



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1972

Date Filmed 8/14/85 Camera No. --- 2

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85040943072

FEDERAL ELECTION COMMISSION

² ~~2~~ References to RAD Review + Committee to be audited with Commission voting (2);
RAD telecons (2).

5 P. Day Report + (5); ⁸ Routing slips (5); ~~Memorandum~~ 2 staff memos (check) (5);

1 p1 (partial) + 2 (entire) of General Counsel's Report (conciliation) ..
1 copy of proposed conciliation agreement (5); 1 Correspondence slip
2 staff withdrawal letters (5); 3 unsigned conciliation agreements (5)

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):

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

Signed Patty Purley
date 7/31/85
[Signature]

FEC 9-21-77

85040543073



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 18, 1985

Jules C. Pollard, treasurer
Allied Bancshares Leadership
Funds-Federal
P.O. Box 3326
Houston, TX 77253

RE: MUR 1972
Allied Bancshares Leadership
Funds-Federal
and Jules C. Pollard,
as treasurer

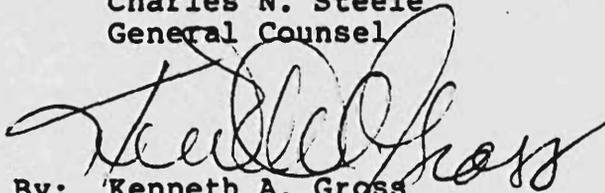
Dear Mr. Pollard:

On June 14, 1985, the Commission accepted the conciliation agreement signed by you, and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(B) and C.F.R. §§ 104.5(C)(3)(i) and 104.5(c)(3)(ii), a provision of the Federal Election Campaign Act of 1971, as amended and its Regulations. 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

85040543074

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Allied Bancshares Funds-Federal
and Jules C. Pollard, as
treasurer

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)

MUR 1972

MAY 29 AIO: S

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

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 Allied Bancshares Leadership Funds-Federal and Jules C. Pollard, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. §§ 104.5(c)(3)(i) and 104.5(c)(3)(ii) by failing to file the required reports 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 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, Allied Bancshares Leadership Funds-Federal, is an unauthorized political committee.

2. Respondent, Jules C. Pollard, is the treasurer of the Allied Bancshares Leadership Funds-Federal.

3. Respondents were required to file the 1983 August Monthly Report on August 20, 1983. This report was not received by the Commission until September 1, 1983.

4. Respondents were required to file the 1983 September Monthly Report on September 20, 1983. This report was not received by the Commission until October 3, 1983.

5. Respondents were required to file the 1983 October Monthly Report on October 20, 1983. This report was not received by the Commission until November 3, 1983.

6. Respondents were required to file the 1983 November Monthly Report on November 20, 1983. This report was not received by the Commission until December 7, 1983.

7. Respondents were required to file the 1983 December Monthly Report on December 20, 1983. This report was not received by the Commission until January 9, 1984.

8. Respondents were required to file the 1984 February Monthly Report on February 20, 1984. This report was not received by the Commission until March 1, 1984.

9. Respondents were required to file the 1984 12 Day Pre-General Report on October 25, 1984. The Commission received the information required in this report on November 26, 1984.

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10. Respondents were required to file the 1984 30 Day Post-General Report on December 6, 1984. The Commission received the information required in this report on December 27, 1984.

V. Respondents' failure to timely file the above-noted reports is a violation of 2 U.S.C. § 434(a)(4)(B).

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Four Hundred Twenty-Five Dollars (\$425), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree that they shall not 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 all parties hereto have executed the same and the Commission has approved the entire agreement.

X. Respondents shall have no 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.

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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 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

June 19, 1985
Date

FOR THE RESPONDENTS:

Jules C. Pollard
Jules C. Pollard
Treasurer

5/22/85
Date

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1972
Allied Bancshares Leadership)
Funds-Federal)
Jules C. Pollard, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 14, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 1972:

1. Accept the conciliation agreement attached to the General Counsel's Report signed June 10, 1985.
2. Close the file in this matter.

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

Attest:

6-14-85
Date

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

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

6-11-85, 2:45
6-12-85, 11:00

85040543079

In the Matter of)
Allied Bancshares Leadership)
Funds-Federal and)
Jules C. Pollard, as treasurer)

25 JUN 71 P 2:45
MOR 1971

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

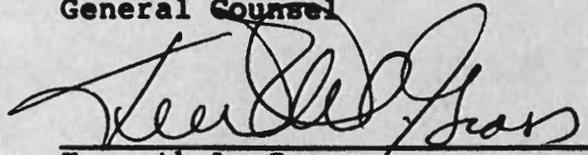
Attached is a conciliation agreement signed by Jules C. Pollard, treasurer of the Allied Bancshares Leadership Funds-Federal.

This agreement contains no changes from the agreement approved by the Commission. The Committee also submitted a check for \$425 in payment of the civil penalty.

II. RECOMMENDATION

The Office of the General Counsel recommends that the Commission accept the agreement and close the file in this matter.

Charles N. Steele
General Counsel


Kenneth A. Gross
Associate General Counsel

June 10, 1971
Date

Attachments

- Conciliation Agreement
- Copy of Civil Penalty Check
- Letter to Respondent

85040543080

Allied Bank of Texas

P O BOX 3326. HOUSTON. TEXAS 77253. 713/224-6611

REC'D
G.C. # 7610
85 MAY 28 P12: 48

May 23, 1985

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

MAY 28
AID: 51
GENERAL COUNSEL

Dear Mr. Steele:

This letter is written in response to your letter dated May 15, 1985 received by us on May 21, 1985 (copy enclosed). Enclosed is the executed conciliation agreement along with a check in the amount of \$425.00 in payment of the civil penalty. If you have any questions please call me at (713) 226-1531.

Sincerely,



Steve Felten
Vice President
Controller/Cashier

Enclosures (2)

cc: Buddy Pollard
Mike Watson

850440543081

ATTACHMENT #1

85040543082

Allied Bank of Texas

P. O. BOX 3326, HOUSTON, TEXAS 77001 (713) 224-6611

No. 55266

EXPENSE CHECK

DATE May 23, 1985

ALLIED BANK **425000**

\$**425.00**

PAY TO THE ORDER OF

Treasurer of the United States

RL
[Signature Box]
AUTHORIZED SIGNATURE

⑆055266⑆ ⑆113001064⑆ 997 002 1⑆



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Jules C. Pollard, treasurer
Allied Bancshares Leadership
Funds-Federal
P.O. Box 3326
Houston, TX 77253

RE: MUR 1972
Allied Bancshares Leadership
Funds-Federal
and Jules C. Pollard,
as treasurer

Dear Mr. Pollard:

On , 1985, the Commission accepted the conciliation agreement signed by you, and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(B) and C.F.R. §§ 104.5(C)(3)(i) and 104.5(c)(3)(ii), a provision of the Federal Election Campaign Act of 1971, as amended and its Regulations. 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

ATTACHMENT #3

85040543085

Allied Bank of Texas

P. O. BOX 3326, HOUSTON, TEXAS 77263, 713/224-6611

RECEIVED BY THE FEC
GCC# 7610
85 MAY 28 12: 00

May 23, 1985

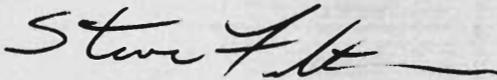
RECEIVED
OFFICE OF THE
GENERAL COUNSEL
MAY 29 AIO: 51

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

Dear Mr. Steele:

This letter is written in response to your letter dated May 15, 1985 received by us on May 21, 1985 (copy enclosed). Enclosed is the executed conciliation agreement along with a check in the amount of \$425.00 in payment of the civil penalty. If you have any questions please call me at (713) 226-1531.

Sincerely,



Steve Felten
Vice President
Controller/Cashier

Enclosures (2)

cc: Buddy Pollard
Mike Watson

850440543084



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 1985

Jules C. Pollard, treasurer
Allied Bancshares Leadership
Funds-Federal
808 Travis Street
P.O. Box 1515
Houston, TX 77002

RE: MUR 1972

Dear Mr. Pollard:

On April 5, 1985, the Commission found reason to believe that the Allied Bancshares Leadership Funds-Federal, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. §§ 104.5(c)(3)(i) 104.5(c)(3)(ii). At your request, the Commission determined on May 10, 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Patty Reilly, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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Allied Bank of Texas

P. O. BOX 3326, HOUSTON, TEXAS 77001 (713) 224-6611

No. 55266

DATE May 23, 1985

EXPENSE CHECK

ALLIED BANK 425 000 00

\$**425.00**

PAY TO THE ORDER OF

Treasurer of the United States

jl
AUTHORIZED SIGNATURE
Arta R. Lewis
AUTHORIZED SIGNATURE

⑆055266⑆ ⑆113001064⑆ 997 002 1⑆



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 1985

Jules C. Pollard, treasurer
Allied Bancshares Leadership
Funds-Federal
808 Travis Street
P.O. Box 1515
Houston, TX 77002

RE: MUR 1972

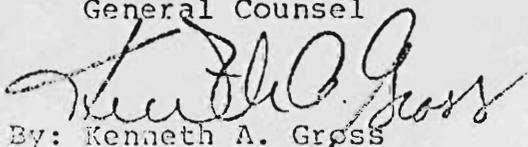
Dear Mr. Pollard:

On April 5, 1985, the Commission found reason to believe that the Allied Bancshares Leadership Funds-Federal, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. §§ 104.5(c)(3)(i) 104.5(c)(3)(ii). At your request, the Commission determined on May 10, 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Patty Reilly, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

85040543087

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Allied Bancshares Funds-Federal) MUR 1972
Jules C. Pollard, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 10, 1985, the Commission decided by a vote of 4-0 to take the following actions in MUR 1972:

1. Enter into conciliation with Allied Bancshares Leadership Fund-Federal and Jules C. Pollard, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter attached to the General Counsel's Report signed May 7, 1985.

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

Attest:

5-13-85

Date

Marjorie W Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 5-7-85, 4:13
Circulated on 48 hour tally basis: 5-8-85, 11:00

85040543088

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
Allied Bancshares Funds-Federal)
and Jules C. Pollard, as)
treasurer)

MUR 1972 7 14:13

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On April 5, 1985, the Commission found reason to believe the Allied Bancshares Leadership Fund-Federal ("the Committee") and Jules C. Pollard, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. §§ 104.5(c)(3)(i) and § 104.5(c)(3)(ii) by failing to file eight required reports in a timely manner. These reports are: the 1983 August, September, October, November, and December Monthly Reports, the 1984 February Monthly Report and the 1984 Pre-General and Post-General Reports. The tardiness of these reports ranged from 10 to 27 days.

Responding to notification of this finding, the respondents assert some of these reports were filed in a timely manner.^{1/} Nevertheless, the Committee requests probable cause conciliation. The Office of the General Counsel recommends the Commission accept Respondents' request.

II. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

^{1/} This Office has verified the Commission's late receipt of all reports in question.

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85040543090

RECOMMENDATIONS

1. Enter into conciliation with Allied Bancshares Leadership Fund-Federal and Jules C. Pollard, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Charles N. Steele
General Counsel

May 7, 1985
Date


Kenneth A. Gross
Associate General Counsel

Attachments

1. Respondents Request for Conciliation
2. Proposed letter
3. Proposed Conciliation Agreement

85040543091

Allied Bank of Texas

P O BOX 3326 HOUSTON, TEXAS 77253 APR 24 11 12:32

HAND DELIVERED
85 APR 24 9:33

Federal Express No. 707789924

April 19, 1985

Ms. Patty Reilly
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1972
Allied Bancshares Leadership Funds - Federal and Jules L. Pollard,
as Treasurer

Dear Ms. Reilly:

Thank you for taking the time to answer my questions on April 19, 1985. Enclosed are copies of all the correspondence between the Allied Bancshares Leadership Funds - Federal ("Allied") and the Federal Election Commission ("Commission"). These copies are provided in hopes of assisting the Commission's investigation of Allied's and Mr. Pollard's alleged violations of the Federal Election Campaign Act of 1971, as amended (the "Act") and the Act's regulations more fully described in McGarry's letter dated April 12, 1985 and received on April 17, 1985.

Allied and Jules Pollard, as treasurer, are alleged to have been late in their filing of monthly, pre-general, and post-general reports.

The General Counsel's Factual and Legal Analysis states that six monthly reports were filed late. Allied's records indicate that some if not all of these records were filed in a timely manner. When Allied realized the discrepancy between the Commission's records of when the reports were filed and Allied's records, Allied instituted a policy of sending all reports to the Commission by certified mail. This policy began in June of 1984. The alleged violations of failing to file the 1984 Pre-General and Post-General Reports in a timely manner can be attributed to a miscommunication between employees of the Commission and employees of Allied Bank of Texas as evidenced by letters dated November 20, 1984, and December 26, 1984. If any alleged violations did occur, they can be attributed to a change in the department and the personnel responsible for filing the reports and to the aforementioned miscommunications. Allied's monthly reports have been current since the alleged violations.

ATTACHMENT #1

85040543092

Ms. Patty Reilly
April 19, 1985
Page 2

Allied requests the Commission to institute pre-probable cause conciliation proceedings as set forth in 2 U.S.C. §437g(4)(A)(i). This letter and the enclosed documents are intended as a brief outline of Allied's response to Mr. McGarry's letter. Allied will readily describe the foregoing in greater detail once the conciliation process has begun.

Sincerely,

J. Michael Watson
J. Michael Watson
Counsel

JMW:cac

Enclosures

85040543093

Allied Bancshares, Inc.

P. O. BOX 1515, 808 TRAVIS
HOUSTON, TEXAS 77001 (713) 224-6611

November 20, 1984

Ms. Lisa Stolaruk
Federal Election Commission
Washington, D.C. 20463

Identification No: C00118984

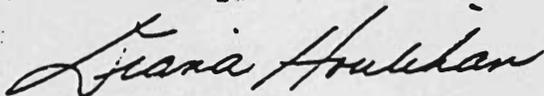
Reference: 12 Day Pre-General Report
(10-1-84 to 10-17-84)

Dear Ms. Stolaruk:

Enclosed is our Report of Receipts and Disbursements for the total month of October. As per our phone conversation today, this report is being sent in lieu of the 12 Day Pre-General Report referenced above. This is due to the fact that I was not in receipt of your previous request for the 12 Day Pre-General.

Please call if you require any additional information or if you have any questions.

Sincerely,



Diana Houlihan
Secretary to
Anita Lewis/Allied Bank of Texas

Phone: (713) 226-1858

85040543094

Allied Bank of Texas

P O BOX 3326. HOUSTON, TEXAS 77253. 713/224-6611

December 26, 1984

Mr. Mike Filler
Federal Election Commission
Washington, D.C. 20463

Identification No.: C00118984

Reference: 30 Day After Election Report

Dear Mr. Filler:

Enclosed is our Report of Receipts and Disbursements for the month of November. As per our phone conversation today, this report is being sent in lieu of the 30 Day After Election Report. This is due to confusion on my part as to the required reporting date. The review raised

Lisa Stolaruk has been a great source of help to me on these reports and when I spoke to her last concerning this year's filings, she mentioned that the 30 Day report was due by the 6th. Unfortunately I took this information to mean the 6th of January when she was actually speaking about the 6th of December, therefore we are now sending this report.

Thank you for all of your assistance. Hopefully we will now keep on a good schedule for your requirements.

Sincerely,

Diana Houlihan
Secretary to
Anita Lewis/Allied Bank of Texas

Phone: (713) 226-1858

85040543095



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

4 April 1984

RQ-2

Jules Pollard, Treasurer
Allied Bancshares Leadership
Fund-Federal
808 Travis Street
P.O. Box 1515
Houston, TX 77002

Identification Number: C00118984

Reference: June Monthly (5/1/83-5/31/83), July Monthly (6/1/83-6/30/83), August Monthly (7/1/83-7/31/83), September Monthly (8/1/83-8/31/83), November Monthly (10/1/83-10/31/83), December Monthly (11/1/83-11/30/83) and Year End (12/1/83-12/31/83) Reports

Dear Mr. Pollard:

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:

-The total amount of contributions itemized on Schedule A plus the total amount of unitemized contributions reported on the Detailed Summary Page should equal the total reported on Line 11(a) of the Detailed Summary Page. Please amend either Schedule A or the Detailed Summary figures to correct this discrepancy. (11 CFR 104.3(a))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Lisa Stolaruk
Senior Reports Analyst
Reports Analysis Division

85040543096



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

4 April 1984 RQ-2

Jules Pollard, Treasurer
Allied Bancshares Leadership
Fund-Federal
808 Travis Street
P.O. Box 1515
Houston, TX 77002

Identification Number: C00118984

Reference: March Monthly Report (2/1/83-2/28/83)

Dear Mr. Pollard:

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:

-The total amount of contributions itemized on Schedule A plus the total amount of unitemized contributions reported on the Detailed Summary Page should equal the total reported on Line 11(a) of the Detailed Summary Page. Please amend either Schedule A or the Detailed Summary figures to correct this discrepancy. (11 CFR 104.3(a))

-The total listed on Line 11d of Column A is incorrect. Please provide the correct total.

-Please provide the totals for Lines 18 and 28 of Column A and Lines 18, 21 and 28 of Column B on the Detailed Summary Page.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Lisa Stolaruk
Senior Reports Analyst
Reports Analysis Division

85040543097



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

4 April 1984

RQ-2

Jules Pollard, Treasurer
Allied Bancshares Leadership
Fund-Federal
808 Travis Street
P.O. Box 1515
Houston, TX 77002

Identification Number: C00118984

Reference: April Monthly (3/1/83-3/31/83) and May Monthly
(4/1/83-4/30/83) Reports

Dear Mr. Pollard:

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:

-The total amount of contributions itemized on Schedule A plus the total amount of unitemized contributions reported on the Detailed Summary Page should equal the total reported on Line 11(a) of the Detailed Summary Page. Please amend either Schedule A or the Detailed Summary figures to correct this discrepancy. (11 CFR 104.3(a))

-Please provide the totals for Line 18 of Column A and Lines 18, 21 and 28 of Column B on the Detailed Summary Pages of your reports.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Lisa Stolaruk
Senior Reports Analyst
Reports Analysis Division

85040543098



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Oct - Sept - fill out
2nd page

4 April 1984 RQ-2

Jules Pollard, Treasurer
Allied Bancshares Leadership
Fund-Federal
808 Travis Street
P.O. Box 1515
Houston, TX 77002

Identification Number: C00118984

Reference: February Monthly Report (1/1/83-1/31/83)

Dear Mr. Pollard:

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:

-The total amount of contributions itemized on Schedule A plus the total amount of unitemized contributions reported on the Detailed Summary Page should equal the total reported on Line 11(a) of the Detailed Summary Page. Please amend either Schedule A or the Detailed Summary figures to correct this discrepancy. (11 CFR 104.3(a))

-The total listed on Line 11d of Column A is incorrect. Please provide the correct total.

-Please provide the totals for Lines 18 and 28, Columns A and B of the Detailed Summary Page. (2 U.S.C. 434(b))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Lisa Stolaruk
Senior Reports Analyst
Reports Analysis Division

218 5040543097
Feb, March, April





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

4 April 1984

RQ-2

Jules Pollard, Treasurer
Allied Bancshares Leadership
Fund-Federal
808 Travis Street
P.O. Box 1515
Houston, TX 77002

Identification Number: C00118984

Reference: October Monthly Report (9/1/83-9/30/83)

Dear Mr. Pollard:

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:

-In order for your report to be considered complete, a Detailed Summary Page must be filed. (2 U.S.C. 434(b))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Lisa Stolaruk
Senior Reports Analyst
Reports Analysis Division

85040543100

Allied Bancshares, Inc.

P. O. BOX 1515, 808 TRAVIS
HOUSTON, TEXAS 77001 (713) 224-6611

April 12, 1984

Ms. Lisa Stolaruk
Senior Reports Analyst
Reports Analysis Division
FEDERAL ELECTION COMMISSION
Washington, D.C. 02463

Reference: Our Identification Number - C00118984

Dear Ms. Stolaruk:

As per your letters of April 4, 1984, we are enclosing amended reports beginning January 1983 through February 1984 for the Allied Bancshares Leadership Fund - Federal. All reports from this date forward will be completed as required.

Thank you for bringing this situation to our attention and we will do our utmost to comply with your specifications.

Sincerely,

ALLIED BANCSHARES LEADERSHIP FUND - FEDERAL


Jules Pollard
Treasurer

JP:dh

Enclosures

85040543101

Allied[®] Bank of Texas

P O BOX 3326, HOUSTON, TEXAS 77253, 713/224-6611

October 18, 1984

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

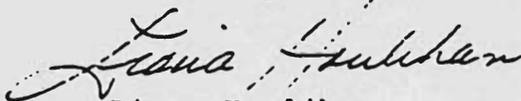
Ref: Allied Bancshares Leadership Fund - Federal
FEC I.D. No. C00118984

Dear Lisa,

In reviewing our report filing for August 1984, I believe that we neglected to enclose a copy of the Schedule B - Itemized Disbursements.

A copy is now enclosed. I hope this has not caused to great of an inconvenience.

Sincerely,



Diana Houlihan
Allied Bank of Texas

85040543102

SCHEDULE B

ITEMIZED DISBURSEMENTS

AUGUST REPORT
 ADDITION TO:

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)

ALLIED BANCSHARES LEADERSHIP FUNDS - FEDERAL

85040543103

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Phil Gram Campaign 216 W. 26th Suite 106 Bryan, TX	Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	08-24-84	\$3,900.00
B. Full Name, Mailing Address and ZIP Code Mark Andrews Campaign 724 North Senate Office Bldg. Washington, D.C. 20001 218	Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	08-23-84	\$ 500.00
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)			\$4,400.00
TOTAL This Period (last page this line number only)			



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

November 16, 1984

Jules C. Pollard, Treasurer
Allied Bancshares Leadership
Funds Federal
P.O. Box 1515/808 Travis
Houston, TX 77002

Identification Number: C00118984

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

Dear Ms. Pollard:

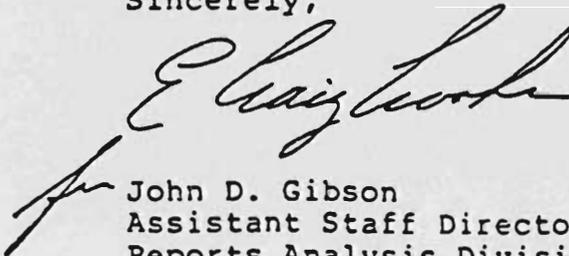
It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

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 Lisa Stolaruk on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,



John D. Gibson
Assistant Staff Director
Reports Analysis Division

85040543104



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Jules C. Pollard, treasurer
Allied Bancshares Leadership
Funds-Federal
808 Travis Street
P.O. Box 1515
Houston, TX 77002

RE: MUR 1972

Dear Mr. Pollard:

On April 5, 1985, the Commission found reason to believe that the Allied Bancshares Leadership Funds-Federal, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. §§ 104.5(c)(3)(i) 104.5(c)(3)(ii). At your request, the Commission determined on _____, 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Patty Reilly, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

ATTACHMENT #2

85040543105

Allied Bank of Texas
P. O. BOX 3326, HOUSTON, TEXAS 77253

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

RECEIVED AT THE FEC
HAND DELIVERED
85 APR 24 4 9: 33

Federal Express No. 707789924

April 19, 1985

Ms. Patty Reilly
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1972
Allied Bancshares Leadership Funds - Federal and Jules L. Pollard,
as Treasurer

Dear Ms. Reilly:

Thank you for taking the time to answer my questions on April 19, 1985. Enclosed are copies of all the correspondence between the Allied Bancshares Leadership Funds - Federal ("Allied") and the Federal Election Commission ("Commission"). These copies are provided in hopes of assisting the Commission's investigation of Allied's and Mr. Pollard's alleged violations of the Federal Election Campaign Act of 1971, as amended (the "Act") and the Act's regulations more fully described in McGarry's letter dated April 12, 1985 and received on April 17, 1985.

Allied and Jules Pollard, as treasurer, are alleged to have been late in their filing of monthly, pre-general, and post-general reports.

The General Counsel's Factual and Legal Analysis states that six monthly reports were filed late. Allied's records indicate that some if not all of these records were filed in a timely manner. When Allied realized the discrepancy between the Commission's records of when the reports were filed and Allied's records, Allied instituted a policy of sending all reports to the Commission by certified mail. This policy began in June of 1984. The alleged violations of failing to file the 1984 Pre-General and Post-General Reports in a timely manner can be attributed to a miscommunication between employees of the Commission and employees of Allied Bank of Texas as evidenced by letters dated November 20, 1984, and December 26, 1984. If any alleged violations did occur, they can be attributed to a change in the department and the personnel responsible for filing the reports and to the aforementioned miscommunications. Allied's monthly reports have been current since the alleged violations.

85040543106

Ms. Patty Reilly
April 19, 1985
Page 2

Allied requests the Commission to institute pre-probable cause conciliation proceedings as set forth in 2 U.S.C. §437g(4)(A)(i). This letter and the enclosed documents are intended as a brief outline of Allied's response to Mr. McGarry's letter. Allied will readily describe the foregoing in greater detail once the conciliation process has begun.

Sincerely,

J. Michael Watson
J. Michael Watson
Counsel

JMW:cac

Enclosures

85040543107

Allied Bancshares, Inc.

P. O. BOX 1515, 808 TRAVIS
HOUSTON, TEXAS 77001 (713) 224-8611

November 20, 1984

Ms. Lisa Stolaruk
Federal Election Commission
Washington, D.C. 20463

Identification No: C00118984

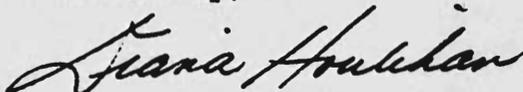
Reference: 12 Day Pre-General Report
(10-1-84 to 10-17-84)

Dear Ms. Stolaruk:

Enclosed is our Report of Receipts and Disbursements for the total month of October. As per our phone conversation today, this report is being sent in lieu of the 12 Day Pre-General Report referenced above. This is due to the fact that I was not in receipt of your previous request for the 12 Day Pre-General.

Please call if you require any additional information or if you have any questions.

Sincerely,



Diana Houlihan
Secretary to
Anita Lewis/Allied Bank of Texas

Phone: (713) 226-1858

85040543108

Allied Bank of Texas

P. O. BOX 3326, HOUSTON, TEXAS 77253, 713/224-8611

December 26, 1984

Mr. Mike Filler
Federal Election Commission
Washington, D.C. 20463

Identification No.: C00118984

Reference: 30 Day After Election Report

Dear Mr. Filler:

Enclosed is our Report of Receipts and Disbursements for the month of November. As per our phone conversation today, this report is being sent in lieu of the 30 Day After Election Report. This is due to confusion on my part as to the required reporting date.

Lisa Stolaruk has been a great source of help to me on these reports and when I spoke to her last concerning this year's filings, she mentioned that the 30 Day report was due by the 6th. Unfortunately I took this information to mean the 6th of January when she was actually speaking about the 6th of December, therefore we are now sending this report.

Thank you for all of your assistance. Hopefully we will now keep on a good schedule for your requirements.

Sincerely,

Diana Houlihan
Secretary to
Anita Lewis/Allied Bank of Texas

Phone: (713) 226-1858

85040543109



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

4 April 1984

RQ-2

Jules Pollard, Treasurer
Allied Bancshares Leadership
Fund-Federal
808 Travis Street
P.O. Box 1515
Houston, TX 77002

Identification Number: C00118984

Reference: June Monthly (5/1/83-5/31/83), July Monthly (6/1/83-6/30/83), August Monthly (7/1/83-7/31/83), September Monthly (8/1/83-8/31/83), November Monthly (10/1/83-10/31/83), December Monthly (11/1/83-11/30/83) and Year End (12/1/83-12/31/83) Reports

Dear Mr. Pollard:

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:

-The total amount of contributions itemized on Schedule A plus the total amount of unitemized contributions reported on the Detailed Summary Page should equal the total reported on Line 11(a) of the Detailed Summary Page. Please amend either Schedule A or the Detailed Summary figures to correct this discrepancy. (11 CFR 104.3(a))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Lisa Stolaruk
Senior Reports Analyst
Reports Analysis Division

85040543110



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

4 April 1984 RQ-2

Jules Pollard, Treasurer
Allied Bancshares Leadership
Fund-Federal
808 Travis Street
P.O. Box 1515
Houston, TX 77002

Identification Number: C00118984

Reference: March Monthly Report (2/1/83-2/28/83)

Dear Mr. Pollard:

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:

-The total amount of contributions itemized on Schedule A plus the total amount of unitemized contributions reported on the Detailed Summary Page should equal the total reported on Line 11(a) of the Detailed Summary Page. Please amend either Schedule A or the Detailed Summary figures to correct this discrepancy. (11 CFR 104.3(a))

-The total listed on Line 11d of Column A is incorrect. Please provide the correct total.

-Please provide the totals for Lines 18 and 28 of Column A and Lines 18, 21 and 28 of Column B on the Detailed Summary Page.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Lisa Stolaruk
Senior Reports Analyst
Reports Analysis Division

85040543111



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

4 April 1984

RQ-2

Jules Pollard, Treasurer
Allied Bancshares Leadership
Fund-Federal
808 Travis Street
P.O. Box 1515
Houston, TX 77002

Identification Number: C00118984

Reference: April Monthly (3/1/83-3/31/83) and May Monthly
(4/1/83-4/30/83) Reports

Dear Mr. Pollard:

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:

-The total amount of contributions itemized on Schedule A plus the total amount of unitemized contributions reported on the Detailed Summary Page should equal the total reported on Line 11(a) of the Detailed Summary Page. Please amend either Schedule A or the Detailed Summary figures to correct this discrepancy. (11 CFR 104.3(a))

-Please provide the totals for Line 18 of Column A and Lines 18, 21 and 28 of Column B on the Detailed Summary Pages of your reports.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Lisa Stolaruk
Senior Reports Analyst
Reports Analysis Division

85040543112



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

4 April 1984

RQ-2

*Oct - (Sept) - fill out
2nd page*

Jules Pollard, Treasurer
Allied Bancshares Leadership
Fund-Federal
808 Travis Street
P.O. Box 1515
Houston, TX 77002

Identification Number: C00118984

Reference: February Monthly Report (1/1/83-1/31/83)

Dear Mr. Pollard:

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:

-The total amount of contributions itemized on Schedule A plus the total amount of unitemized contributions reported on the Detailed Summary Page should equal the total reported on Line 11(a) of the Detailed Summary Page. Please amend either Schedule A or the Detailed Summary figures to correct this discrepancy. (11 CFR 104.3(a))

-The total listed on Line 11d of Column A is incorrect. Please provide the correct total.

-Please provide the totals for Lines 18 and 28, Columns A and B of the Detailed Summary Page. (2 U.S.C. 434(b))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Lisa Stolaruk
Senior Reports Analyst
Reports Analysis Division

2248 5040543113
Feb, March, April



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

4 April 1984

RQ-2

Jules Pollard, Treasurer
Allied Bancshares Leadership
Fund-Federal
808 Travis Street
P.O. Box 1515
Houston, TX 77002

Identification Number: C00118984

Reference: October Monthly Report (9/1/83-9/30/83)

Dear Mr. Pollard:

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:

-In order for your report to be considered complete, a Detailed Summary Page must be filed. (2 U.S.C. 434(b))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

A handwritten signature in cursive script that reads "Lisa Stolaruk".

Lisa Stolaruk
Senior Reports Analyst
Reports Analysis Division

85040543114

Allied Bancshares, Inc.

P. O. BOX 1515, 808 TRAVIS
HOUSTON, TEXAS 77001 (713) 224-8811

April 12, 1984

Ms. Lisa Stolaruk
Senior Reports Analyst
Reports Analysis Division
FEDERAL ELECTION COMMISSION
Washington, D.C. 02463

Reference: Our Identification Number - C00118984

Dear Ms. Stolaruk:

As per your letters of April 4, 1984, we are enclosing amended reports beginning January 1983 through February 1984 for the Allied Bancshares Leadership Fund - Federal. All reports from this date forward will be completed as required.

Thank you for bringing this situation to our attention and we will do our utmost to comply with your specifications.

Sincerely,

ALLIED BANCSHARES LEADERSHIP FUND - FEDERAL


Jules Pollard
Treasurer

JP:dh

Enclosures

85040543115

Allied[®] Bank of Texas

P O BOX 3326. HOUSTON, TEXAS 77253. 713/224-0811

October 18, 1984

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

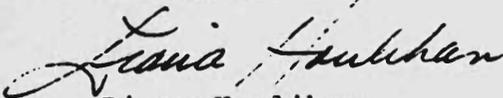
Ref: Allied Bancshares Leadership Fund - Federal
FEC I.D. No. C00118984

Dear Lisa,

In reviewing our report filing for August 1984, I believe that we neglected to enclose a copy of the Schedule B - Itemized Disbursements.

A copy is now enclosed. I hope this has not caused to great of an inconvenience.

Sincerely,



Diana Houlihan
Allied Bank of Texas

85040543116

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page ____ of ____ for
LINE NUMBER _____
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

**AUGUST REPORT
 ADDITION TO:**

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)
ALLIED BANCSHARES LEADERSHIP FUNDS - FEDERAL

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Phil Gram Campaign 216 W. 26th Suite 106 Bryan, TX	Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	08-24-84	\$3,900.00
Mark Andrews Campaign 724 North Senate Office Bldg. Washington, D.C. 20001 218	Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	08-23-84	\$ 500.00
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)			\$4,400.00
TOTAL This Period (last page this line number only)			

85040543117



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

November 16, 1984

Jules C. Pollard, Treasurer
Allied Bancshares Leadership
Funds Federal
P.O. Box 1515/808 Travis
Houston, TX 77002

Identification Number: C00118984

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

Dear Ms. Pollard:

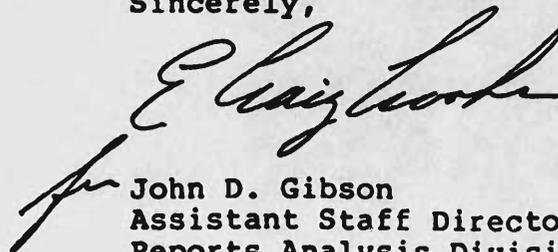
It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

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 Lisa Stolaruk on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,


John D. Gibson
Assistant Staff Director
Reports Analysis Division

85040543118

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
Allied Bancshares Leadership Funds-)	RAD Referral 85NF-76
Federal)	
Jules C. Pollard, as treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 5, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-76:

1. Open a MUR.
2. Find reason to believe the Allied Bancshares Leadership Funds-Federal and Jules C. Pollard, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. §§ 104.5(c)(3)(i) and 104.5(c)(3)(iii).
3. Approve and send the letter and Factual and Legal Analysis attached to the First General Counsel's Report signed April 2, 1985.

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

Attest:

4-5-85
Date

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

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

4-3-85, 10:41
4-3-85, 4:00

85040543119



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 12, 1985

Jules C. Pollard, Treasurer
Allied Bancshares Leadership Funds-Federal
P.O. Box 1515
808 Travis
Houston, TX 77002

RE: MUR 1972
Allied Bancshares Leadership Funds-
Federal and Jules C. Pollard, as
treasurer

Dear Mr. Pollard:

On April 5, 1985, the Federal Election Commission determined that there is reason to believe the Allied Bancshares Leadership Funds-Federal and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), and 11 C.F.R. §§ 104.5(c)(3)(i) and 104.5(c)(3)(ii) provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and the Act's Regulations. 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 your 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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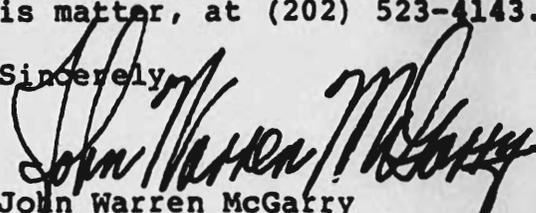
Jules C. Pollard, as treasurer
Page 2

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 Patty Reilly, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,


John Warren McGarry
Chairman

Enclosures

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

85040543121

GENERAL COUNSEL'S FACTUAL & LEGAL ANALYSIS

MUR No: 1972
STAFF MEMBER:
REILLY

RESPONDENT: Allied Bancshares Leadership Funds-Federal and
Jules C. Pollard, as treasurer

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

The Reports Analysis Division ("RAD") referred this matter to the Office of the General Counsel on March 21, 1985. The reason for this referral is the late filing of monthly, pre-general, and post-general reports by the Allied Bancshares Leadership Funds-Federal and Jules C. Pollard, as treasurer.

The Act affords two reporting options for all political committees other than authorized committees of a candidate. Those choosing to file monthly reports must file for each month no later than the 20th day after the last day of the month. 2 U.S.C. § 434(a)(4)(B). 11 C.F.R. § 104.5(c)(3)(i). Additionally, the Act requires such Committees to file pre-general and post-general reports. 2 U.S.C. § 434(a)(4)(B). 11 C.F.R. § 104.5(c)(3)(ii). The pre-general report must be filed no later than 12 days before the general election. Id. The post-general report must be filed no later than 30 days after the general election. Id.

The Respondents failed to file monthly reports in a timely manner. The 1983 August, September, October, November, and December Monthly Reports and the 1984 February Monthly Report were all filed between 10 to 20 days late. Additionally, the Respondents failed to file its 1984 Pre-General and Post-General

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Reports in a timely manner. The Pre-General Report was due on October 25, 1984. The information which should have been contained in that report was not filed until November 21, 1984. The Post-General Report was due on December 6, 1984. The information which should have been contained in that report was not filed until December 27, 1984.*/

The Respondents are required to submit monthly reports. It is also required to submit pre-general and post-general reports in election years. Those reports were not filed in a timely manner. Accordingly, this Office recommends that the Commission find reason to believe the Allied Bancshares Leadership Funds-Federal and Jules C. Pollard, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. §§ 104.5(c)(3)(i) and 104.5(c)(3)(ii).

*/ The Respondents submitted November and December Monthly Reports instead of the pre and post general election reports.

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SENSITIVE

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

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

FIRST GENERAL COUNSEL REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 4/3/85-10:40

85 APR 3 AIO: 41
RAD #85NF-76
STAFF MEMBER:
REILLY

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

RESPONDENTS: NAMES: Allied Bancshares Leadership Funds
Federal and Jules C. Pollard, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(B)
11 C.F.R. § 104.5(c)(3)(i)
11 C.F.R. § 104.5(c)(3)(ii)

INTERNAL AGENCIES
CHECKED: Disclosure Reports

FEDERAL AGENCIES
CHECKED: None

GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred this matter to the Office of the General Counsel on March 21, 1985. The source of this attached referral is the late filings of eight required reports by the Allied Bancshares Leadership Funds-Federal ("the Committee").

FEDERAL BASIS AND LEGAL ANALYSIS

The Act provides two reporting options for all political committees other than authorized committees of a candidate. Those choosing to file monthly reports must file for each month no later than the 20th day after the last day of the month. 2 U.S.C. § 434(a)(4)(B). 11 C.F.R. § 104.5(c)(3)(i). Additionally, the Act requires such committees to file pre-general and post-general election reports. 2 U.S.C.

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§ 434(a)(4)(B). 11 C.F.R. § 104.5(C)(3)(ii). The pre-general report must be filed no later than 12 days before the general election. Id. The post-general report must be filed no later than 30 days after the general election. Id.

The Respondents failed to file monthly reports in a timely manner. The 1983 August, September, October, November, and December Monthly Reports and the 1984 February Monthly Report were all filed between 10 to 20 days late. Additionally, the Respondents failed to file the 1984 Pre-General and Post-General Reports in a timely manner. The Pre-General Report was due on October 25, 1984. The information which should have been contained in that report was not filed until November 21, 1984. The Post-General Report was due on December 6, 1984. The information which should have been contained in that report was not filed until December 27, 1984.^{1/}

The Respondents are required to submit monthly reports. They also are required to submit pre-general and post-general reports in election years. Those reports were not filed in a timely manner. Accordingly, this Office recommends that the Commission find reason to believe the Allied Bancshares Leadership Funds-Federal and Jules C. Pollard, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. §§ 104.5(c)(3)(i) and 104.5(c)(3)(ii).

^{1/} The Respondents submitted November and December Monthly Reports instead of the pre and post general election reports.

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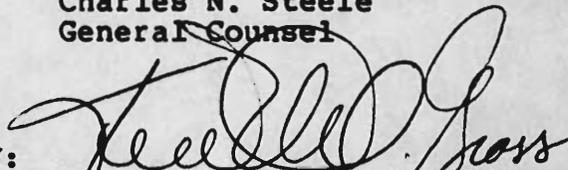
RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe the Allies Bancshares Leadership Funds-Federal and Jules C. Pollard, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. §§ 104.5(c)(3)(i) and 104.5(c)(3)(iii).
3. Approve and send the attached letter and Factual and Legal Analysis.

Charles N. Steele
General Counsel

April 2, 1985

BY:


Kenneth A. Gross
Associate General Counsel

Attachments

1. RAD Referral
2. Proposed letter(1)
3. General Counsel's Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

20 March 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: REFERRAL OF ALLIED BANCSHARES LEADERSHIP FUNDS FEDERAL

This is a referral of Allied Bancshares Leadership Funds Federal ("Allied Bancshares"). Allied Bancshares failed to file eight (8) reports in a timely manner during the 1983-84 election cycle. In addition, Allied Bancshares failed to file the 12 Day Pre-General Report as of Election Day, November 6, 1984.

If you have any questions concerning this matter, please contact Lisa Stolaruk at 523-4048.

Attachment

85040543127

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 20 March 1984

ANALYST: Lisa Stolaruk

I. COMMITTEE: Allied Bancshares Leadership Funds Federal
(C00118984)
Jules C. Pollard, Treasurer
P.O. Box 1515
808 Travis
Houston, TX 77002

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(B)
11 CFR 104.5(c)(3)(i)
11 CFR 104.5(c)(3)(ii)

III. BACKGROUND:

Failure to Timely File Reports

Allied Bancshares Leadership Funds Federal ("Allied Bancshares") failed to file eight (8) Reports of Receipts and Disbursements in a timely manner during the 1983-84 election cycle. In addition, Allied Bancshares failed to file the 12 Day Pre-General Report by Election Day, November 6, 1984 (see attached chart). The reports were filed between ten (10) and twenty-seven (27) calendar days late.

On March 9, 1984, a Chronic Late Filer Notice was sent to Allied Bancshares for failing to file the 1983 August, September, October, November, and December Monthly Reports and the 1984 February Monthly Report in a timely manner (Attachment 10). The notice advised Allied Bancshares that any additional late filing of reports may result in legal enforcement action.

On March 26, 1984, Allied Bancshares submitted a letter of explanation in response to the Chronic Late Filer Notice. The letter stated that the reporting dates had been misunderstood and that they were under the impression that the reports were due ". . . no later than the 10th of the second month; i.e., February's report would be due no later than April 10th" (Attachment 11).

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Subsequent to the Chronic Late Filing Notice, Allied Bancshares filed the 12 Day Pre-General and 30 Day Post-General Reports^{*/} late.

Ms. Houlihan called the RAD analyst on November 20, 1984, in response to a Non-Filer Notice that was sent for failure to file the 12 Day Pre-General Report. Ms. Houlihan stated that she had not received prior notice of when the report was due, but that she had prepared a November Monthly Report instead. The analyst requested that she send a letter of explanation and also reminded her of the coverage dates and due dates for the 30 Day Post-General and Year End Reports (Attachment 14). A November Monthly Report covering October 1 through October 31, 1984 was submitted on November 21, 1984 (Attachment 15).

On December 26, 1984, Ms. Houlihan called the Party/Non-Party Branch Chief, to seek clarification regarding the due date of the 30 Day Post-General Report. The Branch Chief informed Ms. Houlihan that the report was due on December 6, 1984. Ms. Houlihan agreed to send the December Monthly Report (in lieu of the 30 Day Post-General) by air express (Attachment 16). The report was filed on December 27, 1984 with a cover letter stating that there was a misunderstanding regarding the date the report was due (Attachment 17).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

^{*/} Allied Bancshares submitted November and December Monthly Reports in lieu of the required 12 Day Pre-General and 30 Day Post-General Reports.

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LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1983 August Monthly (7/1/83-7/31/83)	7/7/83	8/20/83	N/A	9/1/83
1983 September Monthly (8/1/83-8/31/83)	"	9/20/83	N/A	10/3/83
1983 October Monthly (9/1/83-9/30/83)	"	10/20/83	N/A	11/3/83
1983 November Monthly (10/1/83-10/31/83)	"	11/20/83	N/A	12/7/83
1983 December Monthly (11/1/83-11/30/83)	"	12/20/83	N/A	1/9/84 (
1984 February Monthly (1/1/84-1/31/84)	1/7/84	2/20/84	N/A	3/1/84 (
1984 12 Day Pre-General* (10/1/84-10/17/84)	10/1/84	10/25/84	11/16/84	11/21/84
1984 30 Day Post-General* (10/18/84-11/26/84)	"	12/6/84	N/A	12/27/84

*Allied Bancshares submitted November and December Monthly Reports in lieu of the required 12 Day Pre-General and 30 Day Post-General Reports.

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
ALLIED BANCSHAKES LEADERSHIP FUNDS FEDERAL CONNECTED ORGANIZATION: ALLIED BANCSHARES INC				NON-PARTY QUALIFIED		ID #C00118984
1983	FEBRUARY MONTHLY	3,398	1,500	1JAN83 -31JAN83	5	83FEC/266/2461
	FEBRUARY MONTHLY - AMENDMENT	3,398	1,500	1JAN83 -31JAN83	4	84FEC/311/4211
	REQUEST FOR ADDITIONAL INFORMATION			1JAN83 -31JAN83	1	84FEC/307/0233
	MARCH MONTHLY	3,518	0	1FEB83 -28FEB83	4	83FEC/268/1899
	MARCH MONTHLY - AMENDMENT	3,518	0	1FEB83 -28FEB83	3	84FEC/311/4215
	REQUEST FOR ADDITIONAL INFORMATION			1FEB83 -28FEB83	1	84FEC/307/0233
	APRIL MONTHLY	3,597	0	1MAR83 -31MAR83	6	83FEC/269/4411
	APRIL MONTHLY - AMENDMENT	3,597	0	1MAR83 -31MAR83	3	84FEC/311/4216
	REQUEST FOR ADDITIONAL INFORMATION			1MAR83 -31MAR83	1	84FEC/307/0229
	MAY MONTHLY	3,370	0	1APR83 -30APR83	8	83FEC/272/0167
	MAY MONTHLY - AMENDMENT	3,370	0	1APR83 -30APR83	3	84FEC/311/4221
	REQUEST FOR ADDITIONAL INFORMATION			1APR83 -30APR83	1	84FEC/307/0867
	JUNE MONTHLY	3,589	2,000	1MAY83 -31MAY83	11	83FEC/273/2423
	JUNE MONTHLY - AMENDMENT	3,589	2,000	1MAY83 -31MAY83	3	84FEC/311/4224
	REQUEST FOR ADDITIONAL INFORMATION			1MAY83 -31MAY83	1	84FEC/307/0868
	JULY MONTHLY	3,276	0	1JUN83 -30JUN83	5	83FEC/277/4004
	JULY MONTHLY - AMENDMENT	3,276	0	1JUN83 -30JUN83	3	84FEC/311/4227
	REQUEST FOR ADDITIONAL INFORMATION			1JUN83 -30JUN83	1	84FEC/307/0869
	AUGUST MONTHLY	3,437	1,500	1JUL83 -31JUL83	8	83FEC/282/2795
	AUGUST MONTHLY - AMENDMENT	3,437	1,500	1JUL83 -31JUL83	3	84FEC/311/4230
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31JUL83	1	84FEC/307/0870
	SEPTEMBER MONTHLY	3,075	0	1AUG83 -31AUG83	8	83FEC/284/0463
	SEPTEMBER MONTHLY - AMENDMENT	3,075	0	1AUG83 -31AUG83	3	84FEC/311/4233
	REQUEST FOR ADDITIONAL INFORMATION			1AUG83 -31AUG83	1	84FEC/307/0871
	OCTOBER MONTHLY	3,641	0	1SEP83 -30SEP83	7	83FEC/286/3277
	OCTOBER MONTHLY - AMENDMENT	3,641	0	1SEP83 -30SEP83	3	84FEC/311/4236
	REQUEST FOR ADDITIONAL INFORMATION			1SEP83 -30SEP83	1	84FEC/307/0872
	NOVEMBER MONTHLY	3,133	0	1OCT83 -31OCT83	10	83FEC/288/3111
	NOVEMBER MONTHLY - AMENDMENT	3,133	0	1OCT83 -31OCT83	3	84FEC/311/4237
	REQUEST FOR ADDITIONAL INFORMATION			1OCT83 -31OCT83	1	84FEC/307/0872
	DECEMBER MONTHLY	3,102	1,500	1NOV83 -30NOV83	11	84FEC/290/1301
	DECEMBER MONTHLY - AMENDMENT	3,102	1,500	1NOV83 -30NOV83	3	84FEC/311/4242
	REQUEST FOR ADDITIONAL INFORMATION			1NOV83 -30NOV83	1	84FEC/307/0873
	YEAR-END	3,129	1,000	1DEC83 -31DEC83	11	84FEC/295/4889
	YEAR-END - AMENDMENT	3,129	1,000	1DEC83 -31DEC83	3	84FEC/311/4245
	REQUEST FOR ADDITIONAL INFORMATION			1DEC83 -31DEC83	1	84FEC/307/0227
1984	MISCELLANEOUS NOTICE FROM FEC			9MAR84		84FEC/295/0479
	MISCELLANEOUS REPORT			26MAR84 TO FEC	2	84FEC/306/2078
	FEBRUARY MONTHLY	3,097	2,500	1JAN84 -31JAN84	4	84FEC/297/3990
	FEBRUARY MONTHLY - AMENDMENT	3,097	2,500	1JAN84 -31JAN84	3	84FEC/311/4248
	MARCH MONTHLY	2,959	1,000	1FEB84 -29FEB84	5	84FEC/306/2080
	MARCH MONTHLY - AMENDMENT	2,979	100	1FEB84 -29FEB84	5	84FEC/310/4330
	MARCH MONTHLY - AMENDMENT	2,959	1,000	1FEB84 -29FEB84	3	84FEC/311/4251
	APRIL MONTHLY	2,979	100	1MAR84 -29MAR84	5	84FEC/314/3199

ATTACHMENT 1 (1 of 2)

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	NOTICE OF FAILURE TO FILE			1MAR84 -31MAR84	1	84FEC/314/0955
	MAY MONTHLY	2,280	0	1APR84 -30APR84	3	84FEC/314/3205
	1'ST LETTER INFORMATIONAL NOTICE			1APR84 -30APR84	1	84FEC/324/2878
	JUNE MONTHLY	2,754	4,000	1MAY84 -31MAY84	5	84FEC/317/1313
	JULY MONTHLY	2,497	0	1JUN84 -30JUN84	5	84FEC/323/2678
	AUGUST MONTHLY	2,626	0	1JUL84 -31JUL84	6	84FEC/326/2127
	AUGUST MONTHLY - AMENDMENT	2,626	0	1JUL84 -31JUL84	5	84FEC/336/2295
	1'ST LETTER INFORMATIONAL NOTICE			1JUL84 -31JUL84	1	84FEC/329/5435
	SEPTEMBER MONTHLY	2,658	4,400	1AUG84 -31AUG84	7	84FEC/329/3388
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG84 -31AUG84	3	84FEC/346/3388
	REQUEST FOR ADDITIONAL INFORMATION			1AUG84 -30AUG84	1	84FEC/340/438
	OCTOBER MONTHLY	2,675	3,000	1SEP84 -30SEP84	10	84FEC/344/1688
	NOTICE OF FAILURE TO FILE			1OCT84 -17OCT84	1	84FEC/349/0579
	NOVEMBER MONTHLY	2,481	5,000	1OCT84 -31OCT84	11	84FEC/349/3381
	DECEMBER MONTHLY	2,467	21,100	1NOV84 -30NOV84	11	84FEC/357/4252
	YEAR-END	1,994	1,000	1DEC84 -31DEC84	9	85FEC/361/4903
	TOTAL	71,732	0 49,600	0	251	TOTAL PAGES

All of the reports listed have been reviewed.

Ending cash balance as of 12/31/84: \$73,747

Debts and obligations as of 12/31/84: \$0

ATTACHMENT 1 (7-8-85)



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

July 7, 1983

SEMIANNUAL REPORT FILING REQUIREMENTS

WHO MUST FILE

ALL POLITICAL COMMITTEES currently registered with the Commission (except committees filing monthly) must file a semiannual report by July 31, 1983.

WHAT MUST BE REPORTED

Committees must disclose all financial activity of the committee from the later of, the last report filed or the date of registration,* through June 30, 1983.

FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight July 31, 1983. Reports hand delivered or mailed first class must be received no later than close of business July 31, 1983.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed form for details.

FAILURE TO FILE

According to Commission policy, political committees will not necessarily receive notification of their failure to file reports. However, they remain fully liable for failure to file any report required under the Act. In addition, failure to file required reports may result in compliance proceedings. Committees must submit legible reports which can be reproduced clearly. Illegible documents will not be accepted as reports, and committees filing such documents will be required to refile.

MONTHLY FILERS

Committees filing on a monthly schedule need not file a semi-annual report. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month. The next monthly report must be filed by July 20, 1983, and disclose all financial activity of the committee from June 1 through June 30, 1983.

- * 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).

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

85040543133

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

83 SEP 1 10:08

(Summary Page)

ATTACHMENT 3

1. Name of Committee (in Full)
Allied Benchmarks Leadership Fund - Federal

Address (Number and Street)
**808 Travis
P.O. Box 1515**

City, State and ZIP Code
Houston, Texas 77002

Check if address is different than previously reported.

2. FEC Identification Number
00118984

3. This committee qualified as a multi-candidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for July 1983
 Twelfth day report preceding _____ (Type of Election) 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

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
6. Covering Period <u>7-1-83</u> Through <u>7-31-83</u>		
6. (a) Cash on Hand January 1, 19 <u>83</u>		\$ 51,063.56
(b) Cash on Hand at Beginning of Reporting Period	\$ 68,315.08	
(c) Total Receipts (from Line 18)	\$ 3,437.13	\$ 24,188.65
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 71,752.21	\$ 75,252.21
7. Total Disbursements (from Line 28)	\$ 1,500.00	\$ 5,000.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 70,252.21	\$ 70,252.21
9. Debts and Obligations Owed TO the Committee (transfer all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (transfer all on Schedule C or Schedule D)	\$	

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:

Federal Election Commission
Toll Free 800-424-9530
Local 202-638-6000

Julia C. Pollard
Type or Print Name of Treasurer

Julia C. Pollard
SIGNATURE OF TREASURER

8-26-83
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. §437g.

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 (2/80)

850405431394P
83032022795

REPORT OF RECEIPTS AND DISBURSEMENTS
 For a Political Committee Other Than an Authorized Committee
 (Summary Page)

FEC
 ATTACHMENT 4
 03 OCT 3 4:07

1. Name of Committee (in Full)
 Allied Bancahares Leadership Fund - Federal

Address (Number and Street)
 808 Travis
 P.O. Box 1515

City, State and ZIP Code
 Houston, Texas 77002

Check if address is different than previously reported.

2. FEC Identification Number
 C00118984

This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for August, 1983
 Twelfth day report preceding _____ (Type of Election) 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

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
6. Covering Period <u>8/1/83</u> Through <u>8/31/83</u>			
6. (a) Cash on Hand January 1, 1983		\$ 51,063.56
(b) Cash on Hand at Beginning of Reporting Period	\$ 70,252.21	
(c) Total Receipts (from Line 18)	\$ 3,075.58	\$ 27,264.23
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 73,327.79	\$ 78,327.79
7. Total Disbursements (from Line 25)	\$ -0-	\$ 5,000.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 73,327.79	\$ 73,327.79
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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:

Federal Election Commission
 Toll Free 800-424-9638
 Local 202-423-4088

Julia C. Pollard
 Type or Print Name of Treasurer

Julia C. Pollard
 SIGNATURE OF TREASURER

9-27-83
 Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437c.

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

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FEC FORM 3X (3/80)

85040543135
 83032940463

Summary Report

ATTACHMENT 5
 83 NOV 3 8:40

1. Name of Committee (in Full)
Allied Bankshares Leadership Fund - Federal

Address (Number and Street)
**808 Travis
 P.O. Box 1515**

City, State and ZIP Code
Houston, Texas 77002

Check if address is different than previously reported.

2. FEC Identification Number
C00118984

3. This committee qualified as a multi-candidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for September, 1983
 Twelfth day report preceding _____ (Type of Election) 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

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>9/1/83</u> Through <u>9/30/83</u>		
6. (a) Cash on Hand January 1, 1983		\$ 51,063.56
(b) Cash on Hand at Beginning of Reporting Period	\$ 73,327.79	
(c) Total Receipts (from Line 10)	\$ 3,641.06	\$ 30,905.29
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 76,968.85	\$ 81,968.85
7. Total Disbursements (from Line 20)	\$ -0-	\$ 5,000.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 76,968.85	\$ 76,968.85
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

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:

Federal Election Commission
 Toll Free 888-434-6230
 Local 202-527-4998

Jules C. Pollard
 Type or Print Name of Treasurer

Jules C. Pollard
 SIGNATURE OF TREASURER

10/31/83
 Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437b.

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

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FEC FORM 3X (3/80)

85040543136
 83032863277

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

RECEIVED AT THE FEC

ATTACHMENT 6

(Summary Page)

83 DEC 7 1:02

<p>1. Name of Committee (in Full) Allied Bancshares Leadership Funds - Federal</p> <hr/> <p>Address (Number and Street) 808 Travis P.O. Box 1515</p> <hr/> <p>City, State and ZIP Code Houston, Texas 77002</p> <hr/> <p><input type="checkbox"/> Check if address is different than previously reported.</p>	<p>4. TYPE OF REPORT (check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only) <input checked="" type="checkbox"/> Monthly Report for <u>October, 1983</u> <input type="checkbox"/> Twelfth day report preceding _____ <small>(Type of Election)</small> election on _____ in the State of _____ <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____ <input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>
<p>2. FEC Identification Number C00118984</p> <p>3. <input type="checkbox"/> This committee qualified as a noncandidate committee during this Reporting Period on _____ <small>(Date)</small></p>	

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
6. Covering Period <u>10/1/83</u> Through <u>10/31/83</u>		
6. (b) Cash on Hand January 1, 1983		\$ 51,063.56
(b) Cash on Hand at Beginning of Reporting Period	\$ 76,968.85	
(c) Total Receipts (from Line 10)	\$ 3,133.34	\$ 34,038.63
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(b) and 6(c) for Column B)	\$ 80,102.19	\$ 85,102.19
7. Total Disbursements (from Line 20)	\$ -0-	\$ 5,000.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 80,102.19	\$ 80,102.19
9. Debts and Obligations Owed TO the Committee (Transmit all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Transmit all on Schedule C or Schedule D)	\$ -0-	

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:

Federal Election Commission
Toll Free 800-424-9630
Local 202-673-4988

Jules C. Pollard
Type or Print Name of Treasurer

Jules C. Pollard
SIGNATURE OF TREASURER

11/30/83

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437b.

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

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FEC FORM 3X (3/80)

83032983430

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

ATTACHMENT 7

(Summary Page)

84 JAN 8 8:21

1. Name of Committee (in Full)
**Allied Bankshares Leadership Funds
FEDERAL**

Address (Number and Street)
**808 Travis
P. O. Box 1515**

City, State and ZIP Code
Houston, Texas 77002

Check if address is different than previously reported.

2. FEC Identification Number
C00118984

3. This committee qualified as a multi-candidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for November 1983
 Twelfth day report preceding _____ (Type of Election) 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

08959407A70138

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>11-1-83</u> Through <u>11-30-83</u>		
6. (a) Cash on Hand January 1, 19 <u>83</u>		\$ 51,063.56
(b) Cash on Hand at Beginning of Reporting Period	\$ 80,102.19	
(c) Total Receipts (from Line 18)	\$ 3,102.69	\$ 37,141.32
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 83,204.88	\$ 88,204.88
7. Total Disbursements (from Line 20)	\$ 1,500.00	\$ 6,500.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 81,704.88	\$ 81,704.88
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

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:

Federal Election Commission
Toll Free 800-424-6630
Local 202-637-6000

Jules C. Pollard
Type or Print Name of Treasurer

Jules C. Pollard
SIGNATURE OF TREASURER

12-30-83
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

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FEC FORM 3X (3/80)



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

January 7, 1984

JANUARY 31 YEAR-END REPORT NOTICE

WHO MUST FILE

ALL POLITICAL COMMITTEES currently registered with the Commission must file a year-end report by January 31, 1984.

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through December 31, 1983. Registered committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration* through December 31, 1983.

FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1984. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1984.

WHERE TO FILE

Committees should consult the instructions on the enclosed form for details.

COMPLIANCE

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

1984 FILING REQUIREMENTS

See the January 1984 issue of the FEC Record for filing requirements during 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).

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

85040543139

REPORT OF RECEIPTS AND DISBURSEMENTS
 For a Political Committee Other Than an Authorized Committee
 (Summary Page)

RECEIVED AT THE FEC
 ATTACHMENT 9
 84 MAR 1 17:58

1. Name of Committee (in Full)
**ALLIED BANCSHARES LEADERSHIP
 FEDERAL**

Address (Number and Street)
**BOB TRAVIS
 P.O. BOX 1515**

City, State and ZIP Code
HOUSTON, TEXAS 77002

Check if address is different than previously reported.

2. FEC Identification Number
CO0118984

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for DECEMBER 1983
 Twelfth day report preceding _____ (Type of Election) 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

8051949543648

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
E. Covering Period <u>1-1-84</u> Through <u>1-31-84</u>			
6. (a) Cash on Hand January 1, 19_____			\$ 83,834.47
(b) Cash on Hand at Beginning of Reporting Period	\$ 83,834.47		
(c) Total Receipts (from Line 1E)	\$ 3,097.19	\$ 3,097.19	
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 86,934.66	\$ 86,931.66	
7. Total Disbursements (from Line 2E)	\$ 2,500.00	\$ 2,500.00	
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 84,431.66	\$ 84,431.66	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$		
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$		

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:
 Federal Election Commission
 Toll Free 800-424-9630
 Local 702-623-4068

JULES C. ROLLARD
 Type or Print Name of Treasurer

Jules C. Rollard
 SIGNATURE OF TREASURER

1-31-84
 Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

MS-L
9 March 1984

Jules C. Pollard, Treasurer
Allied Bancshares Leadership
Funds FEDERAL
P.O. Box 1515
808 Travis
Houston, TX 77002

Identification Number: C00118984

Reference: 1983-84 Election Cycle Reports

Dear Mr. Pollard:

This letter is prompted by the Commission's review of the reports filed by your committee. The following is a list of reports your committee has failed to file in a timely manner.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
August Monthly (7/1/83-7/31/83)	8/20/83	9/01/83
September Monthly (8/1/83-8/31/83)	9/20/83	10/03/83
October Monthly (9/1/83-9/30/83)	10/20/83	11/03/83
November Monthly (10/1/83-10/31/83)	11/20/83	12/07/83
December Monthly (11/1/83-11/30/83)	12/20/83	1/09/84
February Monthly (1/1/84-1/31/84)	2/20/84	3/01/84

Timely filing is a specific requirement of the Federal Election Campaign Act and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views late filing as a serious violation of the Act. This communication is to advise you that any additional late filing of a required report by your committee may result in the Commission initiating legal enforcement action.

If you need assistance or have any questions regarding this matter, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Michael B. Filler
Chief
Party Non-Party Branch

8504054314173
74032770173

24 MAR 84 8:33

Allied Bank of Texas

A. G. BOX 2222, HOUSTON, TEXAS 77001 (713) 262-0111

ATTACHMENT 11

March 20, 1984

Mr. Michael B. Filler
Chief
Party/Non-Party Branch
Federal Election Commission
Washington, D.C. 20463

Identification Number: C00118984

Reference: 1983-84 Election Cycle Reports

Dear Mr. Filler:

This letter is in response to your letter dated March 9, 1984.
(A copy is attached.)

We are enclosing the report for February 1984 and have adjusted our system to assure that all reports will be completed by the 20th of each proceeding month. The responsibility for this report was transferred to our area and the reporting date required was somehow misunderstood. As you can see from the history of reporting, we were under the impression that this report was due no later than the 10th of the second month; i.e. February's report would be due no later than April 10th.

Thank you for bringing this situation to our attention and be assured that we will comply with the requirements of your office.

Sincerely,

Anita R. Lewis

Anita R. Lewis
Senior Vice President
Controller

ARL:dh

Attachments (1)
Enclosures

cc: Federal Election Commission
1325 K. Street, N.W.
Washington, D.C. 20463
Att: Mail Room

8 5 4 4 0 3 4 3 6 1 2 4 3 8



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20540

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).

3 5 0 4 0 5 4 3 1 4 3

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

85040543144



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

EQ-7

November 16, 1984

Jules C. Pollard, Treasurer
Allied Bancshares Leadership
Funds Federal
P.O. Box 1515/808 Travis
Houston, TX 77002

Identification Number: C00118984

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

Dear Ms. Pollard:

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 Lisa Stolaruk on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

85040543145
9103317579

RECEIVED AT THE FEC

84 NOV 22 10:18

Allied Bancshares, Inc.

P. O. BOX 1016, ONE TRADING
HOUSTON, TEXAS 77001 (713) 226-8571

ATTACHMENT 15 (1 of 3)

November 20, 1984

Ms. Lisa Stolaruk
Federal Election Commission
Washington, D.C. 20463

Identification No: C00118984

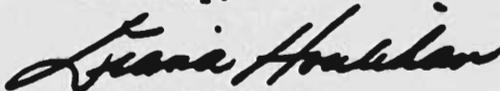
Reference: 12 Day Pre-General Report
(10-1-84 to 10-17-84)

Dear Ms. Stolaruk:

Enclosed is our Report of Receipts and Disbursements for the total month of October. As per our phone conversation today, this report is being sent in lieu of the 12 Day Pre-General Report referenced above. This is due to the fact that I was not in receipt of your previous request for the 12 Day Pre-General.

Please call if you require any additional information or if you have any questions.

Sincerely,



Diana Houlihan
Secretary to
Anita Lewis/Allied Bank of Texas

Phone: (713) 226-1857

84040543146
84033193301

Report of Activity and Financial Statement
 For a Political Committee Other Than a Authorized Committee
 Summary Page

RECEIVED AT THE FEC
 ATTACHMENT 15: (2 of 3)
 84 NOV 28 11:11
 ALLEN AREA

ALLEN AREA

1. Name of Committee (See Full)

Allied Merchants Leadership - Federal

Address (Number and Street)

**808 Travis
 P.O. Box 1515**

City, State and ZIP Code

Houston, Texas 77002

Check here if address is different than previously reported.

2. FEC Identification Number

3. This committee qualified as a constitutional 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 1984

Fourth 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

1
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Z

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>10-1-84</u> through <u>10-31-84</u>			
6. (a) Cash on hand January 1, 19 _____			\$ 83,834.47
(b) Cash on hand at beginning of Reporting Period		\$ 93,903.40	
(c) Total Receipts (from Line 10)		\$ 2,481.80	\$ 27,950.73
(d) Subtotal (add Lines 6(a) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 96,385.20	\$ 111,385.20
7. Total Disbursements (from Line 20)		\$ 5,000.00	\$ 20,000.00
8. Cash on hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 91,385.20	\$ 91,385.20
9. Debts and Obligations Owed TO The Committee		\$ -0-	
(Transfer all on Schedule C or Schedule D)			
10. Debts and Obligations Owed BY the Committee		\$ -0-	
(Transfer all on Schedule C or Schedule D)			

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

JULES C. POLLARD
 Type or Print Name of Treasurer

Jules C. Pollard
 Signature of Treasurer

10-15-84
 Date

For further information contact:
 Federal Election Commission
 Toll Free 800-424-9526
 Local 202-453-4333

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437c.

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

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FEC FORM 2X (2/83)

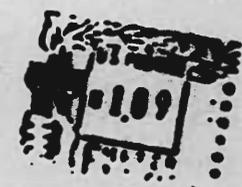
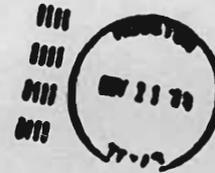
Allied Bank of Texas

P. O. BOX 368, 608 TRAVIS, HOUSTON, TEXAS 77263-3368

8 5 10 34 30 15 94 333 19 41 8

F . 5 41 112 FEB

24:30V26 All: 10



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

CERTIFIED
No. 533 078
MAIL

ATTACHMENT 15 (3 OF 3)

HAND DELIVERED
31 DEC 27 1984

Allied Bank of Texas

P O BOX 3286 HOUSTON, TEXAS 77253 713/226-8811

December 26, 1984

Mr. Mike Filler
Federal Election Commission
Washington, D.C. 20463

Identification No.: C00118984

Reference: 30 Day After Election Report

Dear Mr. Filler:

Enclosed is our Report of Receipts and Disbursements for the month of November. As per our phone conversation today, this report is being sent in lieu of the 30 Day After Election Report. This is due to confusion on my part as to the required reporting date.

Lisa Stolaruk has been a great source of help to me on these reports and when I spoke to her last concerning this year's filings, she mentioned that the 30 Day report was due by the 6th. Unfortunately I took this information to mean the 6th of January when she was actually speaking about the 6th of December, therefore we are now sending this report.

Thank you for all of your assistance. Hopefully we will now keep on a good schedule for your requirements.

Sincerely,

Diana Houlihan

Diana Houlihan
Secretary to
Anita Lewis/Allied Bank of Texas

Phone: (713) 226-1858

8504054314
84033574252

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

ATTACHMENT: 17, (2 of 2), FEC

HAND DELIVERED
F4 DEC 27 1984
ALICIA AREA

(Summary Page)

ALICIA AREA

1. Name of Committee (In Full)
Allied Bancshares Leadership - Federal

Address (Number and Street)
**808 Travis
P.O. Box 1515**

City, State and ZIP Code
Houston, TX 77002

Check here if address is different than previously reported.

2. FEC Identification Number
C00118984

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 **NOVEMBER 1984**
 Twelfth 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

SUMMARY

5. Covering Period **11-1-84** through **11-30-84**

6. (a) Cash on hand January 1, 19 **84**

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1B)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 2B)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6(a)		\$ 83,834.47
6(b)	\$ 91,385.20	
6(c)	\$ 2,467.94	\$ 30,018.67
6(d)	\$ 93,853.14	\$ 113,853.14
7	\$ 21,100.00	\$ 41,100.00
8	\$ 72,753.14	\$ 72,753.14
9	\$ -0-	
10	\$ -0-	

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

Jules C. Pollard
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

12-15-84
Date

For further information contact:
Federal Election Commission
Toll Free 800-424-6530
Local 202-423-6888

NOTE: Submission of false or incorrect, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437c.

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 3X (3/80)

85040543150
9403374253

GENERAL COUNSEL'S FACTUAL & LEGAL ANALYSIS

MUR No:
STAFF MEMBER:
REILLY

RESPONDENT: Allied Bancshares Leadership Funds-Federal and
Jules C. Pollard, as treasurer

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

The Reports Analysis Division ("RAD") referred this matter to the Office of the General Counsel on March 21, 1985. The reason for this referral is the late filing of monthly, pre-general, and post-general reports by the Allied Bancshares Leadership Funds-Federal and Jules C. Pollard, as treasurer.

The Act affords two reporting options for all political committees other than authorized committees of a candidate. Those choosing to file monthly reports must file for each month no later than the 20th day after the last day of the month. 2 U.S.C. § 434(a)(4)(B). 11 C.F.R. § 104.5(c)(3)(i). Additionally, the Act requires such Committees to file pre-general and post-general reports. 2 U.S.C. § 434(a)(4)(B). 11 C.F.R. § 104.5(c)(3)(ii). The pre-general report must be filed no later than 12 days before the general election. Id. The post-general report must be filed no later than 30 days after the general election. Id.

The Respondents failed to file monthly reports in a timely manner. The 1983 August, September, October, November, and December Monthly Reports and the 1984 February Monthly Report were all filed between 10 to 20 days late. Additionally, the Respondents failed to file its 1984 Pre-General and Post-General

Attachment 3

85040543151

Reports in a timely manner. The Pre-General Report was due on October 25, 1984. The information which should have been contained in that report was not filed until November 21, 1984. The Post-General Report was due on December 6, 1984. The information which should have been contained in that report was not filed until December 27, 1984.*/

The Respondents are required to submit monthly reports. It is also required to submit pre-general and post-general reports in election years. Those reports were not filed in a timely manner. Accordingly, this Office recommends that the Commission find reason to believe the Allied Bancshares Leadership Funds-Federal and Jules C. Pollard, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. §§ 104.5(c)(3)(i) and 104.5(c)(3)(ii).

*/ The Respondents submitted November and December Monthly Reports instead of the pre and post general election reports.

85040543152



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Jules C. Pollard, Treasurer
Allied Bancshares Leadership Funds-Federal
P.O. Box 1515
808 Travis
Houston, TX 77002

RE: MUR
Allied Bancshares Leadership Funds-
Federal and Jules C. Pollard, as
treasurer

Dear Mr. Pollard:

On , 1985, the Federal Election Commission determined that there is reason to believe the Allied Bancshares Leadership Funds-Federal and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), and 11 C.F.R. §§ 104.5(c)(3)(i) and 104.5(c)(3)(ii) provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and the Act's Regulations. 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 your 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).

Attachment 2

85040543153

Jules C. Pollard, as treasurer
Page 2

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 Patty Reilly, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry
Chairman

Enclosures

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

85040543154

SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

25 APR 12 P12:33

April 11, 1985

MEMORANDUM TO: The Commission
FROM: Charles N. Steele
General Counsel
By: Kenneth A. Gross
Associate General Counsel *KAG*
SUBJECT: RAD Referral 85NF-76

On April 5, 1985 the Commission approved the recommendation that RAD Referral 85NF-76 should become a MUR. Therefore, all documents which had previously been contained in RAD Referral 85NF-76 should now become MUR 1972.

Attachment
Copy of Certification

85040543155

M 1972
Reilly

In the Matter of)
Allied Bancshares Leadership Funds-)
Federal)
Jules C. Pollard, as treasurer)

RAD Referral 85NF-76

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 5, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-76:

1. Open a MUR.
2. Find reason to believe the Allied Bancshares Leadership Funds-Federal and Jules C. Pollard, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. §§ 104.5(c)(3)(i) and 104.5(c)(3)(iii).
3. Approve and send the letter and Factual and Legal Analysis attached to the First General Counsel's Report signed April 2, 1985.

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

Attest:

4-5-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

4-3-85, 10:41
4-3-85, 4:00

85040543156



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

20 March 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: REFERRAL OF ALLIED BANCSHARES LEADERSHIP FUNDS FEDERAL

This is a referral of Allied Bancshares Leadership Funds Federal ("Allied Bancshares"). Allied Bancshares failed to file eight (8) reports in a timely manner during the 1983-84 election cycle. In addition, Allied Bancshares failed to file the 12 Day Pre-General Report as of Election Day, November 6, 1984.

If you have any questions concerning this matter, please contact Lisa Stolaruk at 523-4048.

Attachment

850440543157

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 20 March 1984

ANALYST: Lisa Stolaruk

I. COMMITTEE: Allied Bancshares Leadership Funds Federal
(C00118984)
Jules C. Pollard, Treasurer
P.O. Box 1515
808 Travis
Houston, TX 77002

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(B)
11 CFR 104.5(c)(3)(i)
11 CFR 104.5(c)(3)(ii)

III. BACKGROUND:

Failure to Timely File Reports

Allied Bancshares Leadership Funds Federal ("Allied Bancshares") failed to file eight (8) Reports of Receipts and Disbursements in a timely manner during the 1983-84 election cycle. In addition, Allied Bancshares failed to file the 12 Day Pre-General Report by Election Day, November 6, 1984 (see attached chart). The reports were filed between ten (10) and twenty-seven (27) calendar days late.

On March 9, 1984, a Chronic Late Filer Notice was sent to Allied Bancshares for failing to file the 1983 August, September, October, November, and December Monthly Reports and the 1984 February Monthly Report in a timely manner (Attachment 10). The notice advised Allied Bancshares that any additional late filing of reports may result in legal enforcement action.

On March 26, 1984, Allied Bancshares submitted a letter of explanation in response to the Chronic Late Filer Notice. The letter stated that the reporting dates had been misunderstood and that they were under the impression that the reports were due ". . . no later than the 10th of the second month; i.e., February's report would be due no later than April 10th" (Attachment 11).

85040543158

ALLIED BANCSHARES LEADERSHIP FUNDS FEDERAL
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

Subsequent to the Chronic Late Filing Notice, Allied Bancshares filed the 12 Day Pre-General and 30 Day Post-General Reports^{*}/ late.

Ms. Houlihan called the RAD analyst on November 20, 1984, in response to a Non-Filer Notice that was sent for failure to file the 12 Day Pre-General Report. Ms. Houlihan stated that she had not received prior notice of when the report was due, but that she had prepared a November Monthly Report instead. The analyst requested that she send a letter of explanation and also reminded her of the coverage dates and due dates for the 30 Day Post-General and Year End Reports (Attachment 14). A November Monthly Report covering October 1 through October 31, 1984 was submitted on November 21, 1984 (Attachment 15).

On December 26, 1984, Ms. Houlihan called the Party/Non-Party Branch Chief, to seek clarification regarding the due date of the 30 Day Post-General Report. The Branch Chief informed Ms. Houlihan that the report was due on December 6, 1984. Ms. Houlihan agreed to send the December Monthly Report (in lieu of the 30 Day Post-General) by air express (Attachment 16). The report was filed on December 27, 1984 with a cover letter stating that there was a misunderstanding regarding the date the report was due (Attachment 17).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

^{*}/ Allied Bancshares submitted November and December Monthly Reports in lieu of the required 12 Day Pre-General and 30 Day Post-General Reports.

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LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1983 August Monthly (7/1/83-7/31/83)	7/7/83 (Attachment	8/20/83	N/A	9/1/83 (Attachment 3)
1983 September Monthly (8/1/83-8/31/83)	" "	9/20/83	N/A	10/3/83 (Attachment 4)
1983 October Monthly (9/1/83-9/30/83)	" "	10/20/83	N/A	11/3/83 (Attachment 5)
1983 November Monthly (10/1/83-10/31/83)	" "	11/20/83	N/A	12/7/83 (Attachment 6)
1983 December Monthly (11/1/83-11/30/83)	" "	12/20/83	N/A	1/9/84 (Attachment 7)
1984 February Monthly (1/1/84-1/31/84)	1/7/84 (Attachment 8)	2/20/84	N/A	3/1/84 (Attachment 9)
1984 12 Day Pre-General* (10/1/84-10/17/84)	10/1/84 (Attachment 12)	10/25/84	11/16/84 (Attachment 13)	11/21/84 (Attachment 15)
1984 30 Day Post-General* (10/18/84-11/26/84)	" "	12/6/84	N/A	12/27/84 (Attachment 17)

*Allied Bancshares submitted November and December Monthly Reports in lieu of the required 12 Day Pre-General and 30 Day Post-General Reports.

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	OF PAGES	MICROFILM LOCATION
ALLIED BANCSHARES LEADERSHIP FUNDS FEDERAL CONNECTED ORGANIZATION: ALLIED BANCSHARES INC				NON-PARTY QUALIFIED		ID #C00110984
1983	FEBRUARY MONTHLY	3,398	1,500	1JAN83 -31JAN83	5	83FEC/266/2461
	FEBRUARY MONTHLY - AMENDMENT	3,398	1,500	1JAN83 -31JAN83	4	84FEC/311/4211
	REQUEST FOR ADDITIONAL INFORMATION			1JAN83 -31JAN83	1	84FEC/307/8233
	MARCH MONTHLY	3,518	0	1FEB83 -28FEB83	4	83FEC/268/1899
	MARCH MONTHLY - AMENDMENT	3,518	0	1FEB83 -28FEB83	3	84FEC/311/4215
	REQUEST FOR ADDITIONAL INFORMATION			1FEB83 -28FEB83	1	84FEC/307/8231
	APRIL MONTHLY	3,597	0	1MAR83 -31MAR83	6	83FEC/269/4414
	APRIL MONTHLY - AMENDMENT	3,597	0	1MAR83 -31MAR83	3	84FEC/311/4218
	REQUEST FOR ADDITIONAL INFORMATION			1MAR83 -31MAR83	1	84FEC/307/8229
	MAY MONTHLY	3,370	0	1APR83 -30APR83	8	83FEC/272/8167
	MAY MONTHLY - AMENDMENT	3,370	0	1APR83 -30APR83	3	84FEC/311/4221
	REQUEST FOR ADDITIONAL INFORMATION			1APR83 -30APR83	1	84FEC/307/8867
	JUNE MONTHLY	3,589	2,000	1MAY83 -31MAY83	11	83FEC/273/2423
	JUNE MONTHLY - AMENDMENT	3,589	2,000	1MAY83 -31MAY83	3	84FEC/311/4224
	REQUEST FOR ADDITIONAL INFORMATION			1MAY83 -31MAY83	1	84FEC/307/8868
	JULY MONTHLY	3,276	0	1JUN83 -30JUN83	5	83FEC/277/4804
	JULY MONTHLY - AMENDMENT	3,276	0	1JUN83 -30JUN83	3	84FEC/311/4227
	REQUEST FOR ADDITIONAL INFORMATION			1JUN83 -30JUN83	1	84FEC/307/8869
	AUGUST MONTHLY	3,437	1,500	1JUL83 -31JUL83	8	83FEC/282/2795
	AUGUST MONTHLY - AMENDMENT	3,437	1,500	1JUL83 -31JUL83	3	84FEC/311/4238
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31JUL83	1	84FEC/307/8870
	SEPTEMBER MONTHLY	3,075	0	1AUG83 -31AUG83	8	83FEC/284/8463
	SEPTEMBER MONTHLY - AMENDMENT	3,075	0	1AUG83 -31AUG83	3	84FEC/311/4233
	REQUEST FOR ADDITIONAL INFORMATION			1AUG83 -31AUG83	1	84FEC/307/8871
	OCTOBER MONTHLY	3,641	0	1SEP83 -30SEP83	7	83FEC/286/3277
	OCTOBER MONTHLY - AMENDMENT	3,641	0	1SEP83 -30SEP83	3	84FEC/311/4236
	REQUEST FOR ADDITIONAL INFORMATION			1SEP83 -30SEP83	1	84FEC/307/8225
	NOVEMBER MONTHLY	3,133	0	1OCT83 -31OCT83	10	83FEC/288/2438
	NOVEMBER MONTHLY - AMENDMENT	3,133	0	1OCT83 -31OCT83	3	84FEC/311/4239
	REQUEST FOR ADDITIONAL INFORMATION			1OCT83 -31OCT83	1	84FEC/307/8872
	DECEMBER MONTHLY	3,102	1,500	1NOV83 -30NOV83	11	84FEC/290/1301
	DECEMBER MONTHLY - AMENDMENT	3,102	1,500	1NOV83 -30NOV83	3	84FEC/311/4242
	REQUEST FOR ADDITIONAL INFORMATION			1NOV83 -30NOV83	1	84FEC/307/8873
	YEAR-END	3,129	1,000	1DEC83 -31DEC83	11	84FEC/293/4889
	YEAR-END - AMENDMENT	3,129	1,000	1DEC83 -31DEC83	3	84FEC/311/4245
	REQUEST FOR ADDITIONAL INFORMATION			1DEC83 -31DEC83	1	84FEC/307/8227
1984	MISCELLANEOUS NOTICE FROM FEC			9MAR84	1	84FEC/299/8479
	MISCELLANEOUS REPORT			26MAR84 TO FEC	2	84FEC/306/2878
	FEBRUARY MONTHLY	3,097	2,500	1JAN84 -31JAN84	4	84FEC/297/3998
	FEBRUARY MONTHLY - AMENDMENT	3,097	2,500	1JAN84 -31JAN84	3	84FEC/311/4248
	MARCH MONTHLY	2,959	1,000	1FEB84 -29FEB84	5	84FEC/306/2888
	MARCH MONTHLY - AMENDMENT	2,979	100	1FEB84 -29FEB84	5	84FEC/310/4338
	MARCH MONTHLY - AMENDMENT	2,959	1,000	1FEB84 -29FEB84	3	84FEC/311/4251
	APRIL MONTHLY	2,979	100	1MAR84 -29MAR84	5	84FEC/314/3199

ATTACHMENT 1 (1 of 2)

8 5 0 4 0 5 4 3 1 6 2
 FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE CHARGES
 PAGE 2

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILE COVERAGE DATES	NO OF PAGES	MICROFILM LOCATION
	NOTICE OF FAILURE TO FILE			1MAR84 -31MAR84	1	84FEC/314/0953
	MAY MONTHLY	2,280	0	1APR84 -30APR84	3	84FEC/314/3205
	1'ST LETTER INFORMATIONAL NOTICE			1APR84 -30APR84	1	84FEC/324/2878
	JUNE MONTHLY	2,754	4,000	1MAY84 -31MAY84	5	84FEC/317/1313
	JULY MONTHLY	2,497	0	1JUN84 -30JUN84	5	84FEC/323/3678
	AUGUST MONTHLY	2,626	0	1JUL84 -31JUL84	6	84FEC/324/2127
	AUGUST MONTHLY - AMENDMENT	2,626	0	1JUL84 -31JUL84	5	84FEC/336/2295
	1'ST LETTER INFORMATIONAL NOTICE			1JUL84 -31JUL84	1	84FEC/329/5495
	SEPTEMBER MONTHLY	2,658	4,400	1AUG84 -31AUG84	7	84FEC/329/2618
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG84 -31AUG84	3	84FEC/346/4942
	REQUEST FOR ADDITIONAL INFORMATION			1AUG84 -30AUG84	1	84FEC/340/425
	OCTOBER MONTHLY	2,675	3,000	1SEP84 -30SEP84	10	84FEC/344/1685
	NOTICE OF FAILURE TO FILE			1OCT84 -17OCT84	1	84FEC/349/6579
	NOVEMBER MONTHLY	2,481	5,000	1OCT84 -31OCT84	11	84FEC/349/3381
	DECEMBER MONTHLY	2,467	21,100	1NOV84 -30NOV84	11	84FEC/357/4252
	YEAR-END	1,994	1,000	1DEC84 -31DEC84	9	85FEC/361/4903
	TOTAL	71,732	0 49,600		0	251 TOTAL PAGES

All of the reports listed have been reviewed.

Ending cash balance as of 12/31/84: \$73,747

Debts and obligations as of 12/31/84: \$0

ATTACHMENT 1 (2 of 2)



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

July 7, 1983

SEMIANNUAL REPORT FILING REQUIREMENTS

WHO MUST FILE

ALL POLITICAL COMMITTEES currently registered with the Commission (except committees filing monthly) must file a semiannual report by July 31, 1983.

WHAT MUST BE REPORTED

Committees must disclose all financial activity of the committee from the later of, the last report filed or the date of registration,* through June 30, 1983.

FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight July 31, 1983. Reports hand delivered or mailed first class must be received no later than close of business July 31, 1983.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed form for details.

FAILURE TO FILE

According to Commission policy, political committees will not necessarily receive notification of their failure to file reports. However, they remain fully liable for failure to file any report required under the Act. In addition, failure to file required reports may result in compliance proceedings. Committees must submit legible reports which can be reproduced clearly. Illegible documents will not be accepted as reports, and committees filing such documents will be required to refile.

MONTHLY FILERS

Committees filing on a monthly schedule need not file a semiannual report. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month. The next monthly report must be filed by July 20, 1983, and disclose all financial activity of the committee from June 1 through June 30, 1983.

- * 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).

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

85040543163

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

RECEIVED AT THE FEC

83 SEP 1 09:08

(Summary Page)

ATTACHMENT 3

1. Name of Committee (in Full)
Allied Senescharee Leadership Fund - Federal

Address (Number and Street)
808 Travis
P.O. Box 1515

City, State and ZIP Code
Houston, Texas 77002

Check if address is different than previously reported.

2. FEC Identification Number
C00119794

3. This committee qualified as a non-federally controlled committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (check appropriate boxes)

April 15 Quarterly Report

July 15 Quarterly Report

October 15 Quarterly Report

January 31 Year End Report

July 31 Mid Year Report (Non-election Year Only)

Monthly Report for July 1983

Twelfth day report preceding _____ (Type of Election) 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

SUMMARY

5. Covering Period 7-1-83 Through 7-31-83

6. (a) Cash on Hand January 1, 1983

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 20)

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))

9. Debts and Obligations Owed TO the Committee (Provide all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Provide all on Schedule C or Schedule D)

	Column A This Period	Column B Calendar Year-to-Date
(a)		\$ 51,063.56
(b)	\$ 68,315.08	
(c)	\$ 3,437.13	\$ 24,188.65
(d)	\$ 71,752.21	\$ 75,252.21
7.	\$ 1,500.00	\$ 5,000.00
8.	\$ 70,252.21	\$ 70,252.21
9.	\$	
10.	\$	

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:

Federal Election Commission
Toll Free 800-424-9520
Local 202-426-4000

Julia C. Pollard
Type or Print Name of Treasurer

Julia C. Pollard
SIGNATURE OF TREASURER

8-26-83
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. §437c.

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

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FEC FORM 3X (8/80)

8504054316
8303292798

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

ATTACHMENT 4

(Summary Page)

83 OCT 3 4:07

1. Name of Committee (in Full)
Allied Benchmarks Leadership Fund - Federal

Address (Number and Street)
808 Travis
P.O. Box 1515

City, State and ZIP Code
Houston, Texas 77002

Check if address is different than previously reported.

2. FEC Identification Number
C00118994

3. This committee qualified as a multi-candidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for August 1983
 Twelfth day report preceding _____ (Type of Election) 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

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>8/1/83</u> Through <u>8/31/83</u>		
6. (a) Cash on Hand January 1, 1983		\$ 51,063.56
(b) Cash on Hand at Beginning of Reporting Period	\$ 70,252.21	
(c) Total Receipts (from Line 10)	\$ 3,075.58	\$ 27,264.23
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 73,327.79	\$ 78,327.79
7. Total Disbursements (from Line 20)	\$ -0-	\$ 5,000.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 73,327.79	\$ 73,327.79
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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:

Federal Election Commission
 Toll Free 800-424-6630
 Local 202-423-4080

Julia C. Pollard
 Type or Print Name of Treasurer

Julia C. Pollard
 SIGNATURE OF TREASURER

9-27-83
 Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437c.

All previous versions of FEC FORM 3 and FEC FORM 2s are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

850403431045
 03032940463

ATTACHMENT 5
 83 NOV 9 8:48

(Summary Page)

1. Name of Committee (in Full)
Allied Seneschare Leadership Fund - Federal

Address (Number and Street)
**688 Travis
 P.O. Box 1515**

City, State and ZIP Code
Houston, Texas 77002

Check if address is different than previously reported.

2. FEC Identification Number
00118984

3. This committee qualified as a non-federally controlled committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Re-election Year Only)
 Monthly Report for September, 1983
 Twelfth day report preceding _____ (Type of General Election) on _____ in the State of _____
 Twelfth day report following the General Election on _____ in the State of _____
 Termination Report

5. Is this Report an Amendment?
 YES NO

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
6. Covering Period <u>9/1/83</u> Through <u>9/30/83</u>		
6. (a) Cash on Hand January 1, 1983		\$ 51,063.56
(b) Cash on Hand at Beginning of Reporting Period	\$ 73,327.79	
(c) Total Receipts (from Line 10)	\$ 3,641.06	\$ 30,905.29
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 76,968.85	\$ 81,968.85
7. Total Disbursements (from Line 20)	\$ -0-	\$ 1,000.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 76,968.85	\$ 76,968.85
9. Debts and Obligations Owed TO the Committee (Provide all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Provide all on Schedule C or Schedule D)	\$ -0-	

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:

Federal Election Commission
 Toll Free 800-424-9595
 Local 202-427-4600

Julia C. Pollard
 Type or Print Name of Treasurer

Julia C. Pollard
 SIGNATURE OF TREASURER

10/31/83
 Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §407c.

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

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FEC FORM 3X (8/80)

85040543166
 63032863277

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

RECEIVED AT THE FEC

ATTACHMENT 6

(Summary Page)

83DEC 7 11:02

<p>1. Name of Committee (in Full) Allied Bankshares Leadership Funds - Federal</p> <hr/> <p>Address (Number and Street) 808 Travis P.O. Box 1515</p> <hr/> <p>City, State and ZIP Code Houston, Texas 77002</p> <hr/> <p><input type="checkbox"/> Check if address is different than previously reported.</p> <hr/> <p>2. FEC Identification Number C00118984</p> <hr/> <p>3. <input type="checkbox"/> This committee qualified as a multi-state committee during this Reporting Period on _____ (date)</p>	<p>4. TYPE OF REPORT (check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only) <input checked="" type="checkbox"/> Monthly Report for <u>October, 1983</u> <input type="checkbox"/> Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____ <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____ <input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>
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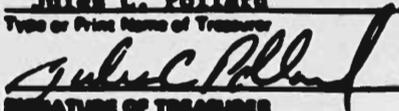
SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>10/1/83</u> Through <u>10/31/83</u>			
6. (a) Cash on Hand January 1, 1983			\$ 51,063.56
(b) Cash on Hand at Beginning of Reporting Period	\$76,968.85		
(c) Total Receipts (from Line 10)	\$ 3,133.34		\$ 34,038.63
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$80,102.19		\$ 85,102.19
7. Total Disbursements (from Line 20)	\$ -0-		\$ 5,000.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 80,102.19		\$ 80,102.19
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-		
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-		

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:

Federal Election Commission
Toll Free 800-424-9530
Local 202-633-4000

Jules C. Pollard
Type or Print Name of Treasurer


SIGNATURE OF TREASURER

11/30/83
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g.

All previous versions of FEC FORM 3 and FEC FORM 2s are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

03032987430

REPORT OF RECEIPTS AND DISBURSEMENTS As Required by **THE FEC**
For a Political Committee Other Than an Authorized Committee

(Summary Page)

ATTACHMENT 7

84 JAN 9 8:21

<p>1. Name of Committee (in Full) Allied Bankshares Leadership Funds FEDERAL</p> <hr/> <p>Address (Number and Street) 908 Travis P. O. Box 1515</p> <hr/> <p>City, State and ZIP Code Houston, Texas 77002</p> <hr/> <p><input type="checkbox"/> Check if address is different than previously reported.</p> <hr/> <p>2. FEC Identification Number C0018984</p> <hr/> <p>3. <input type="checkbox"/> This committee qualified as a multi-candidate committee during this Reporting Period on _____ (date)</p>	<p>4. TYPE OF REPORT (check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only) <input checked="" type="checkbox"/> Monthly Report for <u>November 1983</u> <input type="checkbox"/> Twelfth day report preceding _____ (Type of General election on _____ in the State of _____) <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____</p> <p><input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>
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SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>11-1-83</u> Through <u>11-30-83</u>			
6. (a) Cash on Hand January 1, 1983			\$ 51,063.56
(b) Cash on Hand at Beginning of Reporting Period	\$ 80,102.19		
(c) Total Receipts (from Line 1B)	\$ 3,102.69	\$ 37,141.32	
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 83,204.88	\$ 88,204.88	
7. Total Disbursements (from Line 2B)	\$ 1,500.00	\$ 6,500.00	
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 81,704.88	\$ 81,704.88	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-		
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-		

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:

Federal Election Commission
Toll Free 800-424-6530
Local 202-633-4888

Jules C. Pollard
Type or Print Name of Treasurer

Jules C. Pollard
SIGNATURE OF TREASURER

12-30-83
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437b.

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

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FEC FORM 3X (3/80)

0 8 9 3 2 0 1 3 0 1 0 0



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 7, 1984

JANUARY 31 YEAR-END REPORT NOTICE

WHO MUST FILE

ALL POLITICAL COMMITTEES currently registered with the Commission must file a year-end report by January 31, 1984.

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through December 31, 1983. Registered committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration* through December 31, 1983.

FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1984. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1984.

WHERE TO FILE

Committees should consult the instructions on the enclosed form for details.

COMPLIANCE

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

1984 FILING REQUIREMENTS

See the January 1984 issue of the FEC Record for filing requirements during 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).

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

85040543169

REPORT OF RECEIPTS AND DISBURSEMENTS
 For a Political Committee Other Than an Authorized Committee
 (Summary Page)

RECEIVED AT THE FEC
 ATTACHMENT 9
 4 MAR 1 7:58

1. Name of Committee (in Full)
ALLIED BANCSHARES LEADERSHIP FEDERAL

Address (Number and Street)
**BOB TRAVIS
 P.O. BOX 1515**

City, State and ZIP Code
HOUSTON, TEXAS 77002

Check if address is different than previously reported.

2. FEC Identification Number
CO010994

3. This committee qualified as a multi-candidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for DECEMBER 1983
 Twelfth day report preceding _____ (Year of Election) 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

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>1-1-84</u> Through <u>1-31-84</u>		
6. (a) Cash on Hand January 1, 19____		\$ 83,834.47
(b) Cash on Hand at Beginning of Reporting Period	\$ 83,834.47	
(c) Total Receipts (from Line 18)	\$ 3,097.19	\$ 3,097.19
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 86,931.66	\$ 86,931.66
7. Total Disbursements (from Line 28)	\$ 2,500.00	\$ 2,500.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 84,431.66	\$ 84,431.66
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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:
 Federal Election Commission
 Toll Free 800-424-6630
 Local 702-473-4868

THOMAS C. TOLLARD
 Type or Print Name of Treasurer

Thomas C. Tollard
 SIGNATURE OF TREASURER

1-31-84
 Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing the Report to the penalties of 2 U.S.C. §437g.

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

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0200345858



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

9 March 1984

MS-L

Jules C. Pollard, Treasurer
 Allied Bancshares Leadership
 Funds FEDERAL
 P.O. Box 1515
 800 Travis
 Houston, TX 77002

Identification Number: C00118984

Reference: 1983-84 Election Cycle Reports

Dear Mr. Pollard:

This letter is prompted by the Commission's review of the reports filed by your committee. The following is a list of reports your committee has failed to file in a timely manner.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
August Monthly (7/1/83-7/31/83)	8/20/83	9/01/83
September Monthly (8/1/83-8/31/83)	9/20/83	10/03/83
October Monthly (9/1/83-9/30/83)	10/20/83	11/03/83
November Monthly (10/1/83-10/31/83)	11/20/83	12/07/83
December Monthly (11/1/83-11/30/83)	12/20/83	1/09/84
February Monthly (1/1/84-1/31/84)	2/20/84	3/01/84

Timely filing is a specific requirement of the Federal Election Campaign Act and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views late filing as a serious violation of the Act. This communication is to advise you that any additional late filing of a required report by your committee may result in the Commission initiating legal enforcement action.

If you need assistance or have any questions regarding this matter, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Michael B. Filler
 Chief
 Party Non-Party Branch

85040543171
 9403279017

RECEIVED J. P. THE FEC

84 MAR 28 AM: 83

Allied Bank of Texas

P. O. BOX 222, HOUSTON, TEXAS 77001 (713) 262-0111

ATTACHMENT 11

March 20, 1984

Mr. Michael B. Filler
Chief
Party/Non-Party Branch
Federal Election Commission
Washington, D.C. 20463

Identification Number: C08118984

Reference: 1983-84 Election Cycle Reports

Dear Mr. Filler:

This letter is in response to your letter dated March 9, 1984.
(A copy is attached.)

We are enclosing the report for February 1984 and have adjusted our system to assure that all reports will be completed by the 20th of each proceeding month. The responsibility for this report was transferred to our area and the reporting date required was somehow misunderstood. As you can see from the history of reporting, we were under the impression that this report was due no later than the 10th of the second month; i.e. February's report would be due no later than April 10th.

Thank you for bringing this situation to our attention and be assured that we will comply with the requirements of your office.

Sincerely,

Anita R. Lewis

Anita R. Lewis
Senior Vice President
Controller

AL:dh

Attachments (1)
Enclosures

cc: Federal Election Commission
1325 K. Street, N.W.
Washington, D.C. 20463
Att: Mail Room

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FEDERAL ELECTION COMMISSION
WASHINGTON DC 20540

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).

8 5 0 4 0 5 4 3 1 7 3

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

8 5 0 4 0 5 4 3 1 7 4



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

EQ-7

November 16, 1984

Jules C. Pollard, Treasurer
Allied Bancshares Leadership
Funds Federal
P.O. Box 1515/808 Travis
Houston, TX 77002

Identification Number: C90118984

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

Dear Mr. Pollard:

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 100.2, 100.3, 100.4).

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 Lisa Stolaruk on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

85040543175
91035140579

Allied Bancshares, Inc.

P. O. BOX 900, DALLAS, TEXAS 75201
HOUSTON, TEXAS 77001 (713) 226-1850

RECEIVED AT THE FEC

84 NOV 21 AM 10

ATTACHMENT 15 (1 of 3)

November 20, 1984

Ms. Lisa Stolaruk
Federal Election Commission
Washington, D.C. 20463

Identification No: C90118984

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

Dear Ms. Stolaruk:

Enclosed is our Report of Receipts and Disbursements for the total month of October. As per our phone conversation today, this report is being sent in lieu of the 12 Day Pre-General Report referenced above. This is due to the fact that I was not in receipt of your previous request for the 12 Day Pre-General.

Please call if you require any additional information or if you have any questions.

Sincerely,

Diana Moulihan
Secretary to
Anita Lewis/Allied Bank of Texas

Phone: (713) 226-1850

8504054033193301

84 NOV 28 1984

Summary Page

ALBERTA

1. Name of Committee (in Full)

Allied Business Leadership - Federal

Address (Number and Street)

888 Travis
P.O. Box 1515

City, State and ZIP Code

Houston, Texas 77002

Check here if address is different than previously reported.

2. FEC Identification Number

3. This committee qualified as a non-federally financed 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 31 600 Year Report (Non-Charitable Year Only)

Monthly Report for OCTOBER 1984

Year-end 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

SUMMARY

8. Reporting Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
10-1-84 through 10-31-84		
9. (a) Cash on hand January 1, 84		\$ 83,834.47
(b) Cash on Hand at Beginning of Reporting Period	\$ 93,983.40	
(c) Total Receipts (From Line 10)	\$ 2,481.80	\$ 27,539.73
(d) Subtotal (Add Lines 9(b) and (c) for Column A and Lines 9(a) and (c) for Column B)	\$ 96,385.20	\$ 111,385.20
7. Total Disbursements (From Line 20)	\$ 5,000.00	\$ 20,000.00
8. Cash on Hand at Close of Reporting Period (Subtract Line 7 from Line 6(d))	\$ 91,385.20	\$ 91,385.20
9. Debts and Obligations Owed TO The Committee (Provide all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Provide all on Schedule C or Schedule D)	\$ -0-	

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

JULIE C. POLLARD

Title or Print Name of Treasurer

Julie C. Pollard

10-15-84

Signature

For further information contact:

Federal Election Commission

Toll Free 800-424-9600

Local 202-426-4200

NOTE: Submission of false, overstated, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g.

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 2A (1983)

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FEB 21 1978

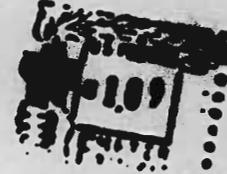
Allied Bank of Texas

P. O. BOX 2828, 650 TRAVIS, HOUSTON, TEXAS 77268-2828

MM
DD
YY



04:30Z ALL: 10



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

CERTIFIED
No. 530 078

ATTACHMENT 15 (3 of 3)

HAND DELIVERED
DEC 27 11:40

Allied Bank of Texas

P O BOX 2286 HOUSTON, TEXAS 77253 713/264-6911

December 26, 1984

Mr. Mike Filler
Federal Election Commission
Washington, D.C. 20463

Identification No.: C00118984

Reference: 30 Day After Election Report

Dear Mr. Filler:

Enclosed is our Report of Receipts and Disbursements for the month of November. As per our phone conversation today, this report is being sent in lieu of the 30 Day After Election Report. This is due to confusion on my part as to the required reporting date.

Lisa Stolaruk has been a great source of help to me on these reports and when I spoke to her last concerning this year's filings, she mentioned that the 30 Day report was due by the 6th. Unfortunately I took this information to mean the 6th of January when she was actually speaking about the 6th of December, therefore we are now sending this report.

Thank you for all of your assistance. Hopefully we will now keep on a good schedule for your requirements.

Sincerely,

Diana Houlihan

Diana Houlihan
Secretary to
Anita Lewis/Allied Bank of Texas

Phone: (713) 226-1858

252437330A

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

ATTACHMENT: 17, (2 of 2) FEI

HAND DELIVERED
F4 DEC 27 11:48
ALLEN AREA

(Summary Page)

ALLEN AREA

1. Name of Committee (No Full)

Allied Bancshares Leadership - Federal

Address (Number and Street)

**808 Travis
P.O. Box 1515**

City, State and ZIP Code

Houston, TX 77002

Check here if address is different than previously reported.

2. FEC Identification Number

00118984

3. This committee qualified as a multicandidate committee during this Reporting Period on _____

4. TYPE OF REPORT (Check appropriate boxes)

- April 15 Quarterly Report
- July 15 Quarterly Report
- July 31 Mid Year Report (Non Election Year Only)
- Monthly Report for **NOVEMBER 1984**
- Twelfth day report preceding _____ election on _____ in the State of _____
- Thirtieth day report following the General Election on _____ in the State of _____
- Termination Report

Is this Report an Amendment?

YES NO

SUMMARY

5. Covering Period **11-1-84** through **11-30-84**

6. (a) Cash on hand January 1, 19 **84**

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 20)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

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

Jules C. Pollard

Title or Print Name of Treasurer

Jules C. Pollard
SIGNATURE OF TREASURER

12-15-84

Date

For further information contact:

Federal Election Commission

Toll Free 800-426-6530

Local 202-453-4888

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437c.

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

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FEC FORM 3X (3/80)

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1972

Date Filmed 8/14/85 Camera No. --- 2

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 1972 .

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G.C.C.# 8339

FEDERAL ELECTION COMMISSION CORRESPONDENCE CONTROL SLIP Do Not Separate From Document	For Division Use 850819142918 JJ	Suspense No. 502560	
	Name and Address of Sender 		
	Subject of Correspondence MUR 1972		
	Date Received 08/19/85	Suspense Date 09/09/85	
	Referred to 4. DOCKET	Action (Optional) 8339 / Rally	
	2.		
	3.		
	4.		
	5.		
	Answer Date		File Designation
Special Instructions: 			

Allied Bank of Texas

P.O. BOX 3328, HOUSTON, TEXAS 77253, 713/224-0611

85 AUG 19 P2:01
BCC#8339

85 AUG 19 P3:47

August 15, 1985

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20403

Dear Mr. Steele:

Enclosed are copies of your letter to Jules Pollard dated June 18, 1985, the Conciliation Agreement between the Federal Election Commission, and Allied Bancshares Leadership Funds-Federal, an article from the Houston Chronicle titled "Houston PAC fined for filing late Reports" dated August 13, 1985, and my letter to Patty Reilly dated April 19, 1985.

From my previous discussions with Ms. Reilly and from my interpretation of the United States Code, I thought that "no information derived in connection with any conciliation attempt by the Commission under subparagraph (A) may be made public by the Commission without the written consent of the Respondent and the Commission." 2U.S.C. §437g(4)B(1). Since the last paragraph of my letter to Ms. Reilly requested "the Commission to institute pre-probable cause conciliation proceedings," I believe the letter must be construed as a conciliation attempt and therefore not available to the public. The Houston Chronicle article mentions my name and my explanations for the cause of the alleged violations as set forth in the third paragraph of my letter to Ms. Reilly.

Prior to the publication of the article, Mr. Felten and I have not spoken to anyone other than employees of Allied Bank of Texas regarding the conciliation process and agreement. Mr. Felten and I have never spoken to any employee of The Houston Chronicle regarding this matter. Allied Bank of Texas has not given its written consent for any information to be made public. I assume that The Houston Chronicle obtained access to my letter to Ms. Reilly while researching the records of the Federal Election Commission.

85040554257

Mr. Charles N. Steele
August 15, 1985
Page 2

Please provide Allied Bank of Texas, Mr. Felten and me with an explanation as to how this information became available to The Houston Chronicle. Thank you for your attention to this matter.

Sincerely,

J. Michael Watson

J. Michael Watson
Counsel

Enclosures

cc: Patty Reilly
Federal Election Commission

Steve Felten
Allied Bank of Texas

85040554258



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

*to Steve Felton
Accounting Dept*

June 18, 1985

Jules C. Pollard, treasurer
Allied Bancshares Leadership
Funds-Federal
P.O. Box 3326
Houston, TX 77253

RE: MUR 1972
Allied Bancshares Leadership
Funds-Federal
and Jules C. Pollard,
as treasurer

Dear Mr. Pollard:

On June 14, 1985, the Commission accepted the conciliation agreement signed by you, and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(B) and C.F.R. §§ 104.5(C)(3)(i) and 104.5(c)(3)(ii), a provision of the Federal Election Campaign Act of 1971, as amended and its Regulations. 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

RECEIVED
AUG 14 1985

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Allied Bancshares Funds-Federal
and Jules C. Pollard, as
treasurer

MUR 1972

MAY 29 AIO: 5
GENERAL COUNSEL
RT

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 Allied Bancshares Leadership Funds-Federal and Jules C. Pollard, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. §§ 104.5(c)(3)(i) and 104.5(c)(3)(ii) by failing to file the required reports 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 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, Allied Bancshares Leadership Funds-Federal, is an unauthorized political committee.
2. Respondent, Jules C. Pollard, is the treasurer of the Allied Bancshares Leadership Funds-Federal.
3. Respondents were required to file the 1983 August Monthly Report on August 20, 1983. This report was not received by the Commission until September 1, 1983.
4. Respondents were required to file the 1983 September Monthly Report on September 20, 1983. This report was not received by the Commission until October 3, 1983.
5. Respondents were required to file the 1983 October Monthly Report on October 20, 1983. This report was not received by the Commission until November 3, 1983.
6. Respondents were required to file the 1983 November Monthly Report on November 20, 1983. This report was not received by the Commission until December 7, 1983.
7. Respondents were required to file the 1983 December Monthly Report on December 20, 1983. This report was not received by the Commission until January 9, 1984.
8. Respondents were required to file the 1984 February Monthly Report on February 20, 1984. This report was not received by the Commission until March 1, 1984.
9. Respondents were required to file the 1984 12 Day Pre-General Report on October 25, 1984. The Commission received the information required in this report on November 26, 1984.

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10. Respondents were required to file the 1984 30 Day Post-General Report on December 6, 1984. The Commission received the information required in this report on December 27, 1984.

V. Respondents' failure to timely file the above-noted reports is a violation of 2 U.S.C. § 434(a)(4)(B).

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Four Hundred Twenty-Five Dollars (\$425), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree that they shall not 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 all parties hereto have executed the same and the Commission has approved the entire agreement.

X. Respondents shall have no 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.

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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 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

Date

June 19, 1945

FOR THE RESPONDENTS:

Jules C. Pollard
Jules C. Pollard
Treasurer

Date

5/22/85

85040554263

Allied Bank of Texas

P. O. BOX 3326, HOUSTON, TEXAS 77283. 713/224-8611

Federal Express No. 707789924

April 19, 1985

Ms. Patty Reilly
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1972
Allied Bancshares Leadership Funds - Federal and Jules L. Pollard,
as Treasurer

Dear Ms. Reilly:

Thank you for taking the time to answer my questions on April 19, 1985. Enclosed are copies of all the correspondence between the Allied Bancshares Leadership Funds - Federal ("Allied") and the Federal Election Commission ("Commission"). These copies are provided in hopes of assisting the Commission's investigation of Allied's and Mr. Pollard's alleged violations of the Federal Election Campaign Act of 1971, as amended (the "Act") and the Act's regulations more fully described in McGarry's letter dated April 12, 1985 and received on April 17, 1985.

Allied and Jules Pollard, as treasurer, are alleged to have been late in their filing of monthly, pre-general, and post-general reports.

The General Counsel's Factual and Legal Analysis states that six monthly reports were filed late. Allied's records indicate that some if not all of these records were filed in a timely manner. When Allied realized the discrepancy between the Commission's records of when the reports were filed and Allied's records, Allied instituted a policy of sending all reports to the Commission by certified mail. This policy began in June of 1984. The alleged violations of failing to file the 1984 Pre-General and Post-General Reports in a timely manner can be attributed to a miscommunication between employees of the Commission and employees of Allied Bank of Texas as evidenced by letters dated November 20, 1984, and December 26, 1984. If any alleged violations did occur, they can be attributed to a change in the department and the personnel responsible for filing the reports and to the aforementioned miscommunications. Allied's monthly reports have been current since the alleged violations.

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Ms. Patty Reilly
April 19, 1985
Page 2

Allied requests the Commission to institute pre-probable cause conciliation proceedings as set forth in 2 U.S.C. §437g(4)(A)(i). This letter and the enclosed documents are intended as a brief outline of Allied's response to Mr. McGarry's letter. Allied will readily describe the foregoing in greater detail once the conciliation process has begun.

Sincerely,

J. Michael Watson
Counsel

JMW:cac

Enclosures

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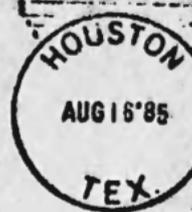
Alliedth Bank of Texas

P. O. BOX 3326
HOUSTON, TEXAS 77263

J. Michael Watson

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20403

PRESORTED
FIRST CLASS



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Allied Bank of Texas
P.O. BOX 3328, HOUSTON, TEXAS 77283, 713/224-8611

RECEIVED AT THE FEC

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August 15, 1985

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20403

Dear Mr. Steele:

Enclosed are copies of your letter to Jules Pollard dated June 18, 1985, the Conciliation Agreement between the Federal Election Commission, and Allied Bancshares Leadership Funds-Federal, an article from the Houston Chronicle titled "Houston PAC fined for filing late Reports" dated August 13, 1985, and my letter to Patty Reilly dated April 19, 1985.

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Mr. Charles N. Steele
August 15, 1985
Page 2

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Sincerely,

J. Michael Watson

J. Michael Watson
Counsel

Enclosures

cc: Patty Reilly
Federal Election Commission

Steve Felten
Allied Bank of Texas

85040554269

Alliedth Bank of Texas

P. O. BOX 3326
HOUSTON, TEXAS 77253

J. Michael Watson

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Patty Reilly
Federal Election Commission
Washington, D.C. 20403

85 AUG 19 P 2: 09





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 5, 1985

J. Michael Watson, Esquire
Bank of Texas
P.O. Box 3326
Houston, Texas 77253

Re: MUR 1972
The Allied Bankshares Leadership
Fund-Federal and Jules C. Pollard,
as treasurer

Dear Mr. Watson:

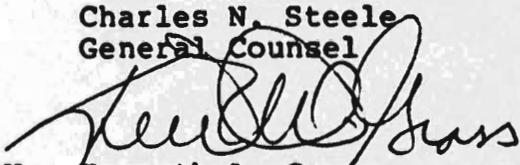
This is in response to your letter to Mr. Steele regarding material placed on the public record in MUR 1972.

As noted in our June 18, 1985 letter, all materials in such matters are routinely placed on the public record unless they are exempt under provisions of the Freedom of Information Act or other statute or they constitute information derived in connection with conciliation negotiations. See 2 U.S.C. § 437g(a)(4)(B). Your April 19, 1985 letter, prior to the Commission's agreement to grant your request for pre-probable cause conciliation, does not constitute information derived in connection with conciliation negotiations. Accordingly, this letter was not among the materials in the file which were excluded from the public record.

If you have any further questions, please contact Ms. Reilly, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

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