



FEDERAL ELECTION COMMISSION

1125 A STREET N.W.
WASHINGTON, D.C. 20561

THIS IS THE END OF MUR # 1292

Date Filmed 2-23-81 Camera No. --- 2

Cameraman SPC

PS Form 3811, 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 c (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Robt S. Molina

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 947834

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
 JAN 15 1978
 POSTMARK
 KYLE N
 JAN 15 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

1292 Hedford ☆GPO: 1977-0-249-505

PS Form 3811, 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 c (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Bernie M Bush

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 947829

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
 JAN 15 1978
 POSTMARK
 KYLE N
 JAN 15 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

1977 H. J. ... ☆GPO: 1977-0-249-505

PS Form 3811, Apr. 1977

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 c (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Allen Johnson

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 947836

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1292 Hedford ☆GPO: 1977-0-249-505

PS Form 3811, Apr. 1977

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 FEES)

2. ARTICLE ADDRESSED TO:
Lein A. Pascaia

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 947833

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY: *1-15-81*

5. ADDRESS (Complete only if requested):
1292 Hedden

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

★GPO 1977-0-240-585

PS Form 3811, Apr. 1977

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 FEES)

2. ARTICLE ADDRESSED TO: *F.M. Young*

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 947831

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY: *JAN 15 1981*

5. ADDRESS (Complete only if requested):
1292 Hedden

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

★GPO 1977-0-240-585

PS Form 3811, Apr. 1977

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 FEES)

2. ARTICLE ADDRESSED TO:
Mr. Nam Leath

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 747828

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY: *JAN 11 1981*

5. ADDRESS (Complete only if requested):
1292 Hedden

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

★GPO 1977-0-240-585

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PS Form 3811, Apr. 1977

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

1. The following service is requested (check one)

- Show to whom and date delivered.
- Show to whom, date, and address delivered.
- RESTRICTED DELIVERY Show to whom and date delivered.
- RESTRICTED DELIVERY Show to whom, date, and address of delivery. (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO
Johnny Stewart

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURANCE
947832

(Always obtain signature of addressee or agent)

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

4. *Mrs. Johnny Stewart*
DATE OF DELIVERY
1-15-81

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

1292 Detroit

77-1111

1815

INITIALS

3101023733

PS Form 3811, Apr 1977

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 FEES)**

2. ARTICLE ADDRESSED TO:
M. N. Kostik

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 _____ *947830* _____
 (Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
1-15-81

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS
AW

1292 The Point

☆GPO 1977-0-249-088

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 9, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bernice M. Beck, Treasurer
Leath for Congress
P.O. Box 263
Killeen, Texas 76541

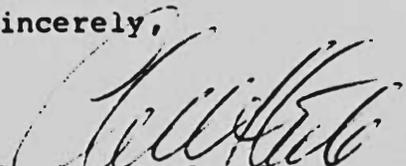
Re: MUR 1292

Dear Ms. Beck:

This is to notify you that on January 6, 1981, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,


Charles N. Steele
General Counsel

cc: The Honorable Marvin Leath
1331 Longworth House Office Building
Washington, D.C. 20515

3100031730



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bernice M. Beck, Treasurer
Leath for Congress
P.O. Box 263
Killeen, Texas 76541

Re: MUR 1292

Dear Ms. Beck:

This is to notify you that on _____, 1980, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,

Charles N. Steele
General Counsel

cc: The Honorable Marvin Leath
1331 Longworth House Office Building
Washington, D.C. 20515

Handwritten initials and date: "JH 1-6-79"

81010031710



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 9, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

M.N. Bostik
KWTX-TV Broadcasting Co.
P.O. Box 7528
Waco, Texas 76710

Re: MUR 1292

Dear Mr. Bostik:

This is to notify you that on January 6, 1981, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles N. Steele".

Charles N. Steele
General Counsel

11019231711



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

M.N. Bostik
KWTX-TV Broadcasting Co.
P.O. Box 7528
Waco, Texas 76710

Re: MUR 1292

Dear Mr. Bostik:

This is to notify you that on _____, 1980, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,

Charles N. Steele
General Counsel

01770031712

9
1-6-80



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 9, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

F.M. Young, President
Young Brothers Construction Co.
P.O. Drawer 1800
Waco, Texas 76703

Re: MUR 1292

Dear Mr. Young:

This is to notify you that on January 6, 1981, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles N. Steele".

Charles N. Steele
General Counsel

8101031713



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

REGISTERED MAIL
RETURN RECEIPT REQUESTED

Young, President
Young Brothers Construction Co.
Drawer 1800
Houston, Texas 76703

Re: MUR 1292

Mr. Young:

This is to notify you that on [redacted], 1980, the Federal Election Commission voted to close the file in the [redacted]-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will be removed from the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

59



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

F.M. Young, President
Young Brothers Construction Co.
P.O. Drawer 1800
Waco, Texas 76703

Re: MUR 1292

Dear Mr. Young:

This is to notify you that on _____, 1980, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,

Charles N. Steele
General Counsel

3171031711

9x
1-6-89



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 9, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Johnny Stewart
925 N. 22nd Street
Waco, Texas 76710

Re: MUR 1292

Dear Mr. Stewart:

This is to notify you that on January 6, 1981, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles N. Steele".

Charles N. Steele
General Counsel

81010:31713



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Johnny Stewart
925 N. 22nd Street
Waco, Texas 76710

Re: MUR 1292

Dear Mr. Stewart:

This is to notify you that on _____, 1980, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,

Charles N. Steele
General Counsel

31719251715

JA
1-6-84



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 9, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Linn A. Pescaia, President
Czechoslovak Publishing Company, Inc.
214 W. Oak
West, Texas 76691

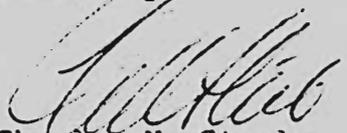
Re: MUR 1292

Dear Mr. Pescaia:

This is to notify you that on January 6, 1981, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,


Charles N. Steele
General Counsel

31010211717



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Linn A. Pescaia, President
Czechoslovak Publishing Company, Inc.
214 W. Oak
West, Texas 76691

Re: MUR 1292

Dear Mr. Pescaia:

This is to notify you that on _____, 1980, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,

Charles N. Steele
General Counsel

3171071713

OK
1-6-81



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 9, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert S. Molina
Burford & Ryburn
1511 Fidelity Union Life Building
Dallas, Texas 75201

Re: MUR 1292

Dear Mr. Molina:

This is to notify you that on January 6, 1981, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,


Charles N. Steele
General Counsel

11010231212



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert S. Molina
Burford & Ryburn
1511 Fidelity Union Life Building
Dallas, Texas 75201

Re: MUR 1292

Dear Mr. Molina:

This is to notify you that on _____, 1980, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,

Charles N. Steele
General Counsel

31010231750

GA
1-6-81



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 9, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lane Denton
P.O. Box 3204
Waco, Texas 76707

Re: MUR 1292

Dear Mr. Denton:

This is to notify you that on January 6, 1981, the Federal Election Commission voted to close the file in this matter as your complaint was not refiled in the proper form.

Should additional information come to your attention which you believe establishes a violation of the Act, please contact Judy Thedford at (202)523-4057.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles N. Steele".

Charles N. Steele
General Counsel

Enclosure
November 10, 1980 Letter

1119281751



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lane Denton
P.O. Box 3204
Waco, Texas 76707

Re: MUR 1292

Dear Mr. Denton:

This is to notify you that on _____, 1980, the Federal Election Commission voted to close the file in this matter as your complaint was not refiled in the proper form.

Should additional information come to your attention which you believe establishes a violation of the Act, please contact Judy Thedford at (202)523-4057.

Sincerely,

Charles N. Steele
General Counsel

31010331752

GA
1-6-81



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 10, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lane Denton
P.O. Box 3204
Waco, Texas 76707

Dear Mr. Denton:

This letter concerns the complaint which you filed on September 10, 1980, against Johnny Stewart, alleging violations of the Federal Election Campaign Act of 1971, as amended.

As set forth in 2 U.S.C. § 437g(a)(1), the Commission is not empowered to take action on a complaint unless it is signed, sworn to, and notarized by the complainant. Congress clearly considered these requirements to be important. Moreover, the Commission wishes to avoid situations where subsequent enforcement of the Act is foreclosed because the original complaint did not meet the specifications of the statute.

Your complaint gives no indication that it is sworn to or made under penalty of perjury (see 28 U.S.C. § 1746). Accordingly, the file in this matter will be closed, unless within 10 days of your receipt of this letter you refile your complaint in proper form.

Sincerely,

A handwritten signature in dark ink, appearing to read "Charles N. Steele".

Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 9, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Glen Johnson
Texas Association of Business
6900 Fannin
Suite 240
Houston, Texas 77030

Re: MUR 1292

Dear Mr. Johnson:

This is to notify you that on January 6, 1981, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,

Charles N. Steele
General Counsel

9101031734



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Glen Johnson
Texas Association of Business
6900 Fannin
Suite 240
Houston, Texas 77030

Re: MUR 1292

Dear Mr. Johnson:

This is to notify you that on _____, 1980, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,

Charles N. Steele
General Counsel

9A
1-6-81

01910231755

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Johnny Stewart, F. M. Young,)
M. N. Bostik, Glen Johnson,)
West News, Inc., John Allison,)
Texas Power and Light Co., and)
Leath for Congress)

MUR 1292

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission's Executive Session on January 6, 1981, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1292:

1. Close the file in this matter and notify the complainant and respondents accordingly.
2. Direct the Office of General Counsel to send to the complainant a copy of the prior letter sent to him, with the understanding that this procedure is not a precedent setting action.

Attest:

1-8-81

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

11000211756



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*

DATE: DECEMBER 16, 1980

SUBJECT: OBJECTION - MUR 1292 - General Counsel's
dated 12-3-80; Signed 12-10-80; Received
in OCS 12-12-80, 3:09

The above-named document was circulated on a 48
hour vote basis at 4:00, December 15, 1980.

Commissioner Harris submitted an objection at 12:13,
December 16, 1980.

MUR 1292 will be placed on the agenda for the next
Executive Session.

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December 12, 1980

MEMORANDUM TO: Majorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1292

Please have the attached General Counsel's Report distributed to the Commission on a 48 hour tally basis.
Thank you.

BEFORE THE FEDERAL ELECTION COMMISSION

December 3, 1980

80 DEC 12 P 3: 09

In the Matter of

Johnny Stewart, F.M. Young,
M.N. Bostil, Glen Johnson,
West News, Inc., John Allison,
Texas Power and Light Co., and
Leath for Congress

)
)
)
)
)
)

MUR 1292

GENERAL COUNSEL'S REPORT

I. Background:

On November 5, 1980, the Commission voted to direct the Office of General Counsel to send letters to the complainant, Mr. Denton, and respondents stating that the complaint in MUR 1292 did not comply with the requirements of 2 U.S.C. § 437g(a)(1) and that the Commission will close the file in this matter, unless the complainant refiles his complaint in proper form within ten days.

II. Legal Analysis:

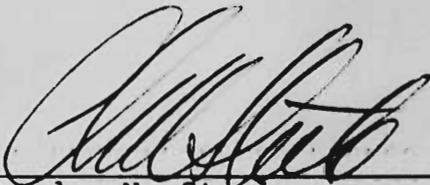
The letter notifying Mr. Denton of the Commission's determination was sent on November 10, 1980; as of this date, the return receipt card showing the date Mr. Denton received the Commission's notification has not been received. Therefore, allowing three days for receipt of the notification letter, ten days to refile the complaint in proper form, and an additional three days for return mailing; the complaint should have been refiled by November 26, 1980. As the complaint was not refiled by Mr. Denton, the Office of General Counsel recommends the closing of the file.

01010231750

III. Recommendation:

The Office of General Counsel recommends closing the file in this matter and notifying the complainant and respondents accordingly.

10 December 1980
Date



Charles N. Steele
General Counsel

Attachments:
Letters ((8))

31710231751



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Linn A. Pescaia, President
Czechoslovak Publishing Company, Inc.
214 W. Oak
West, Texas 76691

Re: MUR 1292

Dear Mr. Pescaia:

This is to notify you that on _____, 1980, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,

Charles N. Steele
General Counsel

0101031752



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert S. Molina
Burford & Ryburn
1511 Fidelity Union Life Building
Dallas, Texas 75201

Re: MUR 1292

Dear Mr. Molina:

This is to notify you that on _____, 1980, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,

Charles N. Steele
General Counsel

31010231753



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Glen Johnson
Texas Association of Business
6900 Fannin
Suite 240
Houston, Texas 77030

Re: MUR 1292

Dear Mr. Johnson:

This is to notify you that on _____, 1980, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,

Charles N. Steele
General Counsel

9101031754



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bernice M. Beck, Treasurer
Leath for Congress
P.O. Box 263
Killeen, Texas 76541

Re: MUR 1292

Dear Ms. Beck:

This is to notify you that on _____, 1980, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,

Charles N. Steele
General Counsel

cc: The Honorable Marvin Leath
1331 Longworth House Office Building
Washington, D.C. 20515

41010231755



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

M.N. Bostik
KWTX-TV Broadcasting Co.
P.O. Box 7528
Waco, Texas 76710

Re: MUR 1292

Dear Mr. Bostik:

This is to notify you that on _____, 1980, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,

Charles N. Steele
General Counsel

1191031755



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

F.M. Young, President
Young Brothers Construction Co.
P.O. Drawer 1800
Waco, Texas 76703

Re: MUR 1292

Dear Mr. Young:

This is to notify you that on _____, 1980, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,

Charles N. Steele
General Counsel

91010231757



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Johnny Stewart
925 N. 22nd Street
Waco, Texas 76710

Re: MUR 1292

Dear Mr. Stewart:

This is to notify you that on _____, 1980, the Federal Election Commission voted to close the file in the above-cited matter as the complainant failed to refile his complaint in proper form. The file in this matter will become part of the public record within thirty days.

If you have any questions, please contact Judy Thedford at (202)523-4057.

Sincerely,

Charles N. Steele
General Counsel

01010231750



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lane Denton
P.O. Box 3204
Waco, Texas 76707

Re: MUR 1292

Dear Mr. Denton:

This is to notify you that on _____, 1980, the Federal Election Commission voted to close the file in this matter as your complaint was not refiled in the proper form.

Should additional information come to your attention which you believe establishes a violation of the Act, please contact Judy Thedford at (202)523-4057.

Sincerely,

Charles N. Steele
General Counsel

91019331759

PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● **REMEMBER:** 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 FEES)

2. ARTICLE ADDRESSED TO:
Glen Johnson

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 . *1292* |
 1 (Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

1292 Chetford



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 10, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Glen Johnson
Texas Association of Business
6900 Fannin
Suite 240
Houston, Texas 77030

Re: MUR 1292

Dear Mr. Johnson:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely

A handwritten signature in cursive script, appearing to read "Charles N. Steele".

Charles N. Steele
General Counsel

Enclosure

110103171



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Glen Johnson
Texas Association of Business
6900 Fannin
Suite 240
Houston, Texas 77030

Re: MUR 1292

Dear Mr. Johnson:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Handwritten initials and date:
11-5-80

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 FEES)

2. ARTICLE ADDRESSED TO:
Hon. Warren Leath

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 bhclhb

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

U.S. POSTAL SERVICE
 NOV 14 1978
 INITIAL

1292 Uthford

PSN: 1978-272-302

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 FEES)

2. ARTICLE ADDRESSED TO:
James Monroe M. Beck

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 25CLHb

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
11-15-78

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

NOV 15 1978

1292 Uthford

PSN: 1978-272-302



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 10, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bernice M. Beck, Treasurer
Leath For Congress
P.O. Box 263
Killen, Texas 76541

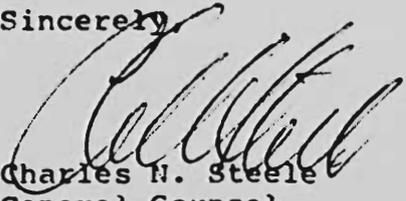
Re: MUR 1292

Dear Ms. Beck:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,


Charles N. Steele
General Counsel

Enclosure

cc: The Honorable Marvin Leath
1331 Longworth House Office Building
Washington, D.C. 20515

310103171



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bernice M. Beck, Treasurer
Leath For Congress
P.O. Box 263
Killen, Texas 76541

Re: MUR 1292

Dear Ms. Beck:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

cc: The Honorable Marvin Leath
1331 Longworth House Office Building
Washington, D.C. 20515

31010361775

Handwritten initials and date: 11-5-80



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 10, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

M. N. Bostik
KWTX-TV Broadcasting Co.
P.O. Box 7528
Waco, Texas 76710

Re: MUR 1292

Dear Mr. Bostik:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,

[Signature]
Steele
unsel

Handwritten return receipt form with fields for recipient name (M. N. Bostik), address, and date. Includes checkboxes for 'RESTRICTED DELIVERY' and 'POSTMASTER FOR FEES'. A large handwritten number '1292' is visible on the right side of the form.

773



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

M. N. Bostik
KWTX-TV Broadcasting Co.
P.O. Box 7528
Waco, Texas 76710

Re: MUR 1292

Dear Mr. Bostik:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

JA
11-5-80



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 10, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Linn A. Pescaia, President
Czechoslovak Publishing Co.
P.O. Box 38
West, Texas 76691

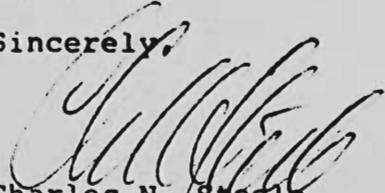
Re: MUR 1292

Dear Mr. Pescaia:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,


Charles N. Steele
General Counsel

Enclosure

0101073



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Linn A. Pescaia, President
Cechoslovak Publishing Co.
P.O. Box 38
West, Texas 76691

Re: MUR 1292

Dear Mr. Pescaia:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

31019:31777

9
11-5-80



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 10, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

F. M. Young, President
Young Brothers Construction Co.
P.O. Drawer 1800
Waco, Texas 76703

Re: MUR 1292

Dear Mr. Young:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,

ele
1

73 Form 3811, Aug. 1979

1. The following services requested (check one):
 Show to whom and how delivered
 Show on whom, show to whom and how delivered
 RESTRICTED DELIVERY
 RESTRICTED DELIVERY
 Show to whom, date and address of delivery & (CONSULT POSTMASTER FOR FEES)

2. ARTICLE REFERRED TO:
 F.M. Young
 1292

3. ARTICLE DELIVERED TO:
 F.M. Young
 1292

4. RETURN TO:
 F.M. Young
 1292

5. RETURN TO:
 F.M. Young
 1292

6. RETURN TO:
 F.M. Young
 1292

7. RETURN TO:
 F.M. Young
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8. RETURN TO:
 F.M. Young
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9. RETURN TO:
 F.M. Young
 1292

10. RETURN TO:
 F.M. Young
 1292

11. RETURN TO:
 F.M. Young
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12. RETURN TO:
 F.M. Young
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13. RETURN TO:
 F.M. Young
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14. RETURN TO:
 F.M. Young
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15. RETURN TO:
 F.M. Young
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16. RETURN TO:
 F.M. Young
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17. RETURN TO:
 F.M. Young
 1292

18. RETURN TO:
 F.M. Young
 1292

19. RETURN TO:
 F.M. Young
 1292

20. RETURN TO:
 F.M. Young
 1292



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 10, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Johnny Stewart
925 N. 22nd Street
Waco, Texas 76710

Re: MUR 1292

Dear Mr. Stewart:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,

Charles Steele
Counsel

Form 3811, Jan 1978
CERTIFIED MAIL
RECEIVED
NOV 11 1980
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463
Handwritten: Johnny Stewart, Esq., 11/11/80, 1006



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Johnny Stewart
925 N. 22nd Street
Waco, Texas 76710

Re: MUR 1292

Dear Mr. Stewart:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

31010231733

9/11/80



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 10, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert S. Molina
Burford and Ryburn
1511 Fidelity Union Life Building
Dallas, Texas 75201

Re: MUP 1292

Dear Mr. Molina:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,

teele
sel

3 1 0 1 0 3 1 7 3 1

1. The following service is requested (check one):
 Show to whom all items 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 FEES)

2. ARTICLE IDENTIFICATION
 RECEIVED BY: *Robert S. Molina*

3. DATE OF DELIVERY
 I have received this article and shown signature of addressee authorized agent

4. NAME OF ADDRESSEE
Robert S. Molina

5. ADDRESS OF ADDRESSEE
1511 Fidelity Union Life Building

6. CITY AND STATE OF ADDRESSEE
Dallas, Texas

7. ZIP CODE
75201

8. POSTAGE PAID BY ADDRESSEE
 Yes No

9. RETURN RECEIPT REQUESTED
 Yes No

10. RETURN TO SENDER
 Yes No

11. RETURN TO ADDRESSEE
 Yes No

12. RETURN TO POSTMASTER
 Yes No

13. RETURN TO SENDER
 Yes No

14. RETURN TO ADDRESSEE
 Yes No

15. RETURN TO POSTMASTER
 Yes No

16. RETURN TO SENDER
 Yes No

17. RETURN TO ADDRESSEE
 Yes No

18. RETURN TO POSTMASTER
 Yes No

19. RETURN TO SENDER
 Yes No

20. RETURN TO ADDRESSEE
 Yes No

21. RETURN TO POSTMASTER
 Yes No

22. RETURN TO SENDER
 Yes No

23. RETURN TO ADDRESSEE
 Yes No

24. RETURN TO POSTMASTER
 Yes No

25. RETURN TO SENDER
 Yes No

26. RETURN TO ADDRESSEE
 Yes No

27. RETURN TO POSTMASTER
 Yes No

28. RETURN TO SENDER
 Yes No

29. RETURN TO ADDRESSEE
 Yes No

30. RETURN TO POSTMASTER
 Yes No

31. RETURN TO SENDER
 Yes No

32. RETURN TO ADDRESSEE
 Yes No

33. RETURN TO POSTMASTER
 Yes No

34. RETURN TO SENDER
 Yes No

35. RETURN TO ADDRESSEE
 Yes No

36. RETURN TO POSTMASTER
 Yes No

37. RETURN TO SENDER
 Yes No

38. RETURN TO ADDRESSEE
 Yes No

39. RETURN TO POSTMASTER
 Yes No

40. RETURN TO SENDER
 Yes No

41. RETURN TO ADDRESSEE
 Yes No

42. RETURN TO POSTMASTER
 Yes No

43. RETURN TO SENDER
 Yes No

44. RETURN TO ADDRESSEE
 Yes No

45. RETURN TO POSTMASTER
 Yes No

46. RETURN TO SENDER
 Yes No

47. RETURN TO ADDRESSEE
 Yes No

48. RETURN TO POSTMASTER
 Yes No

49. RETURN TO SENDER
 Yes No

50. RETURN TO ADDRESSEE
 Yes No

51. RETURN TO POSTMASTER
 Yes No

52. RETURN TO SENDER
 Yes No

53. RETURN TO ADDRESSEE
 Yes No

54. RETURN TO POSTMASTER
 Yes No

55. RETURN TO SENDER
 Yes No

56. RETURN TO ADDRESSEE
 Yes No

57. RETURN TO POSTMASTER
 Yes No

58. RETURN TO SENDER
 Yes No

59. RETURN TO ADDRESSEE
 Yes No

60. RETURN TO POSTMASTER
 Yes No

61. RETURN TO SENDER
 Yes No

62. RETURN TO ADDRESSEE
 Yes No

63. RETURN TO POSTMASTER
 Yes No

64. RETURN TO SENDER
 Yes No

65. RETURN TO ADDRESSEE
 Yes No

66. RETURN TO POSTMASTER
 Yes No

67. RETURN TO SENDER
 Yes No

68. RETURN TO ADDRESSEE
 Yes No

69. RETURN TO POSTMASTER
 Yes No

70. RETURN TO SENDER
 Yes No

71. RETURN TO ADDRESSEE
 Yes No

72. RETURN TO POSTMASTER
 Yes No

73. RETURN TO SENDER
 Yes No

74. RETURN TO ADDRESSEE
 Yes No

75. RETURN TO POSTMASTER
 Yes No

76. RETURN TO SENDER
 Yes No

77. RETURN TO ADDRESSEE
 Yes No

78. RETURN TO POSTMASTER
 Yes No

79. RETURN TO SENDER
 Yes No

80. RETURN TO ADDRESSEE
 Yes No

81. RETURN TO POSTMASTER
 Yes No

82. RETURN TO SENDER
 Yes No

83. RETURN TO ADDRESSEE
 Yes No

84. RETURN TO POSTMASTER
 Yes No

85. RETURN TO SENDER
 Yes No

86. RETURN TO ADDRESSEE
 Yes No

87. RETURN TO POSTMASTER
 Yes No

88. RETURN TO SENDER
 Yes No

89. RETURN TO ADDRESSEE
 Yes No

90. RETURN TO POSTMASTER
 Yes No

91. RETURN TO SENDER
 Yes No

92. RETURN TO ADDRESSEE
 Yes No

93. RETURN TO POSTMASTER
 Yes No

94. RETURN TO SENDER
 Yes No

95. RETURN TO ADDRESSEE
 Yes No

96. RETURN TO POSTMASTER
 Yes No

97. RETURN TO SENDER
 Yes No

98. RETURN TO ADDRESSEE
 Yes No

99. RETURN TO POSTMASTER
 Yes No

100. RETURN TO SENDER
 Yes No

101. RETURN TO ADDRESSEE
 Yes No

102. RETURN TO POSTMASTER
 Yes No

103. RETURN TO SENDER
 Yes No

104. RETURN TO ADDRESSEE
 Yes No

105. RETURN TO POSTMASTER
 Yes No

106. RETURN TO SENDER
 Yes No

107. RETURN TO ADDRESSEE
 Yes No

108. RETURN TO POSTMASTER
 Yes No

109. RETURN TO SENDER
 Yes No

110. RETURN TO ADDRESSEE
 Yes No

111. RETURN TO POSTMASTER
 Yes No

112. RETURN TO SENDER
 Yes No

113. RETURN TO ADDRESSEE
 Yes No

114. RETURN TO POSTMASTER
 Yes No

115. RETURN TO SENDER
 Yes No

116. RETURN TO ADDRESSEE
 Yes No

117. RETURN TO POSTMASTER
 Yes No

118. RETURN TO SENDER
 Yes No

119. RETURN TO ADDRESSEE
 Yes No

120. RETURN TO POSTMASTER
 Yes No

121. RETURN TO SENDER
 Yes No

122. RETURN TO ADDRESSEE
 Yes No

123. RETURN TO POSTMASTER
 Yes No

124. RETURN TO SENDER
 Yes No

125. RETURN TO ADDRESSEE
 Yes No

126. RETURN TO POSTMASTER
 Yes No

127. RETURN TO SENDER
 Yes No

128. RETURN TO ADDRESSEE
 Yes No

129. RETURN TO POSTMASTER
 Yes No

130. RETURN TO SENDER
 Yes No

131. RETURN TO ADDRESSEE
 Yes No

132. RETURN TO POSTMASTER
 Yes No

133. RETURN TO SENDER
 Yes No

134. RETURN TO ADDRESSEE
 Yes No

135. RETURN TO POSTMASTER
 Yes No

136. RETURN TO SENDER
 Yes No

137. RETURN TO ADDRESSEE
 Yes No

138. RETURN TO POSTMASTER
 Yes No

139. RETURN TO SENDER
 Yes No

140. RETURN TO ADDRESSEE
 Yes No

141. RETURN TO POSTMASTER
 Yes No

142. RETURN TO SENDER
 Yes No

143. RETURN TO ADDRESSEE
 Yes No

144. RETURN TO POSTMASTER
 Yes No

145. RETURN TO SENDER
 Yes No

146. RETURN TO ADDRESSEE
 Yes No

147. RETURN TO POSTMASTER
 Yes No

148. RETURN TO SENDER
 Yes No

149. RETURN TO ADDRESSEE
 Yes No

150. RETURN TO POSTMASTER
 Yes No

151. RETURN TO SENDER
 Yes No

152. RETURN TO ADDRESSEE
 Yes No

153. RETURN TO POSTMASTER
 Yes No

154. RETURN TO SENDER
 Yes No

155. RETURN TO ADDRESSEE
 Yes No

156. RETURN TO POSTMASTER
 Yes No

157. RETURN TO SENDER
 Yes No

158. RETURN TO ADDRESSEE
 Yes No

159. RETURN TO POSTMASTER
 Yes No

160. RETURN TO SENDER
 Yes No

161. RETURN TO ADDRESSEE
 Yes No

162. RETURN TO POSTMASTER
 Yes No

163. RETURN TO SENDER
 Yes No

164. RETURN TO ADDRESSEE
 Yes No

165. RETURN TO POSTMASTER
 Yes No

166. RETURN TO SENDER
 Yes No

167. RETURN TO ADDRESSEE
 Yes No

168. RETURN TO POSTMASTER
 Yes No

169. RETURN TO SENDER
 Yes No

170. RETURN TO ADDRESSEE
 Yes No

171. RETURN TO POSTMASTER
 Yes No

172. RETURN TO SENDER
 Yes No

173. RETURN TO ADDRESSEE
 Yes No

174. RETURN TO POSTMASTER
 Yes No

175. RETURN TO SENDER
 Yes No

176. RETURN TO ADDRESSEE
 Yes No

177. RETURN TO POSTMASTER
 Yes No

178. RETURN TO SENDER
 Yes No

179. RETURN TO ADDRESSEE
 Yes No

180. RETURN TO POSTMASTER
 Yes No

181. RETURN TO SENDER
 Yes No

182. RETURN TO ADDRESSEE
 Yes No

183. RETURN TO POSTMASTER
 Yes No

184. RETURN TO SENDER
 Yes No

185. RETURN TO ADDRESSEE
 Yes No

186. RETURN TO POSTMASTER
 Yes No

187. RETURN TO SENDER
 Yes No

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert S. Molina
Burford and Ryburn
1511 Fidelity Union Life Building
Dallas, Texas 75201

Re: MUP 1292

Dear Mr. Molina:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

11-5-80



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 10, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lane Denton
P.O. Box 3204
Waco, Texas 76707

Dear Mr. Denton:

This letter concerns the complaint which you filed on September 10, 1980, against Johnny Stewart, alleging violations of the Federal Election Campaign Act of 1971, as amended.

As set forth in 2 U.S.C. § 437g(a)(1), the Commission is not empowered to take action on a complaint unless it is signed, sworn to, and notarized by the complainant. Congress clearly considered these requirements to be important. Moreover, the Commission wishes to avoid situations where subsequent enforcement of the Act is foreclosed because the original complaint did not meet the specifications of the statute.

Your complaint gives no indication that it is sworn to or made under penalty of perjury (see 28 U.S.C. § 1746). Accordingly, the file in this matter will be closed, unless within 10 days of your receipt of this letter you refile your complaint in proper form.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles N. Steele".

Charles N. Steele
General Counsel

0101031736



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lane Denton
P.O. Box 3204
Waco, Texas 76707

Dear Mr. Denton:

This letter concerns the complaint which you filed on September 10, 1980, against Johnny Stewart, alleging violations of the Federal Election Campaign Act of 1971, as amended.

As set forth in 2 U.S.C. § 437g(a)(1), the Commission is not empowered to take action on a complaint unless it is signed, sworn to, and notarized by the complainant. Congress clearly considered these requirements to be important. Moreover, the Commission wishes to avoid situations where subsequent enforcement of the Act is foreclosed because the original complaint did not meet the specifications of the statute.

Your complaint gives no indication that it is sworn to or made under penalty of perjury (see 28 U.S.C. § 1746). Accordingly, the file in this matter will be closed, unless within 10 days of your receipt of this letter you refile your complaint in proper form.

Sincerely,

Charles N. Steele
General Counsel

JA
11-5-80

31010251737



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: OCTOBER 28, 1980

SUBJECT: MUR 1292 - First General Counsel's Report
dated 10-27-80, Received in OCS 10-27-80,
11:32

The above-named document was circulated on a 48
hour vote basis at 4:00, October 27, 1980.

Commissioner Tiernan submitted an objection at 4:26,
October 28, 1980.

This matter will be placed on the Executive Session
Agenda for Thursday, November 6, 1980.

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

RECEIVED
OFFICE OF THE
COMMISSIONER
SECRETARY

80 OCT 27 11:32

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION : 10-27-80

MUR # 1292
DATE COMPLAINT RECEIVED
BY OGC: 09/11/80
STAFF MEMBER:
Judy Thedford

COMPLAINANT'S NAME: Lane Denton

RESPONDENTS' NAME: Johnny Stewart, F.M. Young, M.N. Postik,
Glen Johnson, West News, Inc., John Allison,
Texas Power and Light Co., Leath for Congress

RELEVANT STATUTE: 2 U.S.C. § 434, 441b(a), 431(17)

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

The complainant, Lane Denton, alleges violations of the Act by Johnny Stewart in connection with the 1978 Congressional election in which both Congressman Leath and Mr. Denton were candidates. The allegations are as follows:

1. Johnny Stewart, who was not previously involved in politics, ran \$10,000 worth of newspaper ads against the Denton Campaign.
2. Mr. Stewart did not have sufficient income to support his activity. A secretary to F.M. Young, president of Young Prothers Construction Co., mentioned to an attorney that "they" had difficulty in funneling cash to Stewart. The complaint stated Mr. Young was a major supporter and contributor to the Leath campaign, and that if these funds were received by Stewart, he did not disclose them.
3. Mr. Stewart claims he discussed the formation of an anti-Denton campaign with M.N. Postik of KWTX-TV Broadcasting Co. Mr. Postik was alleged to be a major worker and supporter in the Leath campaign and, if such consultation happened, a violation has occurred.

31010031701

4. Mr. Stewart was driven through the district by Glen Johnson, a representative of Texas Business Association. If he assisted Mr. Stewart, Stewart failed to disclose the assistance.
5. Mr. Stewart initially prepared his own ads, however, others were professionally prepared. Mr. Stewart failed to disclose who professionally prepared the ads.
6. Mr. Stewart received a special discount from West News, Inc. and neither West News or Mr. Stewart reported the illegal contribution.
7. Mr. Stewart admitted in a news conference that John Allison, an executive with Texas Power and Light Co., assisted him. Mr. Denton, therefore, alleges that Texas Power and Light Co. assisted Stewart and the contribution was not reported.

On September 12, 1980, all persons mentioned in the complaint were sent copies of the complaint. Mr. Denton submitted additional information on September 22, and 24, 1980.

FACTUAL AND LEGAL ANALYSIS

This matter was initiated by the receipt on September 10, 1980, of a letter from Lane Denton, alleging that Johnny Stewart violated the Act in connection with independent expenditures he made in connection with the 1978 congressional election. A copy of Mr. Denton's letter is appended (Attachment I). The letter included at the bottom a statement, seal, and signature of a notary public of the State of Texas. However, no where in the letter does there appear a statement that the contents of the letter were sworn to. Nor is there any determination or affirmation under penalty of perjury that the facts set forth in the letter are true.

Responses from counsel, Robert Molina, attorney for Texas Power and Light Co. and John Allison and the Leath for Congress Committee (Attachment II and III), indicated that complaint was not sworn to by Mr. Denton. Mr. Molina stated that the complaint should be dismissed for this reason.

Section 437g(a)(1) provides that a complaint should be "in writing, signed and sworn to by the person filing such complaint, shall be notarized, and shall be made under penalty of perjury and subject to the provisions of section 1001 of Title 18, United States Code." The complaint in the present matter does not comply with the requirement that it be a sworn statement.

3101031792

In MUR 1230, in which the complaint also was not sworn to, the Commission voted to send letters to the complainant and respondent stating that the complaint does not comply with the requirements of 2 U.S.C. § 437g(a)(1) and, that the Commission would close its file in the matter within 30 days subject to reopening the file if a proper complaint is filed. The Office of General Counsel recommends that letters similar to those sent to the respondent and complainant in MUR 1230 be sent to the respective individuals in this matter, and that the complainant be given a shorter period of time, ten days, in which to file a proper complaint in view of the closeness of the upcoming election.

RECOMMENDATION

Direct the Office of General Counsel to send the attached letters to the complainant and respondents stating that the complaint does not comply with the requirements of 2 U.S.C. § 437g(a)(1) and that the Commission will close its file in this matter within 10 days, subject to reopening the file if a proper complaint is filed.

Attachments:

- I- ~~complaint~~
- II- Molina Response
- III- Leath Response
- IV- Proposed Letters

91040231703

August 28, 1980

Mr. Max L. Friedersdorf, Chairman
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Dear Chairman Friedersdorf:

I would like to file formal complaint against Mr. Johnny Stewart, 925 N. 22nd Street, Waco, Texas 76710 for violations of Federal Elections Laws.

I lost a run-off election to Marvin Leath for the United States Congress. While we were ready to accept an election loss as an ordinary risk of political life, we were not prepared for the many violations of the election laws that were committed on the other side of the campaign in order to secure victory. Recent information has come to light which necessities this formal complaint.

1. An individual named Johnny Stewart who, by his own admission was totally inactive politically before the campaign ran almost \$10,000.00 of newspaper ads against my campaign.
2. Mr. Stewart runs a small business that hardly produces sufficient income to support such a campaign. The secretary to F.M. Young, President of Young Brothers Construction Company mentioned to local attorney that they had great difficulty in funneling cash to Mr. Stewart. Mr. Young was a major supporter and contributor to Mr. Leath's campaign. If in fact, Mr. Stewart received contributions and did not disclose, this represents a serious federal election law violation.
3. Mr. Stewart admits discussing with Mr. M.N. Bostik, owner of KWTX-TV Broadcasting Company, the formation of a anti-Denton group. Mr. Bostik was a major supporter and worker in the Leath campaign. I believe that an investigation will reveal that Mr. Stewart consulted with Mr. Bostik and that Mr. Bostik assisted Mr. Stewart which would be a violation of federal election law.
4. Mr. Stewart was driven throughout the district by Mr. Glen Johnson, a representative of Texas Association of Business. I believe that an investigation will reveal that Mr. Johnson assisted Mr. Stewart and that Mr. Stewart failed to disclose such in violation of federal election laws.

DGC
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GENERAL COUNCIL

ATTACH. I pg 1

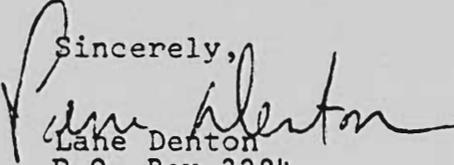
Page 2

Mr. Max L. Friedersdorf, Chairman
Federal Elections Commission

5. Mr. Stewart's initial ad was prepared by him, however, all other ads were professionally prepared. Mr. Stewart failed to disclose who prepared the ads in violation of federal election laws.
6. Mr. Stewart received a special discount from West News, Inc. and neither West News, Inc. nor Mr. Stewart reported the corporate contribution. This is in violation of federal election law.
7. Mr. Stewart admitted in news conference that Mr. John Allison, executive with Texas Power and Light assisted him. I believe that an investigation will reveal that Texas Power and Light Company assisted Mr. Stewart and that Mr. Stewart failed to report their contribution is in violation of federal election laws.

Please let me know if additional information is needed.

Sincerely,


Lane Denton
P.O. Box 3204
Waco, Texas 76707

817/753-1444

THE STATE OF TEXAS

COUNTY OF MCLENNAN

BEFORE ME, the undersigned, a Notary Public in and for said County and State, on this day personally appeared LANE DENTON, known to me to be the person whose name is subscribed to the above instrument and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

GIVEN UNDER MY HAND AND SEAL OF OFFICE, this 28th day of August, 1980.


Notary Public in and for
McLennan County, Texas

my commission expires 6/19/81

I 1282

Thedford



RECEIVED

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TEXAS POWER & LIGHT COMPANY

1511 Bryan Street • P. O. Box 226331 • Dallas, Texas 75266

SEP 23 12:52

JOE M. NELSON
VICE PRESIDENT

30 SEP 23 P 2: 50

September 16, 1980

Ms. Judy Thedford
Office of the General Counsel
Federal Election Commission
Seventh Floor
1325 K Street NW
Washington, D.C. 20463

Re: MUR-1292
Complaint of Lane Denton
Texas Power & Light Co.,
Respondent

Dear Ms. Thedford:

With regard to your correspondence of September 12, 1980, directed to Texas Power & Light Company, P.O. Box 29, Waco, Texas 76703, please be advised that we wish to be represented by counsel in this matter, to wit:

Robert S. Molina
Attorney at Law
Burford & Ryburn
1511 Fidelity Union Life Bldg.
Dallas, Texas 75201
214/741-5811

Also, please be aware that we wish our counsel to receive any notifications and other communications from the Commission and to act in our behalf in all respects. We have also requested that he answer your letter of September 12, 1980, within the time limits prescribed therein.

Very truly yours, -

Joe M. Nelson
Vice President
Texas Power & Light Company

JMN:mjs

ATTACHMENT II pg 1

FRANK M. RYBURN, JR.
ROBERT E. BURNS
ROY L. COLE
H. SAM DAVIS, JR.
WAYNE PEARSON
JAMES H. HOLMES III
J. DAN BOHANNAN
GREGORY E. JENSEN
ROBERT F. BEERY
ROBERT S. MOLINA
CATHERINE A. GERHAUSER
ROBERT L. WRIGHT
MICHAEL S. HOLLOWAY
JED LOVELESS
LARRY HALLMAN
DAVID M. WEAVER

BURFORD & RYBURN
ATTORNEYS AND COUNSELORS AT LAW
1811 FIDELITY UNION LIFE BUILDING
DALLAS, TEXAS 75201
214/741-5811

SAM P. BURFORD
OF COUNSEL

September 18, 1980

Charles N. Steele
General Counsel
Federal Election Commission
Seventh Floor
1325 K Street NW
Washington, D.C. 20463

Attn: Ms. Judy Thedford

Re: MUR-1292
Complaint of Lane Denton
Texas Power & Light Company,
Respondent

Dear Mr. Steele:

In reply to your correspondence of September 12, 1980, regarding the Lane Denton allegations/complaint, Texas Power & Light Company wishes to demonstrate, in writing, that no action should be taken against it, for the following reasons:

First, Respondent submits that your Office should inform Mr. Denton that no action should be taken on this Complaint because the same does not indicate that it has been sworn to or signed in the presence of a Notary Public as required by 11 CFR §111.4(b)(2). The Complaint we received indicates that Mr. Denton acknowledged his letter to Mr. Friedersdorf, but nowhere does a jurat appear whereby Mr. Denton properly swears to the contents of the Complaint and indicates that he signed same in front of a Notary Public. See Williams v. Pierce County Board of Commissioners, 267 F2d 866 (9th Cir. 1959) and Bradley v. United States, 218 F2d 657 (9th Cir. 1954).

Also, nowhere in the allegations contained in paragraph 7 of his letter does he differentiate between statements based upon his personal knowledge or statements based upon information and belief. His allegations against Texas Power & Light Company indicate that he has no personal knowledge of any need for an investigation and he does not identify any source that would give rise to his belief that an investigation is warranted

FEDERAL ELECTION COMMISSION

September 18, 1980

Page 2

or that Federal election laws have been broken by Respondent. Nowhere in paragraph 7 does Mr. Denton put forth a clear and concise recitation of facts which would tend to describe or allege a possible violation of a statute or regulation by Texas Power & Light Company. In other words, Respondent believes that the foregoing demonstrates that Mr. Denton has not substantially complied with the requirements set forth in 11 CFR §111.4, and that your staff should consider informing Mr. Denton that no action can be taken against Texas Power & Light Company on the basis of his Complaint.

Second, a close look at paragraph 7 (the only paragraph in which Texas Power & Light Company is named) demonstrates that Mr. Denton's only allegation against Texas Power & Light Company is that Mr. John Allison is an executive with Texas Power & Light Company. Nowhere else in Mr. Denton's Complaint are any facts or allegations brought forward against Texas Power & Light Company, yet Mr. Denton uses this statement as a basis to ". . . believe that an investigation will reveal that Texas Power & Light Company assisted Mr. Stewart and that Mr. Stewart failed to report their contribution . . ." and that there might be a possible violation of Federal election laws. On their face, these seemingly unrelated statements cannot serve as the basis for a recommendation that the Commission should find a reason to believe that Texas Power & Light Company has committed a violation of the statutes or regulations.

Third, Respondent denies that it assisted Mr. Stewart in the manner alleged by Mr. Denton, and Texas Power & Light Company emphatically denies that it violated any Federal election laws in the Leath/Denton campaign for the United States Congress.

In summary, Respondent respectfully suggests that the Office of the General Counsel inform Mr. Denton that no action will be taken on his Complaint for the aforementioned reasons, and also, that Mr. Denton's Complaint and Respondent's written response indicate that the Office of the General Counsel should inform the Commission that there is no reason to believe that any violation occurred as regards Texas Power & Light Company.

Very truly yours,



Robert S. Molina
Attorney for Texas Power &
Light Company

RSM:mjs

II pg 3

600#2811

FRANK M. RYBURN, JR.
ROBERT E. BURNS
ROY L. COLE
M. SAM DAVIS, JR.
WAYNE PEARSON
JAMES H. HOLMES
J. DAN BOHANNAN
GREGORY E. JENSEN
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ROBERT S. MOLINA
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DAVID M. WEAVER

BURFORD & RYBURN
ATTORNEYS AND COUNSELORS AT LAW
1511 FIDELITY UNION LIFE BUILDING
DALLAS, TEXAS 75201
214/741-8811

SEP 29 P 1: 34

SAM P. BURFORD
OF COUNSEL

September 25, 1980

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Seventh Floor
1325 K Street NW
Washington, D.C. 20463

Attention: Ms. Judy Thedford

Re: MUR-1292 - Complaint of Lane Denton
John W. Allison, Respondent

Dear Mr. Steele:

In reply to your correspondence of September 12, 1980, regarding the above-referenced Complaint, John W. Allison submits the following reasons why no action should be taken against him on the basis of that Complaint:

First, the General Counsel should inform Mr. Denton that no action should be taken against Mr. Allison on the basis of the Complaint because it does not indicate that it was sworn to and signed before a Notary Public as required by the laws of the United States and the rules of the Federal Election Commission. 2 U.S.C.A. §437g(a)(1); 11 CFR §111.4(b)(2). The Complaint contains an "acknowledgment", which is commonly placed on deeds and other instruments to be filed in public records, but an acknowledgment is not sufficient to constitute an affidavit. The acknowledgment does not indicate that Mr. Denton swore to the truth of his allegations nor does it show that Mr. Denton signed the instrument in the presence of a Notary Public. See, Williams v. Pierce County Board of Commissioners, 267 F.2d 866 (9th Cir. 1959), and Bradley v. United States, 218 F.2d 657 (9th Cir. 1954).

Second, Mr. Denton does not differentiate between statements based upon his personal knowledge or statements based upon information and belief as required by this Commission's rules. 11 CFR §111.4(c). Mr. Denton's Complaint does not contain a clear and concise recitation of any facts which describe a violation of any laws or regulations by Mr. Allison. 11 CFR §111.4(d)(3). The

II pg 4

Mr. Charles N. Steele
Attention: Ms. Judy Thedford

September 25, 1980

Complaint only alleges that Mr. Stewart said that Mr. Allison had "assisted" him. Mr. Denton does not state whether he has personal knowledge of Mr. Stewart's alleged statement or not. No facts are stated which indicate any violation of any laws or regulations by Mr. Allison. In short, Mr. Denton's Complaint fails to substantially comply with 11 CFR §111.4, and the General Counsel should inform Mr. Denton that no action can be taken against Mr. Allison on the basis of the Complaint.

Third, Mr. Denton's Complaint does not state or allege any facts which would give this Commission a reason to believe that any violation of any Federal election laws or regulations has been committed by Mr. Allison. As pointed out above, Mr. Denton alleges that Mr. Stewart "admitted" that Mr. Allison "assisted" him. Mr. Allison denies that he assisted Mr. Stewart at all.

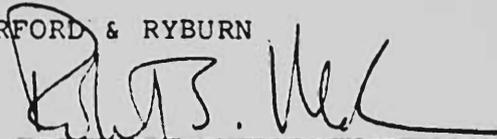
Fourth, Mr. Denton's Complaint does not even allege that Mr. Allison violated any laws whatsoever. In paragraph number 7 of his Complaint, Mr. Denton has only alleged that a Mr. Stewart violated election laws. No allegation is made that Mr. Allison has committed any violations.

In summary, Mr. John W. Allison respectfully submits that the General Counsel inform Mr. Denton that no action can be taken against Mr. Allison on the basis of his Complaint, and that the Complaint and this written response indicate that the General Counsel should recommend to the Commission that there is no reason to believe that Mr. Allison has violated any laws or regulations.

Very truly yours,

BURFORD & RYBURN

By


Robert S. Molina,
Attorney for
John W. Allison

jas

II 095

Thedford - *600 # 2725* - *9/15/80*

RECEIVED

P. O. Box 263
Killeen, Texas 76541
September 15, 1980

80 SEP 22 P 2: 07

RE: MUR 1292

Mr. Charles N. Steele
Federal Election Commission
Washington, D.C. 20463

Attention: Judy Thedford

Dear Ms. Thedford:

10 SEP 22 P 4: 43

GENERAL INVESTIGATIVE DIVISION

In response to a complaint filed September 10, 1980 with the Federal Election Commission by Lane Denton, the Leath for Congress Committee feels that no action should be taken concerning this complaint for the following reasons:

1. Mr. Johnny Stewart was not affiliated with the Leath for Congress Committee in any manner and any actions taken by Mr. Stewart were without the knowledge of the Leath for Congress Committee or the Candidate, Marvin Leath.

Mr. Johnny Stewart was not known by either the Candidate, Marvin Leath or the Leath for Congress Committee (Tommy Mills, Chairman, Bernice M. Beck, Treasurer) until after the polls closed on the date Mr. Denton was defeated, at which time Mr. Stewart came by the Leath Headquarters. Mr. Stewart was not in communication with nor did he receive any aid whatsoever from Marvin Leath or the Leath for Congress Committee or anyone under their direction. The allegations made by Mr. Denton are completely outside of the knowledge of either Marvin Leath or the Leath for Congress Committee.

2. The allegations concerning any encouragement or suggestions received by Johnny Stewart by M. N. Bostik are matters that the Candidate, Marvin Leath or the Leath for Congress Committee had no knowledge of at the time of the alleged commission of the act or at the present time.

ATTACHMENT III pg 1

3. Any acts on the part of Mr. Glen Johnson and Mr. Johnny Stewart were done without the knowledge of the Candidate, Marvin Leath or the Leath for Congress Committee. They received no encouragement, advice or assistance from either Marvin Leath or the Leath for Congress Committee.
4. The Candidate, Marvin Leath nor the Leath for Congress Committee has any knowledge now or at the time of the alleged event of any assistance received by Johnny Stewart from anyone.
5. The complaint signed by Lane Denton does not swear to the truth of the allegations but merely cites that it is executed "for the purposes and consideration therein expressed."

LEATH FOR CONGRESS COMMITTEE

Tommy Mills

 TOMMY MILLS, Chairman

Bernice M. Beck

 BERNICE M. BECK, Treasurer

STATE OF TEXAS X
 X
 COUNTY OF BELL X

BEFORE ME, this day personally appeared TOMMY MILLS and BERNICE M. BECK who stated to me under oath that the contents of the above statement are true and correct.

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned Notary Public on this the 16th day of September, 1980.

Eugene B. Kirby

 NOTARY PUBLIC in and for
 Bell County, Texas

My commission expires:
11-30-80

EUGENE B. KIRBY
 Printed or Stamped name of Notary

III *dg 2*

Saturday, September 20, 1980

Denton Claims Election Fraud in Waco

By LAYLAN COPELIN
Tribune-Herald Staff Writer

More than two years after losing his bid for Congress, Lane Denton has claimed several Wacoans violated federal regulations during the campaign and that a local businessman was a "front" for an anti-Denton conspiracy.



Lane Denton

But those mentioned in Denton's allegations denied funneling money or aid to any front man, and one compared Denton's claims to the Salem witch hunts.

In an Aug. 28 letter to the Federal Election Commission, Denton identified Johnny Stewart, a local businessman who published 19 anti-Denton advertisements during the 1978 campaign for the 12th Congressional District seat, as the principal target of his allegations, claiming Stewart was the front man for anti-Denton money.

THE ADS CITED contributions to the Denton campaign from unions, discussed Denton's voting record and said Denton's "fight" with Texas Power & Light Co. over rate hikes was "deceitful."

Denton refused earlier this week to identify the other parties in his letter, saying Stewart was the only one named

in the formal complaint.

But a copy of Denton's letter to the FEC also listed M.N. Bostick, owner of KWTX-TV; F.M. Young of Young Bros. Contractors; West News Inc.; John Allison, a Texas Power & Light executive; and Glen Johnson, a public relations official with the Texas Association of Business.

The FEC has mailed copies of Denton's allegations to most of the parties and has asked each to provide information so the FEC can decide whether to investigate the claims.

Four of the six commission members must agree before the allegations are investigated.

Fred Eiland, FEC press officer, said the commission's procedure is similar to a grand jury's in that it considers allegations and responses to determine if there is reason to believe the law may have been violated. He declined to answer specific questions about the Denton case because of "confidentiality" requirements.

IN HIS LETTER to the FEC, Denton said:

• Stewart ran almost \$10,000 of newspaper advertisements against the Denton campaign, and that Stewart's game-call business could not support such a financial commitment.

• A secretary to Young "mentioned to a local attorney" that "they had great difficulty in funneling cash to Mr. Stewart." Denton also noted that Young was a major supporter and contributor to U.S. Rep. Marvin Leath, the eventual winner

of the 1978 campaign.

• Stewart discussed the formation of an anti-Denton group with Bostick and "I believe that an investigation will reveal that . . . Mr. Bostick assisted Mr. Stewart, which would be a violation of the federal election law."

• Stewart failed to identify who prepared his "professional" advertisements.

• Stewart was driven through the district by Johnson and that the Texas Association of Business representative "assisted Stewart."

• West News Inc. gave Stewart a "discount" on his advertisements and "neither The West News or Stewart reported the corporate contribution."

• Stewart admitted in a press conference that Allison of TP&L "assisted" him during the campaign.

Asked if he had any more detailed information, Denton, who has referred the matter to a Washington law firm, said, "I think there's more information going in. If they want me to put the evidence together (as a private individual), that's impossible. They (FEC) would have to check the bank records and see where the money goes.

"I'm not optimistic they (FEC) will investigate because the staff is overburdened," he said.

Stewart questioned Denton's motives for requesting an investigation more than two years after the campaign, but Denton said he heard some of the information for the first time this year.

HE ALSO SAID he was worried about

the creation of independent party groups that act as fronts for political efforts.

"I believe Waco was a testing ground for this. We're seeing more of it in other parts of the country now," Denton said.

Stewart said Thursday that the advertisements, which cost \$9,400, were purchased with his own money.

"I was considering forming a PAC (political action committee) on May 1, 1978. I talked to the FEC about the rules, but decided against it because it was only five days before the primary," Stewart said.

He said Bostick had not "given me a penny."

"I sought his (Bostick's) advice because I thought he would know more about politics, because I didn't know anything (in 1978)."

BOSTICK VERIFIED Friday afternoon that he talked with Stewart about the congressional race.

"If Denton can file a complaint because two citizens talk about Carter or someone, then we are in trouble," Bostick said. "He (Denton) just can't believe a private citizen feels strongly enough (about a campaign) to use his

Bostick said he agreed Central Texas voters should be told of Denton's "eastern-liberal" contributors, adding, "I agreed I would contribute money."

But he said he . . . of the complicated campaign regulations, decided to use his own money for the ad-

vertisements.

"I think the voters in Central Texas ought to know where candidates are getting their money, and if the candidates are not ashamed of it, they should let the people know," Bostick said.

He said the wording of Denton's letter, with phrases such as "I think" and "I believe," without citing hard evidence, was similar to the Salem witch hunts.

STEWART AND West News publisher Linn Pescaia said any discounts on the ads were given because they were full-page ads and camera ready.

"I sell ads to both sides, for or against, as long as it's in good taste. If you bought a full-page ad and it was camera ready, you'd get a discount, too," said Pescaia.

The publisher said he has not received a letter from the FEC concerning Denton's allegations.

Stewart said he talked to Allison at TP&L, but he didn't remember "getting anything of value." He said most of his information about Denton's claims of lowering utility bills came from Texas Public Utility Commission hearings.

Stewart also claimed he prepared all of his own advertisements, adding that his long-distance business was built by his in-house advertising agency.

Young denied any political connection with Stewart, saying he met the man after the anti-Denton ads appeared. "I never gave him money, and he's never solicited any from me."

Johnson was unavailable for comment Friday. Allison said he had referred the FEC letter to his attorney.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lane Denton
P.O. Box 3204
Waco, Texas 76707

Dear Mr. Denton:

This letter concerns the complaint which you filed on September 10, 1980, against Johnny Stewart, alleging violations of the Federal Election Campaign Act of 1971, as amended.

As set forth in 2 U.S.C. § 437g(a)(1), the Commission is not empowered to take action on a complaint unless it is signed, sworn to, and notarized by the complainant. Congress clearly considered these requirements to be important. Moreover, the Commission wishes to avoid situations where subsequent enforcement of the Act is foreclosed because the original complaint did not meet the specifications of the statute.

Your complaint gives no indication that it is sworn to or made under penalty of perjury (see 28 U.S.C. § 1746). Accordingly, the file in this matter will be closed, unless within 10 days of your receipt of this letter you refile your complaint in proper form.

Sincerely,

Charles N. Steele
General Counsel

ATTACHMENT IV pg 1



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Glen Johnson
Texas Association of Business
6900 Fannin
Suite 240
Houston, Texas 77030

Re: MUR 1292

Dear Mr. Johnson:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

IV pg 2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

F. M. Young, President
Young Brothers Construction Co.
P.O. Drawer 1800
Waco, Texas 76703

Re: MUR 1292

Dear Mr. Young:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,

Charles N. Steele
General Counsel

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Johnny Stewart
925 N. 22nd Street
Waco, Texas 76710

Re: MUR 1292

Dear Mr. Stewart:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

IV pg 4

01010131307



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

M. N. Bostik
KWTX-TV Broadcasting Co.
P.O. Box 7528
Waco, Texas 76710

Re: MUR 1292

Dear Mr. Bostik:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

IV 085



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bernice M. Beck, Treasurer
Leath For Congress
P.O. Box 263
Killen, Texas 76541

Re: MUR 1292

Dear Ms. Beck:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

cc: The Honorable Marvin Leath
1331 Longworth House Office Building
Washington, D.C. 20515

II pg 6



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Linn A. Pescaia, President
Czechoslovak Publishing Co.
P.O. Box 38
West, Texas 76691

Re: MUR 1292

Dear Mr. Pescaia:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

IV pg 7



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert S. Molina
Burford and Ryburn
1511 Fidelity Union Life Building
Dallas, Texas 75201

Re: MUR 1292

Dear Mr. Molina:

This letter concerns the complaint filed by Lane Denton on September 10, 1980. The Commission has determined that the complaint failed to meet the requirement of 2 U.S.C. § 437g(a)(1) that complaints be sworn to by the complainant. A copy of the Commission's letter to Mr. Denton notifying him of the deficiency is enclosed for your information.

The file in this matter will be closed, unless within 10 days of his receipt of the Commission's letter Mr. Denton refiles his complaint in proper form.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

JV P38

Czechoslovak
Publishing Company, Inc.

PRINTERS & PUBLISHERS

RECEIVED

817 829-8718

80 OCT 8 1980

September 29, 1980

Federal Election Commission
Washington, D.C. 24063

Gentlemen:

RE:MUR 1292

This is in response to your letter of September 12, 1980, which enclosed a complaint filed by Lane Denton stating West News, Inc., gave a special discount to Johnny Stewart for advertising and not reporting such as a corporate contribution.

If ever a case of wasting taxpayers' money exists, the time and efforts spent in investigating Lane Denton's alleged election violation by West News, Inc., is certainly one of the most absurd wastes of 1980. My time has been wasted in defending such and your time and taxpayers' money has been wasted in even looking into the matter.

The accusation against West News, Inc., is false in the following respects:

- (1) There is no "West News, Inc.", at P.O. Box 38, West, Texas. The company name is Czechoslovak Publishing Company, Inc.
- (2) Had any political campaign contribution been given it would have been reported under the proper name of this company.
- (3) All full page ads are given a special rate, rather than regular column inch rate. Further discounts may be given for camera-ready copy.
- (4) Johnny Stewart placed one ad in The West News which our records show receipt No. 97586 for the amount of \$100.00, paid by Johnny Stewart. This amount is the amount other full page advertisers paid in 1978 for camera-ready ads.
- (5) The original receipt remains in our files and is attached to others of the same date and in proper numerical order.
- (6) Mr. Stewart's ad was both full page and camera-ready, therefore qualifying for full page ad rates.
- (7) I fully intended to give a full page ad free to Johnny Stewart and instructed my bookkeeper not to bill him for the ad. However, Mr. Stewart insisted on paying for the ad stating he wanted no money or contributions from anyone.
- (8) If we did not try to be fair with all candidates I guarantee you we would have rejected all ads from the Lane Denton campaign. However, we accept all candidates advertising. We may be biased in our conservative philosophies, but we try to be fair to all candidates.

EX-105
910 394 3852
80 OCT 2 1980
P2:

It is indeed unfortunate Mr. Denton has had nothing better to do for two years than suck on sour grapes, harrass, and try to get his name before the public at no personal expense. If he would quit trying to get on the government tit, get a regular job, go to work and mind his own business, we the people would be much better off.

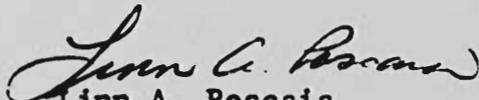
I might suggest someone investigate how this ex-high school teacher and his non-practicing attorney wife were able to acquire two Mercedes Benz automobiles during his two terms in the Texas State Legislature.

I resent Denton's implication that Congressman Marvin Leath's campaign was in any way less than first class. Perhaps Mr. Denton is so accustomed to campaigning on a lower level that he suspects all candidates campaign as he does.

I also resent the fact that you folks who are trying to do a good job in running our government agencies have to spend time and taxpayers' money investigating trivialities such as this.

Should you wish further information or to verify our records, feel free to "come on in".

Sincerely,


Linn A. Pescaia
President

LAB/smp

Czechoslovak
Publishing Company, Inc.

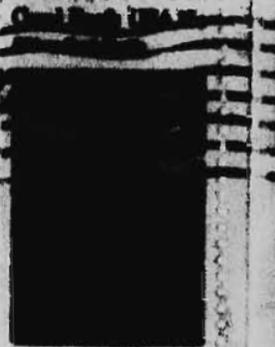
W. OAK

WEST. TEXAS 76091



RECEIVED

80 OCT 2 P



Federal Election Commission
Washington, D. C. 20463

8

910534

GCC#2811

FRANK M. RYBURN, JR.
ROBERT E. BURNS
ROY L. COLE
H. SAM DAVIS, JR.
WAYNE PEARSON
JAMES H. HOLMES III
J. DAN SOHANNAN
GREGORY E. JENSEN
ROBERT F. BEGERT
ROBERT S. MOLINA
CATHERINE A. GERHAUSER
ROBERT L. WRIGHT
MICHAEL S. HOLLOWAY
JES LOVELESS
LARRY HALLMAN
DAVID M. WEAVER

BURFORD & RYBURN
ATTORNEYS AND COUNSELORS AT LAW
1811 FIDELITY UNION LIFE BUILDING
DALLAS, TEXAS 75201
214/741-5811

90 SEP 29 P 1:34

SAM P. BURFORD
OF COUNSEL

September 25, 1980

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Seventh Floor
1325 K Street NW
Washington, D.C. 20463

Attention: Ms. Judy Thedford

Re: MUR-1292 - Complaint of Lane Denton
John W. Allison, Respondent

Dear Mr. Steele:

In reply to your correspondence of September 12, 1980, regarding the above-referenced Complaint, John W. Allison submits the following reasons why no action should be taken against him on the basis of that Complaint:

First, the General Counsel should inform Mr. Denton that no action should be taken against Mr. Allison on the basis of the Complaint because it does not indicate that it was sworn to and signed before a Notary Public as required by the laws of the United States and the rules of the Federal Election Commission. 2 U.S.C.A. §437g(a)(1); 11 CFR §111.4(b)(2). The Complaint contains an "acknowledgment", which is commonly placed on deeds and other instruments to be filed in public records, but an acknowledgment is not sufficient to constitute an affidavit. The acknowledgment does not indicate that Mr. Denton swore to the truth of his allegations nor does it show that Mr. Denton signed the instrument in the presence of a Notary Public. See, Williams v. Pierce County Board of Commissioners, 267 F.2d 866 (9th Cir. 1959), and Bradley v. United States, 218 F.2d 657 (9th Cir. 1954).

Second, Mr. Denton does not differentiate between statements based upon his personal knowledge or statements based upon information and belief as required by this Commission's rules. 11 CFR §111.4(c). Mr. Denton's Complaint does not contain a clear and concise recitation of any facts which describe a violation of any laws or regulations by Mr. Allison. 11 CFR §111.4(d)(3). The

90 SEP 29 P 1:34

Mr. Charles N. Steele
Attention: Ms. Judy Thedford

September 25, 1980

Complaint only alleges that Mr. Stewart said that Mr. Allison had "assisted" him. Mr. Denton does not state whether he has personal knowledge of Mr. Stewart's alleged statement or not. No facts are stated which indicate any violation of any laws or regulations by Mr. Allison. In short, Mr. Denton's Complaint fails to substantially comply with 11 CFR §111.4, and the General Counsel should inform Mr. Denton that no action can be taken against Mr. Allison on the basis of the Complaint.

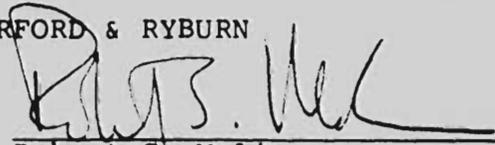
Third, Mr. Denton's Complaint does not state or allege any facts which would give this Commission a reason to believe that any violation of any Federal election laws or regulations has been committed by Mr. Allison. As pointed out above, Mr. Denton alleges that Mr. Stewart "admitted" that Mr. Allison "assisted" him. Mr. Allison denies that he assisted Mr. Stewart at all.

Fourth, Mr. Denton's Complaint does not even allege that Mr. Allison violated any laws whatsoever. In paragraph number 7 of his Complaint, Mr. Denton has only alleged that a Mr. Stewart violated election laws. No allegation is made that Mr. Allison has committed any violations.

In summary, Mr. John W. Allison respectfully submits that the General Counsel inform Mr. Denton that no action can be taken against Mr. Allison on the basis of his Complaint, and that the Complaint and this written response indicate that the General Counsel should recommend to the Commission that there is no reason to believe that Mr. Allison has violated any laws or regulations.

Very truly yours,

BURFORD & RYBURN

By 

Robert S. Molina,
Attorney for
John W. Allison

jas

BURFORD & RYBURN

ATTORNEYS AND COUNSELORS AT LAW

1511 FIDELITY UNION LIFE BUILDING

DALLAS, TEXAS 75201



90 SEP 29 P 1:34

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Seventh Floor
1325 K Street NW
Washington, D.C. 20463

Attention: Ms. Judy Thedford

910324 GOC# 2798

80 SEP 29 09:01

September 24, 1980

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

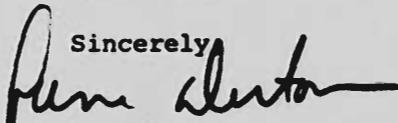
Dear Mr. Steele:

RE: Lane Denton v. Johnny Stewart

Newspaper accounts indicated the Federal Election Commission was unable to contact Mr. Glen Johnson. His address is The Austin Club, 711 Congress Avenue, Austin, Texas 78711.

Thank you.

Sincerely


Lane Denton

3104011313

12:21a 8883S 0

Call # 5792

192

September 22, 1980

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Steele:

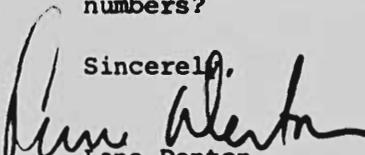
RE: Denton V. Johnny Stewart

I am enclosing a recent article from the Waco Tribune Herald relating to the above cited case.

Also attached are two sample ads used by Mr. Stewart during the campaign.

Several individuals have indicated that they will make statements if the Federal Election Commission contacts them. Would you like to have their names and phone numbers?

Sincerely,


Lane Denton

LD/dp

enclosures

90 SEPT 26 9:08

01010251310

ne Denton
O. Box 3204
co, Texas 76707



Mr. Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

00 SEP 26 48:31

JOHNNY STEWART

P. O. BOX 7594

WACO, TEXAS 76710

September 24, 1980

80 SEP 29 P 1: 33

re: MUR 1292

910325
FCC # 2812
SEP 23 11:41 AM

Mr. Charles N. Steele, General Council
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Steele:

I have been trying to determine what motivated Mr. Denton to file a complaint against me. Surely he must be motivated by something other than vindictiveness, or harassment, something not yet evident. Many questions come to mind. Why did he not file immediately after the race? I suggest that it was because he knew no violation had occurred. And, why would he call the local newspaper and T.V. stations regarding the complaint? I notice your letter of September 12 states that this matter will remain confidential. Of course I realize that you have no control over his actions here in Waco and probably knew nothing of his plans to make a media affair of his complaint. Clippings and T.V. copy are enclosed for your information.

I will discuss each complaint.

1. True, I had been inactive prior to this campaign. However, I have observed the direction in which our country has been headed for a number of years and finally decided to become active. I simply felt that Mr. Denton was not the best qualified man to represent all of the people in our 11th. District. I acted accordingly. I hardly think it matters when a man decided to become politically active.
2. When I was starting my family in the early 1950's, my wife and I saved \$800.00 while my income was \$2.16 per hour. I bought a small airplane for \$400.00 and worked my way out of the oil field into the flying business. The reason I relate this experience is to demonstrate that a thrifty family can save if they want to. Denton seems to feel that I could not afford to spend the money I spent in this race as an individual. Such is not the case. We still live in a 65 year old house, I still drive the same van I drove in 1978, and my business is large enough to enable us to save, even with inflation. Mr. Denton's suspicions are not well founded and everyone who knows me is aware of this.

I've never met Mr. Young's secretary and do not know what she said or did not say, but neither Young nor anyone else "funneled" money to me before, during or after the race.

3. When I moved to Waco in 1958 to fly for a manufacturing firm, the owner introduced me to Mr. M. Buddy Bostick who flew with me to evaluate my abilities for my prospective employer. Mr. Bostick is a hunter and I manufacture hunting equipment. We are both pilots. We have these things in common.

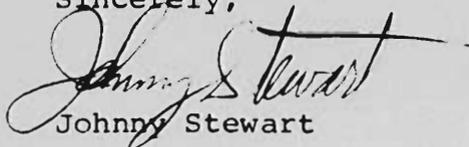
I do not understand the statement that Mr. Bostick was a major supporter and worker in the Leath campaign. That is news to me. Mr. Bostick did not reveal to me that he was active in the Leath campaign. If he contributed financially it would show in the records. I do know that he would be pretty stupid to violate FEC rules, and I can assure you that he has never been accused of being stupid. Perhaps Bostick would have been willing to help me financially, but he did not.

Yes, I discussed politics with those whom I felt knew more about it than I. Since Mr. Bostick could not become involved and did not appear to know much about FEC rules, I called a lady in your office on the morning of May 1 and had a long talk about those rules. As a result of that conversation, I immediately made a decision that forming a PAC was too time consuming. She told me that one can act as an individual, spending his own money, so I decided to do just that. Mr. Bostick made no contributions before, during or after the campaign. In fact, I was a bit surprised that no one made an offer to re-imburse me, although I would not have accepted. This would have compromised my integrity.

5. About ads. I built a nice little business writing my own ads and sales literature. We have had an "in house" ad agency for about 18 years and I wrote all of my copy until 1979. It takes me a bit more time to perfect copy to my liking than it might take a professional advertising person, but I manage to do pretty well.
6. My reports submitted to you should state what I paid for advertising in newspapers. I provided all newspapers with camera ready art.
7. As I recall, I phoned Mr. John Davis to see if he had any information on Mr. Denton's voting record. It's been a long time back and I don't know exactly what he may have sent me, if anything, but I do know that I got the voting record from several sources. I think Denton is wrong about my admitting in a news conference that Mr. John Allison assisted me, at least I do not remember it. Looking at the news clippings I find no mention of this, although Mr. Davis was mentioned. I received no assistance from these men or from their company, Central Texas Power and Light Company, nor did I ask for any other than the above mentioned voting record.

I do not know why Mr. Denton is making a media event of this and I can not figure out why he would start something that could only waste your time, my time and the taxpayers money. I will be glad to answer any other questions you may have, provided I have the knowledge needed to answer.

Sincerely,


Johnny Stewart

*Mr. Johnny Stewart appeared before
me the day 9/25/80 and signed
this letter*

*Patricia News Winder
9/25/80*

Friday, September 19, 1980

80 SEP 23 P 1: 33

Denton Letter Sparks Inquiry

By LAYLAN COPELIN
Tribune-Herald Staff Writer

The Federal Election Commission is making preliminary inquiries about allegations by former State Rep. Lane Denton, who claims several Wacoans violated federal campaign laws during his unsuccessful bid for Congress in 1978.

Denton identified Johnny Stewart, a local businessman who published 19 anti-Denton advertisements during the campaign, as the principal target of his allegations, charging he was a front man for anti-Denton money so campaign laws limiting donations and requiring financial reports could be circumvented.

THE ADS CITED contributions to the Denton campaign from unions, discussed the Denton voting record and said Denton's "fight" with Texas Power & Light over rate hikes was "deceitful."

Denton declined earlier this week to identify the other parties in his letter, saying Stewart was the only one named in the formal complaint.

But a copy of Denton's Aug. 28 letter to the FEC also named M.N. Bostick, owner of KWTX-TV; F.M. Young of Young Bros. Contractors; West News Inc.; John Allison, a Texas Power & Light execu-

live; and Glen Johnson, a public relations official with the Texas Association of Business.

The FEC has mailed copies of Denton's allegations to most of the parties and has asked that each respond with information so the FEC can decide whether to investigate.

FOUR OF THE SIX Federal Election Commissioners must agree before the allegations will be pursued further.

Fred Elland, FEC press officer, said the FEC procedure is similar to a grand jury in that they consider the allegations and responses to determine if there is reason to believe the law may have been violated. He declined to answer specific questions about the case because of the "confidentiality" required by the law.

The parties available for comment either denied the charges outright or have turned the matter over to their attorneys.

In his letter to the FEC, Denton says:
• Stewart ran almost \$10,000 of newspaper advertisements against the Denton campaign, alleging that Stewart's gamecall business could not support such a commitment.

Please see DENTON, Page 2A

• Stewart was driven through the district by Johnson and that the Texas Association of Business representative "assisted Stewart."

West News Inc. gave Stewart a "discount" on his advertisements and that "neither The West News or Stewart reported the corporate contribution."

• Stewart admitted in a press conference that Allison of TP&L "assisted" him during the campaign.

ASKED IF HE had any more detailed information than the allegations, Denton, who has referred the matter to a Washington law firm, said, "I think there's more information going in. If they want me to put the evidence together (as a private individual), that's impossible. They (FEC) would have to check the bank records and see where the money goes.

"I'm not optimistic they (FEC) will investigate because the staff is overburdened."

Stewart said Thursday that the \$9,400 in advertisements was bought with his own money and no one else's.

"I was considering forming a PAC (political action committee) on May 1, 1978. I talked to the FEC about the rules but decided against it because it was only five days before the primary," Stewart said.

STEWART AND THE WEST NEWS Publisher Linn Pescaia said any discounts on the ads were because they were full-page ads and were camera-ready. "I sell ads to both sides, for or against, as long as it's in good taste. If you bought a full-page ad and it was camera-ready, you'd get a discount too," said Pescaia.

The publisher said he had not received a letter from the FEC yet.

Stewart said he talked to Allison at TP&L but he didn't remember "getting anything of value." He said most of his information about Denton's claims of lowering utility bills came from the Public Utility Commission hearings.

He said Bostick, who was unavailable for comment Friday, had not "given me a penny."

STEWART SAID they were friends because both were pilots and interested in hunting. "I sought his advice because I thought he would know more about politics because I didn't know anything (in 1978). But, being in the media, he couldn't help me."

He also claimed he prepared all of his own advertisements, adding that his gamecall business was built by his in-house advertising agency.

Young denied any political connection with Stewart, saying he met the man after the anti-Denton ads appeared. "I never gave him money, and he's never solicited any from me."

Johnson was unavailable for comment Friday. Allison said he had referred the FEC letter to his attorney.

STEWART QUESTIONED Denton's motives more than two years after the campaign.

Denton said he had heard some of the information for the first time this year. He also said he was worried about the creation of independent party groups that would act as fronts for the opposition.

"I believe Waco was a testing ground for this. We're seeing more of it in other parts of the country now," Denton said.

Denton Charges To FEC Include Businessmen

FROM PAGE 1A

• A secretary to Young "mentioned to a local attorney" that "they had great difficulty in funneling cash to Mr. Stewart." He also notes that Young was a major supporter and contributor to Congressman Marvin Leath, the eventual winner of the 1978 campaign.

• Stewart discussed the formation of an anti-Denton group with Bostick and "I believe that an investigation will reveal that . . . Mr. Bostick assisted Mr. Stewart, which would be a violation of the federal election law."

• Stewart failed to identify who prepared his "professional" advertisements.

More than two years after losing his bid for Congress, Lane Denton has claimed several Wacoans violated federal regulations during the campaign and that a local businessman was a "front" for an anti-Denton conspiracy. But those mentioned in Denton's allegations denied funneling money or aid to any front man, and one compared Denton's claims to the Salem witch hunts. Page 3A

Local

Waco Tribune-Herald

Saturday, September 20, 1980

Page 3A

Denton Claims Election Fraud in Waco

By LAYLAN COPELEN

Tribune-Herald Staff Writer

More than two years after losing his bid for Congress, Lane Denton has claimed several Wacoans violated federal regulations during the campaign and that a local businessman was a "front" for an anti-Denton conspiracy.



Lane Denton

But those mentioned in Denton's allegations denied funneling money or aid to any front man, and one compared Denton's claims to the Salem witch hunts.

In an Aug. 28 letter to the Federal Election Commission, Denton identified Johnny Stewart, a local businessman who published 19 anti-Denton advertisements during the 1978 campaign for the 12th Congressional District seat, as the principal target of his allegations, claiming Stewart was the front man for anti-Denton money.

THE ADS CITED contributions to the Denton campaign from unions, discussed Denton's voting record and said Denton's "fight" with Texas Power & Light Co. over rate hikes was "deceitful."

Denton refused earlier this week to identify the other parties in his letter, saying Stewart was the only one named

in the formal complaint.

But a copy of Denton's letter to the FEC also listed M.N. Bostick, owner of KWTX-TV; F.M. Young of Young Bros. Contractors; West News Inc.; John Allison, a Texas Power & Light executive; and Glen Johnson, a public relations official with the Texas Association of Business.

The FEC has mailed copies of Denton's allegations to most of the parties and has asked each to provide information so the FEC can decide whether to investigate the claims.

Four of the six commission members must agree before the allegations are investigated.

Fred Eiland, FEC press officer, said the commission's procedure is similar to a grand jury's in that it considers allegations and responses to determine if there is reason to believe the law may have been violated. He declined to answer specific questions about the Denton case because of "confidentiality" requirements.

IN HIS LETTER to the FEC, Denton said:

• Stewart ran almost \$10,000 of newspaper advertisements against the Denton campaign, and that Stewart's game-call business could not support such a financial commitment.

• A secretary to Young "mentioned to a local attorney" that "they had great difficulty in funneling cash to Mr. Stewart." Denton also noted that Young was a major supporter and contributor to U.S. Rep. Marvin Leath, the eventual winner

of the 1978 campaign.

• Stewart discussed the formation of an anti-Denton group with Bostick and "I believe that an investigation will reveal that . . . Mr. Bostick assisted Mr. Stewart, which would be a violation of the federal election law."

• Stewart failed to identify who prepared his "professional" advertisements.

• Stewart was driven through the district by Johnson and that the Texas Association of Business representative "assisted Stewart."

• West News Inc. gave Stewart a "discount" on his advertisements and "neither *The West News* or Stewart reported the corporate contribution."

• Stewart admitted in a press conference that Allison of TP&L "assisted" him during the campaign.

Asked if he had any more detailed information, Denton, who has referred the matter to a Washington law firm, said, "I think there's more information going in. If they want me to put the evidence together (as a private individual), that's impossible. They (FEC) would have to check the bank records and see where the money goes.

"I'm not optimistic they (FEC) will investigate because the staff is overburdened," he said.

Stewart questioned Denton's motives for requesting an investigation more than two years after the campaign, but Denton said he heard some of the information for the first time this year.

HE ALSO SAID he was worried about

the creation of independent party groups that act as fronts for political efforts.

"I believe Waco was a testing ground for this. We're seeing more of it in other parts of the country now," Denton said.

Stewart said Thursday that the advertisements, which cost \$8,400, were purchased with his own money.

"I was considering forming a PAC (political action committee) on May 1, 1978. I talked to the FEC about the rules, but decided against it because it was only five days before the primary," Stewart said.

He said Bostick had not "given me a penny."

"I sought his (Bostick's) advice because I thought he would know more about politics, because I didn't know anything (in 1978)."

BOSTICK VERIFIED Friday afternoon that he talked with Stewart about the congressional race.

"If Denton can file a complaint because two citizens talk about Carter or someone, then we are in trouble," Bostick said. "He (Denton) just can't believe a private citizen feels strongly enough (about a campaign) to use his own money to inform voters about his contributors."

Bostick said he agreed Central Texas voters should be told of Denton's "eastern-liberal" contributors, adding, "I agreed I would contribute money."

But he said he never made the contributions because Stewart, after learning of the complicated campaign regulations, decided to use his own money for the ad-

vertisements.

"I think the voters in Central Texas ought to know where candidates are getting their money, and if the candidates are not ashamed of it, they should let the people know," Bostick said.

He said the wording of Denton's letter, with phrases such as "I think" and "I believe," without citing hard evidence, was similar to the Salem witch hunts.

STEWART AND *West News* publisher Linn Pescaia said any discounts on the ads were given because they were full-page ads and camera ready.

"I sell ads to both sides, for or against, as long as it's in good taste. If you bought a full-page ad and it was camera ready, you'd get a discount, too," said Pescaia.

The publisher said he has not received a letter from the FEC concerning Denton's allegations.

Stewart said he talked to Allison at TP&L, but he didn't remember "getting anything of value." He said most of his information about Denton's claims of lowering utility bills came from Texas Public Utility Commission hearings.

Stewart also claimed he prepared all of his own advertisements, adding that his game-call business was built by his in-house advertising agency.

Young denied any political connection with Stewart, saying he met the man after the anti-Denton ads appeared. "I never gave him money, and he's never solicited any from me."

Johnson was unavailable for comment Friday. Allison said he had referred the FEC letter to his attorney.

Copy of news item broadcast September 16, 1980. Assistand news director stated on the phone on September 17 that Denton called personally to provide the news tip.

Channel 6, KCEN TV, Temple, Texas

FILE VIDEO: Former democratic congressional candidate Lane Denton

86

today confirmed that he has asked the Federal Election Commission to investigate Waco businessman Johnny Stewart.

Denton was one of the contenders for the 11th congressional district seat in 1978. At the time of the election...Stewart took out a reported 10-thousand dollars worth of advertising against Denton. Denton says he now has reason to believe that Stewart acted as a front for a group who put up the money...and who did not register themselves, which is a violation of the election Code. Just who these other persons are...Denton would not say. He did say however...that he expects a preliminary ruling from the F.E.C. within 30-days.

01010219

Johnny Stewart
Box 7594
Waco, Texas 76710



80 SEP 29 P 1: 33

Mr. Charles N. Steele, General Council
Federal Election Commission
Washington, D.C. 20463

910249

GG#2739

RECEIVED

80 SEP 23 P12: 52

September 17, 1980

30 SEP 23 P2: 50

Ms. Judy Thedford
Office of the General Counsel
Federal Election Commission
Seventh Floor
1325 K Street NW
Washington, D.C. 20463

Re: MUR-1292
Complaint of Lane Denton
John W. Allison, Jr.
Respondent

Dear Ms. Thedford:

With regard to your correspondence of September 12, 1980, please be advised that I wish to be represented by counsel in this matter, to wit:

Robert Molina
Attorney at Law
Burford & Ryburn
1511 Fidelity Union Life Bldg.
Dallas, Texas 75201

Also, please be aware that I wish my counsel to receive any notifications and other communications from the Commission and to act in my behalf in all respects. I have also requested that he answer your letter of September 12, 1980, within the time limits prescribed therein.

Very truly yours,

John W. Allison, Jr.
John W. Allison, Jr.
3113 Alexander
Waco, Texas 76708

JWA:baw

Mr. John W. Allison, Jr.
3113 Alexander
Waco, Texas 76708



Ms. Judy Thedford
Office of the General Counsel
Federal Election Commission
Seventh Floor
1325 K Street NW
Washington, D.C. 20463

Certified Mail
Return Receipt Requested

CERTIFIED

P21 0911096

MAIL

RR SEP 23 P12:52

RECEIVED



RECEIVED

910248
2738

TEXAS POWER & LIGHT COMPANY

1511 Bryan Street • P. O. Box 226331 • Dallas, Texas 75286

JOE M. NELSON
VICE PRESIDENT

September 16, 1980

30 SEP 23 P 2: 50

Ms. Judy Thedford
Office of the General Counsel
Federal Election Commission
Seventh Floor
1325 K Street NW
Washington, D.C. 20463

Re: MUR-1292
Complaint of Lane Denton
Texas Power & Light Co.,
Respondent

Dear Ms. Thedford:

With regard to your correspondence of September 12, 1980, directed to Texas Power & Light Company, P.O. Box 29, Waco, Texas 76703, please be advised that we wish to be represented by counsel in this matter, to wit:

Robert S. Molina
Attorney at Law
Burford & Ryburn
1511 Fidelity Union Life Bldg.
Dallas, Texas 75201
214/741-5811

Also, please be aware that we wish our counsel to receive any notifications and other communications from the Commission and to act in our behalf in all respects. We have also requested that he answer your letter of September 12, 1980, within the time limits prescribed therein.

Very truly yours,

Joe M. Nelson
Vice President
Texas Power & Light Company

JMN:mjs

FRANK M. RYBURN, JR.
ROBERT E. BURNS
ROY L. COLE
H. SAM DAVIS, JR.
WAYNE PEARSON
JAMES H. HOLMES III
J. DAN BOHANNAN
GREGORY E. JENSEN
ROBERT F. BEGERT
ROBERT S. MOLINA
CATHERINE A. GERHAUSER
ROBERT L. WRIGHT
MICHAEL S. HOLLOWAY
JES LOVELESS
LARRY HALLMAN
DAVID M. WEAVER

BURFORD & RYBURN
ATTORNEYS AND COUNSELORS AT LAW
1811 FIDELITY UNION LIFE BUILDING
DALLAS, TEXAS 75201
214/741-5611

SAM P. BURFORD
OF COUNSEL

September 18, 1980

Charles N. Steele
General Counsel
Federal Election Commission
Seventh Floor
1325 K Street NW
Washington, D.C. 20463

Attn: Ms. Judy Thedford

Re: MUR-1292
Complaint of Lane Denton
Texas Power & Light Company,
Respondent

Dear Mr. Steele:

In reply to your correspondence of September 12, 1980, regarding the Lane Denton allegations/complaint, Texas Power & Light Company wishes to demonstrate, in writing, that no action should be taken against it, for the following reasons:

First, Respondent submits that your Office should inform Mr. Denton that no action should be taken on this Complaint because the same does not indicate that it has been sworn to or signed in the presence of a Notary Public as required by 11 CFR §111.4(b)(2). The Complaint we received indicates that Mr. Denton acknowledged his letter to Mr. Friedersdorf, but nowhere does a jurat appear whereby Mr. Denton properly swears to the contents of the Complaint and indicates that he signed same in front of a Notary Public. See Williams v. Pierce County Board of Commissioners, 267 F2d 866 (9th Cir. 1959) and Bradley v. United States, 218 F2d 657 (9th Cir. 1954).

Also, nowhere in the allegations contained in paragraph 7 of his letter does he differentiate between statements based upon his personal knowledge or statements based upon information and belief. His allegations against Texas Power & Light Company indicate that he has no personal knowledge of any need for an investigation and he does not identify any source that would give rise to his belief that an investigation is warranted

or that Federal election laws have been broken by Respondent. Nowhere in paragraph 7 does Mr. Denton put forth a clear and concise recitation of facts which would tend to describe or allege a possible violation of a statute or regulation by Texas Power & Light Company. In other words, Respondent believes that the foregoing demonstrates that Mr. Denton has not substantially complied with the requirements set forth in 11 CFR §111.4, and that your staff should consider informing Mr. Denton that no action can be taken against Texas Power & Light Company on the basis of his Complaint.

Second, a close look at paragraph 7 (the only paragraph in which Texas Power & Light Company is named) demonstrates that Mr. Denton's only allegation against Texas Power & Light Company is that Mr. John Allison is an executive with Texas Power & Light Company. Nowhere else in Mr. Denton's Complaint are any facts or allegations brought forward against Texas Power & Light Company, yet Mr. Denton uses this statement as a basis to ". . . believe that an investigation will reveal that Texas Power & Light Company assisted Mr. Stewart and that Mr. Stewart failed to report their contribution . . ." and that there might be a possible violation of Federal election laws. On their face, these seemingly unrelated statements cannot serve as the basis for a recommendation that the Commission should find a reason to believe that Texas Power & Light Company has committed a violation of the statutes or regulations.

Third, Respondent denies that it assisted Mr. Stewart in the manner alleged by Mr. Denton, and Texas Power & Light Company emphatically denies that it violated any Federal election laws in the Leath/Denton campaign for the United States Congress.

In summary, Respondent respectfully suggests that the Office of the General Counsel inform Mr. Denton that no action will be taken on his Complaint for the aforementioned reasons, and also, that Mr. Denton's Complaint and Respondent's written response indicate that the Office of the General Counsel should inform the Commission that there is no reason to believe that any violation occurred as regards Texas Power & Light Company.

Very truly yours,



Robert S. Molina
Attorney for Texas Power &
Light Company

YOUNG
P. O. Drawer 1880
Waco, Texas
76702

WACO.
6 PM
17 SEP
1980

1.65
SEPT 22 1980
TEX.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

CERTIFIED
No. 726837
MAIL

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

ATTN: Judy Thedford

80SEP22 P2:07

RECEIVED

1318

620 # 2085 9/10/219

RECEIVED

P. O. Box 263 80 SEP 22 P 2: 07
Killeen, Texas 76541
September 15, 1980

RE: MUR 1292

Mr. Charles N. Steele
Federal Election Commission
Washington, D.C. 20463

Attention: Judy Thedford

Dear Ms. Thedford:

In response to a complaint filed September 10, 1980 with the Federal Election Commission by Lane Denton, the Leath for Congress Committee feels that no action should be taken concerning this complaint for the following reasons:

1. Mr. Johnny Stewart was not affiliated with the Leath for Congress Committee in any manner and any actions taken by Mr. Stewart were without the knowledge of the Leath for Congress Committee or the Candidate, Marvin Leath.

Mr. Johnny Stewart was not known by either the Candidate, Marvin Leath or the Leath for Congress Committee (Tommy Mills, Chairman, Bernice M. Beck, Treasurer) until after the polls closed on the date Mr. Denton was defeated, at which time Mr. Stewart came by the Leath Headquarters. Mr. Stewart was not in communication with nor did he receive any aid whatsoever from Marvin Leath or the Leath for Congress Committee or anyone under their direction. The allegations made by Mr. Denton are completely outside of the knowledge of either Marvin Leath or the Leath for Congress Committee.

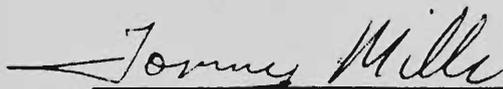
2. The allegations concerning any encouragement or suggestions received by Johnny Stewart by M. N. Bostik are matters that the Candidate, Marvin Leath or the Leath for Congress Committee had no knowledge of at the time of the alleged commission of the act or at the present time.

80 SEP 22 P 4: 43

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GENERAL INVESTIGATIVE
DIVISION

3. Any acts on the part of Mr. Glen Johnson and Mr. Johnny Stewart were done without the knowledge of the Candidate, Marvin Leath or the Leath for Congress Committee. They received no encouragement, advice or assistance from either Marvin Leath or the Leath for Congress Committee.
4. The Candidate, Marvin Leath nor the Leath for Congress Committee has any knowledge now or at the time of the alleged event of any assistance received by Johnny Stewart from anyone.
5. The complaint signed by Lane Denton does not swear to the truth of the allegations but merely cites that it is executed "for the purposes and consideration therein expressed."

LEATH FOR CONGRESS COMMITTEE



TOMMY MILLS, Chairman



BERNICE M. BECK, Treasurer

STATE OF TEXAS X
 X
COUNTY OF BELL X

BEFORE ME, this day personally appeared TOMMY MILLS and BERNICE M. BECK who stated to me under oath that the contents of the above statement are true and correct.

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned Notary Public on this the 16TH day of September, 1980.



NOTARY PUBLIC in and for
Bell County, Texas

My commission expires:

11-30-80

EUGENE B. KIRBY
Printed or Stamped name of Notary

T.J.Mills

Leath

P. O. Box 263
Killeen, TX 76540



**RETURN RECEIPT
REQUESTED**

Mr. Charles N. Steele
Federal Election Commission
Washington, D. C. 20463

88 SEP 22 P 2: 07

RECEIVED

REGISTERED MAIL
P03 7687907

Attn: Judy Thedford

1 1 0 1 1 2

91020

000#2723

KWTX BROADCASTING COMPANY, INC.

4820 BOGUE BLVD. P. O. BOX 7828 WACO, TEXAS 76710 PHONE 770-1389 AREA CODE 817

KWTX-AM-FM-TV
WACO, TEXAS

KXII TV
ARDMORE, OKLAHOMA
SHERMAN, DENISON, TEXAS

KLFY TV
LAFAYETTE, LOUISIANA

KBTX TV
BRYAN, TEXAS

KNAL RADIO
VICTORIA, TEXAS

September 17, 1980

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

Re: MUR 1292

Gentlemen:

This letter is in response to your letter of September 12 in regard to the above matter.

In so far as the above referenced complaint refers to me, I should like to state as follows:

1. I was not a major or minor supporter in the Marvin Leath political campaign, nor was I a worker in the Marvin Leath campaign, nor was I involved as a supporter of Marvin Leath in any manner.
2. As a private citizen I did have conversations with Mr. Stewart concerning the political campaign in which Leath and Denton and other candidates were involved. Any conversations I had were not on behalf of any political candidate or any other person, and I was not in violation of any Federal Election Law.
3. I made no financial contribution directly or indirectly to Mr. Stewart before, during, or since the above referenced political campaign.

There were no violations of Federal Election Laws in connection with the above referenced campaign that I am personally aware of, and the letter of complaint states no factual charges. Surely, speculations and conjectures such as those listed in Mr. Denton's letter of complaint cannot be seriously considered. If any further information is needed, please advise.

Sincerely yours,

M.N. Bostick

MNB/cs

30 SEP 22 P 4: 39

GENERAL INVESTIGATIVE DIVISION

RECEIVED

6 3 8 1 1 3 0 1 0 1 5

COMPLAINANT:

Lane Denton
P.O. Box 3204
Waco, Texas 76707

RESPONDENTS:

Johnny Stewart
925 N. 22nd Street
Waco, Texas 76710

F.M. Young, President
Young Brothers Construction Co.
P.O. Drawer 1800
Waco, Texas 76703 (817-754-2324)

West News, Inc.
P.O. Box 38
West, Texas 76691 (817-826-3718)

M.N. Bostik
KWTX-TV Broadcasting Co.
P.O. Box 7528
Waco, Texas 76710 (817-776-1330)

John Allison
Texas Power and Light Co.
P.O. Box 29
Waco, Texas 76703 (817-754-5621)

Glen Johnson
Texas Association of Business
6900 Fannin
Suite 240
Houston, Texas 77030

Bernice M. Beck, Treasurer
Leath For Congress
P.O. Box 263
Killeen, Texas 76541

cc: The Honorable Marvin Leath
1331 Longworth House Office Building
Washington, DC 20515

Texas Power and Light Company
P.O. Box 29
Waco, Texas 76703

31040251311



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 12, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bernice Beck, Treasurer
Leath for Congress
P.O. Box 263
Killeen, Texas 76541

Re: MUR 1292

Dear Ms. Beck:

This letter is to notify you that on September 10, 1980, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1292. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your Committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Judy Thedford, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

1. Complaint
2. Procedures

cc: The Honorable Marvin Leath



31010231313



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 12, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lane Denton
P.O. Box 3204
Waco, Texas 76707

Dear Mr. Denton:

3101023111

This letter is to acknowledge receipt of your complaint of August 28, 1980, against Johnny Stewart, F. M. Young, West News, Inc., M. N. Bostik, John Allison, Glen Johnson, Bernice M. Beck, and Texas Power and Light Company which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 5 days and a recommendation to the Federal Election Commission as to how this matter should be initially handled will be made 15 days after the respondents' notification. You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,



Charles N. Steele
General Counsel

Enclosure



1292 *Shedford*

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 FEES)

2. ARTICLE ADDRESSED TO:
Jane Denton

3. ARTICLE DESCRIPTION:
 REGISTERED NO. *V55946* CERTIFIED NO. _____ REGISTERED MAIL _____
 (Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE *[Signature]* ADDRESS _____ CARRIER'S AGENT _____

4. DATE OF DELIVERY
9-15-80

5. ADDRESS (Complete only if registered)

6. UNABLE TO DELIVER BECAUSE

WASH DC
 SEP 15 1980
 USPS

11/19/80 11:00 AM
 RETURN WITH RECEIPT
 REGISTERED MAIL CERTIFICATE
 REGISTERED MAIL CERTIFICATE

PSPO: 1978-2000

31010231313



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 12, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Texas Power and Light Company
P.O. Box 29
Waco, Texas 76703

Re: MUR 1292

Dear Sir or Madam:

This letter is to notify you that on September 10, 1980, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1292. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your Committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

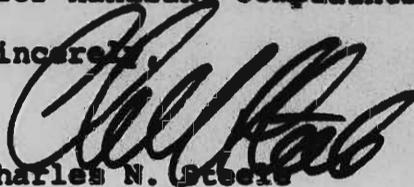
Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Judy Thedford, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,



Charles N. Steer
General Counsel

Enclosure

1. Complaint
2. Procedures

61010231317



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 12, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Glen Johnson
Texas Association of Business
6900 Fannin
Suite 240
Houston, Texas 77030

Re: MUR 1292

Dear Mr. Johnson:

This letter is to notify you that on September 10, 1980, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1292. Please refer to this number in all future correspondence.

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If you have any questions, please contact Judy Thedford, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

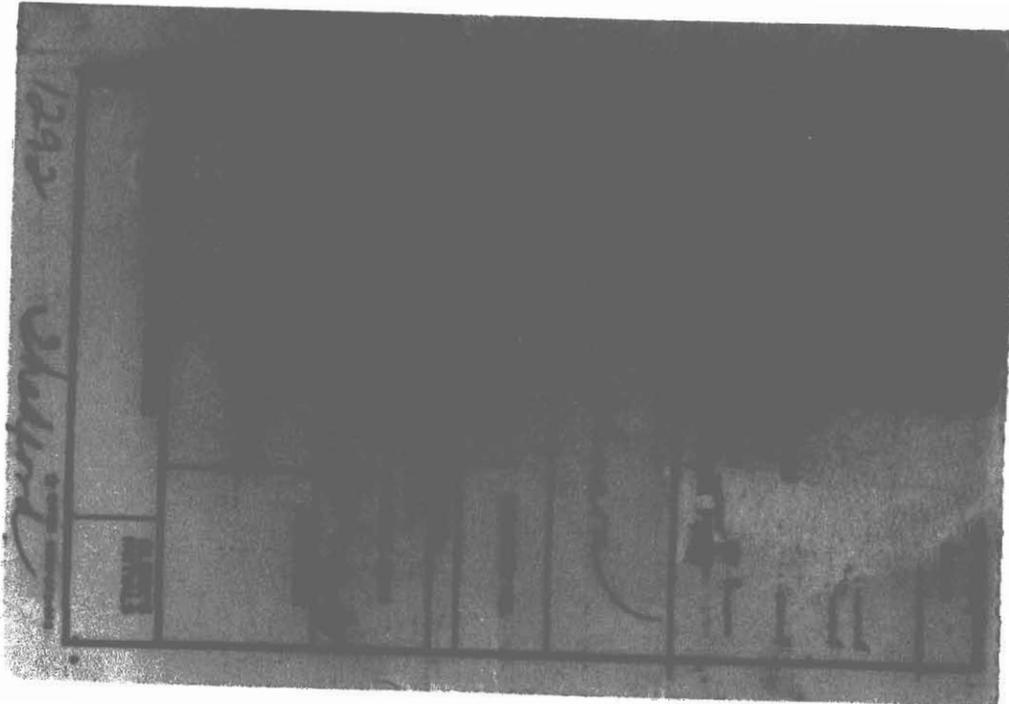


Charles N. Steele
General Counsel

Enclosure

1. Complaint
2. Procedures

611011311





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 12, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John Allison
Texas Power and Light Company
P.O. Box 29
Waco, Texas 76703

Re: MUR 1292

Dear Mr. Allison:

9 1 0 1 0 9 3 3 0
This letter is to notify you that on September 10, 1980, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1292. Please refer to this number in all future correspondence.

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;

If you have any questions, please contact Judy Thedford, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,



Charles N. Stetie
General Counsel

Enclosure

1. Complaint
2. Procedures

0100031311





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 12, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

M. N. Bostik
KWTX-TV Broadcasting Company
P.O. Box 7528
Waco, Texas 76710

Re: MUR 1292

Dear Mr. Bostik:

This letter is to notify you that on September 10, 1980, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1292. Please refer to this number in all future correspondence.

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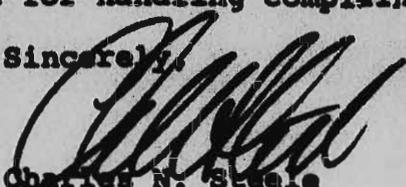
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

01010231352

If you have any questions, please contact Judy Thedford, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

1. Complaint
2. Procedures

31010231353



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 12, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

West News, Inc.
P.O. Box 38
West, Texas 76691

Re: MUR 1292

Dear Sir or Madam:

This letter is to notify you that on September 10, 1980, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1292. Please refer to this number in all future correspondence.

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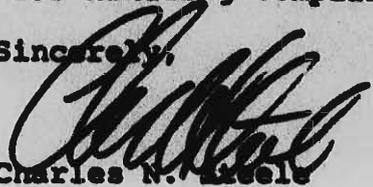
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If you have any questions, please contact Judy Thedford, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

1. Complaint
2. Procedures

81040231855



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 12, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

F. M. Young, President
Young Brothers Construction Company
P.O. Drawer 1800
Waco, Texas 76703

Re: MUR 1292

Dear Mr. Young:

This letter is to notify you that on September 10, 1980, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1292. Please refer to this number in all future correspondence.

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If you have any questions, please contact Judy Thedford, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

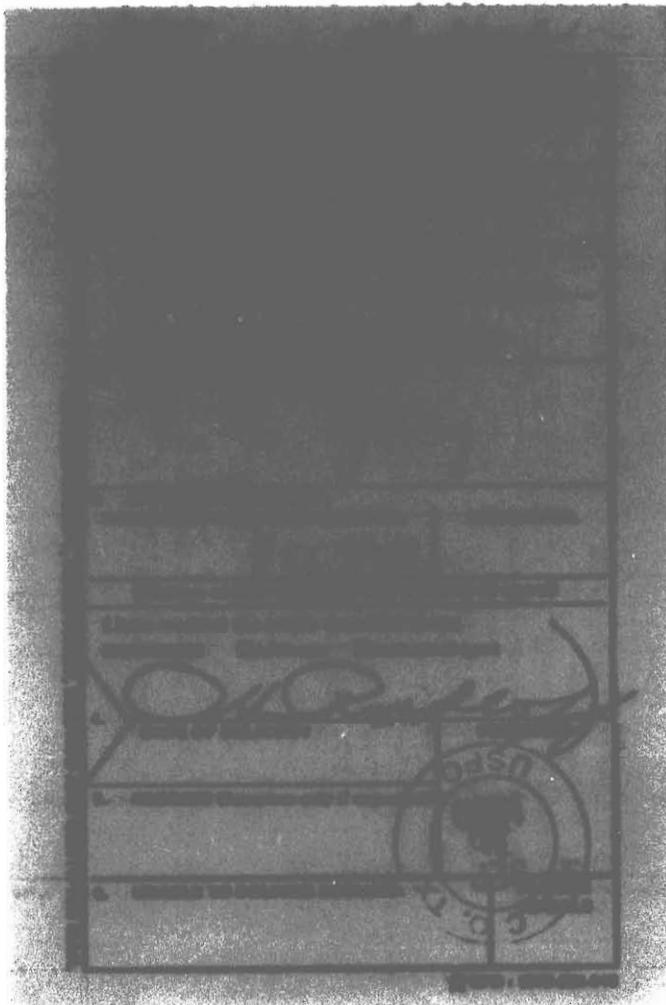


Charles N. Steele
General Counsel

Enclosure

1. Complaint
2. Procedures

11010331037





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 12, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Johnny Stewart
925 North 22nd Street
Waco, Texas 76710

Re: MUR 1292

Dear Mr. Stewart:

This letter is to notify you that on September 10, 1980, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1292. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your Committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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If you have any questions, please contact Judy Thedford, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

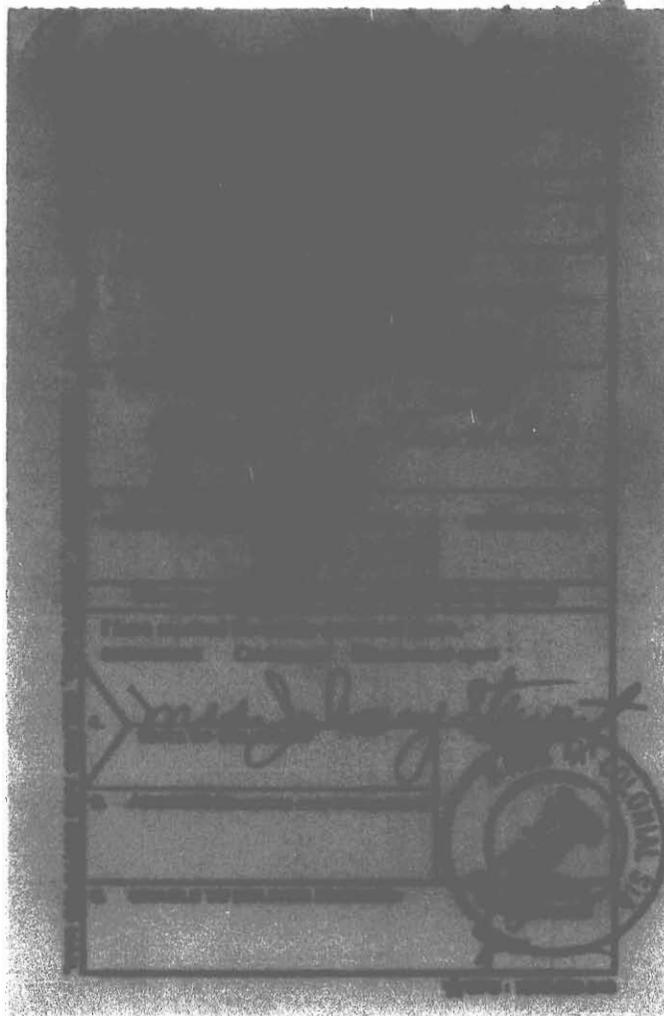


Charles N. Steele
General Counsel

Enclosure

1. Complaint
2. Procedures

110231332



DGC

cc

2589

August 28, 1980

80 SEP 10 AM 10:20

RECORDED
GENERAL COUNCIL

Mr. Max L. Friedersdorf, Chairman
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Dear Chairman Friedersdorf:

I would like to file formal complaint against Mr. Johnny Stewart, 925 N. 22nd Street, Waco, Texas 76710 for violations of Federal Elections Laws.

I lost a run-off election to Marvin Leath for the United States Congress. While we were ready to accept an election loss as an ordinary risk of political life, we were not prepared for the many violations of the election laws that were committed on the other side of the campaign in order to secure victory. Recent information has come to light which necessities this formal complaint.

1. An individual named Johnny Stewart who, by his own admission was totally inactive politically before the campaign ran almost \$10,000.00 of newspaper ads against my campaign.
2. Mr. Stewart runs a small business that hardly produces sufficient income to support such a campaign. The secretary to F.M. Young, President of Young Brothers Construction Company mentioned to local attorney that they had great difficulty in funneling cash to Mr. Stewart. Mr. Young was a major supporter and contributor to Mr. Leath's campaign. If in fact, Mr. Stewart received contributions and did not disclose, this represents a serious federal election law violation.
3. Mr. Stewart admits discussing with Mr. M.N. Bostik, owner of KWTX-TV Broadcasting Company, the formation of a anti-Denton group. Mr. Bostik was a major supporter and worker in the Leath campaign. I believe that an investigation will reveal that Mr. Stewart consulted with Mr. Bostik and that Mr. Bostik assisted Mr. Stewart which would be a violation of federal election law.
4. Mr. Stewart was driven throughout the district by Mr. Glen Johnson, a representative of Texas Association of Business. I believe that an investigation will reveal that Mr. Johnson assisted Mr. Stewart and that Mr. Stewart failed to disclose such in violation of federal election laws.

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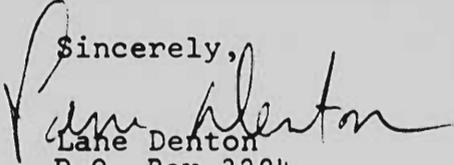
Page 2

Mr. Max L. Friedersdorf, Chairman
Federal Elections Commission

5. Mr. Stewart's initial ad was prepared by him, however, all other ads were professionally prepared. Mr. Stewart failed to disclose who prepared the ads in violation of federal election laws.
6. Mr. Stewart received a special discount from West News, Inc. and neither West News, Inc. nor Mr. Stewart reported the corporate contribution. This is in violation of federal election law.
7. Mr. Stewart admitted in news conference that Mr. John Allison, executive with Texas Power and Light assisted him. I believe that an investigation will reveal that Texas Power and Light Company assisted Mr. Stewart and that Mr. Stewart failed to report their contribution is in violation of federal election laws.

Please let me know if additional information is needed.

Sincerely,


Lane Denton
P.O. Box 3204
Waco, Texas 76707

817/753-1444

THE STATE OF TEXAS

COUNTY OF MCLENNAN

BEFORE ME, the undersigned, a Notary Public in and for said County and State, on this day personally appeared LANE DENTON, known to me to be the person whose name is subscribed to the above instrument and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

GIVEN UNDER MY HAND AND SEAL OF OFFICE, this 28th day of August, 1980.


Notary Public in and for
McLennan County, Texas

my commission expires 6/19/81

Mr. Lane Denton
P.O. Box 3204
Waco, Texas 76707



80 SEP 8 08:59

Mr. Max L. Friedersdorp, Chairman
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

01040218



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1292

Date Filmed 2-23-81 Camera No. --- 2

Cameraman LPC