMENT

0 Response received, 10/27/78 5

0 Response received, 3/19/79 6

Note: The other letter of 2/12/79 was 3R02/78-118 sent to recipient committee on another matter.

0 Response received, 4/5/79 (Question of adequacy of response) 7

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None

OTHER RELEVANT INFORMATION:

ATTACHMENT

Exhibit A referred to in responses of 10/27/78 and 4/5/79 8

Letter of 10/23/78 referred to in response of 10/27/78 9

Contributions made to Federal candidates by recipient committee 10

For comparison, see referral for Cameron County Democratic Executive Committee, Primary Fund

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

See appropriate sections of Texas Elections Code-
Article 13.08(i) and 13.08a(d) 11

NO PREVIOUS OGC/AUDIT REFERRALS FROM RAD

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

REPUBLICAN FINANCE COMMITTEE

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Republican Primary Account William A. McKenzie, Chairman 26th Floor LTV Tower Dallas, Texas 75201	Same Attorney Occupation	2/10/78 3/9/78	2,000.00 7,000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 10,015.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		

SUBTOTAL of receipts this page (optional) \$

TOTAL this period (last page this line number only) \$ 9,000.00

073A

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)
 Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Name of Candidate or Committee in Full
 REPUBLICAN FINANCE COMMITTEE

0001185035

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Republican Primary Account William A. McKenzie, Chairman 26th Floor LTV Tower Dallas, Texas 75202	SAME Occupation: Attorney	8/18/78 9/6/78	\$ 15,000 2,000
Receipt for: <input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 26,000.00			
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each this Period
Receipt for: <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$			
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each this Period
Receipt for: <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$			
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each this Period
Receipt for: <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$			
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each this Period
Receipt for: <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$			
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each this Period
Receipt for: <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$			
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each this Period
Receipt for: <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$			
SUBTOTAL of receipts this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 17,000



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20461

October 17, 1978

Mr. William A. McKenzie, Chairman
Republican Primary Account
26th Floor LTV Tower
Dallas, TX 75201

Dear Mr. McKenzie:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by Republican Finance Committee indicates that your organization may have made contributions which total in excess of \$1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

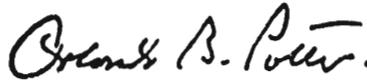
If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed \$1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

00010195036

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact David Greevy in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-1474.

Sincerely,



Orlando B. Potter
Staff Director

Certified Mail
Return Receipts Requested

Enclosures

00010185037

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Line Number 15a

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

REPUBLICAN FINANCE COMMITTEE

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Same	Date (month, day, year)	Amount of each Receipt this Period
Republican Primary Account William A. McKenzie, Chairman 26th Floor LTV Tower Dallas, Texas 75201	Attorney		2/10/78	2,000.00
	Occupation		3/9/78	7,000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		Aggregate Year-To-Date: \$ 10,015.00
Full Name, Mailing Address and ZIP Code	Principal Place of Business		Date (month, day, year)	Amount of each Receipt this Period
	Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		Aggregate Year-To-Date: \$
Full Name, Mailing Address and ZIP Code	Principal Place of Business		Date (month, day, year)	Amount of each Receipt this Period
	Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		Aggregate Year-To-Date: \$
Full Name, Mailing Address and ZIP Code	Principal Place of Business		Date (month, day, year)	Amount of each Receipt this Period
	Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		Aggregate Year-To-Date: \$
Full Name, Mailing Address and ZIP Code	Principal Place of Business		Date (month, day, year)	Amount of each Receipt this Period
	Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		Aggregate Year-To-Date: \$
Full Name, Mailing Address and ZIP Code	Principal Place of Business		Date (month, day, year)	Amount of each Receipt this Period
	Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		Aggregate Year-To-Date: \$
Full Name, Mailing Address and ZIP Code	Principal Place of Business		Date (month, day, year)	Amount of each Receipt this Period
	Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		Aggregate Year-To-Date: \$
Full Name, Mailing Address and ZIP Code	Principal Place of Business		Date (month, day, year)	Amount of each Receipt this Period
	Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		Aggregate Year-To-Date: \$
SUBTOTAL of receipts this page (optional)				\$
TOTAL this period (last page this line number only)				\$ 9,000.00

Commission
N.W.
D.C. 20463

034



FEDERAL ELECTION COMMISSION

1155 K STREET, N.W.
WASHINGTON, D.C. 20541

October 23, 1978

INFORMATIONAL NOTICE

William A. McKenzie, Chairman
Republican Finance Committee
26th Floor LTV Tower
Dallas, Texas 75201

Dear Mr. McKenzie: April 10

During review of your Quarterly Report of Receipts and Expenditures, we noticed that you may have received funds in excess of \$1,000 from an organization(s) which is not registered under the Act as a political committee.

For your information we are attaching a copy of our letter to this organization listed as the source of the funds. Since they are being given the opportunity to bring themselves into compliance as a registered political committee, you may wish to consult with the organization.

If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. If you have any questions, please contact David U. Greevy, our Reports Analyst assigned to you, at (800) 42-9530. Our local number is (202) 523-1474.

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In reply please refer to: 35V1/11-129



FEDERAL ELECTION COMMISSION

1700 SIEGEL NW
WASHINGTON, DC 20541

October 17, 1978

Mr. William A. McKenzie, Chairman
Republican Primary Account
20th Floor LTV Tower
Dallas, TX 75201

Dear Mr. McKenzie:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by Republican Finance Committee indicates that your organization may have made contributions which total in excess of \$1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a statement of organization on FEC Form 1, in accordance with 2 U.S.C. 435. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 or FEC Form 3.

If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committee(s) to which you have contributed may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed \$1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

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7900001301

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact David Greevy in our Reports Analysis Division at (800)24-9530. Our local number is (202)523-1474.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Certified Mail
Return Receipts Requested

Enclosures

60010185041

7893001303
0000011336

Commission on
1974
1000 2-403

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 16a, 16b, 16c, 17a, and/or 18a
of FEC FORM 3

Page 1 of 1

Line Number 15a

Use Separate Form for each numbered line

Name of Candidate or Committee in Full

REPUBLICAN FINANCE COMMITTEE

Name, Mailing Address and ZIP Code	Principal Place of Business	Same	Excess of the over 1974	Amount of the transfer
Republican Primary Account William A. McKenzie, Chairman 26th Floor LTV Tower Dallas, Texas 75201	Attorney Dallas		0/10 78 3/97 78	2,000.00 7,000.00

Other
 Political Service Other
 Full Name, Mailing Address and ZIP Code

Other
 Political Service Other
 Full Name, Mailing Address and ZIP Code

Other
 Political Service Other
 Full Name, Mailing Address and ZIP Code

Other
 Political Service Other
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Other
 Political Service Other
 Full Name, Mailing Address and ZIP Code

Other
 Political Service Other
 Full Name, Mailing Address and ZIP Code

TOTAL (This should equal sum of all itemized receipts)

100010185042



Republican Party OF DALLAS COUNTY

6010 GREENVILLE AVE., SUITE 101 DALLAS, TEXAS 75206 (214) 369-9555

NOV 3 PM 12:30 '78

October 27, 1978

Mr. Orlando B. Potter Staff Director Federal Election Commission 1325 K Street N.W. Washington, D.C. 20463

Re: 3SV1/78-129

Dear Mr. Potter:

This statement is being sent to you in reply to your letters of October 17 and October 23, 1978. I have carefully reviewed the law that you quote, namely 2 U.S.C. 433, as well as other laws pertaining to the Federal Election Commission. If you would kindly examine the first report that we filed, it gives in detail the fact that the Dallas County Republican Party has two bank accounts, (1) our regular bank account and (2) a bank account which we set up to conduct the primary election. Following the primary election the Primary Account was for all practical purposes closed and the funds from that account were transferred to our operational account. It is not a political committee -- it is a part of the Dallas County Republican Party and, in fact, it is nothing but a bank account used solely to clarify for reporting purposes to the State of Texas funds received and expended during the primary election.

The monies reported as coming from our Primary Account were not contributions, but were funds received from filing fees and reimbursements to our regular account from funds received from the State of Texas to reimburse us for the cost of conducting a primary election.

If your report analyst who handles this matter would be so kind as to refer to our initial report, I think the matter can be clarified to your complete satisfaction. In the meantime, there is no Republican Primary Account Committee, party, entity, other than a checking account, as explained above.

Please do not consider this as a criticism, but it appears to me that the weight of the paper expended in reports, etc., as well as correspondence with the F.E.C. is going to soon sink Washington

WILLIAM A. MCKENZIE, COUNTY CHAIRMAN, 26TH FLOOR LTV TOWER, DALLAS, TEXAS 75201 TODDIE L. WYNNIE, JR., FINANCE CHAIRMAN, 4100 FIRST NATIONAL BANK, DALLAS, TEXAS 75202 CLAIR A. SANDURSKY, EXECUTIVE SECRETARY, 9302 W. LAKE, HIGHLANDS, DALLAS, TEXAS 75210 REBECCA SHAW, SECRETARY-OFFICE MANAGER, 5010 GREENVILLE AVENUE, DALLAS, TEXAS 75206

607803890647061

Mr. Orlando B. Potter
October 27, 1978
Page Two

into the Potomac. The foregoing facetious statement is made in jest,
but I am confident that you would agree.

Sincerely and respectfully yours,


William A. McKenzie, Chairman
Republican Party of Dallas County

WAMcK/cs

0004001850447



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20543

2/12/79

Mr. William A. McKenzie, Chairman
Republican Primary Account
26th Floor LTV Tower
Dallas, TX 75201

Dear Mr. McKenzie:

On October 17, 1978, you were notified that our review of the receipts reported by the Republican Finance Committee indicated that your organization may have made contributions which total in excess of \$1,000 during the calendar year, thereby making the Republican Primary Account a political committee, subject to the registration and reporting requirements of the Federal Election Campaign Act, as amended.

We received a response from you on November 3, 1978, however, we found your response to be inadequate. Your failure to provide an adequate response gives the Commission reason to believe that you are in violation of 2 U.S.C. 433 and 434.

Although we are aware of the nature of the Republican Primary Account with respect to the organization of the Republican Finance Committee, it continues to be necessary to:

- 1) Register the Republican Primary Account with, and report its activities to, the Federal Election Commission; or
- 2) Transfer from the Republican Finance Committee to an account not used to influence Federal elections, such an amount that the total remaining amount received from the Republican Primary Account and retained by the Republican Finance Committee does not exceed \$1,000.

As an alternative, because the Republican Primary Account is part of the organization of the Republican Finance Committee, the Republican Finance Committee may amend its reports to include the activities of the Republican Primary Account. These amendments should begin with the first report filed by the Republican Finance Committee, the 30 Day Post-Primary Election Report. In addition, the sources of any additional cash on hand, January 1, 1978, reported by the Republican Finance Committee due to the inclusion of the activities of the Republican Primary Account, should be disclosed.

We note further that the October 10 Quarterly Report filed by the Republican Finance Committee discloses an additional \$17,000 in contributions from the Republican Primary Account. Enclosed is a copy of the page in which these additional contributions are listed.

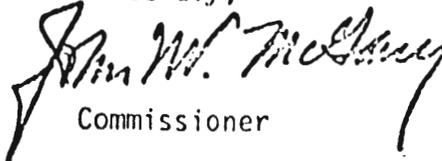
0004718:045

1978 FEB 12 11 58 AM '79

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days of receipt of this letter.

If you require additional information, please contact David Greevy, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is 523-1472.

Sincerely,


Commissioner

Certified Mail
Return Receipt Requested

60010185045

00040185048

35U1178-129

PS Form 3811, April 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER Complete items 1, 2 and 3 Add your address in the RETURN TO space on reverse

1. The following service is requested (check one).
 Show to whom and date delivered C
 Show to whom, date, and address of delivery C
 RESTRICTED DELIVERY Show: to whom and date delivered C
 RESTRICTED DELIVERY Show to whom, date, and address of delivery. \$ ____ (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Makenzie Koput Pri Koot FX

3. ARTICLE DESCRIPTION
 REGISTERED NO. CERTIFIED NO. INSURED NO.
943631
 (Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
Richard Larson

4. DATE OF DELIVERY POSTMARK
001 *001*

5. ADDRESS (Complete only if requested)
216 W. Main St. Dallas TX 75201

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

10/17

☆GPO 1977-0-249-595

35U1178-129

PS Form 3811, April 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER Complete items 1, 2 and 3 Add your address in the RETURN TO space on reverse

1. The following service is requested (check one).
 Show to whom and date delivered C
 Show to whom, date, and address of delivery C
 RESTRICTED DELIVERY Show to whom and date delivered C
 RESTRICTED DELIVERY Show to whom, date, and address of delivery. \$ ____ (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Republican Primary Account TX

3. ARTICLE DESCRIPTION
 REGISTERED NO. CERTIFIED NO. INSURED NO.
711787
 (Always obtain signature of addressee or agent)

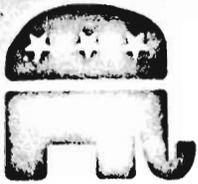
I have received the article described above.
 SIGNATURE Addressee Authorized agent
Grace David

4. DATE OF DELIVERY POSTMARK
FEB 20 1979 *DALLAS TEXAS*

5. ADDRESS (Complete only if requested)
216 W. Main St. Dallas TX 75201

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆GPO 1977-0-249-595



Republican
Party
OF DALLAS COUNTY

500 GREENVILLE AVE., SUITE 101
FEDERAL ELECTION COMMISSION
DALLAS, TEXAS 75206
(214) 369-9555

'79 MAR 26 AM 9:42

March 19, 1979

Mr. David Greevy
Reports Analyst
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Greevy:

We have received two letters dated February 12, 1979 from the Federal Election Commission, one addressed to William A. McKenzie as Chairman of the Republican Finance Committee and the other addressed to William A. McKenzie as Chairman of the Republican Primary Account. I am writing this letter to you, as both letters state that you are the Reports Analyst assigned to these matters.

First, we apologize for the delay in responding to the Commissioners' letters. Mr. McKenzie had expected to be in the office to reply to the letters timely, but instead has been out of the city nearly constantly for the last several weeks. He will return to the office next week and will be in touch with the FEC at his earliest opportunity.

Sincerely,

Claire A. Sandusky

(Mrs.) Claire A. Sandusky
Executive Secretary

000100R5049



Republican
Party
OF DALLAS COUNTY

6010 GREENVILLE AVE., SUITE 101
DALLAS, TEXAS 75206
(214) 369-9555

April 5, 1979

901934

Commissioner John W. McGary
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. McGary:

We have sought in every instance to fully and completely answer and report the facts relative to each contribution made by the Dallas County Republican Party. We have filed with your Commission a complete report of all reports filed with the Secretary of State of Texas, being reports relative to the primary elections in Texas. At no time have I ever intentionally or deliberately failed to respond so that I would be in violation of any provision of the federal law. Also, we have responded both by phone and by letter to your office trying to clear any problems or questions.

In a telephone conversation with your Mr. Greevy today, it was explained in detail the nature of our Republican Primary Account. It is our understanding that it is required of the Dallas County Republican Party to set up a separate primary account under the provisions of the Texas Election Code. The primary account receives its money from filing fees of candidates and from reimbursements from the State of Texas for conducting the primary elections. No contributions go into such account, as the money, as previously stated, comes solely from filing fees of candidates and from reimbursements from the State of Texas.

When the primary elections are over and all costs have been determined, the Dallas County Republican Party then pays all of the expenses out of the Republican Primary Account, including the cost of voting machines, rental of polling places, cost of transport of voting machines, payments to election judges and clerks, and all costs attendant to the primary elections. The Texas Election Code provides for certain fees to be paid to those officers within the party that are charged with the responsibility of conducting the elections, a certain percentage for an office, certain percentage for telephone, postage, printing, clerical help and secretarial help, all of which was itemized on the report previously furnished to you which you state to be an inadequate explanation.

That amount provided for in the Texas Election Code to be paid to the Dallas County Republican Party is then transferred from the Republican Primary Account to the Republican Finance Committee (the operating account of the Republican Party of Dallas County) in payment of its actual costs,

WILLIAM A. MCKENZIE, COUNTY CHAIRMAN, 26TH FLOOR ITV TOWER, DALLAS, TEXAS 75201
TODD L. WYNN, JR., FINANCE CHAIRMAN, 4100 FIRST NATIONAL BANK, DALLAS, TEXAS 75202
CLAIR A. SANDRELY, EXECUTIVE SECRETARY, 900 W. LAKE HIGHLANDS, DALLAS, TEXAS 75208
REBECCA SHAW, SECRETARY-OFFICE MANAGER, 6010 GREENVILLE AVENUE, DALLAS, TEXAS 75206

00010135050



again as itemized in the statement of actual costs of primary elections filed with the Secretary of State of Texas, all of which has been reported to the FEC as exhibits to our original filing of FEC Form 3 on June 28, 1978. The actual cost of the 1978 primary elections owed to the Dallas County Republican Party was \$27,283.62 and the actual receipts by the Dallas County Republican Party at the time of the October 1978 quarterly report to the FEC totalled \$26,000.00, leaving a balance of \$1,283.62 which had not been paid at the time of the report. These amounts have previously been reported to your Commission and I believe satisfy your item No. 2, to-wit: "Transfer ... such an amount that the total remaining amount received from the Republican Primary Account and retained by the Republican Finance Committee does not exceed \$1,000." Thus we believe and hope that we have satisfied the requirement set forth in your letter of February 12, 1979.

I emphasize once again that all of the above has been previously reported to the FEC. In your first paragraph following the numbered paragraphs, the Republican Primary Account is not part of the organization of the Republican Finance Committee, but only a separate bank account to handle filing fees and reimbursements from the State, although our reports to the FEC have included the activities of the Republican Primary Account, as Mr. Greevy affirmed to us today. In effect, every source of monies received has been disclosed and reported to you, whether same was from contributions to the Republican Finance Committee or from filing fees and reimbursements from the State of Texas. In the October 10, 1978 quarterly report filed by the Republican Finance Committee, it shows \$17,000 being deposited from the Republican Primary Account in the Republican Finance Committee account. You sent me a copy of that page. Such \$17,000 was a partial payment to the Dallas County Republican Party for expenses incurred (two payments totalling \$9,000.00 had previously been transferred, bring the total reimbursement as of October 10, 1978 to \$26,000.00) and all of these payments were from monies received from the State of Texas as reimbursement to the County party.

At that time, the only remaining amount left in the Republican Primary Account was an amount sufficient to cover the outstanding checks. Since the report of October 10, 1978, we have closed the Republican Primary Account, having beforehand ascertained that the election judges and clerks who had not cashed their checks did not intend to cash their checks from the Primary Account, and we accordingly closed the account by transferring the balance of \$682.77 to the Republican Finance Committee account, which in turn will be reported in our next report to the FEC.

We are trying to make a final report to the Commission and we will not be making any further contributions to any federal candidates! Moreover, every detail in this letter was discussed with Mr. Greevy today and I am hopeful that through that discussion and through this letter, our reports can be deemed to have been adequate. If a study is made of the reports heretofore made, I believe and am hopeful that you will find that the reports previously made to the State of Texas and included in our reports to your Commission set forth in adequate detail the matters detailed herein.

Lastly, we are most desirous of closing out our federal political committee, although it is my understanding that we cannot do so until such

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time as we have paid off the remaining balance owed to the bank here in Dallas. If I am wrong in that regard, please notify me immediately and, if so, we will gladly file a final report. As indicated in my other letter to the Commission today, the cost involved both at your end and at our end, considering the small amounts of money contributed to federal candidates, in making the reports is overwhelming and certainly we are desirous of reporting fully, but mainly reporting finally!

Trusting that the above, coupled with my conversation with Mr. Greevy, is fully and completely adequate and that upon review of the reports heretofore made, our conversation with your excellent Reports Analyst, Mr. Greevy, and this letter, all of your questions will be answered, I am

Sincerely,

William A. McKenzie, Jr.

William A. McKenzie, Chairman
Republican Party of Dallas County

WAMcK/cs

00040185052

Telecon:

Dug Greevy with Bill McKenzie
Dallas County--Republican Finance Committee & Republican Primary Account
4/7/79

RFC

He stated that he was elected chairman of the committee, and since his position necessitated him to also be the primary fundraiser of the committee, he assumed both duties.

I told him of the complications this made with our law. He stated that he would immediately resign from the post of treasurer. He asked if this would be sufficient. I stated that the committee would then need to have a treasurer. He said that he understood this.

He asked if this action would take care of the matter, and I said that it would at this point, but that there might be some questions regarding the signatures on previous reports filed. I said that I really did not know, but that I would consult OGC regarding this. He said a letter would be sent.

RPA

He said that all of the activity of the RPA had been disclosed to FEC in the addendum to the first report filed. I said that I had not been aware of that, and that I would appreciate a letter to that effect, so that I could consult with OGC regarding the matter.

He said a letter would be sent.

6004085053

**REPORT OF ACTUAL COSTS
FOR 1978 GENERAL PRIMARY
AND RUNOFF PRIMARY**

Article 13.08a, Vernon's Texas Election Code, requires the accurate completion of a sworn itemized report of the actual cost for the primary election or elections and its submission to the Secretary of State within twenty days after the date of the runoff primary.

DUE DATE FOR REPORT -- ON OR BEFORE JUNE 23, 1978

COST OF PRECINCT, SENATORIAL, OR COUNTY CONVENTIONS AND EXECUTIVE COMMITTEE MEETINGS ARE NOT PRIMARY EXPENDITURES, AND WILL NOT BE REIMBURSED FROM STATE FUNDS.

From William A. McKenzie County Chairman, Republican Party
Dallas County, Texas.

County Party Headquarters Address: 5010 Greenville

County Party Headquarters Phone: 214 369-9555
Area/Code

County Chairman's Phone (Home) 214/521-7287 (Business): 214/742-1861
A/C A/C

Home Address of County Chairman: 4517 Beverly, Dallas 75205

Business Address of County Chairman: 26th Floor, LTV Tower, Dallas 75201

A. Please furnish the following requested information relating to your county:

1. Total gubernatorial votes cast in 1978 general primary within the county. 35,838
2. Total turn-out in runoff primary within the county. 2,014
3. Type of equipment used by your party. (Do not include absentee voting) Check appropriate box. No. of units used

Paper Ballots-----	<input type="checkbox"/>	<u>N/A</u>
Voting Machines - AVM----	<input checked="" type="checkbox"/>	<u>480</u>
- Shoup--	<input type="checkbox"/>	<u>N/A</u>
Punch Card-----	<input type="checkbox"/>	<u>N/A</u>
4. Total number of polling places using voting machines

a. General Primary	<u>a. 328</u>
b. Runoff Primary	<u>b. 65</u>
5. Total number of polling places using punch card voting devices.

a. General Primary	<u>a. 0</u>
b. Runoff Primary	<u>b. 0</u>
6. Total number of polling places using paper ballots

a. General Primary	<u>a. 0</u>
b. Runoff Primary	<u>b. 0</u>
7. Total number of election precincts in your county 357
8. Total number of polling places used in your county

a. General Primary	<u>a. 328</u>
b. Runoff Primary	<u>b. 65</u>

8

6 0708103 087: 7055 418 6

1. Cost of printing ballots.

- a. Cost of printing paper ballots if paper ballots are used. \$4,627.00
- b. Cost of printing machine strips if voting machines are used. \$6,602.00
- c. Cost of printing if punch card devices are used. (Exclude any costs incurred in item B 6 below). \$ N/A
 Also, itemize the following:
 - (1) Cost of mask \$ _____
 - (2) Cost of printing ballot pages \$ _____
 - (3) Cost of ballot cards \$ _____
 - (4) Cost of assembly, if contracted for \$ _____

Explanation of any increase over estimate: (11,156) \$73 minimal increase

- 2. Cost of rental of polling place and/or custodial services. (Art. 2.03, para. a, Texas Election Code, provides that no charge shall be made for the use of schoolhouses, fire stations, and other public buildings). \$ 12,535.47

Explanation of any increase over estimate: (13,500) none

- 3. Compensation of election judges and clerks. (See Art. 3.08, para. a, Texas Election Code).

<u>clerks</u>	x	<u>hours</u>	x	<u>rate</u>	=	General	<u>\$33,722.13</u>
<u>clerks</u>	x	<u>hours</u>	x	<u>rate</u>	=	Runoff	<u>\$5,519.00</u>

Explanation of any increase over estimate: (54,390) none \$15,048.87 decrease

- 4. Fees for prompt delivery supplies. (See Art. 3.08, para. a, Texas Election Code.)

<u>328</u>	polling places	x	<u>15</u>	rate	=	General	<u>\$4,920.00</u>
<u>64</u>	polling places	x	<u>15</u>	rate	=	Runoff	<u>\$960.00</u>

Explanation of any increase over estimate: (7005) none \$1125 decrease

- 5. In counties using mechanical and/or punch card voting devices: (Art. 13.08f, Texas Election Code). Maximum compensation per unit, as stated below, includes all charges for preparation and maintenance, if county provided these services.

General Primary -

 - a. 414 Voting Machines @\$16.00 per unit used in precincts. \$ 6,624.00
 - 0 Machines used for absentee voting x \$16.00 per unit. \$ 0

Runoff Primary -

 - a. 66 Voting Machines @\$16.00 per unit used in precincts. \$ 1,056.00
 - 0 Machines used for absentee voting x \$16.00 per unit. \$ 0

0078918057075554387

0 Units Punch Card devices used
for absentee voting x \$3.00.

\$ 0

Runoff Primary -

b. 0 Punch Card voting devices
@ \$3.00 per unit used in precincts

\$ 0

0 Punch Card devices used
for absentee voting x \$3.00 per unit.

\$ 0

Explanation of any increase over estimate: 0

6.a. Other compensable expenditures related to
use of a Central Counting Station in punch
card voting. (Art. 13.08(f), V.T.E.C.; Art. 7.15,
subdiv. 20, para. (a), (d), (e), and subdiv. 9,
para. (a) and (b), V.T.E.C.; and Art. 3.02,
V.T.E.C.) Attach itemized list.

\$ 0

Explanation of any increase over estimate: 0

b. Rental of other equipment related to Punch Card
voting.

\$ 0

Explanation of any increase over estimate: 0

7. General Primary -

a. Transportation charges for delivery of
above stated voting machines in B(5).
(Compensable amounts are not to exceed the
current appropriate county contracts
in existence).
Number of Units 546

\$ 14,151.00

Attach copy of county contract if not previously filed.

Explanation of any increase over estimate: (18,531.72) none
Have not received final billing; however, we are advised by telephone call
that 14,151 will be total figure for both elections.

8. Election sets and supplies

Total number of sets for both elections 427 x \$ 21.45 = \$ 9,159
per set

Explanation of any increase over estimate: none

9. Costs for stationery.

\$ 630.

Explanation of any increase over estimate: (440) We printed larger
quantity of stationery in order to duplicate certain materials directly on our
letterhead, using new duplicating machine at headquarters.

10. Miscellaneous Printing Cost.
Attach itemized list.

\$ 675.10

Explanation of any increase over estimate: (840) see attached note

0007895438

12. Cost of postage related to conducting primaries.

\$ 861.65

Explanation of any increase over estimate: (950) none

13. Costs related to other specific duties of the Executive Committee. (Preparation and Distribution of Supplies, Art. 13.19, V.T.E.C.; Returns of Elections, Art. 13.24, V.T.E.C; Counting of Absentee Ballots, Art. 5.05, subdiv. 6, V.T.E.C.; Delivery of Absentee Paper Ballots, Art. 7.14, sec. 7, V.T.E.C.) Attach explanation and itemized list.

\$ 2,100.00

Explanation of any increase over estimate: see note on attached

Itemization

14. Rental of office space commencing 30 days before filing deadline and ending 10 days after last primary election held. (Only office space sufficient to enable the County Chairman to properly perform the duties related to the conduct of primaries is compensable.)

\$ 5,905.00

Amount of space rented _____ square feet

Monthly cost per square foot \$ _____

Explanation of any increase over estimate: none

15. Reasonable and necessary office personnel employed to assist in the performance of the duties placed upon the county chairman commencing 30 days before filing deadline and ending 10 days after the last primary election held. Attach itemized list

\$ 9,400

16. Other miscellaneous expenses. Attach itemized list.

\$ 4,857.44

Explanation of any increase over estimate: see note on attached

Itemization

17. SUB-TOTAL COST \$ 125,102.56

C. The total compensation paid to the county chairman and the secretary of the county executive committee (where the executive committee has named a secretary) in the performance of the duties placed upon the chairman shall not exceed five percent of the amount actually spent in holding the primary elections for the year; provided, however, that in no case shall the total compensation paid be less than \$300 nor more than \$5,000.

\$ 6,255.13

C-1. TOTAL COST \$ 131,357.69

D. Income to County Chairman

1. All income from fees previously reported and fees not previously reported. (Attach itemized list of fees collected, by office and amounts if not previously submitted). \$ 19,150

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2. All income from contributions previously reported and contributions not previously reported. Attach itemized list if not previously attached. \$ 0

3. Any other income, balance from previous primary year in primary election fund, recounts, etc. Attach itemized list of amounts, and by whom paid if not previously attached. \$ 0

TOTALS \$19,150

4. Payments made by Secretary of State to County Chairman for general primary and runoff primary (75% of estimates)

a. Amount paid by Sec. of State general primary \$ 63,977.04

b. Amount paid by Sec. of State runoff primary \$ 24,237.75

TOTALS \$ 88,214.79

5. TOTAL INCOME \$ 107,364.79

E. If Item D-5 is less than Item C-1 subtract Item D-5 from Item C-1 enter balance due County Chairman in Item E-1

E1. Balance due County Chairman \$ 23,992.90

If Item D-5 is larger than Item C-1, enter difference as a surplus on line E-2

E2. Remaining Surplus (Retain in County Executive Committee's Primary Fund, Art. 13.18, V.T.E.C.) \$

0575-875 & 084

STATE OF TEXAS
COUNTY OF DALLAS

The actual cost for the 1978 primaries as shown in the report attached hereto is true and correct to the best of my knowledge and belief.

Attached to this affidavit is a full and complete statement of all income and all disbursement of Primary Funds received and disbursed in connection with the General Primary and Runoff Primary held in the County herein named, by the herein named party for the year 1978.

All bank statements, including deposit slips and checks issued, which have been negotiated through the bank to the date of this report together with the cost vouchers, are in my possession and fully support each item enumerated on the attached accounting. Copies of each of the above are attached to this report.

The exact surplus in the County Executive Committee's Primary Fund is attached to this statement.

I, William A. McKenzie, County Chairman of the
Republican, Party in Dallas County, Texas,

do solemnly swear that the foregoing facts of costs are true and correct and that all information required to be reported by me for the 1978 primaries is fully shown.

William A. McKenzie
Signature of County Chairman
June 23, 1978 (Date)

Subscribed and sworn to before me by the said William A. McKenzie,
on this the 23 day of June, 1978, to certify which witness my
hand and seal of office.

Rebecca Dawn Shaw
Notary Public in and for
Dallas County, Texas

My commission expires the 31st day of March, 1979.

(SEAL)

State Warrant should be made payable to: William A. McKenzie
County Chairman's Name

26th Floor, LTV Tower Dallas Dallas, Texas 75201
ADDRESS CITY COUNTY ZIP CODE

DO NOT FILL OUT THIS PART -- FOR SECRETARY OF STATE ONLY

1. Total Reported Actual primary cost \$ _____ C-5
2. Approved Total Actual primary cost \$ _____
3. Total Filing Fees, Contributions, and other income \$ _____ D-3
4. Certified Net Actual Cost \$ _____
5. Payments of 75% of previous estimates \$ _____ D-4
6. Balance Due County Chairman APPROVED: Authorization for issuance of Warrant for Balance Due of Certified Net Actual Cost for 1978 Primaries \$ _____ E-1
or
7. Remaining Balance in Article 13.18, V.T.E.C. fund \$ _____ E-2

Secretary of State, Steven C. Oaks: By _____

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**ATTACHMENT TO REPORT OF ACTUAL COSTS FOR 1978
General Primary and Run-off Primary**

Republican Party of Dallas County - Expenditures and Explanations

#10 - Miscellaneous printing costs:

1/18	Kwik-Kopy -- 300 copies application for place on ballot and memo for transmittal	23.37	
4/13	Kwik-Kopy -- 600 copies of 2 letters	23.10	
5/1	A. B. Dick Co. -- stencils, mimeo paper, toner, ink	391.87	
4/29	A. B. Dick Co. -- repair mimeo machine	97.95	
6/12	Stewart Office Supply -- mimeo paper	138.81	675.10

Note: We did much of our printing on the mimeograph machine owned by the Republican Party of Dallas County and duplicated some materials using leased machine at headquarters, as opposed to using professional printing services, therefore, we have included in this category costs of supplies to reproduce materials on our mimeograph machine.

#11 - Telephone Expense: In addition to many long distance charges, we installed two private lines for primary election, one for each of the gubernatorial candidates, and a third line for our County Chairman who was confined in Baylor Hospital.

#13 - This was the first time the firm of Dohm & Wolff had rendered this type service, and simply underestimated the amount of time & fee involved. Their actual bill totalled considerably more than the \$2100 reported here, which is a compromise figure agreed to by the accounting firm and the Dallas County Republican Party.

#15 - 3/4 salaries of Executive Secretary to County Chairman and Secretary-Office Manager of Republican Headquarters, commencing 30 days before filing deadline and ending 10 days after first primary election 5,850.00

Salaries commencing 10 days after first primary through 10 days after second primary election:

Executive Assistant to County Chairman	\$1,500	
Executive Secretary to County Chairman	1,200	
Secretary-Office Manager of Headquarters	850	
		<u>3,550.00</u>
		\$ 9,400.00

#16 - Miscellaneous expenses:

1. Corrigan-Jordan Insurance Agency -- surety bonds for 2 headquarters personnel to be appointed Notaries Public for purpose of properly executing applications for place on ballot	60.00
2. R. L. Polk & Co. - City Directory Services	228.10
3. Slaughter Lumber Co. - stakes for distance markers	47.22
4. Danny Armstrong and Mark Alexander - auditors fee for compiling votes on 5/8	80.00

1684000

5. Primary Vice-Chairman, Dorothy Golden, out-of-pocket expenses for parking, pens, food, and beverages for volunteers working on canvass of ballots, taping and fasteners for primary material, plastic bags for throw-away materials primary night, tolls	\$ 134.25
6. John S. Aronson statement for rental of van and transportation and delivery services for primary and run-off elections; and for personal auto mileage for other primary and run-off related trips, 573 miles at 17¢	262.41
7. Mileage of volunteers (includes primary chairman 100 days, 30 miles perday at 17¢ per mile \$150.00)	935.00
8. Supplies - scotch tape, typewriter ribbons, ruled cards, liquid paper and thinner, black pens, folders, black and blue rolling writers, postage meter slug, plastic bags	214.19
9. Food and beverages for volunteers at headquarters (coffee service, cold drinks, etc.)	357.56
10. County Clerk personnel bill for primary election day	1,247.50
11. Election day and night personnel (clerical, legal, manual labor, translators, accountants, etc. - both elections)	573.75
12. Rental of election day furniture	42.71
13. Blackboards, chalk & erasers	78.75
14. Lease of Olivetti duplicating machine	596.00
	4,857.44

Note: This item #16 was underestimated, mainly due to the fact that the Dallas County Commissioners had rescinded the free services of County personnel in assisting on election preparation and the bill to the Dallas County Republican Party for those services totalled \$1,247.50. We also have included in this total the cost for lease of a duplicating machine which would allow us to copy materials directly on our letterhead, in order to save professional printing costs.

2694468400

DALLAS COUNTY REPUBLICAN PRIMARY CANDIDATES - 1978

<u>NAME</u>	<u>OFFICE</u>	<u>FILING FEE PAID</u>
George B. Shepherd, Jr.	County Criminal Court, No. 1	300.00
Fred Agnich	State Legislature, 33-R	400.00
Bob White	County Courts at Law, No. 5	300.00
Averill Sweltzer	District Clerk	300.00
Nancy Judy	Commissioners Court, Precinct 2	600.00
Frank Gaston	State Legislature, 33-M	400.00
Bill Long	Justice of the Peace, Precinct 2 Place 2	500.00
Pat McDowell	Justice of the Peace, Precinct 1 Place 2	500.00
Bill Blanton	State Legislature 33-B	400.00
Craig M. Fowler	Family District Court	700.00
Ruth Rayner	Family District Court, 256th	700.00
George Patzig	Justice of the Peace, Precinct 2 Place 1	500.00
Patrick C. Guillot	Family District Court, 254th	700.00
Fletcher Freeman	Probate Court	300.00
Charles R. Duke	Commissioners Court, Precinct 4	600.00
Loy D. Atteberry	Commissioners Court, Precinct 4	600.00
J. L. "Buck" Haynes	Commissioners Court, Precinct 2	600.00
Bill Ceverha	State Legislature, 33-P	400.00
Bob Maloney	State Legislature, 33-E	400.00
John Ovard	Criminal District Court, 265th District	700.00
Joe Irwin	County Treasurer	300.00
Tom Pauken	U. S. Congress, 5th District	1,500.00
John Whittington	County Judge	300.00
Ted Martin	State Senate, 23rd District	750.00
Jack Hampton	Criminal District Court	700.00
Bob Davis	State Legislature, 33-A	400.00
Jim Hamlin	Commissioners Court, Precinct 4	600.00
Brenda Hamer	County Clerk	300.00
Sef Dominguez	County Criminal Courts, No. 7	300.00
Jim Airhart	State Legislature, 33-I	400.00
Roberta Burke	District Clerk	300.00
Billy D. Moore	County Criminal Courts, No. 6	300.00
Dale E. McMahon	District Attorney	600.00
S. Bryan Moore, Jr.	County Courts at Law, No. 3	300.00
Roger Durham	State Legislature, 33-K	400.00
George Burke	County Treasurer	300.00
Herbert Green, Jr.	District Attorney	600.00
Will F. Hartnett	State Legislature, 33-E	400.00
Charles Ben Howell	Justice of the Peace, precinct 1 Place 2	500.00
		<u>\$19,150.00</u>

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COMMITTEE INDEX OF CANDIDATES SUPPORTED - (D) (77-78)

 COMMITTEE CANDIDATE SUPPORTED *****
 ***** OFFICE STATE DST PTY CONTRIBUTIONS TO EXPENDITURES ON BEHALF OF ID# *****

C00098707

REPUBLICAN FINANCE COMMITTEE-DALLAS COUNTY
 CONNECTED ORGANIZATION: REPUBLICAN PARTY OF DALLAS CO

	SENATE	TX	REP	2,200	0	QUALIFIED
TOWER, JOHN GOODWIN	HOUSE	TX 24	REP	50	0	S2TX00023
BERMAN, LEO		TX 11	REP	100	0	H6TX24040
BURGESS, JACK		TX 19	REP	100	0	H6TX11047
BUSH, GEORGE WALKER		TX 06	REP	50	0	H8TX19012
MOWERY, WESLEY H.		TX 05	REP	1,200	0	H6TX06039
FAUKEN, THOMAS W.					0	H8TX05011
TOTAL				3,700	0	

10

Art. 13.08

except for voting machines and/or punch card units used in conducting the absentee voting or any other services for which reimbursement is specifically authorized by law.

(h) The secretary of state is authorized to promulgate rules under which compensation is limited to polling places at which voters of more than one election precinct cast their votes, notwithstanding the provisions of Art. 2.02(g). The rules for such common polling places shall provide for adequate public notice by the county chairman to the voters in election precincts affected by the application of such rules and shall provide for an adequate number of polling places taking into account all other relevant factors including distances of polling places from parts of the precincts served, estimated voter turn-out, and geographic or other boundaries. However, the secretary of state may not require that there be less than one polling place for each commissioner's precinct for reimbursement purposes.

(i) The secretary of state is authorized to promulgate rules in regard to the maximum number of election clerks who may be compensated for their services at a polling place and the maximum number of other necessary office personnel employed to assist in the performance of the duties placed upon the county chairman, taking into account the number of registered voters in the election precinct or precincts, the number of votes cast in the precinct, county, or state in previous elections, the method of voting, and any other relevant factors. The secretary of state must allow compensation for the presiding judge, alternate judge, and at least one clerk for each precinct. The secretary of state may allow compensation for clerks and other necessary office personnel employed in excess of the applicable limits set by his rules if he finds that the employment of additional clerks or other office personnel was justified by a good cause. The total compensation paid to the county chairman and the secretary of the county executive committee (where the executive committee has named a secretary) in the performance of the duties placed upon the chairman shall not exceed five percent of the amount actually spent in holding the primary elections for the year; provided, however, that in no case shall the total compensation paid be less than \$300 nor more than \$8,000.

(j) The secretary of state is authorized to promulgate any other reasonable rules which will minimize the costs of the primary elections. The secretary of state shall furnish a copy of all rules promulgated pursuant to this section to each county chairman at least 10 days before the election to which the rules apply.

(k) The county chairman shall account for the primary fund in the manner provided in Art. 13.18 of this code.

(l) The secretary of state shall not approve any expenditure of state funds to any county organization that practices discrimination based on race, sex, age, creed, or national origin. The

Art. 13.08a

approved estimated amount which is payable out of state funds, together with the secretary of state's calculation of three-fourths of that amount; and the comptroller shall issue a warrant to the chairman for three-fourths of the certified amount.

(c) Within 20 days after the date of the runoff primary, the county chairman shall submit to the secretary of state a sworn itemized report of the actual costs, filing fees collected, and contributions received for the primary election or elections (as the case may be) held by his party in his county. If the actual expenditure for an item exceeded the estimated amount, the chairman shall submit an explanation of the reason for the increased expenditure, and the secretary of state shall allow the increase if good cause is shown. The secretary of state shall certify to the comptroller the difference between the total amount payable out of state funds and the amount which has already been transmitted to the chairman. If the total amount of fees and contributions and the payments from the state exceeds the actual expenditures incurred, the chairman shall retain the difference in the primary fund referred to in Art. 13.18. The exact amount of the balance in the primary fund shall be reported to the secretary of state in the actual expense report provided by this section and said amount shall be a beginning balance on hand for the next ensuing primary conducted by the chairman or his successor. If the primary fund is invested as authorized in Section 196, the beginning balance on hand for the next ensuing primary shall be the amount of the primary fund after termination of the investment.

(d) Each county chairman shall deposit to the credit of the primary fund all warrants received by him under this section. Expenses properly incurred by or on behalf of the county executive committee for the conduct of the primary elections shall be paid from the primary fund, in the manner authorized by the committee.

(e) The county chairman is responsible for payment of claims for primary election expenses, and the state is not liable to any claimant for failure of the county chairman to pay a claim. No county chairman shall be personally liable, nor shall a county executive committee be liable for any debt incurred in the administration of the primary but unpaid because the appropriation provided by the legislature was not sufficient to cover the actual expenditures made.

(f) A county chairman may request that the secretary of state approve an expenditure for the purposes of the auditing of the expenditures made out of the primary fund; however, the secretary of state shall not be required to approve such an expenditure. The secretary of state may require an audit of the primary fund, without such a request, when, in his discretion, he believes a valid purpose will be served by such a procedure.

D 557
RAD 72-718A

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

00010185066

DATE 12/21/79 ANALYST Dug Greevy
TO: Office of General Counsel TEAM CHIEF Bobby Werfel
THROUGH: STAFF DIRECTOR DR COMPLIANCE REVIEW B/CB
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE/COMMITTEE: Republican Finance Committee-Dallas County
TREASURER: None
ADDRESS: William A. McKenzie, Chairman
5010 Greenville Avenue, Suite 101
AFFILIATE(S): Dallas, TX 75206

MUR III

ALLEGATION(S): McKenzie served as both chairman and treasurer of committee, then resigned as treasurer, leaving a vacancy Receipt of excessive contribution
CITE: 2 U.S.C. 432(a) & 11 CFR 102.7(a) 2 U.S.C. 441a
ATTACHMENT(S) 2,3,4 5
DATE INITIATED: 8/11/78

MANNER IN WHICH REVIEW WAS INITIATED:

- Normal Review
- Other:
- Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment I.

PERIOD COVERED FROM 1/1/78 TO 9/15/79

TOTAL RECEIPTS \$ 322,781 TOTAL EXPENDITURES \$ 325,425

CASH ON HAND \$ 1/1/78-\$2,106
9/15/79-\$934 DEBTS \$ 9/15/79-\$0

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

REAL, 8/11/78 (30 Day Post-Election) 6
3RQ2/78-118, 2/12/79 for inadequate response (30 Day Post-Election) 7
Note: Because the excessive contribution (loan) was reported received
and repaid at the time that review was done on both the July 10 and
October 10 reports no letter was sent.

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon: Greevy with McKenzie, 9/27/78 8
Telecon: Greevy with McKenzie, 4/7/79 9

REASON(S) FOR REFERRAL:

ATTACHMENT

Memo to the File: Sims, 5/1/79 10
Amount of excessive contribution meets RAD threshold for OGC review
Response to REAL of 8/11/78, 10/3/78 11
Letter from Executive Secretary, 3/19/79 12
Response to 3RQ2/78-118, 4/5/79 13

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None

OTHER RELEVANT INFORMATION:

ATTACHMENT

Loan Repaid 14
Telecon: Greevy, Partnership is not incorporated 15
Note: Termination request will be accepted once disposition of
residual funds is provided
Please note that 2 U.S.C. 431(e)(1) very clearly states that the definition
of contribution includes loans received.

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
REPUBLICAN FINANCE COMMITTEE-DALLAS COUNTY								ID# C00098707
CONNECTED ORGANIZATION: REPUBLICAN PARTY OF DALLAS CO								
	1979 APRIL 10 QUARTERLY		5,714		10,083	1JAN79 -31MAR79	10	79FEC/125/3492
	REQUEST FOR ADDITIONAL INFORMATION					1JAN79 -31MAR79	3	79FEC/134/1338
	JULY 10 QUARTERLY		10,304		10,442	1APR79 -30JUN79	10	79FEC/134/2178
	OCTOBER 10 QUARTERLY - TERMINATED		74,116		73,921	1JUL79 -15SEP79	27	79FEC/141/2160
	TOTAL		90,134	0	94,446		50	TOTAL PAGES

TERMINATED

*All reports reviewed
 October 10 will require PFAI
 unrelated to referral for excessive contribution*

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
REPUBLICAN FINANCE COMMITTEE-DALLAS COUNTY								ID# C00098707
CONNECTED ORGANIZATION: REPUBLICAN PARTY OF DALLAS CO								
	1978 STATEMENT OF ORGANIZATION					29JUN78	5	78FEC/077/5454
	MISCELLANEOUS TRANSACTION TO F.E.C.					29JUN78	8	78FEC/077/5486
	STATEMENT OF ORGANIZATION- AMENDMENT					12OCT78	2	78FEC/088/4533
	MISCELLANEOUS TRANSACTION FROM F.E.C.					23OCT78	5	78FEC/091/1834
	MISCELLANEOUS TRANSACTION FROM F.E.C.					6NOV78	4	78FEC/095/2883
	30 DAY POST-PRIMARY	156,594		175,886		1JAN78 -30JUN78	27	78FEC/077/5459
	REQUEST FOR ADDITIONAL INFORMATION					1JAN78 -30JUN78	3	78FEC/082/2593
	30 DAY POST-PRIMARY - AMENDMENT					1JAN78 -30JUN78	38	78FEC/088/2895
	REQUEST FOR ADDITIONAL INFORMATION					1JAN78 -30JUN78	3	78FEC/094/3647
	30 DAY POST-PRIMARY - AMENDMENT					1JAN78 -30JUN78	3	79FEC/117/1279
	OCTOBER 10 QUARTERLY	55,820		33,670		1JUL78 -30SEP78	15	78FEC/089/1436
	10 DAY PRE-GENERAL		3,423		6,023	1OCT78 -29OCT78	10	78FEC/095/1345
	REQUEST FOR ADDITIONAL INFORMATION					1OCT78 -29OCT78	3	79FEC/126/2981
	10 DAY PRE-GENERAL - AMENDMENT					1OCT78 -23OCT78	4	79FEC/127/0451
	30 DAY POST-GENERAL		1,128		4,858	30OCT78 -27NOV78	8	78FEC/099/2985
	YEAR END REPORT		15,682		10,542	28NOV78 -31DEC78	6	79FEC/117/1115
	REQUEST FOR ADDITIONAL INFORMATION					28NOV78 -31DEC78	1	79FEC/126/2984
	YEAR END REPORT - AMENDMENT		15,682		10,542	28NOV78 -31DEC78	9	79FEC/127/0455
	TOTAL	212,414	20,233	209,556	21,423		154	TOTAL PAGES

All reports reviewed

0040185070

2

Statement of Organization for a Political Committee

FEDERAL ELECTION
COMMISSION

Commission
Washington, D.C. 20463

Supporting any candidate(s) for federal office and anticipating contribu-
tions or expenditures in excess of \$1,000 in any calendar year in support
of such candidate(s).

(See Reverse Side For Instructions.)

1978 JUL 3 PM 1:10

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Committee (in full) <input type="checkbox"/> Check if name or address is changed Republican Finance Committee	2 Identification Number 75-1252145
(b) Address (number and street) 5010 Greenville Avenue	3 Date July 3, 1978
(c) City, State and ZIP code Dallas, Texas 75206	4 Is this an amended statement <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "YES" FILL IN ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE

5 Check one:

(a) This committee has been designated as the principal campaign committee for _____ (Name of Candidate) a candidate for _____ (Federal office sought) in the _____ (Year of election) Election to be held in the State of _____ (State in which election is held)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

(b) This committee is supporting only one candidate, and is authorized by _____ (Name of Candidate) to receive contributions and make expenditures with respect to the _____ Election(s) (General, Primary, Runoff, etc) held in _____ (Year of election in State), and will file all reports and statements with the candidate's principal campaign committee, _____ (Full name of principal campaign committee)

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2a)

(c) This committee supports only one candidate _____ (Name of Candidate) but is not an authorized committee.

(d) This committee supports more than one Federal candidate and is not a party committee.

(e) This committee is a County committee of the Republican Party. (National, State, county, city) (Democratic, Republican, etc.)

Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship
Republican Party of Dallas County	5010 Greenville Avenue Dallas, Texas 75206	One and the same entity; the only distinction being that the bank account of the Dallas County Republican Party is styled "Republican Finance Committee"

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

Corporation Labor organization Membership organization Trade association Cooperative
 Corporation without capital stock Other (please specify)

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

Statement of Organization of a Committee

(Page 2)

Regulation... Commission... \$1,000... letter... C. 20463

Name of Committee

7 Area, Scope and Jurisdiction of Committee:

- (a) Will this committee operate in more than one State? Yes No
- (b) Will it operate on a statewide basis in one State? Yes No
- (c) Will it primarily support candidates seeking State or local office? Yes No
- (d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? Yes No

8 (a) List by name, address, office sought, and party affiliation, any candidate for Federal office that this committee is supporting:

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
John G. Tower	7540 LBJ, Suite 818 Dallas, TX 75240	U. S. Senate	Republican
Jim Collins	12900 Preston Road Dallas, TX 75230	U. S. Congress	Republican
Tom Pauken	2427 Baker St., Suite E Mesquite, TX 75150	U. S. Congress	Republican
Wes Monery	West Cliff Shopping Center Box 11534 Fort Worth 76109	U. S. Congress	Republican
Leo Berman	527 E. Abrams Arlington, TX 76010	U. S. Congress	Republican

(b) List by name, address, office sought, and party affiliation, any candidate(s) for any other public office(s) that this committee is supporting (unless the committee is supporting the entire ticket of a party as indicated in line 9)

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party

9 If this committee is supporting the entire ticket of a party, give name of party ► Republican

10 Identify by name, address and position, the person in possession of committee books and records:

Full name	Mailing address and ZIP code	Title or position
William A. McKenzie	26th Floor, LTV Tower Dallas, TX 75201	County Chairman

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

Federal Election Commission
1100 K Street, N.W.
Washington, D.C. 20463

Name of Committee

REPUBLICAN FINANCE COMMITTEE

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee):

Full name	Mailing address and ZIP code	Title or position
Toddie Lee Wynne, Jr.	4100 First National Bank Bldg.	Finance Chairman

12 Does this committee plan to stay in existence beyond the current calendar year? Yes No
If "Yes" for how long? Indefinitely

13 In the event of dissolution, what disposition will be made of residual funds? N/A

14 List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank, repository, etc.	Mailing address and ZIP code
First National Bank in Dallas	First National Bank Bldg. 1401 Elm Dallas, Texas 75202

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 439(a)):

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code
NONE			

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

William A. McVernie
(Signature of Treasurer)

July 3, 1978

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. § 437g or § 441j (see Instructions)

For further information contact:



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

00040185074

4

60010185076

6



FEDERAL ELECTION COMMISSION

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

August 11, 1978

Toddie Lee Wynne, Jr, Treasurer
Republican Finance Committee-Dallas County
5010 Greenville Avenue
Dallas, Texas
75206

Dear Mr. Wynne:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

30 Day

During review of the Post Election Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact David U. Greevy in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-1474.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

00040185077
78030302593



Republican Finance Committee-Dallas County DATE: August 11, 1978

I.D. NO.: C00098707

30 Day

REQUEST FOR ADDITIONAL INFORMATION FOR THE Post Election REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 1/1/78 THROUGH 6/30/78
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

Coverage Dates omitted or incorrect

Signature omitted or incorrect

Summary Page Line(s) Column(s) Totals omitted or incorrect

Detailed Summary (Page 2) Line(s) Column(s) Totals omitted or incorrect

Schedule Totals disagree with Detailed Summary (Page 2) or omitted

Date(s) omitted or inadequate for Schedule(s) Line(s)

Full Name(s) Omitted for Schedule(s) Line(s)

Mailing Address(es) omitted or inadequate for Schedule(s) Line(s)

Occupational Descriptions omitted or inadequate for Schedule(s) Line(s)

Principal Place(s) of Business omitted or inadequate for Schedule(s) A Line(s) 14

Aggregate Year-to-date Totals omitted or inadequate for Schedule(s) Line(s)

Nature or Purpose of Expenditure omitted or inadequate for Schedule(s) Line(s)

Nature or Purpose of Receipt omitted or inadequate for Schedule(s) Line(s)

Inadequate Description of proceeds dates events location of Schedule

Please See Page Two

If you have any questions regarding this request, please call the Clerk of the Senate.
The local Washington, D.C. telephone number is (202) 523-1474.

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 111 N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

Republican Finance Committee-Dallas County
30 Day Post Election Report

Please be advised that all statements and reports required to be filed must be signed in the original by the treasurer and/or his/her designated agent. Please amend your report accordingly.

Political committees and candidates which have cash on hand at the time of registration shall disclose on their first report the source of such funds, including the information required by 2 U.S.C. 434(b). The cash balances are assumed to be composed of those contributions most recently received by the committee or candidate, prior to the date for which the cash on hand figure was reported. Please provide the source of cash on hand, January 1, 1978, in the amount of \$2,106.99.

Please provide the circumstances for the negative cash on hand reported for the close of the reporting period, June 30, 1978, in the amount of -\$17,184.96.

Please provide the principal place of business for those individual contributors for whom such information was not provided. Section 100.12 of the FEC Regulations defines "principal place of business" to be "full name under which the business is conducted and the city in which the person is employed or conducts business."

The committee has reported, on Schedule A, Line 14, a contribution from Mrs. Roger A. Markley, Treasurer, Dallas County Council of Republican Women's Club. Please clarify whether this is a contribution from Mrs. Markley or from the Republican Women's Club.

The committee has reported, on Schedule B, Line 22, an expenditure made to the Eisenhower Silver Jubilee Dinner. The purpose of this expenditure is listed as, "Contribution by William A. McKenzie." Please state whether the contribution was made by the committee or by Mr. McKenzie.

0040185079
79030322595

00040181080

8

Telecon:

Dug Greevy with William McKenzie
Republican Finance Committee
September 27, 1978

Spoke this day with W.M. concerning the RFAI sent to him regarding the 30P. I discussed each area with him and he seemed to understand what was needed.

W.M. stated that he serves not only as chairman of the committee but also as treasurer. I told him that the ACT requires that political committees have different individuals in the positions of chairman and treasurer. He was not familiar with this provision, and he stated that a letter of explanation would be forthcoming.

Once this information is received, an OGC referral will be prepared.

18080000

60040185082

11



Republican
Party
OF DALLAS COUNTY

5010 GREENVILLE AVE, SUITE 101

DALLAS, TEXAS 75206

(214) 369-9555

OCT 3 PM 12:15

October 3, 1978

Mr. David U. Greevy
Reports Analysis Division
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

806707

Re: 30 Day Post Election Report of
Receipts and Expenditures

Dear Mr. Greevy:

In response to the letter of August 11, 1978 addressed to Mr. Toddie Lee Wynne, Jr., Treasurer of the Republican Finance Committee of Dallas County pointing out certain omissions of information in our report filed June 28, 1978, and further pursuant to my subsequent telephone conversation with you, enclosed you will find an amended copy of said report. As discussed with you in our phone conversation, I offer the following information by way of explanation, in the same order as the paragraphs on page two of the FEC's August 11th letter:

1. Please be advised that Mr. Toddie Lee Wynne, Jr. is not the Treasurer of the Republican Finance Committee, but that the County Chairman serves as Treasurer and likewise signs all the checks as the Treasurer of the County Party.

2. The cash on hand at January 1, 1978 in the amount of \$2,106.99 was the balance in the County Party's account as of January 1, 1978, which came from various contributions from numerous people and, prior to January 1, 1978, no monies had ever been given to any candidate for Federal office.

3. At the time of the close of the reporting period, June 30, 1978, we had a negative cash balance by reason of the fact that the \$17,184.96 was a portion of the cost of conducting the primary election and run-off primary election in Dallas County, for which we were due a reimbursement from the State of Texas for conducting the elections. Those bills had been incurred at that date, but were not paid until after the funds were received from the State of Texas.

4. On the enclosed, amended report, we have inserted the principal place of business for each contributor, where applicable. You will note that in many instances we have inserted "same address", indicating that the address given in the first column is the business address.

0040085083
79030382895

Mr. David U. Greevy
October 3, 1978
Page Two

5. We have typed a notation on the report that the contribution from the Dallas County Council of Republican Women's Clubs was a contribution from the club, and not from Mrs. Roger A. Markley, its Treasurer.

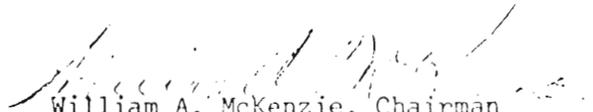
6. The contribution to the Eisenhower Silver Jubilee Dinner is a contribution by William A. McKenzie, individually, through the Committee as a conduit.

Again, I apologize to you for the delay in furnishing the information requested. As you know from our telephone conversation, I am recuperating from back surgery and going to therapy every day, and still have not been released by my doctors to go back to work. I believe the information and amended report furnished herewith will satisfy the FEC's request of August 11th and is consistent with our discussion by telephone; however, should you require any further information or have further questions, please do not hesitate to let me know.

Thank you again for your courtesy in talking with me about this matter and for your patience in allowing the extended time to furnish the enclosures.

With kindest regards, I am

Sincerely,


William A. McKenzie, Chairman
Republican Party of Dallas County

WAMcK:cs
encl.

00040.18:084
780039996

60040185085

3

T. L. WYNNE, JR.
4000 FIRST NATIONAL BANK BUILDING
DALLAS, TEXAS 75202

FEDERAL ELECTION COMMISSION

'78 OCT 12 PM 2:35

October 10, 1978

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

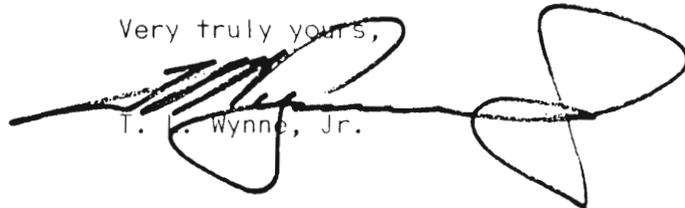
Gentlemen:

I have served in the capacity of financial chairman of the Dallas County Republican Party. I have never served as treasurer of the Dallas County Republican Party. I have never been the signatory on any bank account and in fact, to the contrary, the only thing that I have done insofar as money is concerned is to raise some and to give a bunch!

Mr. William A. McKenzie, the chairman of the Dallas County Republican Party, has served as treasurer of the party, has signed all of the checks, and kept the books relative to same.

For the purpose of the federal election laws I have designated Mr. McKenzie as the responsible person for writing all checks and the disbursing of party funds.

Very truly yours,



T. L. Wynne, Jr.

s
cc: Mr. William A. McKenzie
26th Floor
LTV Tower
Dallas, Texas 75201

80040088408363

80040185087

7



FEDERAL ELECTION COMMISSION

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

2/12/79

William A. McKenzie, Chairman
Republican Finance Committee
26th Floor LTV Tower
Dallas, Texas 75202

Dear Mr. McKenzie:

On August 11, 1978, you were notified that the 30 Day Post-Primary Election Report of Receipts and Expenditures filed by your committee omitted certain required information.

We received a response from you on October 6, 1978, however, we found your response to be inadequate. Your failure to provide an adequate response gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 432.

Specifically, your letter of October 6, 1978, states that you serve as both Chairman and Treasurer of the Republican Finance Committee. Please be advised that 2 U.S.C. 432(a) states in part, "Every political committee shall have a chairman and a treasurer." Section 102.7(a) of the FEC Regulations states further that, "Every political committee shall have a chairman and a treasurer, who shall not be the same individual."

Thus, your serving as chairman and treasurer of the Republican Finance Committee would appear to be a violation of these provisions.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you require additional information, please contact David Greevy, our Reports Analyst assigned to you on our toll free number (800) 424-9530. Our local number is 523-4048.

Sincerely,

Thomas S. Harris

Commissioner

Certified Mail:
Return Receipt Requested.



600101R5088

68038104009

3RC / 78-118

PS Form 3911, Apr 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2 and 3. Add your address in the "RETURN TO" space on reverse

1. The following service is requested (check one).
 Show to whom and date delivered. c
 Show to whom, date, and address of delivery. c
 RESTRICTED DELIVERY Show to whom and date delivered. c
 RESTRICTED DELIVERY Show to whom, date, and address of delivery. \$ ____ (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Republican Finance Committee
TX

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>713988</i>	

(Always obtain signature of addressee or agent)

I have received the article described above
SIGNATURE Addressee Authorized agent
Deane Davidson

4. DATE OF DELIVERY
FEB 20 1978

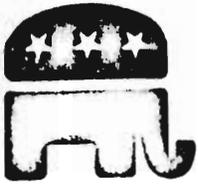
5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE _____ CLERK'S INITIALS _____

POSTMARK

60040185090

12



**Republican
Party**
OF DALLAS COUNTY

5010 GREENVILLE AVE., SUITE 101
FEDERAL ELECTION
COMMISSION DALLAS, TEXAS 75206
(214) 369-9555

'79 MAR 26 AM 9:42

March 19, 1979

Mr. David Greevy
Reports Analyst
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Greevy:

We have received two letters dated February 12, 1979 from the Federal Election Commission, one addressed to William A. McKenzie as Chairman of the Republican Finance Committee and the other addressed to William A. McKenzie as Chairman of the Republican Primary Account. I am writing this letter to you, as both letters state that you are the Reports Analyst assigned to these matters.

First, we apologize for the delay in responding to the Commissioners' letters. Mr. McKenzie had expected to be in the office to reply to the letters timely, but instead has been out of the city nearly constantly for the last several weeks. He will return to the office next week and will be in touch with the FEC at his earliest opportunity.

Sincerely,

(Mrs.) Claire A. Sandusky
Executive Secretary

185091

00040185092

9

Telecon:

Dug Greevy with Bill McKenzie
Dallas County--Republican Finance Committee & Republican Primary Account
4/7/79

RFC

He stated that he was elected chairman of the committee, and since his position necessitated him to also be the primary fundraiser of the committee, he assumed both duties.

I told him of the complications this made with our law. He stated that he would immediately resign from the post of treasurer. He asked if this would be sufficient. I stated that the committee would then need to have a treasurer. He said that he understood this.

He asked if this action would take care of the matter, and I said that it would at this point, but that there might be some questions regarding the signatures on previous reports filed. I said that I really did not know, but that I would consult OGC regarding this. He said a letter would be sent.

RPA

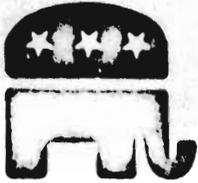
He said that all of the activity of the RPA had been disclosed to FEC in the addendum to the first report filed. I said that I had not been aware of that, and that I would appreciate a letter to that effect, so that I could consult with OGC regarding the matter.

He said a letter would be sent.

0001785093

60040185094

13



**Republican
Party**
OF DALLAS COUNTY

5010 GREENVILLE AVE., SUITE 101

FEDERAL ELECTION COMMISSION
DALLAS, TEXAS 75206
(214) 669-9555

'79 APR 10 AM 9:29

April 5, 1979

Commissioner Thomas E. Harris
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: 3RQ/78-118

Dear Mr. Harris:

In reply to your letter of February 12, 1978, I have not been in the office for the past several weeks, mainly due to the fact that I was travelling outside of the State of Texas. Be that as it may, I have discussed the matter with your Mr. Greevy today and at his suggestion I am replying to your letter.

In my letter of October 6, 1978, I responded to each question raised by Mr. Greevy and attempted to answer in detail. You do not say, however, in which manner you find my response to be inadequate. If it was inadequate, it was certainly inadvertent and not intentional. Further, I have never been accused before of violating any provision of the federal law and I will say unqualifiedly that I have not intended nor do I now intend to violate the law.

Your Commission assumed, by virtue of the fact that it stated on our letterhead that Toddie L. Wynne, Jr. was Finance Chairman, that as Finance Chairman he was also the Treasurer, which was not so. I am the elected Chairman of the Dallas County Republican Party. In order to make contributions to federal candidates, namely Senator Tower and Congressman Collins as well as several other candidates for Congressional offices, we followed the procedures to qualify as a federal political committee. Since I set up the bank accounts as Chairman of the party, I was the signatory on the bank accounts, I raise the money and the Executive Committee within the party's operations determined which candidates were to receive what amount of money and, again in accordance with that committee's directions, certain contributions were made. At all times we made a full and complete report to the State of Texas and to the Federal Election Commission.

Since I in effect appointed myself as Treasurer, I hereby resign and will not serve as Treasurer in the future, effective as of this date. I will continue to serve as Chairman of the Republican Party of Dallas County, inasmuch as I have been elected to such exalted position. Secondly, the Dallas County Republican Party has borrowed

WILLIAM A. MCKENZIE, COUNTY CHAIRMAN, 26TH FLOOR LTV TOWER, DALLAS, TEXAS 75201
TODDIE L. WYNNE, JR., FINANCE CHAIRMAN, 4100 FIRST NATIONAL BANK, DALLAS, TEXAS 75202
CLAIRE A. SANDUSKY, EXECUTIVE SECRETARY, 9302 W LAKE HIGHLANDS, DALLAS, TEXAS 75218
REBECCA SHAW, SECRETARY-OFFICE MANAGER, 5010 GREENVILLE AVENUE, DALLAS, TEXAS 75206

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DEBTS AND OBLIGATIONS

**Supporting Line Numbers 12 and 13
of FEC FORM 3**

Page 1 of 1 for
Line Number 13

Commission
W
D.C. 20463

(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

Republican Finance Committee

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
First National Bank in Dallas P. O. Box 6031 Dallas, Texas 75283	12/18/78	\$15,000.00	\$1,000.00	\$14,000.00
<input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other				
		\$	\$	\$

NATURE OF OBLIGATION (Details of Debt):

Loan

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
McKenzie and Baer 26th Floor LTV Tower Dallas, Texas 75201	4/16/79	\$ 5,500.00	-0-	\$5,500.00
<input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other				
		\$	\$	\$

NATURE OF OBLIGATION (Details of Debt):

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
		\$	\$	\$

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional)	\$	\$	\$
TOTAL this period (last page this line number only)	\$	\$	\$19,500.00

Carry outstanding balance only to appropriate line of summary

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TABLE 2
 1978
 Election Commission
 K Street, N.W.
 Washington, D.C. 20543

RECEIVED
 Reporting Transaction Out, Other
 Loans, Loan Repayments
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

(See separate instructions for
 how to file this form)

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Name of Candidate or Committee in Full			
REPUBLICAN FINANCE COMMITTEE			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
First National Bank in Dallas Dallas, Texas 75202	Payment in full of loan - \$14,000 prin.; \$473.50 int.	8/8/79	\$14,473.50
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
McKenzie and Baer 26th Floor LTV Tower Dallas, Texas 75201	Full payment of loan	8/23/79	\$ 5,500.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		

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Telecon:

Greevy with TX Sec. of State(Charter Division)
10/30/79

Sec. of State(Charter Division) stated this day that McKenzie and
Baer is not a corporation.

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D 558
RAD 92-2/RB

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/21/79 ANALYST Dug Greevy
 TO: Office of General Counsel TEAM CHIEF Bobby Werfel
 THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW PS/CB
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE/COMMITTEE: Cameron County Democratic Executive Committee
 TREASURER: Primary Fund
 ADDRESS: Jack Skaggs
 P.O. Box 2999
 Harlingen, TX 78550

MUR IIII

AFFILIATE(S):
 ALLEGATION(S): Unregistered Political Committee CITE: 2 U.S.C. 433 and 434 ATTACHMENT(S) 1

DATE INITIATED: 6/28/79

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other:
 Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM _____ TO _____

TOTAL RECEIPTS \$ _____ TOTAL EXPENDITURES \$ _____

CASH ON HAND \$ _____ DEBTS \$ _____

HISTORY:

RESULTS OF REVIEW:

3SV1/79-65, 6/28/79

ATTACHMENT

1

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

None

ATTACHMENT

REASON(S) FOR REFERRAL:

Response received, 7/18/79 (question of adequacy)

ATTACHMENT

2

OTHER PENDING ACTIONS INITIATED BY RAD:

None

ATTACHMENT

OTHER RELEVANT INFORMATION:

For comparison, see referral for Republican Primary Account
See appropriate sections of Texas Elections Code-
Article 13.08(i) and 13.08a(d)

ATTACHMENT

3

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 28, 1979

Treasurer
Cameron County Democratic Executive
Committee, Primary Fund
P.O. Box 2999
Harlingen, TX 78550

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by Cameron County Democratic Executive Committee indicates that your organization may have made contributions which total in excess of \$1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

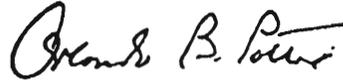
If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed \$1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

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Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact David Greevy, in our Reports Analysis Division at (800)424-9530. Our local number is (202)357-0023.

Sincerely,



Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipt Requested

60700312851038

ITEMIZED RECEIPTS

Commission
J, N.W.
D.C. 20463

(Contributions, Transfers, Contribution In kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Cameron County Democratic Executive Committee

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
Franklin, William & George Dodd 700 Paredes Line Road Brownsville, Texas 78520	700 Paredes Line Road Brownsville, Texas 78520 Occupation Attorney at Law	9/15/78 thru 11/15/78	\$300.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 300.00		
Pan American Bank 1034 E. Levee Brownsville, Texas 78520	1034 E. Levee Brownsville, Texas 78520 Occupation Lending institution	9/18/78	\$1,000.00 (IX)
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 1,000.00		
Cameron County Democratic Executive Committee, Primary Fund P. O. Box 2999 Harlingen, Texas 78550	P. O. Box 2999 Harlingen, Texas 78550 Occupation	8/3/78	\$2,002.32*
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 2,002.32		(*5% of Primary Cost due City of
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
SUBTOTAL of receipts this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 3,302.32

107 B n 38953 10003 3 3

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LAW OFFICES OF
JACK SKAGGS
SKAGGS & KOPPEL BUILDING
312 EAST VAN BUREN AVENUE
P. O. BOX 2999
HARLINGEN, TEXAS 78550
TELEPHONE (512) 425-6122
(512) 425-2000

RECEIVED
FEDERAL ELECTION
COMMISSION

'79 JUL 23 AM 10:48
MEXICO CITY OFFICE
CALLE DOLORES 10 DESP 203
MEXICO D. F.
TELEPHONE (905) 585-08-88
(905) 584-40-48

Jack Skaggs
Alex Huddleston

July 18, 1979

Mr. Orlando R. Potter, Staff Director
FEDERAL ELECTION COMMISSION
1325 "K" Street, N.W.
Washington, D.C. 20463

RE: 3SV1/79-65

Dear Mr. Potter:

The "Cameron County Democratic Executive Committee, Primary Fund" has received your letter of June 28, 1979, in which you raise the question as to whether the "Primary Fund" should be classified or considered as a "political committee" for the purpose of registration, reporting, and contribution limitation under the Federal Election Campaign Act.

Please be advised as follows:

1. Under Texas law, each county has an elected Executive Committee for each of the organized political parties. Each county's Democratic and Republican Executive Committees are composed of elected precinct chairmen for each of the county's voting precincts. The chairman of the County Executive Committees are elected on a county-wide basis in their Party's primary elections.

2. I was the duly elected Chairman of the Cameron County Democratic Executive Committee from 1960 through the primary elections in May of 1978.

3. The Cameron County Democratic Executive Committee, during my years of office, maintained two (2) separate bank accounts. One of these accounts was carried as the "Cameron County Democratic Executive Committee" and represented the funds belonging to the statutory committee itself.

The Cameron County Democratic Executive Committee, Primary Fund, is a separate bank account into which was deposited all monies

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Mr. Orlando R. Potter, Staff Director
July 18, 1979
Page Two

supplied by the State of Texas for the purpose of conducting the primaries. All primary expenses (election judges, supplies, etc.) are paid from the Primary Fund. The Primary Fund is not used for any purpose except the actual conduct of the primaries. That is to say, the Primary Fund is not used for political purposes.

4. Under the provisions of the Texas law, the Chairman of the Executive Committee is in general charge of conducting the primaries, and he is entitled, under the statutes, to charge 5% of the amount expended to conduct the primaries for the conduct of the primaries.

5. Over the years that I was Democratic Chairman, I took the position that since many of the members of the Executive Committee were involved in the conduct of the elections, that the 5% allotted to the Chairman should actually belong to the Committee. The Committee has never had any other source of income and had numerous expenses. Accordingly, rather than receive this 5% myself, I would customarily simply transfer the 5% from the Primary Fund to the Cameron County Democratic Executive Committee.

This is what was done in 1978 when \$2,002.32 was transferred from the Primary Fund to the Cameron County Democratic Executive Committee.

Under no stretch of the imagination could the Primary Fund be considered to be a "political committee" since it is only a bank account.

I hope that this satisfactorily answers the questions raised by your letter of June 28, 1979, and that you will agree that the "Primary Fund" is not a political committee.

If you require any further information in regard to the above, please let me know.

Yours very truly,

Jack Skaggs

Jack Skaggs

JS:nlv

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Art. 13.08a

approved estimated amount which is payable out of state funds, together with the secretary of state's calculation of three-fourths of that amount; and the comptroller shall issue a warrant to the chairman for three-fourths of the certified amount.

(c) Within 20 days after the date of the runoff primary, the county chairman shall submit to the secretary of state a sworn itemized report of the actual costs, filing fees collected, and contributions received for the primary election or elections (as the case may be) held by his party in his county. If the actual expenditure for an item exceeded the estimated amount, the chairman shall submit an explanation of the reason for the increased expenditure, and the secretary of state shall allow the increase if good cause is shown. The secretary of state shall certify to the comptroller the difference between the total amount payable out of state funds and the amount which has already been transmitted to the chairman. If the total amount of fees and contributions and the payments from the state exceeds the actual expenditures incurred, the chairman shall retain the difference in the primary fund referred to in Art. 13.18. The exact amount of the balance in the primary fund shall be reported to the secretary of state in the actual expense report provided by this section and said amount shall be a beginning balance on hand for the next ensuing primary conducted by the chairman or his successor. If the primary fund is invested as authorized in Section 196, the beginning balance on hand for the next ensuing primary shall be the amount of the primary fund after termination of the investment.

(d) Each county chairman shall deposit to the credit of the primary fund all warrants received by him under this section. Expenses properly incurred by or on behalf of the county executive committee for the conduct of the primary elections shall be paid from the primary fund, in the manner authorized by the committee.

(e) The county chairman is responsible for payment of claims for primary election expenses, and the state is not liable to any claimant for failure of the county chairman to pay a claim. No county chairman shall be personally liable, nor shall a county executive committee be liable for any debts incurred in the administration of the primary but unpaid because the appropriation provided by the legislature was not sufficient to cover the actual expenditures made.

(f) A county chairman may request that the secretary of state approve an expenditure for the purposes of the auditing of the expenditures made out of the primary fund; however, the secretary of state shall not be required to approve such an expenditure. The secretary of state may require an audit of the primary fund, without such a request, when, in his discretion, he believes a valid purpose will be served by such a procedure.

Art. 13.08

except for voting machines and/or punch card units used in conducting the absentee voting or any other services for which reimbursement is specifically authorized by law.

(h) The secretary of state is authorized to promulgate rules under which compensation is limited to polling places at which voters of more than one election precinct cast their votes, notwithstanding the provisions of Art. 2.02(g). The rules for such common polling places shall provide for adequate public notice by the county chairman to the voters in election precincts affected by the application of such rules and shall provide for an adequate number of polling places taking into account all other relevant factors including distances of polling places from parts of the precincts served, estimated voter turn-out, and geographic or other boundaries. However, the secretary of state may not require that there be less than one polling place for each commissioner's precinct for reimbursement purposes.

(i) The secretary of state is authorized to promulgate rules in regard to the maximum number of election clerks who may be compensated for their services at a polling place and the maximum number of other necessary office personnel employed to assist in the performance of the duties placed upon the county chairman, taking into account the number of registered voters in the election precinct or precincts, the number of votes cast in the precinct, county, or state in previous elections, the method of voting, and any other relevant factors. The secretary of state must allow compensation for the presiding judge, alternate judge, and at least one clerk for each precinct. The secretary of state may allow compensation for clerks and other necessary office personnel employed in excess of the applicable limits set by his rules if he finds that the employment of additional clerks or other office personnel was justified by a good cause. The total compensation paid to the county chairman and the secretary of the county executive committee (where the executive committee has named a secretary) in the performance of the duties placed upon the chairman shall not exceed five percent of the amount actually spent in holding the primary elections for the year; provided, however, that in no case shall the total compensation paid be less than \$300 nor more than \$8,000.

(j) The secretary of state is authorized to promulgate any other reasonable rules which will minimize the costs of the primary elections. The secretary of state shall furnish a copy of all rules promulgated pursuant to this section to each county chairman at least 10 days before the election to which the rules apply.

(k) The county chairman shall account for the primary fund in the manner provided in Art. 13.18 of this code.

(l) The secretary of state shall not approve any expenditure of state funds to any county organization that practices discrimination based on race, sex, age, creed, or national origin. The



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1111

Date Filmed 5/15/80 Camera No. --- 2

Cameraman BPC

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