



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1918

Date Filmed 9/11/85 Camera No. --- 2

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Routing slips; internal memos; OC report;

Amicable agreement; civil penalty check

See brief; request for conciliation ..

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):

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

Signed S. H. ...  
date 8/28/85

FEC 9-21-77



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 14, 1985

Jeffry L. Hardin, Esquire  
Vinson & Elkins  
Suite 900  
1101 Connecticut Avenue, N.W.  
Washington, D.C. 20036

RE: MUR 1918  
Houston Natural Gas  
Corporation Political Action  
Committee and Jo Anne  
Rasmussen, as treasurer

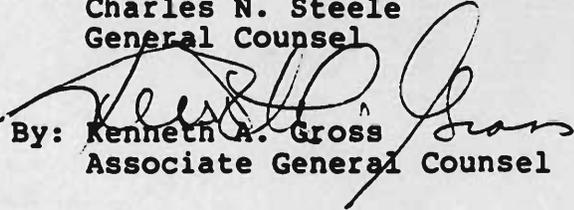
Dear Mr. Hardin:

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

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

Sincerely,

Charles N. Steele  
General Counsel

By:   
Kenneth A. Gross  
Associate General Counsel

Enclosure  
Conciliation Agreement

85040550319

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Houston Natural Gas Corporation ) MUR 1918  
Political Action Committee )  
Jo Anne Rasmussen, as Treasurer )

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Houston Natural Gas Corporation Political Action Committee ("Respondent" and "Respondent Committee") violated 2 U.S.C. §434 by failing to file its 12 Day Pre-General Election Report in a timely manner.

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered into pursuant to 2 U.S.C. §437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

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IV. The pertinent facts in this matter are as follows:

1. Respondent Committee is a political committee within the meaning of 2 U.S.C. §431(4).

2. Respondent Jo Anne Rasmussen currently serves as treasurer for Respondent Committee.

3. Respondent Committee was required to file a 12 Day Pre-General Election Report with the Commission by October 25, 1984. No report designated as the 12 Day Pre-General Election Report was received at the Commission by October 25, 1984.

4. A regularly scheduled general election was held on November 6, 1984.

5. Respondent Committee filed the information required to be contained in its Pre-General Election Report with the Commission on November 13, 1984, in a report covering committee activities during the period of October 1-31, 1984.

6. Section 434(a)(4)(B), Title 2, United States Code, required all unauthorized political committees which are monthly filers to file a Pre-General Election Report instead of a November monthly report in years in which a regularly scheduled general election is held. Section 434(a)(2)(A)(i), Title 2, United States Code, requires the Pre-General Election Report to be filed no later than twelve (12) days before such election.

V. Respondent Committee violated 2 U.S.C. §434(a)(4)(B) and §434(a)(2)(A)(i) by failing to file its 12

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Day Pre-General Election Report until November 13, 1984, nineteen (19) days after it was due.

VI. Respondent Committee will pay a civil penalty to the Treasurer of the United States in the amount of One Hundred Fifty Dollars (\$150) pursuant to 2 U.S.C. §437g(a)(5)(A).

VII. Respondent Committee agrees not to undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §431 et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondent Committee shall have not more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either

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party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele  
General Counsel

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

*August 14, 1985*  
Date

FOR THE RESPONDENTS:

*Anne Rasmussen*  
Anne Rasmussen  
Treasurer

*7-2-85*  
Date

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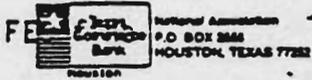
**HNG POLITICAL ACTION COMMITTEE**  
 ROYSTON C. HUGHES, CHAIRMAN  
 P. O. BOX 1188 PH. 713-654-6730  
 HOUSTON, TEXAS 77001

1617

July 1 19 85 <sup>35-60</sup>/<sub>1130</sub>

PAY TO THE ORDER OF United States Treasurer----- s: 150.00

One Hundred Fifty and No/100----- DOLLARS



FOR FEC fine

*Jo Anne Rasmussen*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Jeffrey L. Hardin, Esquire  
Vinson & Elkins  
Suite 900  
1101 Connecticut Avenue, N.W.  
Washington, D.C. 20036

*SK*

RE: MUR 1918  
Houston Natural Gas  
Corporation Political Action  
Committee and Jo Anne  
Rasmussen, as treasurer

Dear Mr. Hardin:

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

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

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Conciliation Agreement

85040550326

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1918
Houston Natural Gas Corporation	)	
Political Action Committee	)	
Jo Anne Rasmussen, treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 2, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 1918:

1. Accept the conciliation agreement proposed by the Houston Natural Gas Corporation Political Action Committee and Jo Anne Rasmussen, as treasurer.
2. Close the file.

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

Attest:

8/5/85  
Date

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

Received in Office of Commission Secretary:	7-30-85, 5:46
Circulated on 48 hour tally basis:	7-31-85, 4:00

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1918
Houston Natural Gas Corporation	)	
Political Action Committee	)	
Deborah S. McCaleb, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 5, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1918:

1. Enter into conciliation with the Houston Natural Gas Corporation Political Action Committee and Deborah S. McCaleb, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement attached to the General Counsel's Report signed May 31, 1985.
3. Approve the letter attached to the General Counsel's Report signed May 31, 1985 .

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

Attest:

6/6/85  
Date

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

Received in Office of Commission Secretary:	6-3-85,	9:03
Circulated on 48 hour tally basis:	6-3-85,	4:00

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6007890  
Kleinfield

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1918

NAME OF COUNSEL: Arthur B. Culvahouse, Jr.  
Jeffrey L. Hardin

ADDRESS: Vinson & Elkins  
1101 Connecticut Avenue, N.W.  
Suite 900  
Washington, D.C. 20036

TELEPHONE: (202) 862-6500

RECEIVED  
 OFFICE OF THE  
 GENERAL COUNSEL  
 MAY 22 1985  
 ALB

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

May 22, 1985  
Date

Jo Arne Rasmussen  
Signature

RESPONDENT'S: Jo Arne Rasmussen

ADDRESS: P.O. Box 1188  
1200 Travis  
Houston, Texas 77001

HOME PHONE: 713/471-2942

BUSINESS PHONE: 713/654-6373

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

05 MAY 3 05:15

May 3, 1985

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele  
General Counsel *CNS*

SUBJECT: MUR #1918

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on May 3, 1985. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Houston Natural Gas Corporation	)	MUR 1918
Political Action Committee	)	
Deborah S. McCaleb, as treasurer	)	

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On January 16, 1985, the Reports Analysis Division ("RAD") of the Federal Election Commission ("Commission") referred the Houston Natural Gas Corporation Political Action Committee ("Committee") and Deborah S. McCaleb, as treasurer, to the Office of General Counsel for failing to timely file its 12 Day Pre-General Election Report of receipts and disbursements.

On October 1, 1984, RAD mailed a notification to the Committee that its 12 Day Pre-General Election Report would be due on October 25, 1984. The Committee filed what it called a "November monthly" covering receipts and disbursements during the period October 1-31, 1984 on November 13, 1984. After the Committee was sent a non-filer notice concerning its 12 Day Pre-General Election Report on November 16, 1984, that report was delivered to the Commission on November 23, 1984.

On March 6, 1985, the Commission determined there is reason to believe that the Houston Natural Gas Corporation Political Action Committee and Deborah S. McCaleb, as treasurer, failed to make a timely filing of its 12 Day Pre-General Election Report. The Committee's response was received on March 29, 1985.

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II. LEGAL ANALYSIS

All unauthorized political committees, which are monthly filers, must file a Pre-General Election Report in any year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(B). The Pre-General Election Report is to be filed in lieu of the November monthly report, 2 U.S.C. § 434(a)(4)(B), and is due no later than twelve (12) days before the general election, 2 U.S.C. § 434(a)(2)(A)(i).

A regularly scheduled general election was held on November 6, 1984. The Committee is not an authorized political committee for any candidate. The Committee's Pre-General Election Report was due on October 25, 1984. Rather than filing such a report by that date, the information which was to be contained in the Pre-General Election Report was included in what the committee called a "November monthly report," filed on November 13, 1984. Because no "monthly report" is due in November in a year in which the Pre-General Election Report is due, the report filed by the Committee on November 13, 1984 will be considered its Pre-General Election Report. Therefore, the Committee filed its report nineteen (19) days late.

In its response to the reason to believe notification, the Committee asks the Commission to take no further action in this matter. This request is based on several factors. First, the Committee claims to have been unaware of the need to file a Pre-General Election Report since it had not received RAD's notification

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that such a report was due. However, by her own admission, the Committee's treasurer had in the past filed Pre-General Election Reports, and reliance upon RAD's notification will not justify a late filing.

Second, the Committee contends that its monthly filing in November demonstrates sufficient compliance with the Act. However, no monthly filing is required in November. The filing of November 13, 1984 by the Committee is deemed to be its 12 Day Pre-General Election Report and was filed 19 days late.

The remaining factors cited by the Committee have no bearing on whether a violation occurred. The fact that the Committee has a history of timely filing and undertook to file a Pre-General Report immediately upon receipt of the non-filing notice do not go to exonerate the ultimate violation here, that of a late filed report.

The Committee refuses to concede in its response to the General Counsel's office that any violation occurred in this matter. However, in light of the fact that the Committee was required to file its 12 Day Pre-General Election Report on October 25, 1984, and the fact that the Commission did not receive the required information until November 13, 1984, the Office of General Counsel recommends that the Commission find probable cause to believe that the Houston Natural Gas Corporation Political Action Committee and Deborah S. McCaleb, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and § 434(a)(2)(A)(i), for failing to file its 12 Day Pre-General Election Report in a timely manner.

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III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe that the Houston Natural Gas Corporation Political Action Committee and Deborah S. McCaleb, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and § 434(a)(2)(A)(i).

\_\_\_\_\_  
Date

\_\_\_\_\_  
Charles N. Steele  
General Counsel

85040550334



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Arthur B. Culvahouse, Jr., Esq.  
Vinson & Elkins  
1101 Connecticut Avenue, N.W.  
Suite 900  
Washington, D.C. 20036

RE: MUR 1918  
Houston Natural Gas Corporation  
Political Action Committee and  
Deborah S. McCaleb, as treasurer

Dear Mr. Culvahouse:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on March 6, 1985, found reason to believe that your clients had violated 2 U.S.C. § 434(a)(4), and instituted an investigation in this matter.

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

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

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

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Arthur B. Culvahouse, Jr., Esq.  
Page 2

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

Should you have any questions, please contact Eric Kleinfeld the attorney assigned to handle this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

Enclosure  
Brief

85040550336



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 3, 1985

Arthur B. Culvahouse, Jr., Esq.  
Vinson & Elkins  
1101 Connecticut Avenue, N.W.  
Suite 900  
Washington, D.C. 20036

RE: MUR 1918  
Houston Natural Gas Corporation  
Political Action Committee and  
Deborah S. McCaleb, as treasurer

Dear Mr. Culvahouse:

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

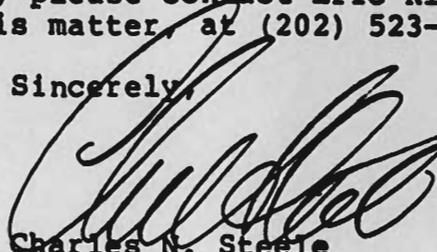
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Arthur B. Culvahouse, Jr., Esq.  
Page 2

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Should you have any questions, please contact Eric Kleinfeld the attorney assigned to handle this matter, at (202) 523-4000.

Sincerely,



Charles N. Steele  
General Counsel

Enclosure  
Brief

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ACCH 7012  
Kleinfeld

VINSON & ELKINS  
ATTORNEYS AT LAW

1101 CONNECTICUT AVE. N. W., SUITE 900  
WASHINGTON, D. C. 20036  
TELEPHONE 202 862-6900 - CABLE VINELKINS - TELEX 89880

FIRST CITY TOWER  
HOUSTON, TEXAS 77002  
TELEPHONE 713 651-2222  
CABLE VINELKINS - TELEX 762 46 - TWX 9108816391

AUSTIN NATIONAL BANK TOWER  
AUSTIN, TEXAS 78701  
TELEPHONE 512 478-2500

47 CHARLES ST., BERKELEY SQUARE  
LONDON W1X 7PB, ENGLAND  
TELEPHONE 44 01 491-7236  
CABLE VINELKINS LONDON W. 1 - TELEX 84140

March 29, 1985

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

Attention: Mr. Eric Kleinfeld

Re: MUR 1918 - Houston Natural Gas Corporation  
Political Action Committee - Deborah S. McCaleb,  
Treasurer

Gentlemen:

Houston Natural Gas Corporation Political Action Committee (the "Committee") and Ms. Deborah S. McCaleb, Treasurer, have designated this law firm to represent them in the above-captioned matter before the Federal Election Commission (the "Commission"). Accordingly, you will find enclosed with this letter Statements of Designation of Counsel executed by the Committee and Ms. McCaleb, respectively. Also enclosed with this letter you will find an Affidavit sworn to and subscribed by Ms. McCaleb.

This letter and the enclosed Affidavit are in reply to the Commission's March 13, 1985 letter to the Committee and are being submitted for the sole purpose of demonstrating that no action should be taken by the Commission against the Committee or Ms. McCaleb. Submission of this letter, the Affidavit and the information contained herein and therein is made without prejudice to any legal position that either the Committee or Ms. McCaleb subsequently may take in connection with this matter.

Based on our review of the enclosed Affidavit, our conversations with Ms. McCaleb and our understanding of the relevant facts and the reporting requirements applicable to the Committee under the Federal Election Campaign Act of 1971, as amended (the "Act"), we respectfully request that the Commission take no further action against the Committee or Ms. McCaleb and that the Commission close its file on the above-captioned Matter Under Review. We think the information and considerations set forth below amply support such a determination by the Commission.

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1. The Committee and Ms. McCaleb in fact were unaware of the need to file a pre-general election report and of the filing deadline for that report.

Ms. McCaleb states in her Affidavit that neither she nor, to her knowledge, the Committee received the Commission's notice advising of the October 25, 1984 filing deadline for the 1984 pre-general election report. Because the Commission's notice concerning the filing deadline for the 1984 pre-general election report was mailed to the Committee by general post, the non-receipt of that notice by the Committee is understandable. Ms. McCaleb also states in her Affidavit that the Committee had relied in previous election years on the Commission's notices for notification of pre-general election and post-general election filing deadlines and that she did not independently recall the need to file a pre-general election report in 1984. Such statements and circumstances demonstrate that the Committee and Ms. McCaleb in fact were unaware of the need to file the pre-general election report in 1984 and by the October 25, 1984 filing deadline.

2. The Committee filed the October 1984 "monthly" report in its good faith attempt to comply with the Act and prior to being advised of the non-filing of a pre-general election report.

For the past ten years, the Committee continuously has elected to file reports with the Commission on a monthly basis for both election and non-election years under Section 304(a)(4)(B) of the Act (2 U.S.C. §434(a)(4)(B)). Therefore, operating under the assumption that a regular "monthly" report for October 1984 was supposed to be filed by the Committee (which was the required report for the preceding 21 months commencing January 1983), the Committee followed its customary reporting practice by preparing and mailing to the Commission for filing a report on Form 3X for October 1984, reporting all receipts, disbursements and contributions effected by the Committee from October 1 through October 31, 1984. That monthly report was mailed for filing by the Committee on November 15, 1984, four days prior to its receipt of the November 16, 1984 non-filing notice from the Commission. That report included all the information that should have been reported in a pre-general election report.

The Committee's preparation and mailing for filing, prior to receiving the non-filing notice, of a regular monthly report for October 1984 containing all the information that should have been reported in the pre-general election report demonstrates that (i) the Committee and Ms. McCaleb in fact were unaware of the need to file a

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pre-general election report in October 1984, (ii) the Committee was attempting in good faith to file what it believed to be the requisite report under the Act and thereby to comply with the Act, and (iii) there was no knowing or willful attempt by the Committee to avoid or evade the reporting requirements of the Act.

3. The Committee prepared and filed the pre-general election report immediately upon receipt of the non-filing notice.

The Committee received the Commission's November 16, 1984 non-filing notice on November 19, 1984. Upon receipt of that notice, Ms. McCaleb immediately began preparing, and that same day mailed to the Commission for filing, the requisite pre-general election report. It thus is evident that the Committee willingly and expeditiously complied with the pre-general election reporting requirement as soon as it was advised of the requirement.

4. The Committee has a history of timely reporting and expeditious amendments.

Ms. McCaleb states in her Affidavit that, to the best of her information, knowledge and belief, before October 25, 1984 the Committee had not missed a filing deadline under the Act. She also states that after November 1984 the Committee has not missed a filing deadline under the Act. In short, the only filing deadline under the Act that the Committee has ever missed since its organization approximately twelve years ago was the October 25, 1984 deadline for the pre-general election report.

Moreover, the Commission should be aware of the cooperation with the Commission that the Committee previously exhibited when the reports of the Committee for the period November 1982 through October 1984 were reviewed in November 1984 by a Commission Reports Analyst. Amended Committee reports correcting the minor technical discrepancies discovered by the Reports Analyst were mailed to the Commission for filing on November 15, 1984, less than one week after the Committee was notified of the need to file such technical amendments. A letter to us from Ms. McCaleb describing that amendatory process is attached to this letter for your information.

The Committee's history of timely compliance with the Act's reporting requirements and the cooperative attitude of and commendable approach taken by Ms. McCaleb during the review by the Reports Analyst demonstrate that the Committee

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considers the timely and accurate filing of reports under the Act to be an important and serious requirement.

5. The Committee's receipts and disbursements during the period October 1-17, 1984 were minimal.

The information that the Commission would have received had the Committee timely filed its pre-general election report would have been inconsequential because only minimal receipts and contributions were effected by the Committee during the period October 1-17, 1984. During that period, the Committee's total receipts were only \$350, an insignificant sum. Furthermore, of the \$6,850 in disbursements during that period, only \$2,000 were for federal campaign contributions. The \$2,000 in federal campaign contributions are relatively insignificant when compared to the \$19,196.40 in federal campaign contributions made by the Committee during the period from January 1, 1984 through October 17, 1984 and are even less significant when compared to the \$38,371.40 in federal campaign contributions made by the Committee during the entire general 1984 election cycle (January 1983 through December 1984). Moreover, the \$2,000 sum reflects only two contributions made by the Committee, one contribution of \$1,000 to a national party committee and another \$1,000 contribution to an incumbent Congressman from the Committee's home state who has been supported by the Committee in prior election years.

6. Further Commission action on this matter is unnecessary.

If the Committee and Ms. McCaleb violated the Act (and we do not concede that a violation did occur), then the violation, if any, arose out of a single untimely filing and therefore is purely technical in nature, was committed unknowingly and unintentionally, involved minimal amounts, was promptly redressed, and is unlikely to be repeated. Furthermore, the Committee and Ms. McCaleb have reaffirmed their commitment to monitor and keep currently informed about the reporting requirements of the Act and all existing and future filing deadlines imposed by the Act or the Commission. Further action on this matter therefore is unnecessary to correct or prevent any violation of the Act by either the Committee or Ms. McCaleb.

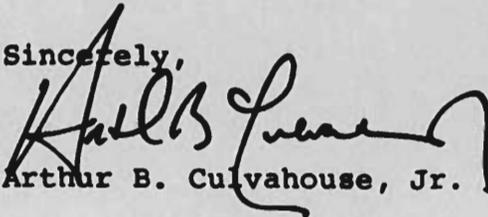
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In summary, we think the above points adequately demonstrate that the Commission should take no further action against either the Committee or Ms. McCaleb. On behalf of the Committee and Ms. McCaleb, we therefore respectfully request you to recommend to the Commission that it close the file on the above-captioned Matter Under Review.

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Please call the undersigned or my colleague, Jeffrey L. Hardin, if you have questions about this letter or the above-captioned Matter Under Review.

Sincerely,



Arthur B. Culvahouse, Jr.

Enclosures

cc: Ms. Deborah S. McCaleb

85040550343

STATEMENT OF DESIGNATION OF COUNSEL

YR 1918

NAME OF COUNSEL: Arthur B. Culvahouse, Jr.

ADDRESS:

Jeffrey Hardin

Vinson & Elkins

1101 Connecticut Ave. N.W. Suite 900

TELEPHONE:

Washington, D.C. 20036

(202) 862-6500

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

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3-26-85  
Date

James A. Hanna CHAIRMAN  
Signature  
Houston Natural Gas Corporation  
Political Action Committee

RESPONDENT'S NAME: Houston Natural Gas Corporation  
Political Action Committee

ADDRESS: P.O. Box 1188

1200 Travis

Houston, Texas 77001

OTHER PHONE: \_\_\_\_\_

BUSINESS PHONE: (713) 654-6503

STATEMENT OF DESIGNATION OF COUNSEL

HJR. 1918

NAME OF COUNSEL: Arthur B. Culvahouse, Jr.

ADDRESS:

Jeffrey Hardin

Vinson & Elkins

1101 Connecticut Ave. N.W. Suite 900

TELEPHONE:

Washington, DC. 20036

(202) 862-6500

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

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3/25/85  
Date

Deborah S. McAleeb  
Signature

RESPONDENT'S NAME:

Deborah S. McAleeb

ADDRESS:

P.O. Box 1188

1300 Travis

Houston, TX 77001

HOME PHONE:

(713) 476-9113

BUSINESS PHONE:

(713) 654-6503

A. B. C.  
MAR 26 1985  
RECEIVED

AFFIDAVIT OF DEBORAH S. McCALEB

The undersigned, Deborah S. McCaleb, being first duly sworn, deposes and says:

1. My name is Deborah S. McCaleb. My business address is c/o Houston Natural Gas Corporation, 1200 Travis, Houston, Texas 77002. I am over 21 years of age. Unless otherwise specified, I make the statements contained in this affidavit based on my own personal knowledge.
2. I am, and have been since November 1978, the treasurer of the Houston Natural Gas Corporation Political Action Committee (the "Committee"), a political committee organized pursuant to the Federal Election Campaign Act of 1971, as amended (the "Act").
3. Since about one year after its organization in October 1973, the Committee, as a political committee other than an authorized committee of a candidate, has elected to file reports to the Federal Election Commission (the "Commission") in accordance with Section 434(a)(4)(B) of the Act. To the best of my information, knowledge and belief, before October 1984, the Committee had timely filed all reports that it was required to file under the Act.
4. To the best of my information, knowledge and belief, for years in which a regularly scheduled general election was held, the Committee and I relied on filing notices from the Commission for notification of the filing deadlines for the pre-general election and post-general election reports required to be filed under the Act. To the best of my information, knowledge and belief, the Committee prior to October 1984 had timely filed all pre-general election and post-general election reports.
5. I did not receive and to the best of my information, knowledge and belief, the Committee did not receive, a filing notice from the Commission designating October 25, 1984 as the filing deadline for the 1984 pre-general election report. I also did not recall that during a year in which a regularly scheduled general election is held a pre-general election report is required to be filed in lieu of the monthly report for October of that year. Accordingly, based on the assumption that the monthly reporting practice would satisfy the Committee's reporting requirements under the Act with respect to October 1984, I prepared a monthly report for October 1984 on Form 3X, reporting all contributions, disbursements, and receipts effected by the Committee during the month of October 1984. That report was mailed to the Commission for filing on November 15, 1984.

85040550346

- 6. I first became aware that a pre-general election report was required to be filed in lieu of the monthly report for October 1984 when the Committee received on November 19, 1984, notice from the Commission of the possible failure by the Committee to file the requisite pre-general election report. I promptly amended the previously filed October 1984 monthly report in order to re-file it as the requisite pre-general election report. The pre-general election report was mailed to the Commission for filing on November 19, 1984, the same day that the Committee received the Commission's non-filing notice.
- 7. On December 6, 1984 a post-general election report by the Committee was mailed to the Commission for filing. To the best of my information, knowledge and belief, the Committee since such date has timely filed with the Commission all reports required under the Act.

Dated March 27, 1985

Deborah S. McCaleb  
Deborah S. McCaleb

STATE OF TEXAS            )  
  )  
COUNTY OF HARRIS        )

SUBSCRIBED AND SWORN to before me this 27th day of March, 1985.

John Rasmussen  
NOTARY PUBLIC

My Commission Expires:

4-2-85

85040550347

# HNG

HOUSTON NATURAL  
GAS CORPORATION  
P. O. Box 1188  
Houston, Texas 77001  
713/654-6161

March 28, 1985

Mr. Arthur B. Culvahouse, Jr.  
Vinson & Elkins  
1101 Connecticut Avenue N.W.  
Suite 900  
Washington, D.C. 20036

Dear Mr. Culvahouse:

You will find set forth below the details concerning my previous contacts with the Analysis Division of the Federal Election Commission ("FEC").

About November 9, 1984, I received by regular mail several letters from the FEC Analysis Division signed by J. Hunter Bryan, Reports Analyst, each dated November 7, 1984. Upon receipt of these letters I immediately telephoned Mr. Bryan at the FEC to obtain clarification of these letters. After discussing the allegations of the FEC, he assured me that the technical discrepancies outlined in his letters were minor. We agreed that due to the cumulative nature of the reports, any amendments made to a prior report would have to be brought forward to the most current report.

During the resulting time consuming effort to amend all reports already on file at the FEC dating back to November 1982, I was in almost constant communication with Mr. Bryan. I indicated to him that I was most eager to comply with his requests. He expressed his gratitude for the tremendous effort on my part in trying to clear up technical discrepancies on such short notice, and said the timely manner in which I replied to the questions would certainly be viewed as evidence of good faith by the FEC. I sent Mr. Bryan my amended reports of 11/1/82 - 10/31/84 on November 15, 1984 - scarcely a week after receiving his requests.

A few days later, on November 19, 1984, I received a non-filer notice from the FEC (dated November 16, 1984) relating to a 12 Day Pre-General Election Report indicated as due on October 25, 1984. I immediately telephoned Mr. Bryan and he told me just to submit an amended October report including only information for the period to be covered by the Pre-General Election Report. He assured me my prompt attention to the matter would be looked on favorably by the FEC. I promptly amended and filed the Pre-General Election Report that same day - November 19, 1984. I considered the matter closed until I received the FEC deficiency notice on March 19, 1985.

A. B. C.

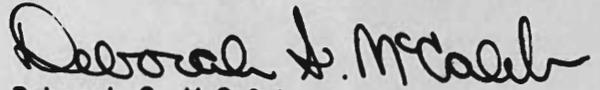
MAR 29 1985

RECEIVED

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I have had no further communication with Mr. Bryan, either telephone or in writing, since my telephone conversation with him on November 19, 1984.

Very truly yours,



Deborah S. McCaleb  
Treasurer  
HNG Political Action Committee

dm

85040550349



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE FEC  
COMPTROLLER SECRETARY

05 MAR 18 P 1: 57

**SENSITIVE**

March 18, 1985

MEMORANDUM TO: The Commission  
FROM: Charles N. Steele  
General Counsel  
By: Kenneth A. Gross  
Associate General Counsel *KAG*  
SUBJECT: RAD Referral 85NF-18

On March 6, 1985 the Commission approved the recommendation that RAD Referral 85NF-18 should become a MUR. Therefore, all documents which had previously been contained in RAD Referral 85NF-18 should now become MUR 1918.

Attachment  
Copy of Certification

85040550350

BEFORE THE FEDERAL ELECTION COMMISSION

*MUR 1918  
Kleinfield*

In the Matter of	)	
	)	RAD Referral 85NF-18
Houston Natural Gas Corporation	)	
Political Action Committee	)	
Deborah S. McCaleb, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 6, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-18:

1. Open a MUR.
2. Find reason to believe that the Houston Natural Gas Corporation Political Action Committee and Deborah S. McCaleb, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).
3. Approve and send the letter and factual and legal analysis attached to the First General Counsel's Report signed March 1, 1985.

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

Attest:

3-7-85

Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:	3-4-85, 9:01
Circulated on 48 hour tally basis:	3-4-85, 4:00

85040550351

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL: RAD REFERRAL 85NF-18  
BY OGC TO THE COMMISSION 3/4/85-9:00 STAFF MEMBER ERIC KLEINFELD

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

RESPONDENTS NAMES: Houston-Natural Gas Corporation Political  
Action Committee  
Deborah S. McCaleb, as treasurer

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

INTERNAL REPORTS CHECKED: Committee Reports

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

Based on information obtained in the normal course of its supervisory duties under the Federal Election Campaign Act of 1971, as amended, (the "Act"), the Reports Analysis Division ("RAD") referred this matter to the Office of General Counsel on January 16, 1985.

SUMMARY OF ALLEGATIONS

The Houston Natural Gas Corporation Political Action Committee and Deborah S. McCaleb, as treasurer, failed to timely file the 12 Day Pre-General Election Report of receipts and disbursements.

FACTUAL AND LEGAL ANALYSIS

Section 434(a)(4)(A)(ii) of Title 2, United States Code, requires, in a calendar year in which a regularly scheduled general election is held, that a pre-general election report be filed no later than the 12th day before any election in which the

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committee makes a contribution to or an expenditure on behalf of a candidate. A regularly scheduled general election was held in 1984 on November 6. The Houston Natural Gas Corporation Political Action Committee was notified on October 1, 1984, that its pre-general election report was due on October 25, 1984. The Houston Natural Gas Corporation Political Action Committee was mailed a non-filer notice on November 16, 1984.

On November 23, 1984, the 12 Day Pre-General Election Report was delivered to the Federal Election Commission ("Commission"). Thus Houston Natural Gas Corporation Political Action Committee filed its 1984 12 Day Pre-General Election Report twenty-nine (29) days late. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that the Houston Natural Gas Corporation Political Action Committee and Deborah S. McCaleb, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Houston Natural Gas Corporation Political Action Committee and Deborah S. McCaleb, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).
3. Approve and send the attached letter and factual and legal analysis.

Charles N. Steele  
General Counsel

March 1, 1985  
Date

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

Attachments

- Proposed letter(1)
- General Counsel's Factual and Legal Analysis
- Referral Materials

85040550353



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Deborah S. McCaleb, Treasurer  
Houston Natural Gas Corporation  
Political Action Committee  
P.O. Box 1188  
Houston, Texas 77001

RE: MUR  
Houston Natural Gas  
Corporation Political  
Action Committee  
Deborah S. McCaleb, Treasurer

Dear Ms. McCaleb:

On \_\_\_\_\_, 1985, the Federal Election Commission determined that there is reason to believe that the Houston Natural Gas Corporation Political Action Committee, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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

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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.

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 Eric Kleinfeld, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

John Warren McGarry  
Chairman

Enclosures

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

85040550355

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Houston Natural Gas Corporation MUR NO. \_\_\_\_\_  
Political Action Committee  
Deborah S. McCaleb, Treasurer

SUMMARY OF ALLEGATIONS

The Houston Natural Gas Corporation Political Action Committee and Deborah S. McCaleb, as treasurer, failed to timely file the 1984 12 Day Pre-General Election Report of receipts and disbursements.

FACTUAL AND LEGAL ANALYSIS

Based on information obtained in the normal course of its supervisory duties under the Federal Election Campaign Act of 1971, as amended, (the "Act"), the Reports Analysis Division ("RAD") referred this matter to the Office of General Counsel on January 16, 1985.

Section 434(a)(4)(A)(ii) of Title 2, United States Code, requires, in a calendar year in which a regularly scheduled general election is held, that a pre-general election report be filed no later than the 12th day before any election in which the committee makes a contribution to or an expenditure on behalf of a candidate. A regularly scheduled general election was held in 1984 on November 6. The Houston Natural Gas Corporation Political Action Committee was notified on October 1, 1984, that the report was due on October 25, 1984. The Houston Natural Gas Corporation Political Action Committee was mailed a non-filer notice on November 16, 1984.

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On November 23, 1984, the 12 Day Pre-General Election Report was delivered to the Commission. Thus, the Houston Natural Gas Corporation Political Action Committee filed its 1984 12 Day Pre-General Election Report twenty-nine (29) days late.

Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that the Houston Natural Gas Corporation Political Action Committee and Deborah S. McCaleb, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).

85040550357



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 15, 1985

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH: JOHN C. SURINA  
STAFF DIRECTOR

FROM: JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

SUBJECT: NON-FILER REFERRALS OF MONTHLY UNAUTHORIZED COMMITTEES

In accordance with Standard 3 of the RAD Review and Referral Procedures for Unauthorized Committees, the attached list of monthly filers is being forwarded to your offices, for failing to file a report covering the pre-election period by election day.

Since the number of committees being referred is relatively large, we felt it best to arrange the information in chart format. You will note that the attached printouts list the names, addresses, and treasurers for thirty-five (35) committees with "C" indices provided for each. <sup>1/</sup> Any telephonic communications have been referenced under Contacts with Filers. The Summary Pages of the late filed reports and/or explanatory letters have been referenced under Response(s).

Two committees have been deleted from the list, because they meet the expedited audit referral threshold. Should the Commission not approve to audit these committees, they will be referred to your office at a later date. The attachments for these committees have also been deleted causing two gaps in the sequence.

All unauthorized committees were sent prior notification on October 1, 1984, which specifically informed monthly filers of the requirement to file a 12 Day Pre-General Election Report by October 25, 1984 (Attachment 38). The committees, which failed to submit either a 12 Day Pre-General Report or a November Monthly Report, were sent Non-Filer Notices on November 16, 1984

---

<sup>1/</sup> In some cases, the aggregate receipt and disbursement figures may be inflated because committees submitted reports covering portions of the same periods (e.g., a November Monthly covering October 1, 1984 through October 31, 1984 and a Pre-General Report covering October 1, 1984 through October 17, 1984.)

85040550358

(see copy of notice - Attachment 39). Certain committees (i.e., those noted with an asterisk on the attached computer printouts) were not sent Non-Filer Notices because a) a report covering the pre-election period was indexed by November 15, 1984, or b) the committee had not been assigned at the time the non-filer printout was generated.

If you have any questions, please contact Michael Filler at 523-4048.

Attachments

85040550359



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

October 1, 1984

GENERAL ELECTION FILING NOTICE  
FOR UNAUTHORIZED COMMITTEES

WHO MUST FILE THE PRE-GENERAL ELECTION REPORT

All committees that file monthly reports must file the pre-general election report due October 25, 1984.

In addition all quarterly filing committees that have made contributions or expenditures (including independent expenditures) in connection with the general election must file a pre-election report, if such activity has not previously been reported. See below for post-general filing information.

WHAT MUST BE REPORTED

The report must disclose all financial activity of the committee from the later of, the last report filed or the date of registration\* through October 17, 1984. (Monthly filers must disclose all financial activity from the later of October 1 or the date of registration\* through October 17, 1984.)

WHEN TO FILE

Pre-general election reports sent registered or certified mail must be postmarked no later than October 22, 1984. Reports hand delivered or mailed first class must be received no later than close of business October 25, 1984.

\* \* \* \* \*

WHO MUST FILE THE POST-GENERAL ELECTION REPORT

All committees must file the post-general election report due December 6, 1984, regardless of election activity.

WHAT MUST BE REPORTED

The post-general election report must cover all financial activity of the committee from either the date of the last report filed or the date of registration, whichever is later\* through November 26, 1984.

WHEN TO FILE

Post-general election reports sent by registered or certified mail must be postmarked no later than December 6, 1984. Reports hand delivered or mailed first class must be received no later than close of business December 6, 1984.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

**WHERE AND HOW TO FILE**

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

**QUARTERLY FILERS**

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
3rd Q-Report	07/01* - 09/30	10/15/84	10/15/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General**	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

\*Or from date of registration, or the close of books of the last report filed, whichever is later.

\*\*Reports filed by committees that did not file the pre-General report should cover all financial activity from the last report filed through November 26, 1984.

\* \* \*

**MONTHLY FILERS**

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
Oct. Monthly	09/01 - 09/30	10/20/84	10/20/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

**COMPLIANCE**

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

FOR INFORMATION CALL: Office Of Public Communications  
800/424-9530 or 202/523-4068

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FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

RQ-7

November 16, 1984

Identification Number:

Reference: 12 Day Pre-General Report (10/1/84-10/17/84)

Dear

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It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

If the report in question was filed, please submit documentation for the public record. Although the Commission may take further legal steps concerning this matter, your prompt response will be taken into consideration.

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

Sincerely,

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

85040550363

**HOUSTON NATURAL GAS CORPORATION POLITICAL  
ACTION COMMITTEE**

**(Attachments 18a - c)**

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FEDERAL ELECTION COMMISSION  
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (03-04)

DATE 11JAN85  
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
HOUSTON NATURAL GAS CORPORATION POLITICAL ACTION COMMITTEE/HMO POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: HOUSTON NATURAL GAS CORPORATION				NON-PARTY QUALIFIED		10 (C000120)
1983	MISCELLANEOUS REPORT			12DEC83 TO FEC	13	03FEC/209/07
	FEBRUARY MONTHLY	2,620	100	1JAN83 -31JAN83	16	03FEC/266/24
	FEBRUARY MONTHLY - AMENDMENT	2,870	100	1JAN83 -31JAN83	17	03FEC/260/00
	FEBRUARY MONTHLY - AMENDMENT	2,870	100	1JAN83 -31JAN83	4	04FEC/349/02
	REQUEST FOR ADDITIONAL INFORMATION			1JAN83 -31JAN83	1	04FEC/349/34
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN83 -31JAN83	2	04FEC/349/33
	MARCH MONTHLY	2,270	2,000	1FEB83 -28FEB83	17	03FEC/260/00
	MARCH MONTHLY - AMENDMENT	2,270	2,000	1FEB83 -28FEB83	5	04FEC/349/02
	MARCH MONTHLY - AMENDMENT	2,270	2,000	1FEB83 -28FEB83	24	04FEC/356/14
	REQUEST FOR ADDITIONAL INFORMATION			1FEB83 -28FEB83	1	04FEC/340/24
	APRIL MONTHLY	4,140	500	1MAR83 -31MAR83	10	03FEC/269/10
	APRIL MONTHLY - AMENDMENT	4,140	500	1MAR83 -31MAR83	3	04FEC/349/02
	MAY MONTHLY	3,070	1,000	1APR83 -30APR83	10	03FEC/272/04
	MAY MONTHLY - AMENDMENT	3,070	1,000	1APR83 -30APR83	3	04FEC/349/02
	JUNE MONTHLY	2,645	1,123	1MAY83 -31MAY83	17	03FEC/273/27
	JUNE MONTHLY - AMENDMENT	2,645	1,375	1MAY83 -31MAY83	6	04FEC/349/02
	1'ST LETTER INFORMATIONAL NOTICE			1MAY83 -31MAY83	1	04FEC/340/24
	JULY MONTHLY	2,845	2,350	1JUN83 -30JUN83	10	03FEC/275/27
	JULY MONTHLY - AMENDMENT	3,095	2,350	1JUN83 -30JUN83	20	03FEC/275/33
	JULY MONTHLY - AMENDMENT	2,845	2,100	1JUN83 -30JUN83	6	04FEC/349/02
	REQUEST FOR ADDITIONAL INFORMATION			1JUN83 -30JUN83	1	04FEC/340/24
	AUGUST MONTHLY	3,295	500	1JUL83 -31JUL83	19	03FEC/281
	AUGUST MONTHLY - AMENDMENT	3,295	500	1JUL83 -31JUL83	4	04FEC/341
	SEPTEMBER MONTHLY	1,170	1,450	1AUG83 -31AUG83	10	03FEC/281
	SEPTEMBER MONTHLY - AMENDMENT	2,470	1,450	1AUG83 -31AUG83	4	04FEC/341
	OCTOBER MONTHLY	2,445	2,750	1SEP83 -30SEP83	20	03FEC/281
	OCTOBER MONTHLY - AMENDMENT	2,845	2,750	1SEP83 -30SEP83	4	04FEC/341
	NOVEMBER MONTHLY	2,625	3,350	1OCT83 -31OCT83	17	03FEC/281
	NOVEMBER MONTHLY - AMENDMENT	2,575	2,350	1OCT83 -31OCT83	3	03FEC/281
	NOVEMBER MONTHLY - AMENDMENT	2,575	2,350	1OCT83 -31OCT83	4	04FEC/341
	DECEMBER MONTHLY	3,870	3,750	1NOV83 -30NOV83	10	03FEC/289
	DECEMBER MONTHLY - AMENDMENT	3,870	3,750	1NOV83 -30NOV83	6	04FEC/341
	REQUEST FOR ADDITIONAL INFORMATION			1NOV83 -30NOV83	1	04FEC/340
	YEAR-END	2,540	1,000	1DEC83 -31DEC83	17	04FEC/290
	YEAR-END - AMENDMENT	2,540	1,000	1DEC83 -31DEC83	4	04FEC/341
1984	FEBRUARY MONTHLY	5,800	2,373	1JAN84 -31JAN84	19	04FEC/341
	FEBRUARY MONTHLY - AMENDMENT	2,530	476	1JAN84 -31JAN84	22	04FEC/341
	FEBRUARY MONTHLY - AMENDMENT			1JAN84 -31JAN84	1	04FEC/341
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31JAN84	1	04FEC/340
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN84 -31JAN84	2	04FEC/341
	MARCH MONTHLY	2,770	500	1FEB84 -29FEB84	15	04FEC/341
	MARCH MONTHLY - AMENDMENT	2,770	500	1FEB84 -29FEB84	4	04FEC/341
	APRIL MONTHLY	2,045	1,650	1MAR84 -31MAR84	16	04FEC/300
	APRIL MONTHLY - AMENDMENT	2,045	1,650	1MAR84 -31MAR84	4	04FEC/341

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COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (03-04)

DATE 11/26/05  
PAGE 2

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIVED	NO. OF DOCUMENTS	TYPE OF FOLIO COVERAGE DATES	NO. OF PAGES	LOCATION
	MAY MONTHLY	2,220	2,950	1APR04 -30APR04	19	04FEC/314/13
	MAY MONTHLY - AMENDMENT	2,220	2,900	1APR04 -30APR04	21	04FEC/319/03
	JUNE MONTHLY	2,215	3,267	1MAY04 -31MAY04	18	04FEC/316/40
	JUNE MONTHLY - AMENDMENT	2,215	3,267	1MAY04 -31MAY04	6	04FEC/319/03
	1'ST LETTER INFORMATIONAL NOTICE			1MAY04 -31MAY04	1	04FEC/348/01
	JULY MONTHLY	2,140	2,046	1JUN04 -30JUN04	17	04FEC/319/47
	JULY MONTHLY - AMENDMENT	2,140	2,046	1JUN04 -30JUN04	20	04FEC/319/03
	REQUEST FOR ADDITIONAL INFORMATION			1JUN04 -30JUN04	1	04FEC/348/24
	AUGUST MONTHLY	1,165	1,000	1JUL04 -31JUL04	10	04FEC/348/23
	AUGUST MONTHLY - AMENDMENT	1,165	1,000	1JUL04 -31JUL04	12	04FEC/349/03
	SEPTEMBER MONTHLY	1,315	9,450	1AUG04 -31AUG04	10	04FEC/349/03
	SEPTEMBER MONTHLY - AMENDMENT	1,315	9,450	1AUG04 -31AUG04	6	04FEC/349/03
	REQUEST FOR ADDITIONAL INFORMATION			1AUG04 -31AUG04	1	04FEC/348/24
	OCTOBER MONTHLY	1,765	1,300	1SEP04 -30SEP04	11	04FEC/349/03
	OCTOBER MONTHLY - AMENDMENT	1,765	1,300	1SEP04 -30SEP04	4	04FEC/349/03
	PRE-GENERAL	350	6,850	1OCT04 -17OCT04	11	04FEC/349/03
	NOTICE OF FAILURE TO FILE			1OCT04 -17OCT04	1	04FEC/349/06
	POST-GENERAL	4,475	4,800	1OCT04 -26NOV04	18	04FEC/349/03
	<b>TOTAL</b>	<b>62,900</b>	<b>61,062</b>		<b>641</b>	<b>TOTAL PAGES</b>

ENDING CASH (11/26/04): \$9,367

DEBTS: \$ 0

04 NOV 1984 ALLEGARIA

ALLEGARIA

1 Name of Committee (in Full)  
 HOUSTON Natural Gas Corporation  
 Political Action Committee  
 H&C Political Action Committee

Address (Number and Street)  
 1200 Travis U Polk  
 P.O. Box 1188

City, State and ZIP Code  
 Houston, Texas 77001

Check here if address is different than previously reported

2 FEC Identification Number  
 00000000

3  This committee qualified as a multicandidate committee during this reporting period on \_\_\_\_\_

4. TYPE OF REPORT (Check appropriate boxes)

(a)  April 15 Quarterly Report  October 15 Quarterly Report  
 July 15 Quarterly Report  January 31 Year End Report  
 July 31 Mid Year Report (Non Election Year Only)  
 Monthly Report for OCTOBER  
 Tenth day report preceding \_\_\_\_\_  
 election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Thirtieth day report following the General Election  
 on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Termination Report

(b) Is this Report an Amendment?  
 YES  NO

85049593615

SUMMARY

5 Reporting Period 10/1/84 through 10/31/84

6 a. Cash on hand January 1, 1984

b. Cash on hand at beginning of Reporting Period

c. Total Receipts from Line 18

d. Disbursements from Line 28

e. Cash on hand at close of Reporting Period (Total of Line 7 from Line 6)

COLUMN A This Period	COLUMN B Calendar Year to Date
\$ 16,192.56	\$ 19,665.81
\$ 4,475.00	\$ 22,640.00
\$ 20,667.56	\$ 42,305.81
\$ 8,911.00	\$ 30,538.25
\$ 11,767.56	\$ 11,767.56

7 a. Total of Column A of Reporting Period (Total of Line 7 from Line 6)

7 b. Total of Column B of Reporting Period (Total of Line 7 from Line 6)

For further information contact  
 Federal Election Commission  
 P.O. Box 800 470 9530  
 Washington, D.C. 20543

SIGNATURE OF TREASURER [Signature] Date 11/12/84

An previous versions of FEC FORM 3 and FEC FORM 3e are obsolete and should no longer be used

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001

3 0 1 3 0 1 5 0 3 6 7



**First Class Mail**

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20543

**CERTIFIED**  
P 398 687 945  
**MAIL**

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

Summary Page

84 NOV 23 11:35

ALBION AREA

ALBION AREA

1. Name of Committee (In Full)  
Houston Natural Gas Corporation  
Political Action Committee  
HNG Political Action Committee

Address (Number and Street)  
1200 Travis @ Polk  
P.O. Box 1188

City, State and ZIP Code  
Houston, Texas 77001

Check here if address is different than previously reported.

2. FEC Identification Number  
000012815

3.  The committee qualified as a multicandidate committee during the Reporting Period on \_\_\_\_\_

4. TYPE OF REPORT (Check appropriate boxes)

(a)  April 15 Quarterly Report     October 15 Quarterly Report  
 July 15 Quarterly Report     January 31 Year End Report  
 July 31 Mid Year Report (Non-Election Year Only)  
 Monthly Report for \_\_\_\_\_  
 Tenth day report preceding \_\_\_\_\_  
election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Tenth day report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_

Termination Report

(b) Is this Report an Amendment?  
 YES     NO

**SUMMARY**

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5 Covering Period <u>10/1/84</u> through <u>10/17/84</u>		
6 (a) Cash on hand January 1, 19 <u>84</u>		\$ 19,655.81
(b) Cash on Hand at Beginning of Reporting Period	\$ 16,192.56	
(c) Total Receipts (from Line 8B)	\$ 350.00	\$ 18,515.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 16,542.56	\$ 38,180.81
7 Total Disbursements (from Line 7B)	\$ 6,850.00	\$ 28,488.75
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 9,692.56	\$ 9,692.56
9 Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	\$ NONE	
10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ 500.00	

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

Deborah S. McCaleb  
 Title or Print Name of Treasurer  
 \_\_\_\_\_  
 Signature of Treasurer

For further information contact:  
 Federal Election Commission  
 Toll Free 800-426-6920  
 Local 707-577-4000

Amended as of 11/11/84

\* If a correction of facts or omission of information may result, the person signing this report to the committee of 2 USC 5423a

All previous versions of FEC FORM 2 and FEC FORM 2a are obsolete and should no longer be used

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FEC FORM 2X (3/80)

85040550368



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FUND TO KEEP AMERICA II 1/ TREASURER'S NAME: TIMOTHY S CARRY 214 MASSACHUSETTS AVENUE, NE SUITE 205 WASHINGTON DC 20002	85 NF-16	None	November Monthly Report received 11/20/84
GTE CORPORATION GOOD GOVERNMENT CLUB TREASURER'S NAME: MARILYN PEARSON ONE STAMFORD FORUM STAMFORD CT 06904	85NF-17	11/19/84 17b	November Monthly Report received 11/12/84 Letter received 11/21/84
HOUSTON NATURAL GAS CORPORATION POLITICAL ACTION COMMITTEE TREASURER'S NAME: DEBORAH S MCCALED P.O. BOX 1108 HOUSTON TX 77001	85NF-18	None	November Monthly Report received 11/13/84 Pre-General Report received 11/19/84
ICR (ILLINOIS CENTRAL GULE RAILROAD CO) GOOD GOVERNMENT FUND TREASURER'S NAME: SANDOR A LOEVI 333 NORTH MICHIGAN AVENUE CHICAGO IL 60601	85NF-19	None	November Monthly Report received 11/8/84
INTERNATIONAL CHIROPRACTORS POLITICAL ACTION COMMITTEE 2/ TREASURER'S NAME: BRUCE E. MURDBTROM 1901 L STREET, N.W. SUITE 800 WASHINGTON DC 20036	85 NF-20	12/19/84 20b&20c	Pre-General Report received 12/21/84 Amended Pre-General Report received 12/19/84
THE COMMITTEE ON POLITICAL EDUCATION TREASURER'S NAME: EDWARD FIRE 1126 16TH STREET NW WASHINGTON DC 20036	85 NF-21	11/20/84 21b	November Monthly Report received 11/20/84 Letter and Pre-General Report received 11/20/84
MALONE & HYDE COMMITTEE FOR RESPONSIBLE GOVERNMENT TREASURER'S NAME: ANDREW CLARKSON 1991 CORPORATE AVE MEMPHIS TN 38132	85NF-22	None	Letter and Pre-General Report received 11/21/84

1/Please note that the Non-Filer Notice was returned, because the Fund moved from New York to Washington. Furthermore, the Fund is currently involved in MUR 1872, which was generated from RAD referral 84L-26.

2/Please note that the Commission approved an audit of this committee on July 10, 1984, based upon RAD referral A84-1. The final audit report was released on October 11, 1984. Subsequent to release of the audit report, the committee was assessed two points for late filing.



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1918

Date Filmed 9/11/85 Camera No. --- 2

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