



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1535

Date Filmed 6/16/83 Camera No. --- 2

Cameraman SPC

FEDERAL ELECTION COMMISSION

*Robert J. Gage*

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

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

Signed

*Gregory M. Latta*

Date

*5/10/83*

83040395119

83 MAY 31 P2: 25  
Ccc# 265

J. G. HELMS  
ONE WEST LOOP PLAZA  
2425 WEST LOOP SOUTH  
HOUSTON, TEXAS 77067  
(713) 961-9999

May 20, 1983

A10: 18

Ms. Suzanne Callahan  
Office of the General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20563

Dear Ms. Callahan:

I enjoyed talking with you on Monday and appreciated your assistance regarding my case, MUR 1535.

As you indicated, in light of my need to be out of Houston a great deal of the time at present because of family illness, it will be possible for me to respond at length to Mr. Steele's letter to Mr. Oxford of May 5 within approximately a month.

However, I do wish to state at this point my intention to request that any reference to a "reason to believe that the J.C. Helms for Congress Committee violated" any provision of the federal campaign law be deleted from the record. I shall, of course, detail my reasons in my following letter, but I thought it might be useful to clarify that intention at this time.

In the meantime, I look forward to receiving from you a copy of my file and wish you a pleasant Memorial Day weekend.

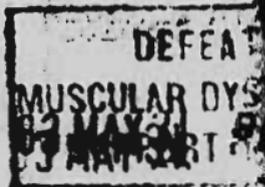
Yours very truly,

*J. C. Helms*  
J.C. Helms

83040395120

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Ms. Susanne Callahan  
Office of the General Counsel  
Federal Election Commissions  
1325 K Street, N.W.  
Washington, D.C. 20463



PATRICK OXFORD

MAY 6 9 3:31

Case# 9985

May 4, 1983

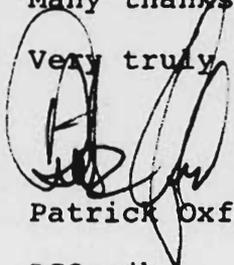
Ms. Suzanne Callahan  
Investigator  
Office of the General Counsel  
Federal Election Commission  
1325 K Street  
Washington, D.C. 20463

Dear Ms. Callahan:

Please find enclosed a copy of my resignation as Treasurer of the J. C. Helms Campaign. Please make sure that it is filed appropriately among Mr. Helms' records. Please make sure I receive all copies of correspondence, however, regarding the FEC claims regarding the J. C. Helms' for Congress Committee (Matter Under Review 1535).

Many thanks for your help.

Very truly yours,



Patrick Oxford

PCO:cjb  
W13

Enclosure

83040595100

PATRICK OXFORD

May 4, 1983

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

RE: J. C. HELMS FOR CONGRESS - I.D. NO. C00149179

Gentlemen:

Please consider this notice of my resignation as  
Treasurer of the J. C. Helms for Congress Committee.

Very truly yours,



Patrick Oxford

PCO:cjb  
W13

Enclosure

83040395143

PATRICK OXFORD

May 4, 1983

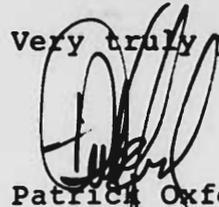
Mr. J. C. Helms  
2425 West Loop South  
Suite 480  
Houston, Texas 77027

Dear J.C.:

Please consider this as my resignation as Treasurer  
of the J. C. Helms for Congress Committee.

Many thanks.

Very truly yours,



Patrick Oxford

PCO:cjb  
W13

8 3 0 4 0 3 9 5 1 4 4

PATRICK OXFORD

May 4, 1983

Ms. Suzanne Callahan  
Investigator  
Office of the General Counsel  
Federal Election Commission  
1325 K Street  
Washington, D.C. 20463

Dear Ms. Callahan:

Please find enclosed a copy of my resignation as Treasurer of the J. C. Helms Campaign. Please make sure that it is filed appropriately among Mr. Helms' records. Please make sure I receive all copies of correspondence, however, regarding the FEC claims regarding the J. C. Helms' for Congress Committee (Matter Under Review 1535).

Many thanks for your help.

Very truly yours,

Patrick Oxford

PCO:cjb  
W13

Enclosure

83040395125



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 5, 1983

Patrick Oxford, Treasurer  
J. C. Helms for Congress  
2425 West Log South, Suite 480  
Houston, Texas 77027

RE: MUR 1535

Dear Mr. Oxford:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, the Federal Election Commission, on March 29, 1983, found reason to believe that your committee violated 2 U.S.C. § 434, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available, the Commission has voted to take no further action and close the file in this matter.

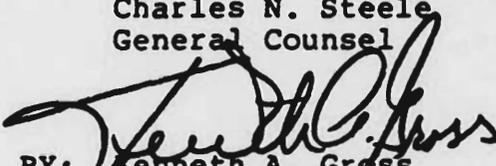
However, please be advised that future filings by the committee must comply with § 434(b)(8). Specifically, the proposed Schedule C which you submitted in response to this matter must be filed until the entire debt is extinguished.

This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

Should you have any questions, please contact Suzanne Callahan at (202) 523-4529.

Sincerely,

Charles N. Steele  
General Counsel

  
BY: Kenneth A. Gross  
Associate General Counsel

83040395126



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Patrick Oxford, Treasurer  
J. C. Helms for Congress  
2425 West Log South, Suite 480  
Houston, Texas 77027

RE: MUR 1535

Dear Mr. Oxford:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, the Federal Election Commission, on March 29, 1983, found reason to believe that your committee violated 2 U.S.C. § 434, a provision of the Act and instituted an investigation of this matter.

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Should you have any questions, please contact Suzanne Callahan at (202) 523-4529.

Sincerely,

Charles N. Steele  
General Counsel

*Signature*  
4/1/83

BY: Kenneth A. Gross  
Associate General Counsel

83040395127

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 1535  
J.C. Helms for Congress )  
 )  
Committee )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 4, 1983, the Commission decided by a vote of 5-0 to take the following actions in MUR 1535:

1. Take no further action against the J.C. Helms for Congress Committee.
2. Close the file.

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

Attest:

5/4/83

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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

4-29-83, 5:03  
5- 2-83, 11:00

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *JW*  
DATE: April 29, 1983  
SUBJECT: MUR 1535 - GC Report

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

CIRCULATIONS

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

Other [ ]

DISTRIBUTION

Compliance   
Audit Matters [ ]  
Litigation [ ]  
Closed MUR Letters [ ]  
Status Sheets [ ]  
Advisory Opinions [ ]

Other (see distribution below) [ ]

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\_\_\_\_\_

33040395129

**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

In the Matter of )  
 )  
J. C. Helms for Congress )  
Committee )

83 APR 29 P 5: 03

MUR 1535

**GENERAL COUNSEL'S REPORT**

**I. Background**

This matter was referred to the Office of General Counsel by the Reports Analysis Division. The referral was based on the fact that the J. C. Helms for Congress Committee failed to disclose whether the original source of \$70,000 in candidate loans was the candidate's personal funds or the funds of a lending institution.

No response to the requests for additional information were received concerning the source of candidate loans or the continuous reporting of outstanding debts. On March 29, 1983, the Commission found reason to believe that the J. C. Helms for Congress Committee had violated 2 U.S.C. § 434 and so notified the respondent.

**II. Legal Analysis**

When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his personal funds or borrowed the money from a lending institution or other source. Failure to provide the requested information as well as failure to properly report outstanding debts violates 2 U.S.C. § 434.

33040395130

In response to the Commission's reason to believe notification, the committee submitted a letter responding to our allegations.

According to the statement, candidate Helms secured a \$100,000 line of credit prior to his candidacy for use in business transactions. Subsequently, he became a candidate and used a portion of those funds in his campaign. However, Mr. Helms believed he had correctly characterized his loan to the campaign as personal rather than from a lending institution.

The committee has now submitted a proposed Schedule C to be filed with all future filings which characterizes the outstanding loan balance as follows:

"The candidate obtained personal funds to make this loan from Allied Bank of Texas, Houston, Texas. The amount of the loan outstanding to Allied Bank of Texas is \$64,095. \*/ There is no other endorser or guarantor, or collateral owned by anyone other than the candidate pledged to Allied Bank of Texas."

Thus, it appears that reporting violations resulted from a misunderstanding as to how to characterize the source of a personal loan and did not result in any underlying substantive violation. In that the respondent has now corrected the public record and has an understanding of the reporting of a personal

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\*/ Appropriate outstanding amount will be inserted on the FEC filing.

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loan to his campaign, we recommend that no further action be taken.

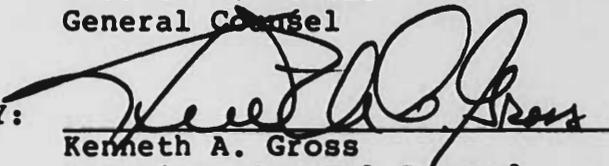
**III. Recommendations**

1. Take no further action against the J. C. Helms for Congress Committee.
2. Close the file.

Charles N. Steele  
General Counsel

April 28, 1983  
Date

BY:

  
Kenneth A. Gross  
Associate General Counsel

Attachment  
Notification letter - one page

33040395132



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Patrick Oxford, Treasurer  
J. C. Helms for Congress  
2425 West Log South, Suite 480  
Houston, Texas 77027

RE: MUR 1535

Dear Mr. Oxford:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, the Federal Election Commission, on March 29, 1983, found reason to believe that your committee violated 2 U.S.C. § 434, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available, the Commission has voted to take no further action and close the file in this matter.

However, please be advised that future filings by the committee must comply with § 434(b)(8). Specifically, the proposed Schedule C which you submitted in response to this matter must be filed until the entire debt is extinguished.

This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

Should you have any questions, please contact Suzanne Callahan at (202) 523-4529.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

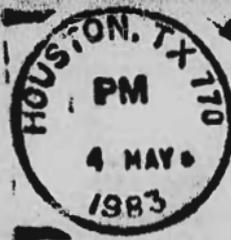
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8304039534

**PATRICK OXFORD**

1240 BANK ONE BANK & TRUST BUILDING  
2001 HUNTER DRIVE HOUSTON, TEXAS 77010



**Ms. Suzanne Callahan  
Investigator  
Office of the General Counsel  
Federal Election Commission  
1325 K Street  
Washington, D.C. 20463**

83 MAY 6 P 1:14

Acct 9852

PATRICK OXFORD

83 APR 14 P 1: 01

April 11, 1983

Ms. Suzanne Callahan  
Investigator  
Office of the General Counsel  
Federal Election Commission  
1325 K Street  
Washington, D.C. 20563

APR 14 1983 14:23

RE: J. C. HELMS

Dear Ms. Callahan:

Pursuant to our telephone conversations today, please consider this letter a clarification of various filings made by Mr. Helms with respect to his congressional campaign. Specifically, this letter will formally clarify Schedule "C", Loans, upon which Mr. Helms listed a personal loan to the campaign and stated that the source of funds was the "candidate's personal funds."

As we discussed this morning, Mr. Helms obtained a loan commitment from Allied Bank of Texas, Houston, Texas, for a \$100,000 line of credit prior to the time he became a candidate. The loan was to provide Mr. Helms with a source of funds for anticipated business expenses during 1982. Thus, when at a later time, moneys from this personal line of credit were used in the campaign, Mr. Helms understandably concluded that the source of the funds that he put in the campaign was personal. To further clarify, however, please be advised that the note was unsecured, and was signed only by Mr. Helms. There was no collateral nor other guarantors, nor did anyone else pledge collateral for the loan.

To confirm the terms and conditions of the loan, please contact Frank McDowell at Allied Bank of Texas, Area Code 713, 224-6611. The present balance on the line of credit loan is approximately \$101,000. As shown on his year-end report, the balance due Mr. Helms from the campaign is \$64,095.

33040395163

Ms. Suzanne Callahan  
April 11, 1983  
Page 2

As we discussed this morning, please note that Mr. Helms' loan from Allied was disclosed in his personal financial disclosure before the primary, a copy of which is enclosed for your review as Exhibit "A".

With respect to the allegation that Mr. Helms failed to respond in a timely matter to your inquiries, I point out that there must be some confusion with respect to his addresses, as your notice to me was addressed to an address on West Loop South, when the campaign address was changed sometime ago. A copy of the address change is attached hereto as Exhibit "B".

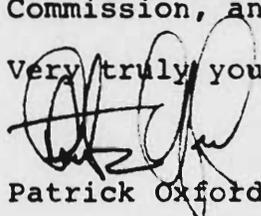
Finally, you have asked that we bring this clarification forward on all future filings. I have attached hereto a proposed Schedule "C" which states the source of funds as a clarification:

"The candidate obtained personal funds to make this loan from Allied Bank of Texas, Houston, Texas. The amount of the loan outstanding to Allied Bank of Texas is \_\_\_\_\_ . There is no other endorser or guarantor, or collateral owned by anyone other than the candidate pledged to Allied Bank of Texas."

Please let me know if the proposed Schedule "C" is adequate for your purposes.

If you have any questions with regard to the foregoing, please give me a call. If not, we would expect for this matter to be dropped by the Election Commission, and the action formally terminated.

Very truly yours,

  
Patrick Oxford

PCO:cjb  
M11

Attachments

cc: Mr. J. C. Helms

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IN PARTS II AND III, THE INFORMATION REQUIRED SHOULD BE CURRENT AS OF A DATE WHICH IS LESS THAN THIRTY-ONE DAYS BEFORE THE FILING DATE. THE INFORMATION BELOW IS CURRENT AS OF April 23, 1982

(Date)

NOTE: For Parts II and III below, indicate Category of Value, as follows: Category A—not more than \$5,000; B—\$5,001-\$15,000; C—\$15,001-\$50,000; D—\$50,001-\$100,000; E—\$100,001-\$250,000; F—over \$250,000.

II. HOLDINGS

The identity and category of value of any interest in property held in a trade or business, or for investment or the production of income, which has a fair market value in excess of \$1,000 as of the date specified above.

IDENTITY	CATEGORY
2200 s.f. Tract of Land in Harris County, Texas	D
Interest in West Loop Plaza, Harris County, Texas (287,000 s.f. Office Building, 7.9 Acres undeveloped land)	F
Miscellaneous business assets	B

III. LIABILITIES

The identity and category of value of the total liabilities owed to any creditor which exceeds \$10,000 as of the date specified above.

IDENTITY	CATEGORY
Loans from Allied Bank of Texas	D

IV. POSITIONS

The identity of all positions held on or before the date of filing during the current calendar year as an officer, director, trustee, partner, proprietor, representative, employee, or consultant of any corporation, firm, partnership, or other business enterprise, any nonprofit organization, any labor organization, or any educational or other institution other than the United States Government.

POSITION	NAME OF ORGANIZATION
Owner	J. C. Helms Interests
President & Owner	J. C. Helms, Inc., (General Partner of HN Management
Partner	2425 West Loop Associates, Ltd.
Partner	Loop 610 Venture
Administration Commissioner	St. Anne's Church (resigned)

V. AGREEMENTS

(For New Employees Only)

A description of the date, parties to, and terms of any agreement or arrangement with respect to: future employment; leave of absence during period of government service; continuation of payments by a former employer other than the U.S. Government; and continuing participation in an employee welfare or benefit plan maintained by a former employer.

DATE	PARTIES TO	TERMS OF AGREEMENT

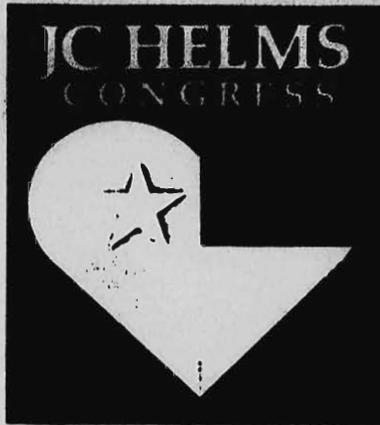
VI. ADDITIONAL INFORMATION

- A. Are you aware of any interests in property or liabilities of a spouse or dependant child which you have not reported because they meet the three standards for exemption? (See Instructions) YES \_\_\_ NO X
- B. Do you, your spouse or dependent child receive income from or have a beneficial interest in a trust or other financial arrangement whose holdings were not reported because the trust is a "qualified blind trust" or other excepted trust? (See Instructions) YES \_\_\_ NO X

NOTE: Any individual who knowingly and willfully falsifies, or who knowingly and willfully fails to file this report may be subject to civil and criminal sanctions (2 U.S.C. 706 and 18 U.S.C. 1001).

Signature J. C. Helms Date April 23, 1982

"A"



July 1, 1982

Clerk of the House  
U. S. House of Representatives  
Longworth H.O.B.  
Washington, D. C. 20515

Dear Sir:

This is to inform you that the address has changed for J. C. Helms for Congress. The new address is as follows:

J. C. Helms for Congress  
2425 West Loop South  
Suite 480  
Houston, Texas 77027

Please change your records accordingly. The identification number for J. C. Helms for Congress is C00149179.

Thank you for your cooperation in this matter.

Very truly yours,

Patrick Oxford  
Treasurer

PO:geg

" B "

83040595158

Name of Committee (in Full) <b>J.C. HELMS FOR CONGRESS COMMITTEE</b>			
<b>A. Full Name, Mailing Address and ZIP Code of Loan Source</b> J.C. Helms 2425 West Loop South, Suite 500 Houston, Texas 77027	<b>Original Amount of Loan</b> \$82,600	<b>Cumulative Payment To Date</b> \$18,505	<b>Balance Outstanding at Close of This Period</b> \$64,095
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>Runoff</b>			
Terms: Date Incurred <b>1982</b> Date Due <b>N.A.</b> Interest Rate <b>N.A.</b> % (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code <b>SOURCE OF FUNDS:</b>	Name of Employer		
"The candidate obtained personal funds to make this loan from Allied Bank of Texas, Houston, Texas. The amount of the loan outstanding to Allied Bank is _____. There is no other endorser or guarantor, or collateral owned by anyone other than the candidate pledged to Allied Bank of Texas."	Occupation		
	Amount Guaranteed Outstanding: \$		
	2. Full Name, Mailing Address and ZIP Code		
2. Full Name, Mailing Address and ZIP Code of Texas, Houston, Texas. The amount of the loan outstanding to Allied Bank is _____. There is no other endorser or guarantor, or collateral owned by anyone other than the candidate pledged to Allied Bank of Texas."	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code owned by anyone other than the candidate pledged to Allied Bank of Texas."	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$		
<b>B. Full Name, Mailing Address and ZIP Code of Loan Source</b>			
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
	2. Full Name, Mailing Address and ZIP Code		
2. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$		
SUBTOTALS This Period This Page (optional)			\$64,095
TOTALS This Period (last page in this line only)			\$64,095
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary			

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63 APR 19 11:01

Ms. Suzanne Callahan  
Investigator  
Office of the General Counsel  
Federal Election Commission  
1325 K Street  
Washington, D.C. 20563

1289 RIVER OAKS BANK & TRUST BUILDING  
2001 KIRBY DRIVE • HOUSTON, TEXAS 77019

PATRICK OXFORD

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
J. C. Helms for Congress ) MUR 1535

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 29, 1983, the Commission decided by a vote of 6-0 to take the following actions in MUR 1535:

1. Find reason to believe the J.C. Helms for Congress Committee has violated 2 U.S.C. § 434(b)(8).
2. Send the notification as attached to the First General Counsel's Report dated March 25, 1983.

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

Attest:

3/29/83  
Date

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

83040395111

Received in Office of Commission Secretary: 3-25-83, 9:08  
Circulated on 48 hour tally basis: 3-25-83, 2:00



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *gck*  
DATE: March 25, 1983  
SUBJECT: MUR 1535 - 1st GC Rpt

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

CIRCULATIONS

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

DISTRIBUTION

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

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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**SENSITIVE**

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

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

83 MAR 25 A 9: 08

**FIRST GENERAL COUNSEL'S REPORT**

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION 3-25-83

MUR NO. 1535  
STAFF MEMBER  
Suzanne Callahan

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

RESPONDENT'S NAME: J. C. Helms for Congress

RELEVANT STATUTE: 2 U.S.C. § 434(b) (8)

INTERNAL REPORTS CHECKED: J. C. Helms for Congress

FEDERAL AGENCIES CHECKED: None

**GENERATION OF MATTER**

This matter was referred to the Office of General Counsel by the Reports Analysis Division based on the J. C. Helms for Congress Committee's failure to properly itemize loans and failure to continuously report outstanding debts as required by 2 U.S.C. § 434(b) (8).

**SUMMARY OF ALLEGATIONS**

- A. Failure to Properly Itemize Loans - 2 U.S.C. § 434(b) (8)

The Committee's 1982 April 15 Quarterly, 12 Day Pre-Primary, and 12 Day Pre-Runoff reports disclosed a total of \$70,100 in loans made or guaranteed by the candidate; however, the Committee failed to disclose whether the original source of the loans was the candidate's personal funds or a lending institution.

Requests for Additional Information (RFAs) were sent to the Committee requesting clarification of the original source of the

83040395113

loans on three reports. The RFAI for the April 15 Quarterly and 12 Day Pre-Primary reports was mailed on May 24, 1982, and the RFAI for the 12 Day Pre-Runoff report was sent on July 6, 1982. No responses were received to the two RFAIs, and Second Notices were sent on June 18, 1982 and September 7, 1982, respectively.

No response has been received and attempts to contact the Committee have been unsuccessful.

B. Failure to Continuously Report Outstanding Debts and Obligations - 2 U.S.C. § 434(b) (8)

The July Quarterly report disclosed an additional \$12,500 in loans from the candidate and a \$1,500 loan repayment to the candidate on the Detailed Summary page. The loan repayment was also itemized on a supporting Schedule B. Schedule C did not include the \$70,100 in loans previously reported or the \$1,500 loan repayment. Line 10 of the Summary Page also did not include the previously reported loans.

An RFAI was mailed to the Committee on September 14, 1982, requesting complete clarification of all loan activity on Schedule C, and the correct total of all indebtedness on Line 10 of the Summary Page. No response was received to the RFAI and a Second Notice was sent on October 8, 1982.

No response has been received and attempts to contact the Committee have been unsuccessful.

FACTUAL AND LEGAL ANALYSIS

When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the

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candidate used his personal funds or borrowed the money from a lending institution or other source.

The respondent's failure to provide the requested information appears to be a violation of the provisions of § 434. Additionally, the Committee's failure to properly report outstanding debts is a violation of § 434 and 11 C.F.R. § 104.11(b).

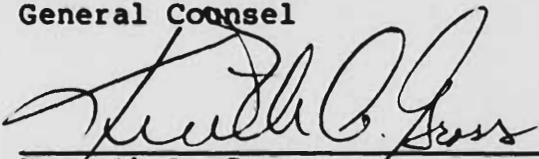
Because the Committee has repeatedly failed to provide the necessary information through amended reports, and because of the substantial sum of funds involved, we believe this matter warrants further action.

RECOMMENDATIONS

1. Find reason to believe the J. C. Helms for Congress Committee has violated 2 U.S.C. § 434(b)(8).
2. Send attached notification.

Charles N. Steele  
General Counsel

BY:

  
 \_\_\_\_\_  
 Kenneth A. Gross  
 Associate General Counsel

Date

March 27, 1983

Attachments

- RAD Referral
- General Counsel's Factual and Legal Analysis
- Notification letter

(30 total pages attached)

8304039514E

DATE: September 30, 1982

ANALYST: Benita Marcus Adler

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

I. COMMITTEE: J.C. Helms For Congress (C00149179)  
Patrick C. Oxford, Treasurer  
2425 West Loop South  
Suite 480  
Houston, TX 77027

II. RELEVANT STATUTE: 2 U.S.C. 434(b) (8)

III. BACKGROUND:

A. Failure to Properly Itemize Loans -- 2 U.S.C. 434(b) (8)

The Committee's 1982 April 15 Quarterly, 12 Day Pre-Primary, and 12 Day Pre-Runoff reports disclosed a total of \$70,100 in loans made or guaranteed by the candidate; however, the committee failed to disclose whether the original source of the loans was the candidate's personal funds or a lending institution (Attachments #2, #3, #4).

Requests for Additional Information (RFAs) were sent to the committee requesting clarification of the original source of the loans on three (3) reports. The RFA for the April 15 Quarterly and 12 Day Pre-Primary reports was mailed on May 24, 1982 and the RFA for the 12 Day Pre-Runoff report was sent on July 6, 1982 (Attachments #5, #6). No responses were received to the two (2) RFAs, and Second Notices were sent on June 18, 1982 and September 7, 1982, respectively (Attachments #7, #8).

No response has been received and attempts to contact the Committee have been unsuccessful (Attachment #9).

B. Failure to Continuously Report Outstanding Debts and Obligations -- 2 U.S.C. 434(b) (8)

The July Quarterly report disclosed an additional \$12,500 in loans from the candidate and a \$1500 loan repayment to the candidate on the Detailed Summary Page (Attachment #10). The loan repayment was also itemized on a supporting Schedule B (Attachment #11). Schedule C did not include the \$70,100 in loans previously reported or the \$1500 loan repayment (Attachment #12). Line 10 of the Summary Page also did not include the previously reported loans (Attachment #13).

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A RFAI was mailed to the Committee on September 14, 1982 requesting complete clarification of all loan activity on Schedule C, and the correct total of all indebtedness on Line 10 of the Summary Page (Attachment #14). No response was received to the RFAI and a Second Notice was sent on October 8, 1982 (Attachment #15).

No response has been received and attempts to contact the Committee have been unsuccessful (see Attachment #9).

IV. OTHER PENDING ACTIONS INITIATED BY RAO:

None at this time.

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2

CANDIDATE/COMMITTEE/ORGANIZATION	OFFICE SOUGHT	PARTY	RECEIPTS		EXPENDITURES		COVERAGE DATES	FIDUCIARY TYPE OF FIDUCIARY	MATERIAL LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			

HELMS, J. C.	HOUSE 25	REPUBLICAN PARTY					1982 ELECTION	100	W2125041
--------------	----------	------------------	--	--	--	--	---------------	-----	----------

1. STATEMENT OF CANDIDATE 1982 STATEMENT OF CANDIDATE							20.JAN82	1	HOUSE/20/1005
--	--	--	--	--	--	--	----------	---	---------------

2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES									
3. PRINCIPAL CAMPAIGN COMMITTEES									

J. C. HELMS FOR CONGRESS COMMITTEE							100	06149179	HOUSE
------------------------------------	--	--	--	--	--	--	-----	----------	-------

1982 STATEMENT OF ORGANIZATION							20.JAN82	1	HOUSE/20/1004
--------------------------------	--	--	--	--	--	--	----------	---	---------------

48 HOUR CONTRIBUTION NOTICE							29APR82	1	HOUSE/21/2959
-----------------------------	--	--	--	--	--	--	---------	---	---------------

48 HOUR CONTRIBUTION NOTICE							4.JUN82	2	HOUSE/21/2302
-----------------------------	--	--	--	--	--	--	---------	---	---------------

STATEMENT OF ORGANIZATION - AMENDMENT							6.JUN 82	1	HOUSE/21/0150
---------------------------------------	--	--	--	--	--	--	----------	---	---------------

APRIL QUARTERLY			42,140		41,406		1.JAN82 - 31.MAR82	20	HOUSE/21/0404
-----------------	--	--	--------	--	--------	--	--------------------	----	---------------

REQUEST FOR ADDITIONAL INFORMATION							1.JAN82 - 31.MAR82	2	HOUSE/21/3291
------------------------------------	--	--	--	--	--	--	--------------------	---	---------------

REQUEST FOR ADDITIONAL INFORMATION 2ND							1.JAN82 - 31.MAR82	3	HOUSE/21/2504
--	--	--	--	--	--	--	--------------------	---	---------------

PRE-PRIMARY			17,155		7,540		1.APR82 - 11.APR82	11	HOUSE/21/2149
-------------	--	--	--------	--	-------	--	--------------------	----	---------------

PRE-PRIMARY - AMENDMENT			17,155		7,540		1.APR82 - 11.APR82	15	HOUSE/21/0404
-------------------------	--	--	--------	--	-------	--	--------------------	----	---------------

REQUEST FOR ADDITIONAL INFORMATION							1.APR82 - 11.APR82	4	HOUSE/21/0210
------------------------------------	--	--	--	--	--	--	--------------------	---	---------------

REQUEST FOR ADDITIONAL INFORMATION 2ND							1.APR82 - 11.APR82	4	HOUSE/21/0210
--	--	--	--	--	--	--	--------------------	---	---------------

PRE-RUN-OFF			50,070		56,712		11.APR82 - 14.MAY82	38	HOUSE/21/2200
-------------	--	--	--------	--	--------	--	---------------------	----	---------------

REQUEST FOR ADDITIONAL INFORMATION							1.APR82 - 14.MAY82	2	HOUSE/21/4178
------------------------------------	--	--	--	--	--	--	--------------------	---	---------------

REQUEST FOR ADDITIONAL INFORMATION 2ND							1.APR82 - 14.MAY82	3	HOUSE/21/3317
--	--	--	--	--	--	--	--------------------	---	---------------

JULY QUARTERLY			36,143		39,036		17.MAY82 - 30.JUN82	19	HOUSE/22/1054
----------------	--	--	--------	--	--------	--	---------------------	----	---------------

REQUEST FOR ADDITIONAL INFORMATION							17.MAY82 - 30.JUN82	2	HOUSE/21/1497
------------------------------------	--	--	--	--	--	--	---------------------	---	---------------

REQUEST FOR ADDITIONAL INFORMATION 2ND							17.MAY82 - 30.JUN82	3	HOUSE/21/2204
--	--	--	--	--	--	--	---------------------	---	---------------

TOTAL			146,316		144,702	0		125	TOTAL PAGES
-------	--	--	---------	--	---------	---	--	-----	-------------

4. AUTHORIZED COMMITTEES									
--------------------------	--	--	--	--	--	--	--	--	--

4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES									
--	--	--	--	--	--	--	--	--	--

ALL REPORTS REVIEWED

CLOSING CASH ON HAND AS OF JULY QUARTERLY REPORT: \$1,001.41

OUTSTANDING DEBTS AND OBLIGATIONS AS OF JULY QUARTERLY: \$94,107.44

AA Note that the report of the committee notes only \$12,500 on line 10, however, the actual indebtedness of the committee is \$94,107 (all outstanding loans and debts as previously reported).

Handwritten mark resembling a stylized 'S' or '8'.

**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3)**

ATTACHMENT NO. \_\_\_\_\_  
PAGE NO. \_\_\_\_\_

Name of Committee (in Full)

J. W. Helms for Congress Committee

Report covering the Period

From 1/1/69

To 7/31/69

COLUMN A  
Total This Period

COLUMN B  
Calendar Year-to-Date

**I. RECEIPTS**

**11. CONTRIBUTIONS (other than loans) FROM:**

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitemized \$ 1,000.00)

(b) Political Party Committees

(c) Other Political Committees

(d) The Candidate

(e) TOTAL CONTRIBUTIONS (other than loans) (Add 11a, 11b, 11c and 11d)

**12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES**

**13. LOANS:**

(a) Made or Guaranteed by the Candidate

(b) All Other Loans

(c) TOTAL LOANS (Add 13a and 13b)

**14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Returns, etc.)**

**15. OTHER RECEIPTS (Dividends, Interest, etc.)**

**16. TOTAL RECEIPTS (Add 11a, 12, 13c, 14 and 15)**

**II. DISBURSEMENTS**

**17. OPERATING EXPENDITURES**

**18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES**

**19. LOAN REPAYMENTS:**

(a) Of Loans Made or Guaranteed by the Candidate

(b) Of All Other Loans

(c) TOTAL LOAN REPAYMENTS (Add 19a and 19b)

**20. REFUNDS OF CONTRIBUTIONS TO:**

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (Add 20a, 20b and 20c)

**21. OTHER DISBURSEMENTS**

**22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)**

**III. CASH SUMMARY**

**23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD**

**24. TOTAL RECEIPTS THIS PERIOD (From Line 16)**

**25. SUBTOTAL (Add Line 23 and Line 24)**

**26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)**

**27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)**

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	1,000.00	
(Memo Entry Unitemized \$ <u>1,000.00</u> )		
(b) Political Party Committees	41.40	
(c) Other Political Committees	500.00	
(d) The Candidate	00	
(e) TOTAL CONTRIBUTIONS (other than loans) (Add 11a, 11b, 11c and 11d)	1,541.40	
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	00	
13. LOANS:		
(a) Made or Guaranteed by the Candidate	35,100.00	
(b) All Other Loans	--	
(c) TOTAL LOANS (Add 13a and 13b)	35,100.00	
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Returns, etc.)	--	
15. OTHER RECEIPTS (Dividends, Interest, etc.)	--	
16. TOTAL RECEIPTS (Add 11a, 12, 13c, 14 and 15)	42,148.40	
II. DISBURSEMENTS		
17. OPERATING EXPENDITURES	41,406.98	
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	--	
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate	--	
(b) Of All Other Loans	--	
(c) TOTAL LOAN REPAYMENTS (Add 19a and 19b)	--	
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	--	
(b) Political Party Committees	--	
(c) Other Political Committees	--	
(d) TOTAL CONTRIBUTION REFUNDS (Add 20a, 20b and 20c)	--	
21. OTHER DISBURSEMENTS	--	
22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)	41,406.98	

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4

Name of Corporation (if any)

J. C. Helms for Congress Committee

A Full Name, Address and ZIP Code of Loan Source

J. C. Helms  
4635 N. Braeswood #206  
Houston, Texas 77096

Original Amount of Loan

\$100.00

Collateral Provided To Date

None

Balance Outstanding at Close of This Period

\$105.00

Enter:  Current  General  Other (Specify)

Term: Date Maturity 2/15/62

Date Due

Interest Rate

Security

List of Employers or Guarantors (if any) to item A

None

1 Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding \$

2 Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding \$

3 Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding \$

B Full Name, Mailing Address and ZIP Code of Loan Source

J. C. Helms  
4635 N. Braeswood #206  
Houston, Tx. 77096

Original Amount of Loan

\$10,000.00

Collateral Provided To Date

None

Balance Outstanding at Close of This Period

\$10,100.00

Enter:  Student  General  Other (Specify)

Term: Date Maturity 1/15/62

Date Due

Interest Rate

Security

List of Employers or Guarantors (if any) to item B

None

1 Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding \$

2 Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding \$

3 Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding \$

EXCESSIVE This Period This Period (optional)

TOTAL This Period (if any) to this date

Comments: (to be filled in by Lender, Borrower, or Guarantor)

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85-100-EG  
(Rev. 10-2-72)

LOANS

ATTACHMENT NO. April 15, 1973

2072

Name of Committee for Part A  
**J. C. Helms for Congress Committee**

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Completions Payments To Date	Balance Outstanding at Close of This Period
<b>J. C. Helms 4635 N. Braeswood #206 Houston, TX 77096</b>	<b>\$5,000.00</b>	<b>None</b>	<b>\$15,100.00</b>
Terms: Date Incurred <u>3/7/67</u> Date Due _____ Interest Rate _____ Secured <input type="checkbox"/>			

Part A: Endorsers or Guarantors (if any) to item A **None**

1. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$
2. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$
3. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Completions Payments To Date	Balance Outstanding at Close of This Period
<b>J. C. Helms 4635 N. Braeswood #206 Houston, TX. 77096</b>	<b>\$15,000.00</b>	<b>None</b>	<b>\$30,100.00</b>
Exempt <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____			
Terms: Date Incurred <u>3/7/67</u> Date Due <u>1/1</u> Interest Rate <u>4%</u> Secured <input type="checkbox"/>			

Part B: Endorsers or Guarantors (if any) to item B **None**

1. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$
2. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$
3. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$

SUBTOTALS This Period (To Pay bottom) .....

TOTALS This Period (for both of the line above) .....

Copy returned to office only to LMC3, Branch C, for use in the \_\_\_\_\_

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112012150711

2072

4

LOANS

Form No. 10-67  
Use current edition  
for first payment of 1968

RM

Schedule  
Private Loan

**1. Name of Beneficiary (in Full)**  
**J. C. Helms 308 Congress Committee**

**2. Full Name, Mailing Address and ZIP Code of Loan Recipient**  
**J. C. Helms**  
**4535 N. Braeswood #206**  
**HOUSTON, TX: 77096**

**3. Original Amount of Loan** **\$5,000.00**      **4. Amount of Payment To Date** **None**      **5. Monthly Outstanding at Close of This Period** **\$5,000.00**

**6. Election:**  Primary     General     Other (Specify)

**7. Terms:** Date Incurred **3/30/62**    Date Due **N/A**    Interest Rate **N/A**     Secured

**8. List All Endorsers or Guarantors (if any) to Item A** **None**

1. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding \$

**9. Full Name, Mailing Address and ZIP Code of Loan Source**

**10. Original Amount of Loan**      **11. Current Payment To Date**      **12. Balance Due at Close of This Period**

**13. Election:**  Primary     General     Other (Specify)

**14. Terms:** Date Incurred      Date Due **N/A**    Interest Rate **N/A**     Secured

**15. List All Endorsers or Guarantors (if any) to Item 9**

1. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding \$

**TOTALS The Period This Form Covers:**      **TOTALS The Period This Form Covers:**

*Copy outstanding balance only to Line 2, Schedule D, for the line. If no Schedule D, copy amount to appropriate line of Summary.*

3 014200 4 9 5 9 057217

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17



Part C. Return for Contract Com-10000

Original Amount of Loan <b>\$5,000.00</b>	Contract or Period None	Unpaid Contract or Contract of the Period <b>\$45,100.00</b>
--	----------------------------	--

Name: **J. C. Helms**  
 Address: **4635 N. Braeswood #206 Houston, Texas 77096**  
 Date Incurred: **6/9/82** Date Due: **N/A** Interest Rate: **N/A**

Part A. Enclosure or Question 61 (a) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding
2. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding
3. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding

Part B. Full Name, Mailing Address and ZIP Code of Loan Source

Original Amount of Loan <b>\$5,000.00</b>	Contract or Period None	Unpaid Contract or Contract of the Period <b>\$45,100.00</b>
--	----------------------------	--

Name: **J. C. Helms**  
 Address: **4635 N. Braeswood #206 Houston, Texas 77096**  
 Date Incurred: **6/7/82** Date Due: **N/A** Interest Rate: **N/A**

Part A. Enclosure or Question 61 (a) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding
2. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding
3. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding

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File

File

9

**DETAILED SUMMARY PAGE**  
**Receipts and Disbursements**  
**(Page 2, FEC FORM 3)**

ATTACHMENT # - 10  
 Runoff report

Committee (or Path)

Report Covering the Period:

From: To:

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
<b>I. RECEIPTS</b>		
1. CONTRIBUTIONS (other than loans) FROM:		
a) Individuals/Persons Other Than Political Committees	\$ 21,370.00	\$ 35,573.40
(Marie Entry Universalized \$ 4,500.00)		43.40
b) Political Party Committees		
c) Other Political Committees	4,500.00	5,000.00
d) The Candidate		
e) TOTAL CONTRIBUTIONS (other than loans) (Add 11a, 11b, 11c and 11d)	25,870.00	40,073.40
2. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	--	--
3. LOANS:		
a) Made or Guaranteed by the Candidate	25,000.00	70,100.00
b) All Other Loans		
c) TOTAL LOANS (Add 13a and 13b)	25,000.00	70,100.00
4. OFFSETS TO OPERATING EXPENDITURES (Personal, Personal, etc.)	--	--
5. OTHER RECEIPTS (Dividends, Interest, etc.)	--	--
6. TOTAL RECEIPTS (Add 11a, 12, 13c, 14 and 15)	50,870.00	110,173.40
<b>II. DISBURSEMENTS</b>		
7. OPERATING EXPENDITURES	55,712.22	105,666.17
8. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	--	--
9. LOAN REPAYMENTS:		
a) Of Loans Made or Guaranteed by the Candidate	--	--
b) Of All Other Loans	--	--
c) TOTAL LOAN REPAYMENTS (Add 19a and 19b)	--	--
10. REFUNDS OF CONTRIBUTIONS TO:		
a) Individuals/Persons Other Than Political Committees	--	--
b) Political Party Committees	--	--
c) Other Political Committees	--	--
d) TOTAL CONTRIBUTION REFUNDS (Add 20a, 20b and 20c)	--	--
11. OTHER DISBURSEMENTS	--	--
12. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)	55,712.22	105,666.17
<b>III. CASH SUMMARY</b>		
13. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD		10,347.45
14. TOTAL RECEIPTS THIS PERIOD (From Line 6)	\$ 50,870.00	
15. SUBTOTAL (Add Line 13 and Line 14)	\$ 61,217.45	
16. TOTAL DISBURSEMENTS THIS PERIOD (From Line 12)	\$ 55,712.22	
17. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 16 from 15)	\$ 4,505.23	

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LOANS

LINE NUMBER 10/2  
 Use separate schedules for each numbered line

Helms for Congress Committee

Name, Mailing Address and ZIP Code of Loan Source

J. Helms  
 45 N. Braeswood #206  
 Houston, Tx. 77096

Original Amount of Loan

\$15,000.00

Cumulative Payments To Date

Balance Outstanding at Close of This Period

\$60,100.00

Terms Date Incurred 4/20/82 Date Due N/A

Interest Rate N/A

Secured

List All Endorsers or Guarantors (if any) to Item A

1 Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding

2 Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding

3 Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding

Name, Mailing Address and ZIP Code of Loan Source

J. C. Helms  
 4635 N. Braeswood #206  
 Houston, Tx. 77096

Original Amount of Loan

\$10,000

Cumulative Payments To Date

Balance Outstanding at Close of This Period

\$70,100.00

Terms Date Incurred 4/26/82 Date Due N/A

Interest Rate N/A

Secured

List All Endorsers or Guarantors (if any) to Item B

1 Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding

2 Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding

3 Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding

SUBTOTALS This Period This Page (optional)

\$25,000.00

TOTALS This Period (last page in this line only)

\$25,000.00

Carry outstanding balance only to LINE 3 Schedule D, for the line. If no Schedule D, carry forward to appropriate line of Summary.

3040395156



FEDERAL ELECTION COMMISSION

24 May 1982

Mr. Patrick Oxford  
J. C. Helms for Congress Committee  
3270 South Loop West  
Houston, TX 77025

Identification Number: C00149179

Reference: 1982 April Quarterly Report (1/1/82-3/31/82) and 12 Day Pre-Primary Report (4/1/82-4/11/82)

Dear Mr. Oxford:

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

-When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution or other source. If the candidate borrowed funds from a lending institution or any other source, the amount of the loan, the date incurred, the date due, the interest rate, whether or not the loan was secured, and all endorsers' or guarantors' names, addresses, occupations, employers and the amount guaranteed by each, if applicable, should be itemized. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. Further, it is important to note that "personal funds" is strictly defined by Commission regulations and may be found in 11 C.F.R. 110.10. (11 C.F.R. 100.7(a)(1) and 104.3(d))

-You must provide the occupation and name of employer for each contributor required to be itemized on Schedule A. Please amend your report by supplying the omitted information.

If your committee has made at least one effort per solicitation either by a written request or by an oral request documented in writing to obtain this information from the contributors, your committee may have "exercised best efforts" and need only confirm

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this effort, in writing. See 11 C.F.R. 104.3(a)(4)(i) and 11 C.F.R. 104.7.

-On your 12 Day Pre-Primary, Line 10 should be \$45,100 as this is the total amount of the outstanding loans owed to your committee. This should agree with Schedule C.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4172.

Sincerely,

*Benita Marcus Adler*

Benita Marcus Adler  
Reports Analyst  
Reports Analysis Division

3040695158

13



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20541

ATTACHMENT #4

6 July 1982

Patrick C. Oxford, Treasurer  
J. C. Helms for Congress Committee  
3270 South Loop West  
Houston, TX 77025

Identification Number: C00149179

Reference: 12 Day Pre-Runoff (4/1/82-5/16/82)

Dear Mr. Oxford:

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

-You must provide the occupation and name of employer for each contributor required to be itemized on Schedule A. Please amend your report by supplying the omitted information.

If your committee has made at least one effort per solicitation either by a written request or by an oral request documented in writing to obtain this information from the contributors, your committee may have "exercised best efforts" and need only confirm this effort, in writing. See 11 C.F.R. 104.3(a)(4)(i) and 11 C.F.R. 104.7.

-For future reports, please include an aggregate total for all contributions you choose to itemize.

-When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution or other source. If the candidate borrowed funds from a lending institution or any other source, the amount of the loan, the date incurred, the date due, the interest rate, whether or not the loan was secured, and all endorsers' or guarantors' names, addresses, occupations, employers and the amount guaranteed by each, if applicable, should be itemized. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. Further, it is important to note that "personal funds" is strictly defined by Commission regulations and may be found in 11 C.F.R. 110.10. (11 C.F.R. 100.7(a)(1) and 104.3(d))

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-Commission Regulations define the term "purpose" to mean a brief statement or description of why a disbursement was made. Examples are "dinner expense", "media", "salary", "polling", "travel", "party fees", "phone banks", "travel expenses", "travel expense reimbursement" and "catering costs". Unacceptable descriptions include "advance", "election day expense", "expenses", "other expenses", "expense reimbursement", "miscellaneous", "outside services", "get-out-the-vote" and "voter registration". (11 C.F.R. 104.3(b)(4)) For future filings, please clarify the following descriptions which do not meet the requirements of the Regulations:

reimbursement expenses

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4172.

Sincerely,

*Benita Marcus Adler*

Benita Marcus Adler  
Reports Analyst  
Reports Analysis Division

3040395160



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20541

June 18, 1982

Patrick Oxford, Treasurer  
J. C. Helms for Congress Committee  
3270 South Loop West  
Houston, TX 77025

Identification Number: C00149179

Reference: 1982 April Quarterly Report (1/1/82-3/31/82) and  
12 Day Pre-Primary Report (4/1/82-4/11/82)

Dear Mr. Oxford:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated May 24, 1982. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Benita Marcus Adler on our toll-free number (800)424-9530 or our local number (202)523-4172.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

3040395161



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

September 16, 1982

Patrick C. Oxford, Treasurer  
J. C. Helms for Congress Committee  
2425 West Loop South, Suite 480  
Houston, Texas 77057

Identification Number: C00149179

Reference: 12 Day Pre-Runoff (4/1/82-5/16/82)

Dear Mr. Oxford:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated July 6, 1982. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Benita Marcus Adler on our toll-free number (800) 424-9530 or our local number (202) 523-4172.

Sincerely,

*John D. Gibson*  
John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

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TELECON

DATE: December 6, 7, and 8, 1982

FROM: Benita Adler

TO: J.C. Helms for Congress Cmte.

COMMITTEE: J.C. Helms for Congress Committee  
(713) 432-0025  
(713) 961-9999



This number has been disconnected.  
The operator in the (713) area code said there was no listing for  
Patrick Oxford (treasurer) or J.C. Helms (candidate)

The second number - there has been no answer for 3 days.

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*Handwritten signature or initials*

18

DETAILED SUMMARY PAGE  
of Financial and Disbursement  
STATE REPORT FORM 8

ATTACHMENT #1

STATE REPORT FORM 8

Name of Committee or Fund	Period Covering the Period	
	From	To
J. C. Helms for Congress Committee	5/17/62	6/30/62
	COLUMN A Total To Period	COLUMN B Calendar Year-to-Date
<b>I. RECEIPTS</b>		
11 CONTRIBUTIONS (other than loans) FROM		
(a) Individual Persons Other Than Political Committees (Memo Entry Unitemized \$ _____)	\$26,600.00	<del>\$ 52,355.40</del>
(b) Political Party Committees	-0-	43.40
(c) Other Political Committees	6,500.00	11,500.00
(d) The Candidate	-0-	-0-
(e) TOTAL CONTRIBUTIONS (other than loans) (Add 11a, 11b, 11c and 11d)	\$23,100.00	\$ 63,726.80
12 TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	-0-	-0-
13 LOANS		
(a) Made or Guaranteed by the Candidate	12,500.00	82,600.00
(b) Other Loans	-0-	-0-
(c) TOTAL LOANS (Add 13a and 13b)	\$12,500.00	\$ 82,600.00
14 OFFSETS TO OPERATING EXPENDITURES (Returns, Receipts, etc.)	533.00	533.00
15 OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-
16 TOTAL RECEIPTS (Add 11e, 12, 13c, 14 and 15)	<del>\$36,143.00</del>	\$140,859.80
<b>II. DISBURSEMENTS</b>		
17 OPERATING EXPENDITURES	36,530.82	142,204.99
18 TRANSFERS TO OTHER AUTHORIZED COMMITTEES	-0-	-0-
19 LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate	1,500.00	1,500.00
(b) Of All Other Loans	-0-	-0-
(c) TOTAL LOAN REPAYMENTS (Add 19a and 19b)	\$ 1,500.00	\$ 1,500.00
20 REFUNDS OF CONTRIBUTIONS TO:		
(a) Individual Persons Other Than Political Committees	1,000.00	1,000.00
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees	-0-	-0-
(d) TOTAL CONTRIBUTION REFUNDS (Add 20a, 20b, and 20c)	\$ 1,000.00	\$ 1,000.00
21 OTHER DISBURSEMENTS	-0-	-0-
22 TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)	\$38,030.82	\$143,704.99
<b>III. CASH SUMMARY</b>		
23 CASH ON HAND AT THE BEGINNING OF THE REPORTING PERIOD		\$1,625.23
24 TOTAL RECEIPTS THIS PERIOD (From Line 16)		30,143.00
25 SUBTOTAL (Add Line 23 and Line 24)		\$1,625.23
26 TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)		\$36,036.82
27 CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from Line 25)		\$1,000.00

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All information derived from such Reports and Statements may not be sold or used by any person for the purpose of making any contribution or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

J. C. Helms for Congress Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
J. C. Helms 4635 N. Braeswood #206 Houston, Texas 77096	Repayment of Loan Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <u>Pay-off</u>	6/3/82	\$1,500.00
Clymer Wright, Jr. 6038 Darkwood Houston, Texas 77088	Return of Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <u>Pay-off</u>	6/3/82	1,000.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement:  Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement:  Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement:  Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement:  Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement:  Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement:  Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement:  Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			2,500.00
TOTAL This Period (last page this line number only)			\$26,026.82

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20

LOANS

U.S. GOVERNMENT PRINTING OFFICE: 1975 O-250-000

LINE for Congress Committee

1. Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Helms N. Braeswood, #206 Houston, Texas 77096 (Special category) <b>Runoff</b>	5,000.00	-0-	5,000.00

Terms:  A-1 Income  Date Due  Interest Rate  (Suppl.)  Secured

4. Endorser or Guarantor (If any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer
N/A (source of loan was derived from J. C. Helms' personal funds)	Occupation
	Amount Guaranteed Outstanding \$
2. Full Name, Mailing Address and ZIP Code	Name of Employer
N/A	Occupation
	Amount Guaranteed Outstanding \$
3. Full Name, Mailing Address and ZIP Code	Name of Employer
N/A	Occupation
	Amount Guaranteed Outstanding \$

5. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
J. C. Helms 4635 N. Braeswood, #206 Houston, Texas 77096 Election (P-Primary, G-General, O-Other (specify)): <b>Runoff</b>	7,500.00	-0-	7,500.00

Terms:  A-1 Income  Date Due  Interest Rate  (Suppl.)  Secured

Let A. Endorser or Guarantor (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer
N/A (source of loan was derived from J. C. Helms' personal funds)	Occupation
	Amount Guaranteed Outstanding \$
2. Full Name, Mailing Address and ZIP Code	Name of Employer
N/A	Occupation
	Amount Guaranteed Outstanding \$
3. Full Name, Mailing Address and ZIP Code	Name of Employer
N/A	Occupation
	Amount Guaranteed Outstanding \$

TOTALS This Period This Page (optional) .....  
 TOTALS This Page (all pages on this line only) ..... \$12,500.00

Complete information relative to this LINE 2 Schedule D, for the line if no Schedule D, copy forward to appropriate line of Summary.

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REPORT OF FEDERAL CANDIDATE  
For a House or Senate Committee

(Summary Page)

6553

JUL 15 1982

1. Name of Committee in Full  
**J. C. Helms for Congress Committee**  
Address Number and Street:  
**2425 West Loop South Suite 400**  
City and State:  
**HOUSTON, TEXAS 77057**

2. FEC Identification Number:  
**COB-149-179**  
3. Is this report of a primary election?  
 YES

4. TYPE OF REPORT

- April 15 Quarterly Report
- 02** July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year-End Report
- July 31 Mid-Year Report (Non-election Year Only)
- Twelfth day report preceding election of \_\_\_\_\_ in the State of \_\_\_\_\_
- Thirtieth day report following the general election on \_\_\_\_\_ in the State of \_\_\_\_\_
- Termination Report

This report contains activity for:  Primary Election  General Election  Special Election  Runoff Election

SUMMARY

5. Covering Period May 17 Through June 30, 1982

	Column A This Period	Column B Calendar Year to-Date
6. Net Contributions (other than loans):		
(a) Total Contributions (other than loans) (from Line 11e) .....	\$ 23,110.00	\$ 63,726.80
(b) Total Contribution Refunds (from Line 20d) .....	\$ 1,000.00	\$ 1,000.00
(c) Net Contributions (other than loans) (Subtract Line 6b from 6a) .....	\$ 22,110.00	\$ 62,726.80
7. Net Operating Expenditures:		
(a) Total Operating Expenditures (from Line 17) .....	\$ 36,536.82	\$142,204.99
(b) Total Offsets to Operating Expenditures (from Line 14) .....	\$ 533.00	\$ 533.00
(c) Net Operating Expenditures (Subtract Line 7b from 7a) .....	\$ 36,003.82	\$141,671.99
8. Cash on Hand at Close of Reporting Period (from Line 27) .....	\$ 1,549.53	\$ 1,549.53
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) .....	\$ 0.00	\$ 0.00
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) .....	\$ 25,707.45	\$ 25,707.45

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

For further information, contact:

Patrick C. Oxford

Federal Election Commission  
Tel. Free 1-800-424-9530  
Local 202-523-4300

Signature of Treasurer: [Signature]  
Date: 7/15/82

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 1913.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

Handwritten notes and stamps at the bottom of the page, including "FEC FORM 3 1982" and various initials.



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20543

14 September 1982

Patrick C. Oxford, Treasurer  
J.C. Helms for Congress  
2425 West Loop South, Suite 480  
Houston, TX 77057

Identification Number: C00149179

Reference: July Quarterly Report (5/17/82-6/30/82)

Dear Mr. Oxford:

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

-Your previous report detailed \$70,100 of outstanding loans from the candidate. This report appears to have dropped these loans. Our calculations indicate that your committee has the following outstanding debts:

\$ 70,100	= candidate loans previously reported
12,500	= candidate loans on July Quarterly
13,207	= debts reported on July Quarterly
<u>\$ 95,807</u>	
- 1,500	= loan repayment on July Quarterly
<u>\$ 94,307</u>	= total outstanding debts and obligations

Please amend your report to accurately reflect the above activity. All loans must be reported separately on Schedule C, including whether personal or bank funds were borrowed. A total must then be entered on Line 10 of the Summary Page.

-On Schedule D, you have reported debts to Bracewell and Patterson and Ketchum Advertising with outstanding balances at the beginning of this reporting period. These debts were not included on your previous report. Please be advised any loan, debt or obligation, the amount of which is over \$500 should be reported as of the time the debt was incurred. (11 CFR 104.11(b)) Please clarify the reporting of these debts.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 1, 1983

Mr. Patrick Oxford  
J. C. Helms for Congress Committee  
3270 South Loop West  
Houston, Texas 77025

RE: MUR 1535

Dear Mr. Oxford:

On March 29, 1983, the Federal Election Commission determined that there is reason to believe that the J. C. Helms for Congress Committee violated 2 U.S.C. § 434(b)(8), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") by failure to properly itemize loans and failure to continuously report outstanding debts. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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

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

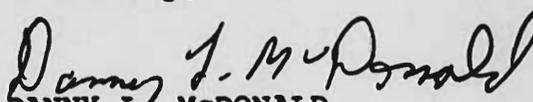
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Letter to Patrick Oxford  
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

Sincerely,

  
DANNY L. MCDONALD  
Chairman

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

cc: J. C. Helms  
4635 North Braeswood, #206  
Houston, Texas 77096

83040395171

FEDERAL ELECTION COMMISSION  
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1535

RESPONDENT J. C. Helms for Congress

STAFF MEMBER & TEL. NO.

Suzanne Callahan  
(202) 523-4529

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

A. Failure to Properly Itemize Loans - 2 U.S.C.  
§ 434(b) (8)

8304039517  
The Committee's 1982 April 15 Quarterly, 12 Day Pre-Primary, and 12 Day Pre-Runoff reports disclosed a total of \$70,100 in loans made or guaranteed by the candidate; however, the Committee failed to disclose whether the original source of the loans was the candidate's personal funds or a lending institution.

Requests for Additional Information (RFAIs) were sent to the Committee requesting clarification of the original source of the loans on three reports. The RFAI for the April 15 Quarterly and 12 Day Pre-Primary reports was mailed on May 24, 1982, and the RFAI for the 12 Day Pre-Runoff report was sent on July 6, 1982. No responses were received to the two RFAIs, and Second Notices were sent on June 18, 1982 and September 7, 1982, respectively.

No response has been received and attempts to contact the Committee have been unsuccessful.

B. Failure to Continuously Report Outstanding Debts and Obligations - 2 U.S.C. § 434(b) (8)

The July Quarterly report disclosed an additional \$12,500 in loans from the candidate and a \$1,500 loan repayment to the

candidate on the Detailed Summary page. The loan repayment was also itemized on a supporting Schedule B. Schedule C did not include the \$70,100 in loans previously reported or the \$1,500 loan repayment. Line 10 of the Summary Page also did not include the previously reported loans.

An RFAI was mailed to the Committee on September 14, 1982, requesting complete clarification of all loan activity on Schedule C, and the correct total of all indebtedness on Line 10 of the Summary Page. No response was received to the RFAI and a Second Notice was sent on October 8, 1982.

No response has been received and attempts to contact the Committee have been unsuccessful.

#### FACTUAL AND LEGAL ANALYSIS

When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his personal funds or borrowed the money from a lending institution or other source.

The respondent's failure to voluntarily provide the requested information appears to be a violation of the provisions of § 434. Additionally, the Committee's failure to properly report outstanding debts is a violation of § 434 and 11 C.F.R. § 104.11(b). Therefore, the General Counsel recommends that the Commission find reason to believe that the J. C. Helms for Congress Committee has violated 2 U.S.C. § 434(b)(8).

#### RECOMMENDATION

1. Find reason to believe the J. C. Helms for Congress Committee has violated 2 U.S.C. § 434(b)(8).

83040395173



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. Patrick Oxford  
J. C. Helms for Congress Committee  
3270 South Loop West  
Houston, Texas 77025

RE: MUR 1535

Dear Mr. Oxford:

On March 29, 1983, the Federal Election Commission determined that there is reason to believe that the J. C. Helms for Congress Committee violated 2 U.S.C. § 434(b)(8), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") by failure to properly itemize loans and failure to continuously report outstanding debts. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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

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

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Letter to Patrick Oxford  
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

Sincerely,

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

cc: J. C. Helms  
4635 North Braeswood, #206  
Houston, Texas 77096

03040395175

*Smk*  
*5/20/83*



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20543

ATTACHMENT 114

6 July 1982

Patrick C. Oxford, Treasurer  
J. C. Helms for Congress Committee  
3270 South Loop West  
Houston, TX 77025

Identification Number: C00149179

Reference: 12 Day Pre-Runoff (4/1/82-5/16/82)

Dear Mr. Oxford:

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

-You must provide the occupation and name of employer for each contributor required to be itemized on Schedule A. Please amend your report by supplying the omitted information.

If your committee has made at least one effort per solicitation either by a written request or by an oral request documented in writing to obtain this information from the contributors, your committee may have "exercised best efforts" and need only confirm this effort, in writing. See 11 C.F.R. 104.3(a)(4)(i) and 11 C.F.R. 104.7.

-For future reports, please include an aggregate total for all contributions you choose to itemize.

-When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution or other source. If the candidate borrowed funds from a lending institution or any other source, the amount of the loan, the date incurred, the date due, the interest rate, whether or not the loan was secured, and all endorsers' or guarantors' names, addresses, occupations, employers and the amount guaranteed by each, if applicable, should be itemized. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. Further, it is important to note that "personal funds" is strictly defined by Commission regulations and may be found in 11 C.F.R. 110.10. (11 C.F.R. 100.7(a)(1) and 104.3(d))

83040395176



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

24 May 1982

Mr. Patrick Oxford  
 J. C. Helms for Congress Committee  
 3270 South Loop West  
 Houston, TX 77025

Identification Number: C00149179

Reference: 1982 April Quarterly Report (1/1/82-3/31/82) and 12  
 Day Pre-Primary Report (4/1/82-4/11/82)

Dear Mr. Oxford:

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

-When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution or other source. If the candidate borrowed funds from a lending institution or any other source, the amount of the loan, the date incurred, the date due, the interest rate, whether or not the loan was secured, and all endorsers' or guarantors' names, addresses, occupations, employers and the amount guaranteed by each, if applicable, should be itemized. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. Further, it is important to note that "personal funds" is strictly defined by Commission regulations and may be found in 11 C.F.R. 110.10. (11 C.F.R. 100.7(a)(1) and 104.3(d))

-You must provide the occupation and name of employer for each contributor required to be itemized on Schedule A. Please amend your report by supplying the omitted information.

If your committee has made at least one effort per solicitation either by a written request or by an oral request documented in writing to obtain this information from the contributors, your committee may have "exercised best efforts" and need only confirm

83040395177



**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3)**

ATTACHMENT # \_\_\_\_\_  
 Funded by \_\_\_\_\_

Committee (or Path)	Report Covering the Period:	
	From:	To:
	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
<b>I. RECEIPTS</b>		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees .....	\$ 21,370.00	\$ 25,573.40
(Minor Entry Unitemized \$ 4,500.00)		43.40
(b) Political Party Committees .....		
(c) Other Political Committees .....	4,500.00	5,000.00
(d) The Candidates .....		
(e) TOTAL CONTRIBUTIONS (other than loans) (Add 11a, 11b, 11c and 11d) .....	25,870.00	40,073.40
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES .....	--	--
13. LOANS:		
(a) Made or Guaranteed by the Candidate .....	25,000.00	70,100.00
(b) All Other Loans .....	--	--
(c) TOTAL LOANS (Add 13a and 13b) .....	25,000.00	70,100.00
14. OFFSETS TO OPERATING EXPENDITURES (Political, Personal, etc.) .....	--	--
15. OTHER RECEIPTS (Donations, Interest, etc.) .....	--	--
16. TOTAL RECEIPTS (Add 11e, 12, 13c, 14 and 15) .....	50,870.00	110,173.40
<b>II. DISBURSEMENTS</b>		
17. OPERATING EXPENDITURES .....	55,712.22	105,665.17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES .....	--	--
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate .....	--	--
(b) Of All Other Loans .....	--	--
(c) TOTAL LOAN REPAYMENTS (Add 19a and 19b) .....	--	--
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees .....	--	--
(b) Political Party Committees .....	--	--
(c) Other Political Committees .....	--	--
(d) TOTAL CONTRIBUTION REFUNDS (Add 20a, 20b and 20c) .....	--	--
21. OTHER DISBURSEMENTS .....	--	--
22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21) .....	55,712.22	105,665.17
<b>III. CASH SUMMARY</b>		
23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD .....		10,347.45
24. TOTAL RECEIPTS THIS PERIOD (From Line 16) .....	50,870.00	
25. SUBTOTAL (Add Line 23 and Line 24) .....		61,217.45
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22) .....	55,712.22	
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25) .....		4,505.23

**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3)**

ATTACHMENT #3 11 Day Fee

Name of Committee (in Full)

**J. C. Helms for Congress Committee**

Period Covering the Period:

From: 4/1/82

To: 4/30/82

COLUMN A  
Total This Period

COLUMN B  
Calendar Year-to-Date

**I. RECEIPTS**

**11. CONTRIBUTIONS (other than loans) FROM:**

(a) Individuals/Persons Other Than Political Committees

7,155.00

14,203.40

(Name Entry Limited to \_\_\_\_\_)

(b) Political Party Committees

--

43.40

(c) Other Political Committees

--

552.00

(d) The Candidates

--

(e) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b, 11c and 11d)

7,155.00

14,203.40

**12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES**

--

--

**13. LOANS:**

(a) Made or Guaranteed by the Candidates

10,000.00

45,100.00

(b) All Other Loans

10,000.00

45,100.00

(c) TOTAL LOANS (add 13a and 13b)

--

--

**14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Prepaid, etc.)**

--

--

**15. OTHER RECEIPTS (Dividends, Interest, etc.)**

--

--

**16. TOTAL RECEIPTS (Add 11e, 12, 13c, 14 and 15)**

17,155.00

59,303.40

**H. DISBURSEMENTS**

**17. OPERATING EXPENDITURES**

7,548.97

48,955.95

**18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES**

--

--

**19. LOAN REPAYMENTS:**

(a) Of Loans Made or Guaranteed by the Candidates

--

--

(b) Of All Other Loans

--

--

(c) TOTAL LOAN REPAYMENTS (add 19a and 19b)

--

--

**20. REFUNDS OF CONTRIBUTIONS TO:**

(a) Individuals/Persons Other Than Political Committees

--

--

(b) Political Party Committees

--

--

(c) Other Political Committees

--

--

(d) TOTAL CONTRIBUTION REFUNDS (add 20a, 20b and 20c)

--

--

**21. OTHER DISBURSEMENTS**

--

--

**22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)**

7,548.97

48,955.95

**III. CASH SUMMARY**

**23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD**

\$ 741.42

**24. TOTAL RECEIPTS THIS PERIOD (From Line 16)**

\$ 17,155.00

**25. SUBTOTAL (Add Line 23 and Line 24)**

\$ 17,896.42

**26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)**

\$ 7,548.97

**27. CASH ON HAND AT END OF REPORTING PERIOD (Subtract Line 26 from 25)**

\$ 10,347.45

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80-100-EC  
Rev. 10-2-52

LOANS

U.S. DEPARTMENT OF COMMERCE  
BUREAU OF BUSINESS  
WASHINGTON, D.C.

2071

Name of Committee for Pur.  
**J. C. Helms for Congress Committee**

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Outstanding Payment To Date	Amount Outstanding at Close of This Period
<b>J. C. Helms 4635 N. Braeswood #206 Houston, TX 77096</b>	<b>\$5,000.00</b>	<b>None</b>	<b>\$15,100.00</b>

Terms: Date Incurred 3/17/52 Date Due \_\_\_\_\_ Interest Rate \_\_\_\_\_ %  Variable  Secured

Let A: Endorser or Guarantor (if any) to item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$
	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$
	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Outstanding Payment To Date	Amount Outstanding at Close of This Period
<b>J. C. Helms 4635 N. Braeswood #206 Houston, TX 77096</b>	<b>\$15,000.00</b>	<b>None</b>	<b>\$30,100.00</b>

Extension:  Partial  General  Other (Specify) \_\_\_\_\_  
Terms: Date Incurred 3/17/52 Date Due \_\_\_\_\_ Interest Rate \_\_\_\_\_ %  Variable  Secured

Let A: Endorser or Guarantor (if any) to item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$
	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$
	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$

3. TOTALS This Period (The Paid column) \_\_\_\_\_

TOTALS This Period (for each of the two ends) \_\_\_\_\_

Copy outline (use free only on LINC 2, Enclosure C, for 100,000 P. 8) \_\_\_\_\_

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112012150716

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**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3)**

STATEMENT OF RECEIPTS AND DISBURSEMENTS

Name of Committee (in Full) J. H. Helms for Congress Committee

Report covering the Period From 1/1/69 To 12/31/69

COLUMN A  
Total This Period

COLUMN B  
Calendar Year-to-Date

**I. RECEIPTS**

**11. CONTRIBUTIONS (other than loans) FROM:**

(a) Individuals/Persons Other Than Political Committees ..... \$ 1,000.00  
(Memo Entry Unitemized \$ 1,000.00)

(b) Political Party Committees ..... 43.40

(c) Other Political Committees ..... 900.00

(d) The Candidates ..... 00

(e) TOTAL CONTRIBUTIONS (other than loans) (Add 11a, 11b, 11c and 11d) ..... 2,043.40

**12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES** ..... 00

**13. LOANS:**

(a) Made or Guaranteed by the Candidate ..... 35,100.00

(b) All Other Loans ..... --

(c) TOTAL LOANS (Add 13a and 13b) ..... 35,100.00

**14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)** ..... --

**15. OTHER RECEIPTS (Dividends, Interest, etc.)** ..... --

**16. TOTAL RECEIPTS (Add 11e, 12, 13c, 14 and 15)** ..... 42,146.40

**II. DISBURSEMENTS**

**17. OPERATING EXPENDITURES** ..... 41,406.98

**18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES** ..... --

**19. LOAN REPAYMENTS:**

(a) Of Loans Made or Guaranteed by the Candidate ..... --

(b) Of All Other Loans ..... --

(c) TOTAL LOAN REPAYMENTS (Add 19a and 19b) ..... --

**20. REFUNDS OF CONTRIBUTIONS TO:**

(a) Individuals/Persons Other Than Political Committees ..... --

(b) Political Party Committees ..... --

(c) Other Political Committees ..... --

(d) TOTAL CONTRIBUTION REFUNDS (Add 20a, 20b and 20c) ..... --

**21. OTHER DISBURSEMENTS** ..... --

**22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)** ..... 41,406.98

**III. CASH SUMMARY**

**23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD** ..... \$ ---

**24. TOTAL RECEIPTS THIS PERIOD (From Line 16)** ..... \$ 42,146.40

**25. SUBTOTAL (Add Line 23 and Line 24)** ..... \$ 42,146.40

**26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)** ..... \$ 41,406.98

**27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)** ..... \$ 749.42

11 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32

A RFAI was mailed to the Committee on September 14, 1982 requesting complete clarification of all loan activity on Schedule C, and the correct total of all indebtedness on Line 10 of the Summary Page (Attachment #14). No response was received to the RFAI and a Second Notice was sent on October 8, 1982 (Attachment #15).

No response has been received and attempts to contact the Committee have been unsuccessful (see Attachment #9).

IV. OTHER PENDING ACTIONS INITIATED BY RAO:

None at this time.

83040395183

2

JUL 15 1982

REPORT OF RECEIPTS AND DISBURSEMENTS  
For or Authorized Committee

(Summary Page)

08502

1. Name of Committee in Full  
J. C. Helms for Congress Committee

2. FEC Registration Number  
000-149-376

Address (Number and Street)  
2425 WEST LOOP SOUTH SUITE 200

City, State, and Zip  
HOUSTON, TEXAS 77057

3. Is this Report an Amendment?  
 YES  NO

TYPE OF REPORT

- April 15 Quarterly Report
- July 15 Quarterly Report **02**
- October 15 Quarterly Report
- January 31 Year-End Report
- July 31 Mid-Year Report (Non-election Year Only)
- Twelfth day report preceding election or \_\_\_\_\_ in the State of \_\_\_\_\_
- Thirtieth day report following the general election on \_\_\_\_\_ in the State of \_\_\_\_\_
- Termination Report

This report contains activity for:  Primary Election  General Election  Special Election  Runoff Election

SUMMARY

	Column A This Period	Column B Calendar Year to-Date
5. Covering Period <u>May 17</u> Through <u>June 30, 1982</u>		
6. Net Contributions (other than loans):		
(a) Total Contributions (other than loans) (from Line 11e)	\$ 23,110.00	\$ 63,726.80
(b) Total Contribution Refunds (from Line 20d)	\$ 1,000.00	\$ 1,000.00
(c) Net Contributions (other than loans) (Subtract Line 6b from 6a)	\$ <u>22,100.00</u>	\$ 62,726.80
7. Net Operating Expenditures:		
(a) Total Operating Expenditures (from Line 17)	\$ 36,536.82	\$142,204.99
(b) Total Offsets to Operating Expenditures (from Line 14)	\$ 533.00	\$ 533.00
(c) Net Operating Expenditures (Subtract Line 7b from 7a)	\$ <u>36,003.82</u>	\$141,671.99
8. Cash on Hand at Close of Reporting Period (from Line 27)	\$ 1,917.41	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ <u>0.00</u>	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ <u>25,707.45</u>	

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

For further information, contact:

Richard C. Oxford  
 Name of Treasurer

[Signature]  
 Signature of Treasurer

7/15/82  
Date

Federal Election Commission  
 Telephone: 404-526-6200  
 Local: 202-553-4300

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 4376.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

3304039518

Vertical stamp: JUL 15 1982

Handwritten signature and initials in the bottom right corner.

TELECOM

DATE: December 6, 7, and 8, 1982

FROM: Benita Adler

TO: J.C. Helms for Congress Cntr.

COMMITTEE: J.C. Helms for Congress Committee  
(713) 432-0025  
(713) 961-9999

---

This number has been disconnected.  
The operator in the (713) area code said there was no listing for  
Patrick Oxford (treasurer) or J.C. Helms (candidate).

The second number - there has been no answer for 3 days.

33040395105



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20541

June 18, 1982

Patrick Oxford, Treasurer  
J. C. Helms for Congress Committee  
3270 South Loop West  
Houston, TX 77025

Identification Number: C00149179

Reference: 1982 April Quarterly Report (1/1/82-3/31/82) and  
12 Day Pre-Primary Report (4/1/82-4/11/82)

Dear Mr. Oxford:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated May 24, 1982. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Benita Marcus Adler on our toll-free number (800)424-9530 or our local number (202)523-4172.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

3040395186

this effort in writing. See 11 C.F.R. 104.3(a)(4)(i) and 11 C.F.R. 104.7.

-On your 12 Day Pre-Primary, Line 10 should be \$45,100 as this is the total amount of the outstanding loans owed to your committee. This should agree with Schedule C.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4172.

Sincerely,

*Benita Marcus Adler*

Benita Marcus Adler  
Reports Analyst  
Reports Analysis Division

83040395187



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20463

EC-5

October 8, 1982

Patrick C. Oxford, Treasurer  
J. C. Helms for Congress  
2425 West Loop South, Suite 480  
Houston, TX 77057

Identification Number: CC0149179

Reference: July Quarterly Report (5/17/82-6/30/82)

02

Dear Mr. Oxford:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated September 14, 1982. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Benita Marcus Adler on our toll-free number (800) 424-9530 or our local number (202) 523-4172.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

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FEDERAL ELECTION COMMISSION  
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1535

RESPONDENT J. C. Helms for Congress

STAFF MEMBER & TEL. NO.

Suzanne Callahan  
(202) 523-4529

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

A. Failure to Properly Itemize Loans - 2 U.S.C.  
§ 434(b) (8)

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The Committee's 1982 April 15 Quarterly, 12 Day Pre-Primary, and 12 Day Pre-Runoff reports disclosed a total of \$70,100 in loans made or guaranteed by the candidate; however, the Committee failed to disclose whether the original source of the loans was the candidate's personal funds or a lending institution.

Requests for Additional Information (RFAIs) were sent to the Committee requesting clarification of the original source of the loans on three reports. The RFAI for the April 15 Quarterly and 12 Day Pre-Primary reports was mailed on May 24, 1982, and the RFAI for the 12 Day Pre-Runoff report was sent on July 6, 1982. No responses were received to the two RFAIs, and Second Notices were sent on June 18, 1982 and September 7, 1982, respectively.

No response has been received and attempts to contact the Committee have been unsuccessful.

B. Failure to Continuously Report Outstanding Debts and Obligations - 2 U.S.C. § 434(b) (8)

The July Quarterly report disclosed an additional \$12,500 in loans from the candidate and a \$1,500 loan repayment to the

27

candidate on the Detailed Summary page. The loan repayment was also itemized on a supporting Schedule B. Schedule C did not include the \$70,100 in loans previously reported or the \$1,500 loan repayment. Line 10 of the Summary Page also did not include the previously reported loans.

An RFAI was mailed to the Committee on September 14, 1982, requesting complete clarification of all loan activity on Schedule C, and the correct total of all indebtedness on Line 10 of the Summary Page. No response was received to the RFAI and a Second Notice was sent on October 8, 1982.

No response has been received and attempts to contact the Committee have been unsuccessful.

FACTUAL AND LEGAL ANALYSIS

When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his personal funds or borrowed the money from a lending institution or other source.

The respondent's failure to voluntarily provide the requested information appears to be a violation of the provisions of § 434. Additionally, the Committee's failure to properly report outstanding debts is a violation of § 434 and 11 C.F.R. § 104.11(b). Therefore, the General Counsel recommends that the Commission find reason to believe that the J. C. Helms for Congress Committee has violated 2 U.S.C. § 434(b)(8).

RECOMMENDATION

1. Find reason to believe the J. C. Helms for Congress Committee has violated 2 U.S.C. § 434(b)(8).

33040395170

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. Patrick Oxford  
J. C. Helms for Congress Committee  
3270 South Loop West  
Houston, Texas 77025

RE: MUR 1535

Dear Mr. Oxford:

On , 1983, the Federal Election Commission determined that there is reason to believe that the J. C. Helms for Congress Committee violated 2 U.S.C. § 434(b)(8), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") by failure to properly itemize loans and failure to continuously report outstanding debts. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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

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

83040395191

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Letter to Patrick Oxford  
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

Sincerely,

Enclosures

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

cc: J. C. Helms  
4635 North Braeswood, #206  
Houston, Texas 77096

83040395192

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
J. C. Helms for Congress ) RAD Referral 82L-47

CERTIFICATION

I, Lena L. Stafford, Recording Secretary for the Federal Election Commission meeting on March 8, 1983, do hereby certify that the Commission decided in a vote of 6-0 to open a MUR in the above-captioned matter.

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

Attest:

3-10-83

Date

Lena L. Stafford

Recording Secretary

83040395192



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL  
FROM: MARJORIE W. EMMONS / JODY C. RANSOM *JCR*  
DATE: FEBRUARY 24, 1983  
SUBJECT: OBJECTIONS - RAD Referral 82L-47  
Memorandum to the Commission dated  
February 18, 1983

The above-named document was circulated to the Commission on Tuesday, February 22, 1983 at 11:00.

Objections have been received from the Commissioners as indicated by the name(s) checked:

Commissioner Aikens	<u>          X          </u>
Commissioner Elliott	<u>          X          </u>
Commissioner Harris	<u>                          </u>
Commissioner McDonald	<u>                          </u>
Commissioner McGarry	<u>                          </u>
Commissioner Reiche	<u>                          </u>

This matter will be placed on the Executive Session agenda for Tuesday, March 8, 1983.

33040395194



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 18, 1983

MEMORANDUM TO: Marjorie W. Emmons

FROM: George Demougeot *GD*

SUBJECT: RAD Referral 82L- 47

Please have the attached Memo to the Commission distributed to the Commission on a 48 hour tally basis as a sensitive matter. Thank you.

Attachment

33040595193



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

88 FEB 18 AM 11:43

February 18, 1983

**SENSITIVE**

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel *KAG*

SUBJECT: RAD Referral 82L-47 - J.C. Helms for Congress

The Office of General Counsel has prepared for Commission review seventeen critiques of referrals from the Reports Analysis Division.

Attached to this referral is a critique prepared by this Office, a copy of the referral from the Reports Analysis Division, and a 48-hour tally vote sheet. The OGC critique summarizes the facts, presents an analysis of the legal issues involved, and makes a recommendation as to the disposition of the referrals. The copy of the RAD referral is attached for informational purposes; and the separate vote sheet provides for a vote on this referral.

Attachments  
Critique and Referral

83040395196

**RAD REFERRAL NUMBER:** 82L-47  
**SUBJECT:** J. C. Helms for Congress

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**BACKGROUND**

1. **Date of Referral:** December 30, 1982
2. **Financial Background:**
  - a. Total 1981-1982 receipts: \$ 146,316.00
  - b. Total 1981-1982 disbursements: \$ 144,702.00
  - c. Cash on hand (July 1982 Quarterly): \$ 1,911.41
  - d. Debts owed to the Committee (as of July Quarterly): \$ 0
  - e. Debts owed by the Committee (as of July Quarterly): \$ 94,307.00
3. **Status of Candidate**

Non-applicable.

**SUMMARY OF RAD ACTIONS**

**Referral category 11:** Failure to properly itemize loans and failure to continuously report outstanding debts - 2 U.S.C. § 434(b)(8))

- A. Failure to Properly Itemize Loans - 2 U.S.C. § 434(b)(8)

The Committee's 1982 April 15 Quarterly, 12 Day Pre-Primary, and 12 Day Pre-Runoff reports disclosed a total of \$70,100 in loans made or guaranteed by the candidate; however, the Committee failed to disclose whether the original source of the loans was the candidate's personal funds or a lending institution.

Requests for Additional Information (RFAIs) were sent to the Committee requesting clarification of the original source of the loans on three reports. The RFAI for the April 15 Quarterly and 12 Day Pre-Primary reports was mailed on May 24, 1982, and the RFAI for the 12 Day Pre-Runoff report was sent on July 6, 1982. No responses were received to the two RFAIs, and Second Notices were sent on June 18, 1982 and September 7, 1982, respectively.

No response has been received and attempts to contact the Committee have been unsuccessful.

33040395197

B. Failure to Continuously Report Outstanding Debts and Obligations - 2 U.S.C. § 434(b) (8)

The July Quarterly report disclosed an additional \$12,500 in loans from the candidate and a \$1,500 loan repayment to the candidate on the Detailed Summary page. The loan repayment was also itemized on a supporting Schedule B. Schedule C did not include the \$70,100 in loans previously reported or the \$1,500 loan repayment. Line 10 of the Summary Page also did not include the previously reported loans.

An RFAI was mailed to the Committee on September 14, 1982, requesting complete clarification of all loan activity on Schedule C, and the correct total of all indebtedness on Line 10 of the Summary Page. No response was received to the RFAI and a Second Notice was sent on October 8, 1982.

No response has been received and attempts to contact the Committee have been unsuccessful.

OGC ANALYSIS

When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his personal funds or borrowed the money from a lending institution or other source.

The respondent's failure to voluntarily provide the requested information appears to be a violation of the provisions of § 434. Additionally, the Committee's failure to properly report outstanding debts is a violation of § 434 and 11 C.F.R. § 104.11(b).

Because the Committee has repeatedly failed to voluntarily provide the necessary information through amended reports, and because of the substantial sum of funds involved, we believe this matter warrants MUR status.

RECOMMENDATION

Open a MUR.

83040395108



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 30, 1982

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH: B. ALLEN CLUTTER *Handwritten signature* *for and on the behalf of.*  
STAFF DIRECTOR

FROM: JOHN D. GIBSON *Handwritten signature*  
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT: REFERRAL OF J.C. HELMS FOR CONGRESS

Please find the attached referral of the J.C. Helms For Congress committee ("Committee"). According to the non-compliance standards contained in the Review and Referral Procedures, the Committee has failed to clarify the original source(s) of loans from the candidate totalling \$70,100 (Chart #11). The Committee has also failed to continuously report all outstanding debts and obligations (Chart #7).

If you have any questions, please contact Benita Marcus Adler at 523-4172.

Attachment

cc: The Commissioners

83040395199

DATE: December 30, 1982ANALYST: Benita Marcus Adler

REPORTS ANALYSIS REFERRAL  
TO  
OFFICE OF GENERAL COUNSEL

I. COMMITTEE: J.C. Helms For Congress (C00149179)  
Patrick C. Oxford, Treasurer  
2425 West Loop South  
Suite 480  
Houston, TX 77027

II. RELEVANT STATUTE: 2 U.S.C. 434(b)(8)

III. BACKGROUND:

A. Failure to Properly Itemize Loans -- 2 U.S.C. 434(b)(8)

The Committee's 1982 April 15 Quarterly, 12 Day Pre-Primary, and 12 Day Pre-Runoff reports disclosed a total of \$70,100 in loans made or guaranteed by the candidate; however, the committee failed to disclose whether the original source of the loans was the candidate's personal funds or a lending institution (Attachments #2, #3, #4).

Requests for Additional Information (RFAIs) were sent to the committee requesting clarification of the original source of the loans on three (3) reports. The RFAI for the April 15 Quarterly and 12 Day Pre-Primary reports was mailed on May 24, 1982 and the RFAI for the 12 Day Pre-Runoff report was sent on July 6, 1982 (Attachments #5, #6). No responses were received to the two (2) RFAIs, and Second Notices were sent on June 18, 1982 and September 7, 1982, respectively (Attachments #7, #8).

No response has been received and attempts to contact the Committee have been unsuccessful (Attachment #9).

B. Failure to Continuously Report Outstanding Debts and Obligations -- 2 U.S.C. 434(b)(8)

The July Quarterly report disclosed an additional \$12,500 in loans from the candidate and a \$1500 loan repayment to the candidate on the Detailed Summary Page (Attachment #10). The loan repayment was also itemized on a supporting Schedule B (Attachment #11). Schedule C did not include the \$70,100 in loans previously reported or the \$1500 loan repayment (Attachment #12). Line 10 of the Summary Page also did not include the previously reported loans (Attachment #13).

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A RFAI was mailed to the Committee on September 14, 1982 requesting complete clarification of all loan activity on Schedule C, and the correct total of all indebtedness on Line 10 of the Summary Page (Attachment #14). No response was received to the RFAI and a Second Notice was sent on October 8, 1982 (Attachment #15).

No response has been received and attempts to contact the Committee have been unsuccessful (see Attachment #9).

IV. OTHER PENDING ACTIONS INITIATED BY RAD:

None at this time.

83040395201

FEDERAL ELECTION COMMISSION

DATE 08DEC82

3 3 0 4 1 9 0 - 1 9 8 2 9 5 2 0 2  
 CANDIDATE INDEX OF SUPPORTING DOCUMENTS (2)

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
HELMS, J C	HOUSE 25	REPUBLICAN PARTY					1982 ELECTION	ID# H2TX25061	
1. STATEMENT OF CANDIDATE							20.JAN82	1	B2HSE/207/1885
1982 STATEMENT OF CANDIDATE									
2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES									
3. PRINCIPAL CAMPAIGN COMMITTEE									
J C HELMS FOR CONGRES COMMITTEE							ID# C00149179	HOUSE	
1982 STATEMENT OF ORGANIZATION							20.JAN82	1	B2HSE/207/1884
48 HOUR CONTRIBUTION NOTICE							29APR82	1	B2HSE/215/2959
48 HOUR CONTRIBUTION NOTICE							4JUN82	2	B2HSE/217/2202
STATEMENT OF ORGANIZATION - AMENDMENT							6JUL82	1	B2HSE/218/1503
APRIL QUARTERLY			42,148		41,406		1JAN82 -31MAR82	20	B2HSE/215/0698
REQUEST FOR ADDITIONAL INFORMATION							1JAN82 -31MAR82	2	B2FEC/231/3291
REQUEST FOR ADDITIONAL INFORMATION 2ND							1JAN82 -31MAR82	3	B2FEC/233/2506
PRE-PRIMARY			17,155		7,548		1APR82 -11APR82	11	B2HSE/215/2149
PRE-PRIMARY - AMENDMENT			17,155		7,548		1APR82 -11APR82	15	B2HSE/218/0404
REQUEST FOR ADDITIONAL INFORMATION							1APR82 -11APR82	1	B2FEC/232/0224
REQUEST FOR ADDITIONAL INFORMATION 2ND							1APR82 -11APR82	1	B2FEC/234/0236
PRE-RUN-OFF			50,870		56,712		11APR82 -16MAY82	38	B2HSE/216/2204
REQUEST FOR ADDITIONAL INFORMATION							1APR82 -16MAY82	2	B2FEC/234/3795
REQUEST FOR ADDITIONAL INFORMATION 2ND							1APR82 -16MAY82	3	B2FEC/243/3312
JULY QUARTERLY			36,143		39,036		17MAY82 -30.JUN82	19	B2HSE/221/3644
REQUEST FOR ADDITIONAL INFORMATION							17MAY82 -30.JUN82	2	B2FEC/243/1497
REQUEST FOR ADDITIONAL INFORMATION 2ND							17MAY82 -30.JUN82	3	B2FEC/245/5284
TOTAL			146,316	0	144,702	0		125	TOTAL PAGES
4. AUTHORIZED COMMITTEES									
4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES									

ALL REPORTS REVIEWED

CLOSING CASH-ON-HAND AS OF JULY QUARTERLY REPORT: \$1,911.41

OUTSTANDING DEBTS AND OBLIGATIONS AS OF JULY QUARTERLY: \$94,307 \*\*

\*\* Note that the report of the committee notes only \$12,500 on Line 10, however, the actual indebtedness of the committee is \$94,307 (all outstanding loans and debts as previously reported).

ATTACHMENT #1



LOANS

EMMA

Name of Committee (in Full) <b>J. C. Helms for Congress Committee</b>			
A. Full Name, Mailing Address and ZIP Code of Loan Source <b>J. C. Helms 4635 N. Braeswood #206 Houston, Tx. 77096</b>		Original Amount of Loan <b>\$100.00</b>	Collateral Payment To Date <b>None</b>
Election <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Balance Outstanding at Close of This Period <b>\$100.00</b>	
Terms: Date Incurred <b>1/15/62</b> Date Due _____ Interest Rate _____ % (year)		<input type="checkbox"/> Secured	

List All Endorsers or Guarantors (if any) to item A **None**

1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding \$		

EMMA

B. Full Name, Mailing Address and ZIP Code of Loan Source <b>J. C. Helms 4635 N. Braeswood #206 Houston, Tx. 77096</b>		Original Amount of Loan <b>\$10,000.00</b>	Collateral Payment To Date <b>None</b>
Election <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Balance Outstanding at Close of This Period <b>\$10,100.00</b>	
Terms: Date Incurred <b>1/18/62</b> Date Due <b>N/A</b> Interest Rate <b>6%</b> % (year)		<input type="checkbox"/> Secured	

List All Endorsers or Guarantors (if any) to item B **None**

1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding \$		

SUBTOTALS This Period (This Page optional) .....	
TOTALS This Period (Set page in this line only) .....	

Copy amounts in balance only to LWC, S, B, and C, if applicable. If no balance, then enter "0" in each column.

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SCHEDULE C  
(Revised 3/83)

LOANS

Page 2 of 2 to  
State Report  
Form 1041-SS (1-83)  
Use only for Form 1041-SS

BMD

112012150711

Name of Committee (in Full)			
J. C. Helms for Congress Committee			
A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Compliance Payment To Date	Balance Outstanding at Close of This Period
J. C. Helms 4635 N. Braeswood #206 Houston, Tx. 77096 Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	\$5,000.00	None	\$15,100.00
Terms Date Incurred <u>3/1/82</u> Date Due _____ Interest Rate _____ % (year) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A <b>None</b>			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding \$		
B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Compliance Payment To Date	Balance Outstanding at Close of This Period
J. C. Helms 4635 N. Braeswood #206 Houston, Tx. 77096 Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	\$15,000.00	None	\$30,100.00
Terms Date Incurred <u>3/3/82</u> Date Due <u>4/1</u> Interest Rate <u>12</u> % (year) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B <b>None</b>			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding \$		
SUBTOTALS This Period (This Page optional) .....			
TOTALS This Period (all pages on this line only) .....			
Carry outstanding balances only to LINC 3, Schedule D, for this line. If so Schedule D carry forward to appropriate line of Summary.			

BMD

SCHEDULE C  
(Revised 3/80)

LOANS

Page 1 of 3 for  
LINE NUMBER 13  
Use separate sheets  
for each numbered line

BNA

Name of Committee (in Full) <b>J. C. Helms for Congress Committee</b>			
A. Full Name, Mailing Address and ZIP Code of Loan Source <b>J. C. Helms 4635 N. Braeswood #206 Houston, Tx. 77096</b>		Original Amount of Loan <b>\$5,000.00</b>	Completed Payments To Date <b>None</b>
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Balance Outstanding at Close of This Period <b>\$35,100.00</b>	
Terms: Date Incurred <b>3/30/82</b> Date Due <b>N/A</b> Interest Rate <b>N/A</b> (Year)		Secured	
List All Endorsers or Guarantors (if any) to Item A <b>None</b>			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Completed Payments To Date
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Balance Outstanding at Close of This Period	
Terms: Date Incurred _____ Date Due <b>N/A</b> Interest Rate <b>N/A</b> (Year)		Secured	
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
SUBTOTALS This Period This Page (optional) .....			
TOTALS This Period (last page of this line only) .....			
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

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**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3)**

ATTACHMENT #3 12 Day Pre-  
Primary report

Name of Committee (in Full)

**J. C. Helms for Congress Committee**

Report Covering the Period:

From: 4/1/82

To: 4/11/82

**I. RECEIPTS**

**11. CONTRIBUTIONS (other than loans) FROM:**

(a) Individuals/Persons Other Than Political Committees ..... 7,155.00 ..... 14,203.40  
(Name Entry Unitemized \$ \_\_\_\_\_)

(b) Political Party Committees ..... -- ..... 43.40

(c) Other Political Committees ..... -- ..... 500.00

(d) The Candidate ..... --

(e) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b, 11c and 11d) ... 7,155.00 ..... 14,203.40

**12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.** ..... --

**13. LOANS:**

(a) Made or Guaranteed by the Candidate ..... 10,000.00 ..... 45,100.00

(b) All Other Loans ..... 10,000.00 ..... 45,100.00

(c) TOTAL LOANS (add 13a and 13b) ..... 10,000.00 ..... 45,100.00

**14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)** ..... --

**15. OTHER RECEIPTS (Dividends, Interest, etc.)** ..... --

**16. TOTAL RECEIPTS (Add 11e, 12, 13c, 14 and 15).** ..... 17,155.00 ..... 59,303.40

**H. DISBURSEMENTS**

**17. OPERATING EXPENDITURES** ..... 7,548.97 ..... 48,955.95

**18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.** ..... --

**19. LOAN REPAYMENTS:**

(a) Of Loans Made or Guaranteed by the Candidate ..... --

(b) Of All Other Loans ..... --

(c) TOTAL LOAN REPAYMENTS (add 19a and 19b). ..... --

**20. REFUNDS OF CONTRIBUTIONS TO:**

(a) Individuals/Persons Other Than Political Committees ..... --

(b) Political Party Committees ..... --

(c) Other Political Committees ..... --

(d) TOTAL CONTRIBUTION REFUNDS (add 20a, 20b and 20c) ..... --

**21. OTHER DISBURSEMENTS.** ..... --

**22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21).** ..... 7,548.97 ..... 48,955.95

**III. CASH SUMMARY**

**23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD** ..... \$ 741.42

**24. TOTAL RECEIPTS THIS PERIOD (From Line 16)** ..... \$ 17,155.00

**25. SUBTOTAL (Add Line 23 and Line 24)** ..... \$ 17,896.42

**26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)** ..... \$ 7,548.97

**27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)** ..... \$ 10,347.45

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LOANS

Name of Committee (in Full)  
**J. C. Helms for Congress Committee**

A. Full Name, Mailing Address and ZIP Code of Loan Source <b>J. C. Helms 4635 N. Braeswood #206 Houston, Texas 77096</b>	Original Amount of Loan <b>\$5,000.00</b>	Cumulative Payments To Date <b>None</b>	Balance Outstanding at Close of This Period <b>\$40,100.00</b>
Election <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Terms: Date Incurred <u>4/6/82</u> Date Due <u>N/A</u> Interest Rate <u>N/A</u> <input type="checkbox"/> Secured <input type="checkbox"/> Unsecured			

N/A

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding
2. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding
3. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding

B. Full Name, Mailing Address and ZIP Code of Loan Source <b>J. C. Helms 4635 N. Braeswood #206 Houston, Texas 77096</b>	Original Amount of Loan <b>\$5,000.00</b>	Cumulative Payments To Date <b>None</b>	Balance Outstanding at Close of This Period <b>\$45,100.00</b>
Election <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Terms: Date Incurred <u>4/7/82</u> Date Due <u>N/A</u> Interest Rate <u>N/A</u> <input type="checkbox"/> Secured <input type="checkbox"/> Unsecured			

N/A

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding
2. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding
3. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding

SUBTOTALS This Period This Page (Include all)	<b>\$10,000</b>
TOTAL (Include all pages)	

02012152159

**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3)**

ATTACHMENT #4 12 Day Pre-  
Runoff report

Committee (in Full)

Report Covering the Period:

From:

To:

**COLUMN A**  
Total This Period

**COLUMN B**  
Calendar Year-to-Date

**I. RECEIPTS**

**11. CONTRIBUTIONS (other than loans) FROM:**

(a) Individuals/Persons Other Than Political Committees ..... \$ 21,370.00  
(Memo Entry Unitemized \$ 4,500.00 )

(b) Political Party Committees .....

(c) Other Political Committees .....

(d) The Candidates .....

(e) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b, 11c and 11d) ...

**12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES .....**

**13. LOANS:**

(a) Made or Guaranteed by the Candidate .....

(b) All Other Loans .....

(c) TOTAL LOANS (add 13a and 13b) .....

**14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) .....**

**15. OTHER RECEIPTS (Dividends, Interest, etc.) .....**

**16. TOTAL RECEIPTS (Add 11a, 12, 13c, 14 and 15) .....**

**II. DISBURSEMENTS**

**17. OPERATING EXPENDITURES .....**

**18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES .....**

**19. LOAN REPAYMENTS:**

(a) Of Loans Made or Guaranteed by the Candidate .....

(b) Of All Other Loans .....

(c) TOTAL LOAN REPAYMENTS (add 19a and 19b) .....

**20. REFUNDS OF CONTRIBUTIONS TO:**

(a) Individuals/Persons Other Than Political Committees .....

(b) Political Party Committees .....

(c) Other Political Committees .....

(d) TOTAL CONTRIBUTION REFUNDS (add 20a, 20b and 20c) .....

**21. OTHER DISBURSEMENTS .....**

**22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21) .....**

**III. CASH SUMMARY**

**23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD .....**

**24. TOTAL RECEIPTS THIS PERIOD (From Line 16) .....**

**25. SUBTOTAL (Add Line 23 and Line 24) .....**

**26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22) .....**

**27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25) .....**

U 201 216 240 B  
3304  
395200

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees ..... \$ 21,370.00 (Memo Entry Unitemized \$ 4,500.00 )	\$ 21,370.00	\$ 35,573.40
(b) Political Party Committees .....		43.40
(c) Other Political Committees .....	4,500.00	5,000.00
(d) The Candidates .....		
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b, 11c and 11d) ...	25,870.00	40,073.40
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES .....	--	--
13. LOANS:		
(a) Made or Guaranteed by the Candidate .....	25,000.00	70,100.00
(b) All Other Loans .....		--
(c) TOTAL LOANS (add 13a and 13b) .....	25,000.00	70,100.00
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) .....	--	--
15. OTHER RECEIPTS (Dividends, Interest, etc.) .....	--	--
16. TOTAL RECEIPTS (Add 11a, 12, 13c, 14 and 15) .....	50,870.00	110,173.40
II. DISBURSEMENTS		
17. OPERATING EXPENDITURES .....	56,712.22	105,668.17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES .....	--	--
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate .....	--	--
(b) Of All Other Loans .....	--	--
(c) TOTAL LOAN REPAYMENTS (add 19a and 19b) .....	--	--
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees .....	--	--
(b) Political Party Committees .....	--	--
(c) Other Political Committees .....	--	--
(d) TOTAL CONTRIBUTION REFUNDS (add 20a, 20b and 20c) .....	--	--
21. OTHER DISBURSEMENTS .....	--	--
22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21) .....	56,712.22	105,668.17

23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD .....	\$ 10,347.45
24. TOTAL RECEIPTS THIS PERIOD (From Line 16) .....	\$ 50,870.00
25. SUBTOTAL (Add Line 23 and Line 24) .....	\$ 61,217.45
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22) .....	\$ 56,712.22
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25) .....	\$ 4,505.23

LOANS

Committee (in full):  
**Helms for Congress Committee**

Name, Mailing Address and ZIP Code of Loan Source <b>C. Helms</b> <b>35 N. Braeswood #206</b> <b>Houston, Tx. 77096</b>		Original Amount of Loan <b>\$15,000.00</b>	Cumulative Payment To Date <b>0</b>	Balance Outstanding at Close of This Period <b>\$60,100.00</b>
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Terms: Date Incurred <b>4/20/82</b> Date Due <b>N/A</b> Interest Rate <b>N/A</b> <input type="checkbox"/> Secured		

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding \$
2. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding \$
3. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding \$

Name, Mailing Address and ZIP Code of Loan Source <b>J. C. Helms</b> <b>4635 N. Braeswood #206</b> <b>Houston, Tx. 77096</b>		Original Amount of Loan <b>\$10,000</b>	Cumulative Payment To Date <b>0</b>	Balance Outstanding at Close of This Period <b>\$70,100.00</b>
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Terms: Date Incurred <b>4/26/82</b> Date Due <b>N/A</b> Interest Rate <b>N/A</b> <input type="checkbox"/> Secured		

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding \$
2. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding \$
3. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding \$

SUBTOTALS This Period This Page (optional) .....	<b>\$25,000.00</b>
TOTALS This Period (last page in this line only) .....	<b>\$25,000.00</b>

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

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 33040395210



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

24 May 1982

Mr. Patrick Oxford  
J. C. Helms for Congress Committee  
3270 South Loop West  
Houston, TX 77025

Identification Number: C00149179

Reference: 1982 April Quarterly Report (1/1/82-3/31/82) and 12  
Day Pre-Primary Report (4/1/82-4/11/82)

Dear Mr. Oxford:

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

83040395211  
EXX

-When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution or other source. If the candidate borrowed funds from a lending institution or any other source, the amount of the loan, the date incurred, the date due, the interest rate, whether or not the loan was secured, and all endorsers' or guarantors' names, addresses, occupations, employers and the amount guaranteed by each, if applicable, should be itemized. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. Further, it is important to note that "personal funds" is strictly defined by Commission regulations and may be found in 11 C.F.R. 110.10. (11 C.F.R. 100.7(a)(1) and 104.3(d))

-You must provide the occupation and name of employer for each contributor required to be itemized on Schedule A. Please amend your report by supplying the omitted information.

If your committee has made at least one effort per solicitation either by a written request or by an oral request documented in writing to obtain this information from the contributors, your committee may have "exercised best efforts" and need only confirm

this effort, in writing. See 11 C.F.R. 104.3(a)(4)(i)  
and 11 C.F.R. 104.7.

-On your 12 Day Pre-Primary, Line 10 should be \$45,100  
as this is the total amount of the outstanding loans  
owed to your committee. This should agree with  
Schedule C.

An amendment to your original report(s) correcting the above  
problem(s) should be filed with the Clerk of the House of  
Representatives, 1036 Longworth House Office Building,  
Washington, DC 20515 within fifteen (15) days of the date of  
this letter. If you need assistance, please feel free to contact  
me on our toll-free number, (800) 424-9530. My local number is  
(202) 523-4172.

Sincerely,

*Benita Marcus Adler*

Benita Marcus Adler  
Reports Analyst  
Reports Analysis Division

83040395212



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

6 July 1982

Patrick C. Oxford, Treasurer  
J. C. Helms for Congress Committee  
3270 South Loop West  
Houston, TX 77025

Identification Number: C00149179

Reference: 12 Day Pre-Runoff (4/1/82-5/16/82)

Dear Mr. Oxford:

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

-You must provide the occupation and name of employer for each contributor required to be itemized on Schedule A. Please amend your report by supplying the omitted information.

If your committee has made at least one effort per solicitation either by a written request or by an oral request documented in writing to obtain this information from the contributors, your committee may have "exercised best efforts" and need only confirm this effort, in writing. See 11 C.F.R. 104.3(a)(4)(i) and 11 C.F.R. 104.7.

-For future reports, please include an aggregate total for all contributions you choose to itemize.

*RA* [ -When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution or other source. If the candidate borrowed funds from a lending institution or any other source, the amount of the loan, the date incurred, the date due, the interest rate, whether or not the loan was secured, and all endorsers' or guarantors' names, addresses, occupations, employers and the amount guaranteed by each, if applicable, should be itemized. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. Further, it is important to note that "personal funds" is strictly defined by Commission regulations and may be found in 11 C.F.R. 110.10. (11 C.F.R. 100.7(a)(1) and 104.3(d)) ]

33040395210

-Commission Regulations define the term "purpose" to mean a brief statement or description of why a disbursement was made. Examples are "dinner expense", "media", "salary", "polling", "travel", "party fees", "phone banks", "travel expenses", "travel expense reimbursement" and "catering costs". Unacceptable descriptions include "advance", "election day expense", "expenses", "other expenses", "expense reimbursement", "miscellaneous", "outside services", "get-out-the-vote" and "voter registration". (11 C.F.R. 104.3(b)(4)) For future filings, please clarify the following descriptions which do not meet the requirements of the Regulations:

reimbursement expenses

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4172.

Sincerely,

*Benita Marcus Adler*

Benita Marcus Adler  
Reports Analyst  
Reports Analysis Division

83040395214



FEDERAL ELECTION COMMISSION  
 WASHINGTON, D.C. 20463

June 18, 1982

Patrick Oxford, Treasurer  
 J. C. Helms for Congress Committee  
 3270 South Loop West  
 Houston, TX 77025

Identification Number: C00149179

Reference: 1982 April Quarterly Report (1/1/82-3/31/82) and  
 12 Day Pre-Primary Report (4/1/82-4/11/82)

Dear Mr. Oxford:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated May 24, 1982. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Benita Marcus Adler on our toll-free number (800)424-9530 or our local number (202)523-4172.

Sincerely,

John D. Gibson  
 Assistant Staff Director  
 Reports Analysis Division

Enclosure

83040395215



FEDERAL ELECTION COMMISSION  
WASHINGTON D.C. 20463

September 16, 1982

Patrick C. Oxford, Treasurer  
J. C. Helms for Congress Committee  
2425 West Loop South, Suite 480  
Houston, Texas 77057

Identification Number: C00149179

Reference: 12 Day Pre-Runoff (4/1/82-5/16/82)

Dear Mr. Oxford:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated July 6, 1982. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Benita Marcus Adler on our toll-free number (800) 424-9530 or our local number (202) 523-4172.

Sincerely,

*John D. Gibson*

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

12R

07 sent

83040395216

TELECON

DATE: December 6,7,and 8, 1982

FROM: Benita Adler

TO: J.C. Helms for Congress Cmte.

COMMITTEE: J.C. Helms for Congress Committee  
(713) 432-0025  
(713) 961-9999

---

This number has been disconnected.  
The operator in the (713) area code said there was no listing for  
Patrick Oxford (treasurer) or J.C.Helms (candidate)

The second number - there has been no answer for 3 days.

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DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3)

Name of Committee (in Full)	Period Covering the Period	
	From	To
J. C. Helms for Congress Committee	5/17/82	6/30/82
	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
<b>I. RECEIPTS</b>		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees (Memo Entry Utilized \$ _____)	\$16,610.00	\$ 52,183.40
(b) Political Party Committees	-0-	43.40
(c) Other Political Committees	6,500.00	11,500.00
(d) The Candidate	-0-	-0-
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b, 11c and 11d)	\$23,110.00	\$ 63,726.80
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	-0-	-0-
13. LOANS		
(a) Made or Guaranteed by the Candidate	12,500.00	82,600.00
(b) All Other Loans	-0-	-0-
(c) TOTAL LOANS (add 13a and 13b)	\$12,500.00	\$ 82,600.00
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Reverses, etc.)	533.00	533.00
15. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-
16. TOTAL RECEIPTS (Add 11e, 12, 13c, 14 and 15)	\$36,143.00	\$146,859.80
<b>II. DISBURSEMENTS</b>		
17. OPERATING EXPENDITURES	36,536.82	142,204.99
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	-0-	-0-
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate	1,500.00	1,500.00
(b) Of All Other Loans	-0-	-0-
(c) TOTAL LOAN REPAYMENTS (add 19a and 19b)	\$ 1,500.00	\$ 1,500.00
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	1,000.00	1,000.00
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees	-0-	-0-
(d) TOTAL CONTRIBUTION REFUNDS (add 20a, 20b and 20c)	\$ 1,000.00	\$ 1,000.00
21. OTHER DISBURSEMENTS	-0-	-0-
22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)	\$38,036.82	\$144,704.99
<b>III. CASH SUMMARY</b>		
23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD		\$ 14,505.23
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)		\$ 36,143.00
25. SUBTOTAL (Add Line 23 and Line 24)		\$ 40,648.23
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)		\$ 39,036.82
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from Line 25)		\$ 1,611.41

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ITEMIZED DISBURSEMENTS

ATTACHMENT #11 July  
 Quarterly  
 Report

Any information collected from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

Name of Committee (in Full)

J. C. Helms for Congress Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
88 J. C. Helms 4635 N. Braeswood #206 Houston, Texas 77096	Repayment of Loan Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <u>Run-off</u>	6/3/82	\$1,500.00
89 Clymer Wright, Jr. 6038 Darkwood Houston, Texas 77088	Return of Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <u>Run-off</u>	6/3/82	1,000.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional) .....			2,500.00
TOTAL This Period (last page this line number only) .....			\$39,036.82

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LOANS

Name (in Full)  
**Helms for Congress Committee**

Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
J. Helms 5 N. Braeswood, #206 Houston, Texas 77096 Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>Runoff</b>	5,000.00	-0-	5,000.00
Terms: <input checked="" type="checkbox"/> Accr Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured			

List A: Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer
N/A (source of loan was derived from J. C. Helm's personal funds)	Occupation
	Amount Guaranteed Outstanding \$
2. Full Name, Mailing Address and ZIP Code	Name of Employer
N/A	Occupation
	Amount Guaranteed Outstanding \$
3. Full Name, Mailing Address and ZIP Code	Name of Employer
N/A	Occupation
	Amount Guaranteed Outstanding \$

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
J. C. Helms 4635 N. Braeswood, #206 Houston, Texas 77096 Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>Runoff</b>	7,500.00	-0-	7,500.00
Terms: <input checked="" type="checkbox"/> Accr Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured			

List A: Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer
N/A (source of loan was derived from J. C. Helm's personal funds)	Occupation
	Amount Guaranteed Outstanding \$
2. Full Name, Mailing Address and ZIP Code	Name of Employer
N/A	Occupation
	Amount Guaranteed Outstanding \$
3. Full Name, Mailing Address and ZIP Code	Name of Employer
N/A	Occupation
	Amount Guaranteed Outstanding \$

SUBTOTALS This Period This Page (optional) \_\_\_\_\_  
 TOTALS This Period (fill page in this line only) ..... \$12,500.00

Carry over ending balance only to LINE 2, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

Back

832040395260





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

14 September 1982

Patrick C. Oxford, Treasurer  
J.C. Helms for Congress  
2425 West Loop South, Suite 480  
Houston, TX 77057

Identification Number: C00149179

Reference: July Quarterly Report (5/17/82-6/30/82)

Dear Mr. Oxford:

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

BY - Your previous report detailed \$70,100 of outstanding loans from the candidate. This report appears to have dropped these loans. Our calculations indicate that your committee has the following outstanding debts:

\$ 70,100	= candidate loans previously reported
12,500	= candidate loans on July Quarterly
13,207	= debts reported on July Quarterly
<u>\$ 95,807</u>	
- 1,500	= loan repayment on July Quarterly
<u>\$ 94,307</u>	= total outstanding debts and obligations

Please amend your report to accurately reflect the above activity. All loans must be reported separately on Schedule C, including whether personal or bank funds were borrowed. A total must then be entered on Line 10 of the Summary Page.

-On Schedule D, you have reported debts to Bracewell and Patterson and Ketchum Advertising with outstanding balances at the beginning of this reporting period. These debts were not included on your previous report. Please be advised any loan, debt or obligation, the amount of which is over \$500 should be reported as of the time the debt was incurred. (11 CFR 104.11(b)) Please clarify the reporting of these debts.

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this effort, in writing. See 11 C.F.R. 104.3(a)(4)(i)  
and 11 C.F.R. 104.7.

-On your 12 Day Pre-Primary, Line 10 should be \$45,100  
as this is the total amount of the outstanding loans  
owed to your committee. This should agree with  
Schedule C.

An amendment to your original report(s) correcting the above  
problem(s) should be filed with the Clerk of the House of  
Representatives, 1036 Longworth House Office Building,  
Washington, DC 20515 within fifteen (15) days of the date of  
this letter. If you need assistance, please feel free to contact  
me on our toll-free number, (800) 424-9530. My local number is  
(202) 523-4172.

Sincerely,

*Benita Marcus Adler*

Benita Marcus Adler  
Reports Analyst  
Reports Analysis Division

83040395223



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 8, 1982

Patrick C. Oxford, Treasurer  
J. C. Helms for Congress  
2425 West Loop South, Suite 480  
Houston, TX 77057

Identification Number: C00149179

Reference: July Quarterly Report (5/17/82-6/30/82)

02

Dear Mr. Oxford:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated September 14, 1982. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Benita Marcus Adler on our toll-free number (800) 424-9530 or our local number (202) 523-4172.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

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CB  
10-14

11/13/82



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 30, 1982

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH: B. ALLEN CLUTTER *Handwritten signature*  
STAFF DIRECTOR *for and on the absence of.*

FROM: JOHN D. GIBSON *Handwritten initials JG*  
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT: REFERRAL OF J.C. HELMS FOR CONGRESS

Please find the attached referral of the J.C. Helms For Congress committee ("Committee"). According to the non-compliance standards contained in the Review and Referral Procedures, the Committee has failed to clarify the original source(s) of loans from the candidate totalling \$70,100 (Chart #11). The Committee has also failed to continuously report all outstanding debts and obligations (Chart #7).

If you have any questions, please contact Benita Marcus Adler at 523-4172.

Attachment

cc: The Commissioners

03040395222

DATE: December 30, 1982ANALYST: Benita Marcus Adler

## REPORTS ANALYSIS REFERRAL

TO

## OFFICE OF GENERAL COUNSEL

I. COMMITTEE: J.C. Helms For Congress (C00149179)  
 Patrick C. Oxford, Treasurer  
 2425 West Loop South  
 Suite 480  
 Houston, TX 77027

II. RELEVANT STATUTE: 2 U.S.C. 434(b) (8)

## III. BACKGROUND:

## A. Failure to Properly Itemize Loans -- 2 U.S.C. 434(b) (8)

The Committee's 1982 April 15 Quarterly, 12 Day Pre-Primary, and 12 Day Pre-Runoff reports disclosed a total of \$70,100 in loans made or guaranteed by the candidate; however, the committee failed to disclose whether the original source of the loans was the candidate's personal funds or a lending institution (Attachments #2, #3, #4).

Requests for Additional Information (RFAIs) were sent to the committee requesting clarification of the original source of the loans on three (3) reports. The RFAI for the April 15 Quarterly and 12 Day Pre-Primary reports was mailed on May 24, 1982 and the RFAI for the 12 Day Pre-Runoff report was sent on July 6, 1982 (Attachments #5, #6). No responses were received to the two (2) RFAIs, and Second Notices were sent on June 18, 1982 and September 7, 1982, respectively (Attachments #7, #8).

No response has been received and attempts to contact the Committee have been unsuccessful (Attachment #9).

## B. Failure to Continuously Report Outstanding Debts and Obligations -- 2 U.S.C. 434(b) (8)

The July Quarterly report disclosed an additional \$12,500 in loans from the candidate and a \$1500 loan repayment to the candidate on the Detailed Summary Page (Attachment #10). The loan repayment was also itemized on a supporting Schedule B (Attachment #11). Schedule C did not include the \$70,100 in loans previously reported or the \$1500 loan repayment (Attachment #12). Line 10 of the Summary Page also did not include the previously reported loans (Attachment #13).

83040395246

A RFAI was mailed to the Committee on September 14, 1982 requesting complete clarification of all loan activity on Schedule C, and the correct total of all indebtedness on Line 10 of the Summary Page (Attachment #14). No response was received to the RFAI and a Second Notice was sent on October 8, 1982 (Attachment #15).

No response has been received and attempts to contact the Committee have been unsuccessful (see Attachment #9).

IV. OTHER PENDING ACTIONS INITIATED BY RAD:

None at this time.

33040395227

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 FEDERAL ELECTION COMMISSION  
 CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 8DEC82

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
HELMS, J C	HOUSE 25	REPUBLICAN PARTY					1982 ELECTION	ID# H2TX25061	
1. STATEMENT OF CANDIDATE									
1982 STATEMENT OF CANDIDATE							20JAN82		1 82HSE/207/1885
2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES									
3. PRINCIPAL CAMPAIGN COMMITTEE									
J C HELMS FOR CONGRES COMMITTEE								ID# C00149179	HOUSE
1982 STATEMENT OF ORGANIZATION							20JAN82		1 82HSE/207/1884
48 HOUR CONTRIBUTION NOTICE							29APR82		1 82HSE/215/2959
48 HOUR CONTRIBUTION NOTICE							4JUN82		2 82HSE/217/2202
STATEMENT OF ORGANIZATION - AMENDMENT							6JUL82		1 82HSE/218/1503
APRIL QUARTERLY			42,148		41,406		1JAN82 -31MAR82		20 82HSE/215/0698
REQUEST FOR ADDITIONAL INFORMATION							1JAN82 -31MAR82		2 82FEC/231/3291
REQUEST FOR ADDITIONAL INFORMATION 2ND							1JAN82 -31MAR82		3 82FEC/233/2506
PRE-PRIMARY			17,155		7,548		1APR82 -11APR82		11 82HSE/215/2149
PRE-PRIMARY - AMENDMENT			17,155		7,548		1APR82 -11APR82		15 82HSE/218/0404
REQUEST FOR ADDITIONAL INFORMATION							1APR82 -11APR82		1 82FEC/232/0224
REQUEST FOR ADDITIONAL INFORMATION 2ND							1APR82 -11APR82		1 82FEC/234/0236
PRE-RUN-OFF			50,870		56,712		11APR82 -16MAY82		38 82HSE/216/2204
REQUEST FOR ADDITIONAL INFORMATION							1APR82 -16MAY82		2 82FEC/234/3795
REQUEST FOR ADDITIONAL INFORMATION 2ND							1APR82 -16MAY82		3 82FEC/243/3312
JULY QUARTERLY			36,143		39,036		17MAY82 -30JUN82		19 82HSE/221/3644
REQUEST FOR ADDITIONAL INFORMATION							17MAY82 -30JUN82		2 82FEC/243/1497
REQUEST FOR ADDITIONAL INFORMATION 2ND							17MAY82 -30JUN82		3 82FEC/245/5284
TOTAL			146,316	0	144,702	0			125 TOTAL PAGES
4. AUTHORIZED COMMITTEES									
4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES									

ALL REPORTS REVIEWED

CLOSING CASH-ON-HAND AS OF JULY QUARTERLY REPORT: \$1,911.41

OUTSTANDING DEBTS AND OBLIGATIONS AS OF JULY QUARTERLY: \$94,307 \*\*

\*\* Note that the report of the committee notes only \$12,500 on Line 10, however, the actual indebtedness of the committee is \$94,307 (all outstanding loans and debts as previously reported).

ATTACHMENT #1

**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3)**

ATTACHMENT #2 April 15  
report

Name of Committee (in Full)	Report Covering the Period	
	From	To
<b>J. C. Helms for Congress Committee</b>	<b>1/1/82</b>	<b>3/31/82</b>
	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
<b>I. RECEIPTS</b>		
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>		
(a) Individuals/Persons Other Than Political Committees .....	0000.00	
(Memo Entry Unitemized \$ <u>1,040.00</u> )		
(b) Political Party Committees .....	43.40	
(c) Other Political Committees .....	500.00	
(d) The Candidate .....	00	
(e) <b>TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b, 11c and 11d)</b> .....	<b>7048.40</b>	
<b>12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES</b> .....	<b>00</b>	
<b>13. LOANS:</b>		
(a) Made or Guaranteed by the Candidate .....	35,100.00	
(b) All Other Loans .....	--	
(c) <b>TOTAL LOANS (add 13a and 13b)</b> .....	<b>35,100.00</b>	
<b>14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)</b> .....	<b>--</b>	
<b>15. OTHER RECEIPTS (Dividends, Interest, etc.)</b> .....	<b>--</b>	
<b>16. TOTAL RECEIPTS (Add 11a, 12, 13c, 14 and 15)</b> .....	<b>42,148.40</b>	
<b>II. DISBURSEMENTS</b>		
<b>17. OPERATING EXPENDITURES</b> .....	<b>41,406.98</b>	
<b>18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES</b> .....	<b>--</b>	
<b>19. LOAN REPAYMENTS:</b>		
(a) Of Loans Made or Guaranteed by the Candidate .....	--	
(b) Of All Other Loans .....	--	
(c) <b>TOTAL LOAN REPAYMENTS (add 19a and 19b)</b> .....	<b>--</b>	
<b>20. REFUNDS OF CONTRIBUTIONS TO:</b>		
(a) Individuals/Persons Other Than Political Committees .....	--	
(b) Political Party Committees .....	--	
(c) Other Political Committees .....	--	
(d) <b>TOTAL CONTRIBUTION REFUNDS (add 20a, 20b and 20c)</b> .....	<b>--</b>	
<b>21. OTHER DISBURSEMENTS</b> .....	<b>--</b>	
<b>22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)</b> .....	<b>41,406.98</b>	
<b>III. CASH SUMMARY</b>		
<b>23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD</b> .....		--
<b>24. TOTAL RECEIPTS THIS PERIOD (From Line 16)</b> .....		<b>42,148.40</b>
<b>25. SUBTOTAL (Add Line 23 and Line 24)</b> .....		<b>42,148.40</b>
<b>26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)</b> .....		<b>41,406.98</b>
<b>27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)</b> .....		<b>741.42</b>

11201215069

LOANS

Name of Committee (in Full) <b>J. C. Helms for Congress Committee</b>			
A. Full Name, Mailing Address and ZIP Code of Loan Source <b>J. C. Helms 4635 N. Braeswood #206 Houston, Tx. 77096</b>		Original Amount of Loan <b>\$100.00</b>	Balance Outstanding at Close of This Period <b>\$100.00</b>
Election <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Comprehensive Payments To Date <b>None</b>	
Terms: Date Incurred <b>1/15/82</b> Date Due _____ Interest Rate _____ % (per) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A <b>None</b>			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source <b>J. C. Helms 4635 N. Braeswood #206 Houston, Tx. 77096</b>		Original Amount of Loan <b>\$10,000.00</b>	Balance Outstanding at Close of This Period <b>\$10,100.00</b>
Election <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Comprehensive Payments To Date <b>None</b>	
Terms: Date Incurred <b>1/18/82</b> Date Due <b>N/A</b> Interest Rate <b>0%</b> % (per) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B <b>None</b>			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
SUBTOTALS This Period This Page (optional) .....			
TOTALS This Period (last page in this file only) .....			
Copy information on loans only to LIRC 3, Schedule D, for the IRS. If no Schedule D, copy information on loans only to LIRC 3, Schedule D.			

BMA

BMA

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2150715

SCHEDULE C  
(Revised 3/80)

LOANS

Page 2 of 2 to  
LHA 4/15/82  
For separate entries  
for each numbered entry

BWD

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Name of Committee (in Full)			
J. C. Helms for Congress Committee			
A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
J. C. Helms 4635 N. Braeswood #206 Houston, Tx. 77096 Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	\$5,000.00	None	\$15,100.00
Terms: Date Incurred <u>3/1/82</u> Date Due _____ Interest Rate _____ % (year) <input type="checkbox"/> Secured			
Let All Endorsers or Guarantors (if any) to item A <b>None</b>			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding \$		
B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
J. C. Helms 4635 N. Braeswood #206 Houston, Tx. 77096 Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	\$15,000.00	None	\$30,100.00
Terms: Date Incurred <u>3/3/82</u> Date Due <u>4/1</u> Interest Rate <u>5 1/2</u> % (year) <input type="checkbox"/> Secured			
Let All Endorsers or Guarantors (if any) to item B <b>None</b>			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding \$		
SUBTOTALS This Period This Page (optional) .....			
TOTALS This Period (last page in this line only) .....			
Carry outstanding balance only to LINE 3, Schedule D, for this line. If on Schedule D, carry forward to appropriate line of Summary.			

BWD

**SCHEDULE C**  
(Revised 3/80)

**LOANS**

Page 2 of 2 for  
LINE NUMBER 13  
Use spaces or dashes  
for each numbered line

BR4

Name of Committee (in Full)

**J. C. Helms for Congress Committee**

A. Full Name, Mailing Address and ZIP Code of Loan Source

**J. C. Helms  
4635 N. Braeswood #206  
Houston, Tx. 77096**

Original Amount  
of Loan

**\$5,000.00**

Completions Payments  
To Date

**None**

Balance Outstanding at  
Close of This Period

**\$3,100.00**

Election:  Primary  General  Other (specify):

Terms: Date Incurred 3/30/82 Date Due N/A Interest Rate N/A % (per)  Secured

List All Endorsers or Guarantors (if any) to Item A

**None**

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding

B. Full Name, Mailing Address and ZIP Code of Loan Source

Original Amount  
of Loan

Completions Payments  
To Date

Balance Outstanding at  
Close of This Period

Election:  Primary  General  Other (specify):

Terms: Date Incurred \_\_\_\_\_ Date Due N/A Interest Rate N/A % (per)  Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding

SUBTOTALS This Period This Page (optional) .....

TOTALS This Period (last page in this line only) .....

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

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**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3)**

ATTACHMENT #3 12 Day Pre-  
Primary report

Name of Committee (in Full)  
**J. C. Helms for Congress Committee**

Report Covering the Period:  
From: **4/1/82** To: **4/11/82**

**I. RECEIPTS**

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>		
(a) Individuals/Persons Other Than Political Committees .....	7,155.00	14,203.40
(Name Entry Unitemized \$ _____)		
(b) Political Party Committees .....	--	43.40
(c) Other Political Committees .....	--	500.00
(d) The Candidate .....	--	
(b) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b, 11c and 11d) ...	7,155.00	14,203.40
<b>12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES .....</b>	--	--
<b>13. LOANS:</b>		
(a) Made or Guaranteed by the Candidate .....	10,000.00	45,100.00
(b) All Other Loans .....		
(c) TOTAL LOANS (add 13a and 13b) .....	10,000.00	45,100.00
<b>14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Prepaids, etc.) .....</b>	--	--
<b>15. OTHER RECEIPTS (Dividends, Interest, etc.) .....</b>	--	--
<b>16. TOTAL RECEIPTS (Add 11a, 12, 13c, 14 and 15) .....</b>	17,155.00	59,303.40

**H. DISBURSEMENTS**

<b>17. OPERATING EXPENDITURES .....</b>	7,548.97	48,955.95
<b>18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES .....</b>	--	--
<b>19. LOAN REPAYMENTS:</b>		
(a) Of Loans Made or Guaranteed by the Candidate .....	--	--
(b) Of All Other Loans .....	--	--
(c) TOTAL LOAN REPAYMENTS (add 19a and 19b) .....	--	--
<b>20. REFUNDS OF CONTRIBUTIONS TO:</b>		
(a) Individuals/Persons Other Than Political Committees .....	--	--
(b) Political Party Committees .....	--	--
(c) Other Political Committees .....	--	--
(d) TOTAL CONTRIBUTION REFUNDS (add 20a, 20b and 20c) .....	--	--
<b>21. OTHER DISBURSEMENTS .....</b>	--	--
<b>22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21) .....</b>	7,548.97	48,955.95

**III. CASH SUMMARY**

<b>23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD .....</b>	\$ 741.42
<b>24. TOTAL RECEIPTS THIS PERIOD (From Line 16) .....</b>	\$ 17,155.00
<b>25. SUBTOTAL (Add Line 23 and Line 24) .....</b>	\$ 17,896.42
<b>26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22) .....</b>	\$ 7,548.97
<b>27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25) .....</b>	\$ 10,347.45

832300142015592512500

LOANS

Name of Committee (in Full) <b>J. C. Helms for Congress Committee</b>				
A. Full Name, Mailing Address and ZIP Code of Loan Source <b>J. C. Helms 4635 N. Braeswood #206 Houston, Texas 77096</b>		Original Amount of Loan <b>\$5,000.00</b>	Cumulative Payment To Date <b>None</b>	Balance Outstanding at Close of This Period <b>\$40,100.00</b>
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):				
Terms: Date Incurred <u>4/6/82</u> Date Due <u>N/A</u> Interest Rate <u>N/A</u> (Year) <input type="checkbox"/> Secured				
List All Endorsers or Guarantors (if any) to Item A				
1. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding		
2. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding		
3. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding		
B. Full Name, Mailing Address and ZIP Code of Loan Source <b>J. C. Helms 4635 N. Braeswood #206 Houston, Texas 77096</b>		Original Amount of Loan <b>\$5,000.00</b>	Cumulative Payment To Date <b>None</b>	Balance Outstanding at Close of This Period <b>\$45,100.00</b>
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):				
Terms: Date Incurred <u>4/7/82</u> Date Due <u>N/A</u> Interest Rate <u>N/A</u> (Year) <input type="checkbox"/> Secured				
List All Endorsers or Guarantors (if any) to Item B				
1. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding		
2. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding		
3. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding		
SUBTOTALS This Period This Page (optional) .....			<b>\$10,000</b>	
TOTALS This Period This Page (in full) .....				

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LOANS

Committee (in Full)  
**Helms for Congress Committee**

Name, Mailing Address and ZIP Code of Loan Source  
**C. Helms**  
**35 N. Braeswood #206**  
**Houston, Tx. 77096**

Original Amount of Loan  
**\$15,000.00**

Cumulative Payment To Date  
**N/A**

Balance Outstanding at Close of This Period  
**\$60,100.00**

Election  Primary  General  Other (specify):

Terms Date Incurred **4/20/82** Date Due **N/A** Interest Rate **N/A** Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$
2. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$
3. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$

B Full Name, Mailing Address and ZIP Code of Loan Source

**J. C. Helms**  
**4635 N. Braeswood #206**  
**Houston, Tx. 77096**

Original Amount of Loan  
**\$10,000**

Cumulative Payment To Date  
**N/A**

Balance Outstanding at Close of This Period  
**\$70,100.00**

Election  Primary  General  Other (specify):

Terms Date Incurred **4/26/82** Date Due **N/A** Interest Rate **N/A** Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$
2. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$
3. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$

SUBTOTALS This Period This Page (optional) ..... **\$25,000.00**

TOTALS This Period (last page in this line only) ..... **\$25,000.00**

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

03048392216



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

24 May 1982

Mr. Patrick Oxford  
 J. C. Helms for Congress Committee  
 3270 South Loop West  
 Houston, TX 77025

Identification Number: C00149179

Reference: 1982 April Quarterly Report (1/1/82-3/31/82) and 12  
 Day Pre-Primary Report (4/1/82-4/11/82)

Dear Mr. Oxford:

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

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AW

-When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution or other source. If the candidate borrowed funds from a lending institution or any other source, the amount of the loan, the date incurred, the date due, the interest rate, whether or not the loan was secured, and all endorsers' or guarantors' names, addresses, occupations, employers and the amount guaranteed by each, if applicable, should be itemized. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. Further, it is important to note that "personal funds" is strictly defined by Commission regulations and may be found in 11 C.F.R. 110.10. (11 C.F.R. 100.7(a)(1) and 104.3(d))

-You must provide the occupation and name of employer for each contributor required to be itemized on Schedule A. Please amend your report by supplying the omitted information.

If your committee has made at least one effort per solicitation either by a written request or by an oral request documented in writing to obtain this information from the contributors, your committee may have "exercised best efforts" and need only confirm

this effort, in writing. See 11 C.F.R. 104.3(a)(4)(i)  
and 11 C.F.R. 104.7.

-On your 12 Day Pre-Primary, Line 10 should be \$45,100 as this is the total amount of the outstanding loans owed to your committee. This should agree with Schedule C.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4172.

Sincerely,

*Benita Marcus Adler*

Benita Marcus Adler  
Reports Analyst  
Reports Analysis Division

83040395238



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

6 July 1982

Patrick C. Oxford, Treasurer  
 J. C. Helms for Congress Committee  
 3270 South Loop West  
 Houston, TX 77025

Identification Number: C00149179

Reference: 12 Day Pre-Runoff (4/1/82-5/16/82)

Dear Mr. Oxford:

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

-You must provide the occupation and name of employer for each contributor required to be itemized on Schedule A. Please amend your report by supplying the omitted information.

If your committee has made at least one effort per solicitation either by a written request or by an oral request documented in writing to obtain this information from the contributors, your committee may have "exercised best efforts" and need only confirm this effort, in writing. See 11 C.F.R. 104.3(a)(4)(i) and 11 C.F.R. 104.7.

-For future reports, please include an aggregate total for all contributions you choose to itemize.

AM [ -When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution or other source. If the candidate borrowed funds from a lending institution or any other source, the amount of the loan, the date incurred, the date due, the interest rate, whether or not the loan was secured, and all endorsers' or guarantors' names, addresses, occupations, employers and the amount guaranteed by each, if applicable, should be itemized. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. Further, it is important to note that "personal funds" is strictly defined by Commission regulations and may be found in 11 C.F.R. 110.10. (11 C.F.R. 100.7(a)(1) and 104.3(d)) ]

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-Commission Regulations define the term "purpose" to mean a brief statement or description of why a disbursement was made. Examples are "dinner expense", "media", "salary", "polling", "travel", "party fees", "phone banks", "travel expenses", "travel expense reimbursement" and "catering costs". Unacceptable descriptions include "advance", "election day expense", "expenses", "other expenses", "expense reimbursement", "miscellaneous", "outside services", "get-out-the-vote" and "voter registration". (11 C.F.R. 104.3(b)(4)) For future filings, please clarify the following descriptions which do not meet the requirements of the Regulations:

reimbursement expenses

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4172.

Sincerely,

*Benita Marcus Adler*

Benita Marcus Adler  
Reports Analyst  
Reports Analysis Division

83040395240



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 18, 1982

Patrick Oxford, Treasurer  
J. C. Helms for Congress Committee  
3270 South Loop West  
Houston, TX 77025

Identification Number: C00149179

Reference: 1982 April Quarterly Report (1/1/82-3/31/82) and  
12 Day Pre-Primary Report (4/1/82-4/11/82)

Dear Mr. Oxford:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated May 24, 1982. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Benita Marcus Adler on our toll-free number (800)424-9530 or our local number (202)523-4172.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

83040395241



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 16, 1982

Patrick C. Oxford, Treasurer  
J. C. Helms for Congress Committee  
2425 West Loop South, Suite 480  
Houston, Texas 77057

Identification Number: C00149179

Reference: 12 Day Pre-Runoff (4/1/82-5/16/82)

Dear Mr. Oxford:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated July 6, 1982. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Benita Marcus Adler on our toll-free number (800) 424-9530 or our local number (202) 523-4172.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

33040395212

12R

Q7 sent

TELECON

DATE: December 6,7,and 8, 1982

FROM: Benita Adler

TO: J.C. Helms for Congress Cmte.

COMMITTEE: J.C. Helms for Congress Committee  
(713) 432-0025  
(713) 961-9999

---

This number has been disconnected.  
The operator in the (713) area code said there was no listing for  
Patrick Oxford (treasurer) or J.C.Helms (candidate)

The second number - there has been no answer for 3 days.

33040395210



ITEMIZED DISBURSMENTS

ATTACHMENT #11 July  
 copy of the Quarterly  
 Summary Report

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

Name of Committee (in Full)

J. C. Helms for Congress Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
J. C. Helms 4635 N. Braeswood #206 Houston, Texas 77096	Repayment of Loan Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Run-off	6/3/82	\$1,500.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Clymer Wright, Jr. 6038 Darkwood Houston, Texas 77088	Return of Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Run-off	6/3/82	1,000.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional) .....			2,500.00
TOTAL This Period (last page this line number only) .....			\$39,036.82

B 87270410232915325 R 0

LOANS

(See line Full)

Helms for Congress Committee

1. Mailing Address and ZIP Code of Loan Source

Original Amount of Loan

Cumulative Payment To Date

Balance Outstanding at Close of This Period

Helms  
 5 N. Braeswood, #206  
 Houston, Texas 77096  
 Election:  Primary  General  Other (specify): Runoff

5,000.00

-0-

5,000.00

Terms:  Unsecured  Secured Date Due \_\_\_\_\_ Interest Rate \_\_\_\_\_ % (apr)

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code

Name of Employer

N/A (source of loan was derived from J. C. Helm's personal funds)

Occupation

Amount Guaranteed Outstanding: \$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

N/A

Occupation

Amount Guaranteed Outstanding: \$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

N/A

Occupation

Amount Guaranteed Outstanding: \$

2. Full Name, Mailing Address and ZIP Code of Loan Source

Original Amount of Loan

Cumulative Payment To Date

Balance Outstanding at Close of This Period

J. C. Helms  
 4635 N. Braeswood, #206  
 Houston, Texas 77096  
 Election:  Primary  General  Other (specify): Runoff

7,500.00

-0-

7,500.00

Terms:  Unsecured  Secured Date Due \_\_\_\_\_ Interest Rate \_\_\_\_\_ % (apr)

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code

Name of Employer

N/A (source of loan was derived from J. C. Helm's personal funds)

Occupation

Amount Guaranteed Outstanding: \$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

N/A

Occupation

Amount Guaranteed Outstanding: \$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

N/A

Occupation

Amount Guaranteed Outstanding: \$

SUBTOTALS This Period This Page (optional) \_\_\_\_\_

TOTALS This Period (last page in this line only) \_\_\_\_\_

\$12,500.00

Carry forward the balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

Back

88-320410239349





FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

14 September 1982

Patrick C. Oxford, Treasurer  
J.C. Helms for Congress  
2425 West Loop South, Suite 480  
Houston, TX 77057

Identification Number: C00149179

Reference: July Quarterly Report (5/17/82-6/30/82)

Dear Mr. Oxford:

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

*BNA* -Your previous report detailed \$70,100 of outstanding loans from the candidate. This report appears to have dropped these loans. Our calculations indicate that your committee has the following outstanding debts:

\$ 70,100	= candidate loans previously reported
12,500	= candidate loans on July Quarterly
13,207	= debts reported on July Quarterly
<u>\$ 95,807</u>	
- 1,500	= loan repayment on July Quarterly
<u>\$ 94,307</u>	= total outstanding debts and obligations

Please amend your report to accurately reflect the above activity. All loans must be reported separately on Schedule C, including whether personal or bank funds were borrowed. A total must then be entered on Line 10 of the Summary Page.

-On Schedule D, you have reported debts to Bracewell and Patterson and Ketchum Advertising with outstanding balances at the beginning of this reporting period. These debts were not included on your previous report. Please be advised any loan, debt or obligation, the amount of which is over \$500 should be reported as of the time the debt was incurred. (11 CFR 104.11(b)) Please clarify the reporting of these debts.

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this effort, in writing. See 11 C.F.R. 104.3(a)(4)(i)  
and 11 C.F.R. 104.7.

-On your 12 Day Pre-Primary, Line 10 should be \$45,100 as this is the total amount of the outstanding loans owed to your committee. This should agree with Schedule C.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4172.

Sincerely,

*Benita Marcus Adler*

Benita Marcus Adler  
Reports Analyst  
Reports Analysis Division

83040395249

RQ-3



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 8, 1982

Patrick C. Oxford, Treasurer  
J. C. Helms for Congress  
2425 West Loop South, Suite 480  
Houston, TX 77057

Identification Number: C00149179

Reference: July Quarterly Report (5/17/82-6/30/82)

Q2

Dear Mr. Oxford:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated September 14, 1982. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Benita Marcus Adler on our toll-free number (800) 424-9530 or our local number (202) 523-4172.

Sincerely,

*John D. Gibson*

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

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CB  
10-14

10/13/82



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1535

Date Filmed 6/16/83 Camera No. --- 2

Cameraman SPE

6/16/83 1535



FEDERAL ELECTION COMMISSION

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

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC FILE OF CLOSED MUR 1535.

83040413682



J. G. HELMS  
ONE WEST LOOP PLAZA  
2485 WEST LOOP SOUTH  
HOUSTON, TEXAS 77027  
(713) 961-9999

RECEIVED BY THE #16  
Coff 409  
83 JUN 30  
N 30  
P 3: 08

June 24, 1983

Ms. Suzanne Callahan  
Office of the General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

RE: J.C. Helms for Congress  
Committee  
MUR 1535

Dear Ms. Callahan:

With reference to your letter of May 5, 1983 and to our telephone conversation of May 16, I wish to request formally that all references to Matter Under Review 1535, regarding the J.C. Helms for Congress Committee, be deleted from the Federal Election Commission record on this committee.

As I explained to you by telephone and in my letter of May 20, severe family illness in New Mexico has occupied much of my time since December, 1982, in particular since early May of this year, and I have, therefore, been detained in preparing this letter. Consequently, you were kind enough to allow me some time, say, a month or so after our conversation on May 16, to present this request.

I am making this request for the following two reasons:

1. MUR 1535 regarding the J.C. Helms for Congress Committee was initiated in the first place because of an error within the FEC.
2. The nature of the tentative and now dismissed allegations by the FEC, and the specific language used, render this material particularly open to abuse by political opponents. Although the full record clearly explains what happened, certain phrases can nevertheless be lifted out of context only too easily.

Discussion follows.

1. MUR 1535 INITIATED IN ERROR

Mr. Danny McDonald's letter of April 1, 1983 to Mr. Patrick Oxford, the treasurer of our committee, stated that the

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Federal Election Commission had "reason to believe that the J.C. Helms for Congress Committee violated 2 U.S.C. 434 (b)(8), a provision of the Federal Election Act of 1971 ....by failure to properly itemize loans and failure to continuously report outstanding debts."

As discussed below, neither of these allegations has any merit and, since the materials to substantiate this statement have at all times been on file in the offices of the FEC itself, neither allegation should ever have been made in the first place.

a. Failure to Properly Itemize Loans

In your memorandum (undated), to which Mr. McDonald referred for discussion of these two allegations, you stated that our campaign committee had failed to state the source of funds of loans to the campaign in Reports 1, 2 and 3, dated, respectively, 4/15/82, 4/23/82 and 5/19/82. Per the FEC's specific terminology, this was true for Reports 1 and 2, but was not true for Report 3 (5/19/82), which contained the required language as to source of funds.

Your statement about the Requests for Additional Information (RAI's) from Ms. Benita Marcus Adler and the second notices from Mr. John D. Gibson are correct, except that it appears that Mr. Gibson's final communication was on 9/16/82, not 9/7/82.

Your statement, however, about no communication and no response is incorrect. There was a great deal of telephone communication in late 1982 and early 1983 and written communication which is in the record. I presume this indicates that the Reports Division did not forward to you the entire file. As Mr. Oxford and I both pointed out, you were using in April of 1983 addresses for him and for me that were some 9 or 10 months out of date (see Item c below).

Our committee's statement as to source of funds was quite clear in Reports 3, 4 and 5, dated, respectively, 5/19/82, 7/15/82 and 2/25/83. Specifically, the source of \$70,100 was clearly stated on the Exhibit for Loans, Page 1 of 1, referring to Line Number 13:

"This loan is made possible through J.C. Helms' personal funds."

This specific language was given to my campaign staff by the staff of the FEC in the Spring of 1982 by telephone. We were particularly concerned that no uncertainty exist as to the source of these funds or my willingness to reveal that source.

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It was pointed out that I did, at that time, have a loan outstanding from Allied Bank of Texas and that I had listed this loan on my Financial Disclosure Statement, which was filed with the FEC on April 23, 1982. There was clearly no attempt to conceal this loan from the FEC or any desire on our part to keep it out of the reports being filed with the FEC. All we were concerned with was answering the question regarding source of funds accurately and in the appropriate terminology.

Therefore, as far as concerned our committee and campaign staff or the FEC staff with whom they communicated in the Spring of 1982, this question was completely and satisfactorily answered by May 19, 1982. The question continued to be answered in like fashion in Reports 4 and 5, dated, respectively, 7/15/82 and 2/25/83.

In addition, however, Ms. Benita Marcus Adler explicitly told me in a telephone conversation sometime in January or February of 1983, that our year-end report would suffice as correction or clarification of all points, but that it would be helpful if I also wrote a cover letter referring specifically to her earlier correspondence so that any one who reviewed the file would easily understand. This I did in my cover letter, dated February 28, 1983.

In summation, I see no way that the FEC can claim that the source of funds was not clearly stated from May 19, 1982 forward. All of this is a matter of public record. It is quite clear now that there was a misunderstanding, to the effect that the FEC wanted the Allied Bank loan listed not only on my financial statement, but also in my periodic reports, but this was never stated to me or to my staff, and it came as a complete surprise when, in April, 1983, our treasurer, Mr. Oxford, spoke with you by telephone and learned that this was, in fact, what you were looking for.

b. Failure to Continuously Report Debts

Your reference to our 7/15/82 report, regarding failure to include the \$70,100 in loans previously reported, is correct. An omission was made by the preparer of the report, who was a member of my campaign staff. This omission was not noticed by either myself or our treasurer, Mr. Oxford. However, it was completely corrected to

8 3 0 4 0 4 1 3 6 8 5

the satisfaction of Ms. Adler in the year-end report mentioned above.

Your statements as to the dates of the RFAI from Ms. Adler and the second notice from Mr. Gibson are correct.

However, your statement about no communication and no response is incorrect. Just as for Item (a) above, there was a great deal of telephone communication in late 1982 and early 1983 and written communication which is in the record.

c. Change of Address

Mr. McDonald's letter to Mr. Oxford of April 1, 1983 was sent to the campaign address at 3270 South Loop West, and a copy sent to me at 4635 North Braeswood. Both of these addresses had been changed in June, 1982 and notification sent to the FEC.

The campaign address was changed on June 8, 1982 from 3270 South Loop West to 2425 West Loop South. My own mailing address was changed on June 30, 1982 from 4635 North Braeswood to 2425 West Loop South.

This was communicated to the FEC and the Clerk of the House on several occasions, in particular:

7/1/82	Letter from Patrick Oxford
7/15/82	Cover letter from J.C. Helms (P.S. at bottom)

This change of address was clearly recorded by the FEC and the Clerk of the House, as is indicated by letters to Mr. Oxford and myself at 2425 West Loop South:

9/16/82	John Gibson (FEC)
10/5/82	Clerk of the House
10/8/82	John Gibson (FEC)

In addition, all copies of the FEC publication, Record, since August, 1982 have been sent to 2425 West Loop South.

It would appear, therefore, that if the General Counsel's office was using an address some 9 or 10 months out of date, it probably did not have all other materials placed in the file since June, 1982.

d. Conclusion

Clearly, our committee took all necessary steps to meet

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its reporting obligations and logically concluded that the matter was closed by the end of February, 1983. However, the FEC made its decision to proceed on March 29, 1983, fully one month later. As you yourself have acknowledged, this was evidently a failure of internal communication. The MUR should never have been initiated in the first place, and certainly not continued after February 28, 1983.

2. SENSITIVITY OF MATERIAL

I well understand that such things happen in large agencies and I do not fault the FEC staff for what occurred. Generally speaking, I would not worry further about such a matter.

However, in this case, since the FEC itself has seen fit to put on the public record language to the effect that the J.C. Helms for Congress Committee may have "violated" a provision of the law, it would seem only fair that this language and all references to it be deleted from the record, because of the obvious misuse another candidate could make of such language.

3. REQUEST FOR DELETION

I appeal, therefore, to your sense of fair play and justice and ask that you present this matter to the FEC and request that all papers pertinent to MUR 1535 regarding the J.C. Helms for Congress Committee be deleted from the record.

4. STATUS OF LOAN

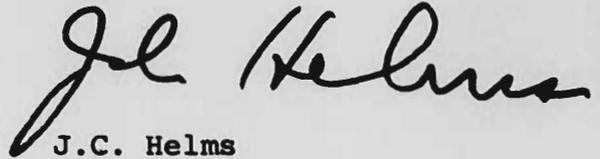
For your information and with specific reference to Mr. Kenneth A. Gross' request of May 5, 1983 that we indicate the Allied Bank of Texas as the source of funds "until the entire debt is extinguished", I paid off my entire debt to Allied Bank on May 13, 1983 and at this point have no debts whatever to anyone of any sort. I trust, therefore, that, following the present reporting period (1/1/83 to 6/30/83), there will be no further need of reference to the Allied Bank loan.

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\* \* \* \*

I appreciate your assistance in this matter. Please let me know if there is anything further that I should do. I can be reached either at the above number or at 505-983-4037, where I presently must spend most of my time.

Yours very truly,

  
J.C. Helms

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AIR MAIL

CERTIFIED  
P 456 394 085  
MAIL

Ms. Suzanne Callahan  
Office of the General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

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

END OF ADDITIONAL MATERIAL FOR CLOSED MR

1535

83040413690





FEDERAL ELECTION COMMISSION

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

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THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC FILE OF CLOSED MR 1535.





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 22, 1982

Mr. J. C. Helms  
One West Loop Plaza  
2425 West Loop South  
Houston, Texas 77027

RE: MUR 1535

Dear Mr. Helms:

This is in response to your letter of June 24, 1983, in which you request that the entire file in MUR 1535 be deleted from the Federal Election Commission's public record.

Commission regulations require that, upon the termination of any enforcement matter, the Commission's action and the basis therefore be made available to the public. See 11 C.F.R. § 4.4(a)(3) and § 111.20(a) excerpted for your reference below.

§ 4.4 - Availability of Records

Opinions of Commissioners rendered in enforcement cases and General Counsel's reports and non-exempt 2 U.S.C. § 437g investigatory materials in enforcement files will be made available no later than 30 days from the date on which a respondent is notified that the Commission has voted to take no further action and to close such an enforcement file.

§ 111.20 Public Disclosure of Commission action (2 U.S.C. § 437g(a)(4)).

If the Commission makes a finding of no reason to believe or no probable cause to believe or otherwise terminates its proceedings, it shall make public such action and the basis therefor no later than thirty (30) days from the date on which the required notifications are sent to complainant and respondent.

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Mr. J. C. Helms  
Page 2

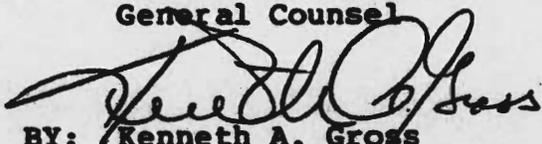
Under the provisions of the Federal Election Campaign laws and regulations, investigative files must be made public regardless of whether the allegations contained in the file are found to be violations of the Act. Therefore, we are unable to accommodate your request. Pursuant to the foregoing regulatory provisions, the file in MUR 1535 was microfilmed and placed on the public record on June 9, 1983.

While the file in this matter has been made public, we have added your position statement of June 24, 1983, in order that your concerns be a part of the permanent record in this matter.

If you have any further questions, please contact Suzanne Callahan at (202) 523-4529.

Sincerely,

Charles N. Steele  
General Counsel



BY: Kenneth A. Gross  
Associate General Counsel

83040434038



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. J. C. Helms  
One West Loop Plaza  
2425 West Loop South  
Houston, Texas 77027

RE: MUR 1535

Dear Mr. Helms:

This is in response to your letter of June 24, 1983, in which you request that the entire file in MUR 1535 be deleted from the Federal Election Commission's public record.

Commission regulations require that, upon the termination of any enforcement matter, the Commission's action and the basis therefore be made available to the public. See 11 C.F.R. § 4.4(a)(3) and § 111.20(a) excerpted for your reference below.

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§ 111.20 Public Disclosure of Commission action (2 U.S.C. § 437g(a)(4)).

If the Commission makes a finding of no reason to believe or no probable cause to believe or otherwise terminates its proceedings, it shall make public such action and the basis therefor no later than thirty (30) days from the date on which the required notifications are sent to complainant and respondent.

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Mr. J. C. Helms  
Page 2

Under the provisions of the Federal Election Campaign laws and regulations, investigative files must be made public regardless of whether the allegations contained in the file are found to be violations of the Act. Therefore, we are unable to accommodate your request. Pursuant to the foregoing regulatory provisions, the file in MUR 1535 was microfilmed and placed on the public record on June 9, 1983.

While the file in this matter has been made public, we have added your position statement of June 24, 1983, in order that your concerns be a part of the permanent record in this matter.

If you have any further questions, please contact Suzanne Callahan at (202) 523-4529.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

*Done*  
*8/19*

83040434040

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 1535  
J.C. Helms for Congress )  
Committee )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 19, 1983, the Commission decided by a vote of 6-0 to take the following actions in MUR 1535:

1. Reject J.C. Helms' request to delete the file in MUR 1535 from the public record.
2. Send the notification as attached to the General Counsel's August 17, 1983 Memorandum to the Commission.

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

Attest:

8-29-83  
Date

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

83040434041

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

8-17-83, 8:46  
8-17-83, 11:00



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *Cut*  
DATE: August 17, 1983  
SUBJECT: MUR 1535 (Closed) - Memorandum to Commission

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

CIRCULATIONS

DISTRIBUTION

48 Hour Tally Vote	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Sensitive	<input checked="" type="checkbox"/>	Audit Matters	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Litigation	<input type="checkbox"/>
24 Hour No Objection	<input type="checkbox"/>	Closed MUR Letters	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>	Status Sheets	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Advisory Opinions	<input type="checkbox"/>
Information	<input type="checkbox"/>	Other (see distribution below)	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>		
Non-Sensitive	<input type="checkbox"/>		
Other	<input type="checkbox"/>		

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**SENSITIVE**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 17, 1983

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RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

MEMORANDUM

TO : The Commission  
FROM : Charles N. Steele  
General Counsel  
BY: Kenneth A. Gross  
Associate General Counsel *KAG*  
SUBJECT: Closed MUR 1535

The above-referenced matter was initiated as a referral from the Reports Analysis Division ("RAD"). On March 27, 1983, the Commission found reason to believe that the J.C. Helms for Congress Committee violated 2 U.S.C. § 434. The committee filed a response and on May 4, 1983, the Commission determined that it would take no further action in this matter and close the file; the respondent was so notified on May 5, 1983.

On May 12, 1983, the closed MUR file was forwarded to the Commission Secretary's office and on June 9, 1983, the file was sent to be microfilmed and made part of the public record.

On June 24, 1983, the candidate, Mr. Helms, requested that the entire file in this matter be deleted from the public record. Helms contends that the dismissed allegations by the Federal Election Commission could be abused by political opponents even though the record in this matter explains the circumstances of the questioned transaction.

Commission regulations require that, upon the termination of any enforcement matter, the Commission's action and the basis therefore be made available to the public.

§ 4.4 - Availability of Records

Opinions of Commissioners rendered in enforcement cases and General Counsel's reports and non-exempt 2 U.S.C. § 437g investigatory materials in enforcement files will be made available no later than 30 days

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from the date on which a respondent is notified that the Commission has voted to take no further action and to close such an enforcement file.

§ 111.20 Public Disclosure of Commission action (2 U.S.C. § 437g(a)(4)).

If the Commission makes a finding of no reason to believe or no probable cause to believe or otherwise terminates its proceedings, it shall make public such action and the basis therefor no later than thirty (30) days from the date on which the required notifications are sent to complainant and respondent.

Therefore, under the provisions of the Act and regulations, investigative files must be made public regardless of whether the allegations contained in the file are found to be violations of the Act.

The Office of General Counsel recommends that the Commission reject Mr. Helms' request to delete MUR 1535 from the public record. We propose sending Mr. Helms the attached letter explaining the Commission's statutory requirement and advising him that his letter of request will be made part of the public record.

Recommendations

1. Reject J.C. Helms' request to delete the file in MUR 1535 from the public record.
2. Send attached notification.

Attachments

Helms letter of June 24, 1983  
Proposed notification letter  
(8 total pages attached)

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J. G. HELMS  
ONE WEST LOOP PLAZA  
8488 WEST LOOP SOUTH  
HOUSTON, TEXAS 77027  
(713) 961-9999

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Callahan

June 24, 1983

Ms. Suzanne Callahan  
Office of the General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

RE: J.C. Helms for Congress  
Committee  
MUR 1535

Dear Ms. Callahan:

With reference to your letter of May 5, 1983 and to our telephone conversation of May 16, I wish to request formally that all references to Matter Under Review 1535, regarding the J.C. Helms for Congress Committee, be deleted from the Federal Election Commission record on this committee.

As I explained to you by telephone and in my letter of May 20, severe family illness in New Mexico has occupied much of my time since December, 1982, in particular since early May of this year, and I have, therefore, been detained in preparing this letter. Consequently, you were kind enough to allow me some time, say, a month or so after our conversation on May 16, to present this request.

I am making this request for the following two reasons:

1. MUR 1535 regarding the J.C. Helms for Congress Committee was initiated in the first place because of an error within the FEC.
2. The nature of the tentative and now dismissed allegations by the FEC, and the specific language used, render this material particularly open to abuse by political opponents. Although the full record clearly explains what happened, certain phrases can nevertheless be lifted out of context only too easily.

Discussion follows.

1. MUR 1535 INITIATED IN ERROR

Mr. Danny McDonald's letter of April 1, 1983 to Mr. Patrick Oxford, the treasurer of our committee, stated that the

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Federal Election Commission had "reason to believe that the J.C. Helms for Congress Committee violated 2 U.S.C. 434 (b) (8), a provision of the Federal Election Act of 1971 ....by failure to properly itemize loans and failure to continuously report outstanding debts."

As discussed below, neither of these allegations has any merit and, since the materials to substantiate this statement have at all times been on file in the offices of the FEC itself, neither allegation should ever have been made in the first place.

a. Failure to Properly Itemize Loans

In your memorandum (undated), to which Mr. McDonald referred for discussion of these two allegations, you stated that our campaign committee had failed to state the source of funds of loans to the campaign in Reports 1, 2 and 3, dated, respectively, 4/15/82, 4/23/82 and 5/19/82. Per the FEC's specific terminology, this was true for Reports 1 and 2, but was not true for Report 3 (5/1/82), which contained the required language as to source of funds.

Your statement about the Requests for Additional Information (RAFI's) from Ms. Benita Marcus Adler and the second notices from Mr. John D. Gibson are correct, except that it appears that Mr. Gibson's final communication was on 9/16/82, not 9/7/82.

Your statement, however, about no communication and no response is incorrect. There was a great deal of telephone communication in late 1982 and early 1983 and written communication which is in the record. I presume this indicates that the Reports Division did not forward to you the entire file. As Mr. Oxford and I both pointed out, you were using in April of 1983 addresses for him and for me that were some 9 or 10 months out of date (see Item c below).

Our committee's statement as to source of funds was quite clear in Reports 3, 4 and 5, dated, respectively, 5/19/82, 7/15/82 and 2/25/83. Specifically, the source of \$70,100 was clearly stated on the Exhibit for Loans, Page 1 of 1, referring to Line Number 13:

"This loan is made possible through J.C. Helms' personal funds."

This specific language was given to my campaign staff by the staff of the FEC in the Spring of 1982 by telephone. We were particularly concerned that no uncertainty exist as to the source of these funds or my willingness to reveal that source.

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It was pointed out that I did, at that time, have a loan outstanding from Allied Bank of Texas and that I had listed this loan on my Financial Disclosure Statement, which was filed with the FEC on April 23, 1982. There was clearly no attempt to conceal this loan from the FEC or any desire on our part to keep it out of the reports being filed with the FEC. All we were concerned with was answering the question regarding source of funds accurately and in the appropriate terminology.

Therefore, as far as concerned our committee and campaign staff or the FEC staff with whom they communicated in the Spring of 1982, this question was completely and satisfactorily answered by May 19, 1982. The question continued to be answered in like fashion in Reports 4 and 5, dated, respectively, 7/15/82 and 2/25/83.

In addition, however, Ms. Benita Marcus Adler explicitly told me in a telephone conversation sometime in January or February of 1983, that our year-end report would suffice as correction or clarification of all points, but that it would be helpful if I also wrote a cover letter referring specifically to her earlier correspondence so that any one who reviewed the file would easily understand. This I did in my cover letter, dated February 28, 1983.

In summation, I see no way that the FEC can claim that the source of funds was not clearly stated from May 19, 1982 forward. All of this is a matter of public record. It is quite clear now that there was a misunderstanding, to the effect that the FEC wanted the Allied Bank loan listed not only on my financial statement, but also in my periodic reports, but this was never stated to me or to my staff, and it came as a complete surprise when, in April, 1983, our treasurer, Mr. Oxford, spoke with you by telephone and learned that this was, in fact, what you were looking for.

b. Failure to Continuously Report Debts

Your reference to our 7/15/82 report, regarding failure to include the \$70,100 in loans previously reported, is correct. An omission was made by the preparer of the report, who was a member of my campaign staff. This omission was not noticed by either myself or our treasurer, Mr. Oxford. However, it was completely corrected to

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the satisfaction of Ms. Adler in the year-end report mentioned above.

Your statements as to the dates of the RFAI from Ms. Adler and the second notice from Mr. Gibson are correct.

However, your statement about no communication and no response is incorrect. Just as for Item (a) above, there was a great deal of telephone communication in late 1982 and early 1983 and written communication which is in the record.

c. Change of Address

Mr. McDonald's letter to Mr. Oxford of April 1, 1983 was sent to the campaign address at 3270 South Loop West, and a copy sent to me at 4635 North Braeswood. Both of these addresses had been changed in June, 1982 and notification sent to the FEC.

The campaign address was changed on June 8, 1982 from 3270 South Loop West to 2425 West Loop South. My own mailing address was changed on June 30, 1982 from 4635 North Braeswood to 2425 West Loop South.

This was communicated to the FEC and the Clerk of the House on several occasions, in particular:

7/1/82	Letter from Patrick Oxford
7/15/82	Cover letter from J.C. Helms (P.S. at bottom)

This change of address was clearly recorded by the FEC and the Clerk of the House, as is indicated by letters to Mr. Oxford and myself at 2425 West Loop South:

9/16/82	John Gibson (FEC)
10/5/82	Clerk of the House
10/8/82	John Gibson (FEC)

In addition, all copies of the FEC publication, Record, since August, 1982 have been sent to 2425 West Loop South.

It would appear, therefore, that if the General Counsel's office was using an address some 9 or 10 months out of date, it probably did not have all other materials placed in the file since June, 1982.

d. Conclusion

Clearly, our committee took all necessary steps to meet

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its reporting obligations and logically concluded that the matter was closed by the end of February, 1983. However, the FEC made its decision to proceed on March 29, 1983, fully one month later. As you yourself have acknowledged, this was evidently a failure of internal communication. The MUR should never have been initiated in the first place, and certainly not continued after February 28, 1983.

2. SENSITIVITY OF MATERIAL

I well understand that such things happen in large agencies and I do not fault the FEC staff for what occurred. Generally speaking, I would not worry further about such a matter.

However, in this case, since the FEC itself has seen fit to put on the public record language to the effect that the J.C. Helms for Congress Committee may have "violated" a provision of the law, it would seem only fair that this language and all references to it be deleted from the record, because of the obvious misuse another candidate could make of such language.

3. REQUEST FOR DELETION

I appeal, therefore, to your sense of fair play and justice and ask that you present this matter to the FEC and request that all papers pertinent to MUR 1535 regarding the J.C. Helms for Congress Committee be deleted from the record.

4. STATUS OF LOAN

For your information and with specific reference to Mr. Kenneth A. Gross' request of May 5, 1983 that we indicate the Allied Bank of Texas as the source of funds "until the entire debt is extinguished", I paid off my entire debt to Allied Bank on May 13, 1983 and at this point have no debts whatever to anyone of any sort. I trust, therefore, that, following the present reporting period (1/1/83 to 6/30/83), there will be no further need of reference to the Allied Bank loan.

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\* \* \* \*

I appreciate your assistance in this matter. Please let me know if there is anything further that I should do. I can be reached either at the above number or at 505-983-4037, where I presently must spend most of my time.

Yours very truly,

*J.C. Helms*  
J.C. Helms

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. J. C. Helms  
One West Loop Plaza  
2425 West Loop South  
Houston, Texas 77027

RE: MUR 1535

Dear Mr. Helms:

This is in response to your letter of June 24, 1983, in which you request that the entire file in MUR 1535 be deleted from the Federal Election Commission's public record.

Commission regulations require that, upon the termination of any enforcement matter, the Commission's action and the basis therefore be made available to the public. See 11 C.F.R. § 4.4(a)(3) and § 111.20(a) excerpted for your reference below.

§ 4.4 - Availability of Records

Opinions of Commissioners rendered in enforcement cases and General Counsel's reports and non-exempt 2 U.S.C. § 437g investigatory materials in enforcement files will be made available no later than 30 days from the date on which a respondent is notified that the Commission has voted to take no further action and to close such an enforcement file.

§ 111.20 Public Disclosure of Commission action (2 U.S.C. § 437g(a)(4)).

If the Commission makes a finding of no reason to believe or no probable cause to believe or otherwise terminates its proceedings, it shall make public such action and the basis therefor no later than thirty (30) days from the date on which the required notifications are sent to complainant and respondent.

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Mr. J. C. Helms  
Page 2

Under the provisions of the Federal Election Campaign laws and regulations, investigative files must be made public regardless of whether the allegations contained in the file are found to be violations of the Act. Therefore, we are unable to accommodate your request. Pursuant to the foregoing regulatory provisions, the file in MUR 1535 was microfilmed and placed on the public record on June 9, 1983.

While the file in this matter has been made public, we have added your position statement of June 24, 1983, in order that your concerns be a part of the permanent record in this matter.

If you have any further questions, please contact Suzanne Callahan at (202) 523-4529.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1535

Date Filmed 9/22/83 Camera No. --- 4

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