

THIS IS THE BEGINNING OF MUR # 3683

93040992539

06C#7232

PERKINS COIE

RECEIVED  
FEDERAL ELECTION COMMISSION  
COUNSEL

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATION  
607 FOURTEENTH STREET, N.W. • WASHINGTON, D.C. 20005-2011 • (202) 628-6600

92 OCT 30 PM 4:53

October 30, 1992

MUR 3683

Lawrence M. Noble, Esq.  
Office of the General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re: Stokley for Congress - NRA Political Victory Fund  
Contributions in Excess of FECA Limits

Dear Mr. Noble:

Stokley for Congress Committee ("Stokley Committee"), the campaign committee of Mr. Richard Stokley, Republican candidate for Congress in the Fifth Congressional District of Texas, received and accepted contributions from the National Rifle Association Political Victory Fund ("NRA Victory Fund") for his general election campaign in excess of the limits prescribed by the Federal Election Campaign Act (the "Act").

The Democratic Congressional Campaign Committee files this letter as a formal complaint against the Stokley Committee, the Committee's treasurer and the NRA Victory Fund for violations of Sections 441a(a) and 441a(f) of the Act.

The Stokley Committee's reports are evidence of these violations. The Quarterly Reports of the Stokley Committee show contributions of \$2,500 and \$2,450 on June 6 and July 29, 1992, respectively from the NRA Victory Fund for the general election. See Exhibits I and II. And, the Stokley Committee's Pre-General Report shows a contribution of \$2,450 for the general election from NRA Victory Fund on October 13, 1992. See Exhibit III. Therefore, according to these reports, the Stokley Committee has received a total of \$7,400 from the NRA Victory Fund for the general election. All of the contributions were received after the primary election on March 10, 1992, and before the general election.

Section 441a(a)(2)(A) of the Act limits contributions from multicandidate committees to candidate committees to \$5,000 per election. Further, Section 441a(f) of the Act provides:

No candidate or political committee shall knowingly accept any contribution or make any

[09901-9700/DA923040.013]

TELEX: 44-0277 PCSO UI • FACSIMILE: (202) 434-1690

ANCHORAGE • BELLEVUE • LOS ANGELES • PORTLAND • SEATTLE • SPOKANE

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92 NOV -4 PM 1:47

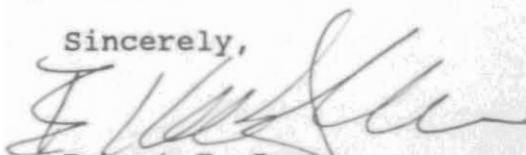
Lawrence M. Noble, Esq.  
October 30, 1992  
Page 2

expenditure in violation of the provisions of this section. No officer or employee of a political committee shall knowingly accept a contribution made for the benefit or use of a candidate, or knowingly make any expenditure on behalf of a candidate, in violation of any limitation imposed on contributions and expenditures under this section.

Under these provisions, the NRA Victory Fund is prohibited from making, and the Stokley Committee is similarly prohibited from accepting from NRA, contributions in excess of \$5,000 per election.

We urge the Commission to take all appropriate enforcement actions under the law against the Stokley Committee and the NRA Victory Fund.

Sincerely,



Robert F. Bauer  
B. Holly Schadler  
Counsel to the Democratic  
Congressional Campaign Committee

Subscribed and sworn before me this 30<sup>th</sup> day of October, 1992.



Notary Public  
NANCY W. BENNING  
Notary Public, Washington, D.C.

My Commission Expires May 31, 1995

Enclosure

BliS:hab

93040992541

7

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule for each category of the Required Summary Page

Page 1 of 1  
FOR LINE NUMBER 11 (G)

Contributions from other Political Committees

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

NAME OF COMMITTEE (in Full)

STOKLEY FOR CONGRESS C00258020

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
N.R.A. POLITICAL VICTORY FUND 1600 Rhode Island Ave. N.W. Washington, D.C. 20036		6-6-92	\$2,500.00
Receipt For: <input type="checkbox"/> Other (specify): <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation	Aggregate Year-to-Date \$	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Other (specify): <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation	Aggregate Year-to-Date \$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Other (specify): <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation	Aggregate Year-to-Date \$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Other (specify): <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation	Aggregate Year-to-Date \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Other (specify): <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation	Aggregate Year-to-Date \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Other (specify): <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation	Aggregate Year-to-Date \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Other (specify): <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation	Aggregate Year-to-Date \$	

SUBTOTAL of Receipts This Page (optional)

TOTAL This Report (sum page 01b line number only)

\$2,500.00

93040992542

1132

**SCHEDULE A ITEMIZED RECEIPTS**  
**CONTRIBUTIONS FROM OTHER POLITICAL COMMITTEES**

Use separate schedule for each category of the Detailed Summary Page  
 PAGE 1 1  
 FOR LINE NUMBER 11 (c)

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

NAME OF COMMITTEE (in Full)  
**STOKLEY FOR CONGRESS C00258020**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
N.R.A. POLITICAL VICTORY FUND 1600 Rhode Island Ave. N.W. Washington, D.C. 20036		7-29-92	\$2,450.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation	Aggregate Year-to-Date	\$ 4,950.00
Other (specify):			
E-SYSTEMS INC. PAC 1901 North Moore St., Suite 609 Arlington, VA 22209		9-4-92	\$500.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation	Aggregate Year-to-Date	\$ 500.00
Other (specify):			
Dr. Pepper Political Action Comm, P.O. Box 65086 Dallas, Texas 75201-0144		9-15-92	\$200.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation	Aggregate Year-to-Date	\$ 200.00
Other (specify):			
EXPAC Exxon Political Action Comm. P.O. Box 2180 Houston, Texas 77001		9-21-92	\$500.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation	Aggregate Year-to-Date	\$ 500.00
Other (specify):			
OilPIPAC Pacifi Gas Pipeline Corporation 1700 Pacific Ave First City Center Dallas, Texas 75201-4696		9-30-92	\$250.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation	Aggregate Year-to-Date	\$ 250.00
Other (specify):			
All American Technology, Inc. 54 River Oaks Drive New Braunfels, Texas 78132	Contribution refunded	9-29-92 9-1-92	\$100.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation	Aggregate Year-to-Date	\$ 100.00
Other (specify):			

**SUBTOTAL of Receipts This Page (optional)** \_\_\_\_\_  
**TOTAL This Period (fill page with line number only)** **\$4,000.00**

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**SCHEDULE A** **ITEMIZED RECEIPTS**  
**CONTRIBUTIONS FROM OTHER POLITICAL COMMITTEES**

Use separate schedule for each employer or other donating business firm.  
 Form 11 (c) 1978

Any information reported here from such reports and statements may not be valid or correct for the purposes of determining your tax liability or the amount of your refund. Before using the name and address of any political committee to collect contributions from such organizations, check with the Internal Revenue Service for the correct name and address.

NAME OF CONTRIBUTOR (in Full) **STOKLEY FOR CONGRESS** **000258020**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
American Political Action Comm. P.O. Box 1882 Bellevue, WA 98009		10-5-92	\$300.00
Receipt for: <input type="checkbox"/> Other (specify) <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Aggregate Year-to-Date \$ 100.00		
B. Full Name, Mailing Address and ZIP Code E - Systems Corporate PAC P.O. Box 660248 Dallas, TX 75266-0248		10-6-92	\$250.00
Receipt for: <input type="checkbox"/> Other (specify) <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Aggregate Year-to-Date \$ 750.00		
C. Full Name, Mailing Address and ZIP Code GTE PAC 816 Congress, Suite 1500 Austin, TX 78701		10-13-92	\$50.00
Receipt for: <input type="checkbox"/> Other (specify) <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Aggregate Year-to-Date \$ 50.00		
D. Full Name, Mailing Address and ZIP Code N.R.A. POLITICAL VICTORY FUND 1600 Rhode Island Ave. N.W. Washington, D.C. 20036		10-13-92	\$2,450.00
Receipt for: <input type="checkbox"/> Other (specify) <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Aggregate Year-to-Date \$ 7,400.00		
E. Full Name, Mailing Address and ZIP Code			
Receipt for: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Aggregate Year-to-Date \$		
F. Full Name, Mailing Address and ZIP Code			
Receipt for: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Aggregate Year-to-Date \$		
G. Full Name, Mailing Address and ZIP Code			
Receipt for: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Aggregate Year-to-Date \$		

SUBTOTAL of Receipts This Page (including): **\$3,050.00**

TOTAL This Period (see page 1 for instructions):

93040992544

10/19/92



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 6, 1992

Robert F. Bauer, Esq.  
B. Holly Schadler, Esq.  
Perkins Coie  
607 Fourteenth St., N.W.  
Washington, D.C. 20005-2011

RE: MUR 3683

Dear Mr. Bauer and Ms. Schadler:

This letter acknowledges receipt on October 30, 1992, of a complaint you filed on behalf of your client, the Democratic Congressional Campaign Committee, alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by the NRA Political Victory Fund and Stokley for Congress. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3683. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

  
Lisa E. Klein  
Assistant General Counsel

Enclosure  
Procedures

93040992545



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

November 6, 1992

Ms. MaryRose Jennison, Treasurer  
NRA Political Victory Fund  
1600 Rhode Island Ave., N.W.  
Washington, D.C. 20036

RE: MUR 3683  
NRA Political Victory Fund

Dear Ms. Jennison:

The Federal Election Commission received a complaint which indicates that the NRA Political Victory Fund (the "Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3683. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee or you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040992546

Ms. MaryRose Jennison, Treasurer  
NRA Political Victory Fund  
Page 2

If you have any questions, please contact Dawn M. Odrowski, the attorney assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

93040992547



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 6, 1992

Earl D. Milton, Treasurer  
Stokley for Congress  
32 Lariat Drive  
Frisco, TX 75034

RE: MUR 3683  
Stokley for Congress

Dear Mr. Milton:

The Federal Election Commission received a complaint which indicates that Stokley for Congress (the "Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3683. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee or you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

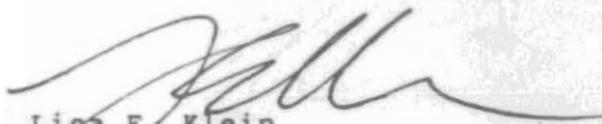
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040992548

Mr. Earl D. Milton, Treasurer  
Stokley for Congress  
Page 2

If you have any questions, please contact Dawn M. Odrowski, the attorney assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

93040992549



**NRA**  
**Political Victory Fund**

Institute for Legislative Action  
P.O. Box 18911, Washington, D.C. 20036

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIN COPY ROOM

Nov 19 11 16 AM '92

November 17, 1992

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Attn: Lisa E. Klein  
Assistant General Counsel

RE: MUR 3683

92 NOV 19 PM 3:12

RECEIVED  
FEDERAL ELECTION COMMISSION

Dear Ms. Klein:

In response to your letter dated November 16, 1992, the NRA Political Victory Fund denies violating the Federal Election Campaign Act of 1971. The contributions to the Stokley for Congress Committee were allocated as follows: \$2,500.00 on 6/2/92 to the General Election, \$2,450.00 on 7/23/92 to the Primary Election Debt Retirement, and \$2,450.00 on 10/12/92 to the General Election. Enclosed are copies of the respective pages from the filed reports. Apparently, Stokley for Congress Committee failed to report the July 23 contribution as a contribution to the Primary Election Debt Retirement.

If you have any questions, I can be reached at 828-6233.

Sincerely,

*Mary Rose Jennison*  
Mary Rose Jennison  
Treasurer

Sworn and subscribed to  
before me this 17<sup>th</sup> day of  
November, 1992.

*Dessie B. Scott*  
Notary Public

Dessie B. Scott  
Notary Public, District of Columbia  
My Commission Expires Oct. 31, 1994

93040992550

ITEMIZED DISBURSEMENTS

Schedule B

Page 1 of 10  
Line Number 23

NRA Political Victory Fund

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

Name & Address	Purpose of Disbursement	Date	Amount
ERDREICH FOR CONGRESS PO BOX 751 BIRMINGHAM, AL 35202	BEN ERDREICH 1992 PRIMARY ELECTION CONTRIBUTION AL-6	06/01/92	4,450.00
MCCURDY FOR RE-ELECTION 2100 PENNSYLVANIA AVE, NW WASHINGTON, DC 20037	DAVE MCCURDY 1992 PRIMARY ELECTION CONTRIBUTION OK-4	06/02/92	1,000.00
MASTERSON FOR CONGRESS 207 SOUTH CEDAR RIDGE DUNCANVILLE, TX 75116	STEVE MASTERSON 1992 PRIMARY DEBT CONTRIBUTION TX-24	06/02/92	2,500.00
STOKLEY FOR CONGRESS PO BOX 550580 DALLAS, TX 75335	RICHARD STOKLEY 1992 GENERAL ELECTION CONTRIBUTION TX-5	06/02/92	2,500.00
CITIZENS FOR ARLEN SPECTER 112 STATE STREET HARRISBURG, PA 17101	ARLEN SPECTER 1992 GENERAL ELECTION CONTRIBUTION PA-2	06/02/92	1,000.00
FLOYD SPENCE FOR CONGRESS 3869 BEECH DOWN DRIVE CHANTILLY, VA 22021	FLOYD SPENCE 1992 PRIMARY ELECTION CONTRIBUTION SC-2	06/02/92	1,000.00
FRIENDS OF BILL CLINGER PO BOX 631 WARREN, PA 16365	BILL CLINGER 1992 PRIMARY ELECTION CONTRIBUTION PA-5	06/02/92	350.00
----- SUBTOTAL of Disbursements this page . . . . .			12,800.00
TOTAL this period (last page this line number only) . . . . .			-----

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RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE

ITEMIZED DISBURSEMENTS

Schedule B

Page 4 of 5  
Line Number 23

NRA Political Victory Fund

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

Name & Address	Purpose of Disbursement	Date	Amount
HATTERY FOR CONGRESS 406 SHERROW AVENUE FALLS CHURCH, VA 22046	TOM HATTERY 1992 GENERAL ELECTION CONTRIBUTION MO-6	07/23/92	4,600.00
SANTORUM FOR CONGRESS PO BOX 10495 PITTSBURGH, PA 15234	RICK SANTORUM 1992 GENERAL ELECTION CONTRIBUTION PA-18	07/23/92	4,950.00
STOKLEY FOR CONGRESS PO BOX 550580 DALLAS, TX 75335	RICHARD STOKLEY 1992 PRIMARY DEBT RETIREMENT CONTRIBUTION TX-5	07/23/92	2,450.00
MASTERSON FOR CONGRESS 207 SOUTH CEDAR RIDGE DUNCANVILLE, TX 75116	STEVE MASTERSON 1992 GENERAL ELECTION CONTRIBUTION TX-24	07/23/92	2,500.00
WILLIAMSON FOR US SENATE 29 S LA SALLE STREET, #1192 CHICAGO, IL 60603	RICH WILLIAMSON 1992 GENERAL ELECTION CONTRIBUTION IL-S	07/23/92	4,950.00
VUCANOVICH FOR CONGRESS PO BOX 71435 RENO, NV 89515	BARBARA VUCANOVICH 1992 PRIMARY ELECTION CONTRIBUTION NV-2	07/23/92	500.00
FOX FOR CONGRESS 231 SOUTH EASTON ROAD GLENDALE, PA 19038	JON FOX 1992 GENERAL ELECTION CONTRIBUTION PA-13	07/23/92	1,000.00
----- SUBTOTAL of Disbursements this page . . . . .			20,950.00
TOTAL this period (last page this line number only) . . . . .			

ITEMIZED DISBURSEMENTS

Schedule B

Page 8 of 13  
Line Number 23

NRA Political Victory Fund

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Any information copied from such Reports & Statements may not be sold or used by any person for the purpose of soliciting or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committees.  
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Name & Address	Purpose of Disbursement	Date	Amount
BUSTAMANTE FOR CONGRESS PO BOX 120010 SAN ANTONIO, TX 78212	ALBERT BUSTAMANTE 1992 GENERAL ELECTION CONTRIBUTION TX-24	10/07/92	4,950.00
M HALL FOR CONGRESS PO BOX 711 ROCKWALL, TX 75087	RALPH HALL 1992 GENERAL ELECTION CONTRIBUTION TX-4	10/07/92	3,950.00
N METCALF FOR CONGRESS 4941 EAST HWY 525 CLINTON, WA 98236	JACK METCALF 1992 GENERAL ELECTION CONTRIBUTION WA-2	10/12/92	2,450.00
O STOKLEY FOR CONGRESS PO BOX 550580 DALLAS, TX 75335	RICHARD STOKLEY 1992 GENERAL ELECTION CONTRIBUTION TX-5	10/12/92	2,450.00
M HINCHEY FOR CONGRESS 260 FAIR STREET KINGSTON, NY 12401	MAURICE HINCHEY 1992 GENERAL ELECTION CONTRIBUTION NY-26	10/12/92	4,950.00
FRIENDS OF NEWT GINGRICH 4400 ROSWELL ROAD MARIETTA, GA 30062	NEWT GINGRICH 1992 GENERAL ELECTION CONTRIBUTION GA-6	10/12/92	4,950.00
COVERDELL SENATE COMMITTEE 1730 NORTHEAST EXPRESSWAY ATLANTA, GA 30329	PAUL COVERDELL 1992 GENERAL ELECTION CONTRIBUTION GA-SENATE	10/12/92	4,950.00

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SUBTOTAL of Disbursements this page . . . . . 28,650.00

TOTAL this period (last page this line number only) . . . . .  
-----

Richard

# STOKLEY For Congress 5th District

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM  
Nov 30 12 41 PM '92

November 25, 1992

Ms. Dawn M. Odrowski  
General Counsel's Office  
Federal Election Commission  
999 E. Street N.W.  
Washington, D.C. 20463

Re: MUR 3683  
Stokley for Congress

Dear Ms. Odrowski,

In response to the letter from Lisa E. Klein, Assistant General Counsel, dated November 6, 1992, with regard to an alleged violation of the Federal Election Campaign Act of 1971, we hereby submit the following:

(1) On October 15, 1992 as we were preparing our October 15, 1992 Quarterly Report, an electrical storm knocked out our computer. In order to file on time, we proceeded to file the incomplete report and stated on the signature page that it was incomplete and would be amended. Unfortunately, without electricity we failed to catch the typist error.

(2) On October 24, 1992, we filed an amended report which showed the N.R.A. Political Victory Fund contribution of July 29, 1992 was designated for Primary.

(3) For your information we are enclosing a copy of page 1 of the incomplete October 15, 1992 report and a copy of page 1 and Schedule A "Contribution From Other Political Committees" of the October 24, 1992 amended report.

(4) May we also point out that the complaint letter from Perkins Coie was dated October 30, 1992, which was several days after our amended report was filed.

We apologize for any inconvenience this error may have caused.

Sincerely,  
STOKLEY FOR CONGRESS

Earl D. Milton  
Campaign Treasurer

Enclosures

**"An Independent Voice For Change"**

P.O. BOX 850071 • MESQUITE, TEXAS 75185-0071 • 214/329-1992 • FAX 214/ 329-5930

POLITICAL ADVERTISING PAID FOR BY STOKLEY FOR CONGRESS CAMPAIGN, EARL MILTON, TREASURER, 3795 WALDORF, DALLAS, TX 75229

93040992554

92 NOV 30 PM 4:21

FEDERAL ELECTION COMMISSION

# REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee  
(Summary Page)

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIN COPY ROOM

NOV 20 12 41 PM '92

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <b>STOKLEY FOR CONGRESS</b>		2. FEC IDENTIFICATION NUMBER <b>C00258020</b>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. <b>32 LARIAT DR.</b>		
CITY, STATE and ZIP CODE <b>FRISCO, TEXAS 75034</b>	STATE/DISTRICT <b>Texas/5th Dist.</b>	3. IS THIS REPORT AN AMENDMENT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

## 4. TYPE OF REPORT

- 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)
- 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

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

## SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
7/1/92 through 9/30/92		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	\$16,260.00	
(b) Total Contribution Refunds (from Line 20(d))		
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	16,260.00	
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	6,915.07	
(b) Total Offsets to Operating Expenditures (from Line 14)		
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	6,915.07	
8. Cash on Hand at Close of Reporting Period (from Line 27)	9,401.22	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$15,035.87	

I certify that I have examined this Report and to the best of my knowledge and belief it is ~~true, correct, and complete~~ incomplete because electrical storm knocked out electricity on 10-15-92 as report was being prepared. Will file amended report tomorrow.

Type or Print Name of Treasurer **Earl D. Milton** Signature of Treasurer *Earl D. Milton* Date **Oct. 15, 1992**

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

**FEC FORM 3**  
(revised 4/87)

93040992555

92 NOV 30 PM 4: 21

RECEIVED  
FEDERAL ELECTION  
COMMISSION

# REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee  
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <b>STOKLEY FOR CONGRESS</b>		2. FEC IDENTIFICATION NUMBER <b>C00258020</b>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. <b>32 LARIAT DRIVE</b>		3. IS THIS REPORT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
CITY, STATE and ZIP CODE <b>FRISCO, TEXAS 75034</b>	STATE/DISTRICT <b>Texas/5th Dist.</b>	

92 NOV 30 PM 4:21  
RECEIVED  
FEDERAL ELECTION COMMISSION

### 4. TYPE OF REPORT

<input type="checkbox"/> April 15 Quarterly Report	<input type="checkbox"/> Twelfth day report preceding _____ (Type of Election)
<input type="checkbox"/> July 15 Quarterly Report	election on _____ in the State of _____
<input checked="" type="checkbox"/> October 15 Quarterly Report	<input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____
<input type="checkbox"/> January 31 Year End Report	
<input type="checkbox"/> July 31 Mid-Year Report (Non-election Year Only)	<input type="checkbox"/> Termination Report

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

### SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>7/1/92</u> through <u>9/30/92</u>		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	16,260.00	25,965.00
(b) Total Contribution Refunds (from Line 20(d))	100.00	100.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	16,160.00	25,865.00
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	15,963.62	30,107.33
(b) Total Offsets to Operating Expenditures (from Line 14)	64.50	64.50
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	15,899.12	30,042.83
8. Cash on Hand at Close of Reporting Period (from Line 27)	2,092.17	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	19,973.14	

**For further information contact:**  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463  
Toll Free 800-424-9530  
Local 202-376-3120

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

Type or Print Name of Treasurer  
**Earl D. Milton**

Signature of Treasurer  
*Earl D. Milton*

Date  
**Oct. 24, 1992**

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

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1  
FOR LINE NUMBER 11 (c)

**CONTRIBUTIONS FROM OTHER POLITICAL COMMITTEES**

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)

STOKLEY FOR CONGRESS C00258020

7  
5  
5  
2  
9  
9  
4  
0  
9  
2  
3  
0  
9

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
N.R.A. POLITICAL VICTORY FUND 1600 Rhode Island Ave. N.W. Washington, D.C. 20036		7-29-92	\$2,450.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 4,950.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
E-SYSTEMS INC. PAC 1901 North Moore St., Suite 609 Arlington, VA 22209		9-4-92	\$500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 500.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Dr. Pepper Political Action Comm. P.O. Box 655086 Dallas, Texas 75231-8144		9-15-92	\$200.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 200.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
EXPAC Exxon Political Action Comm. P.O. Box 2180 Houston, Texas 77001		9-21-92	\$500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 500.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
DELHIPAC Delhi Gas Pipeline Corporation 1700 Pacific Ave/First City Center Dallas, Texas 75201-4696		9-30-92	\$250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 250.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
All American Technology, Inc. 54 River Oaks Drive New Braunfels, Texas 78132	Contribution refunded	9-1-92	\$100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 100.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

\$4,000.00

MUR # 3683

ADDITIONAL DOCUMENTS WILL BE ADDED TO THIS FILE AS THEY  
BECOME AVAILABLE. PLEASE CHECK FOR ADDITIONAL MICROFILM  
LOCATIONS.

93040992558



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

THIS IS THE End of MUR# 3683

DATE FILMED 10/29/93 CAMERA NO. 2

CAMERAMAN MC

93040992559



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20463

Microfilm  
 Public Records  
 Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3683.

12/10/93

23043543509

**THE READER IS REFERRED TO ADDITIONAL MICROFILM LOCATIONS  
FOR THE FOLLOWING DOCUMENTS PERTINENT TO THIS CASE**

1. Memo, General Counsel to the Commission, dated September 22, 1992, Subject: Priority System Report.  
See Reel 354, pages 1590-94.
2. Memo, General Counsel to the Commission, dated April 14, 1993, Subject: Enforcement Priority System.  
See Reel 354, pages 1595-1620.
3. Certification of Commission vote, dated April 28, 1993.  
See Reel 354, pages 1621-22.
4. General Counsel's Report, In the Matter of Enforcement Priority, dated December 3, 1993.  
See Reel 354, pages 1623-1740.
5. Certification of Commission vote, dated December 9, 1993.  
See Reel 354, pages 1741-1746.

23043543510



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Robert F. Bauer, Esq.  
B. Holly Schadler, Esq.  
Perkins Coie  
607 Fourteenth Street, N.W.  
Washington, DC 20005-2011

RE: MUR 3683

Dear Mr. Bauer and Ms. Schadler:

On October 30, 1992, the Federal Election Commission received a complaint you filed on behalf of your client, the Democratic Congressional Campaign Committee, alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the NRA Political Victory Fund and Mary Rose Jennison, as treasurer, and Stokley for Congress and Earl D. Milton, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

*Dawn M. Odrowski*

Dawn M. Odrowski  
Attorney

Attachment  
Narrative

Date the Commission voted to close the file: DEC 09 1993

23043543511

MUR 3683  
POLITICAL VICTORY FUND

The Democratic Congressional Committee (DCCC) filed a complaint alleging that Stokely for Congress Committee accepted, and the National Rifle Association of America Political Victory Fund (NRA) made, contributions totaling \$7,400 toward the 1992 general election. The Committee and the NRA maintain that the Committee misreported the second of the NRA's three contributions, which was made after the primary election to retire the Committee's primary debt. The Committee reports show that a primary debt existed at the time the NRA made the second contribution consisting entirely of loans and debts owed to the candidate.

No substantial amounts or significant issues relative to the other issues pending before the Commission are involved in this matter. The case also had little or no impact on the process and there is no indication of any serious intent to violate the FECA.

23043543512



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Mary Rose Jennison, Treasurer  
NRA Political Victory Fund  
1600 Rhode Island Avenue, N.W.  
Washington, DC 20036

RE: MUR 3683  
NRA Political Victory Fund and  
Mary Rose Jennison, as treasurer

Dear Ms. Jennison:

On November 6, 1992, the Federal Election Commission notified the NRA Political Victory Fund and you, as treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the NRA Political Victory Fund and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Dawn M. Odrowski  
Attorney

Attachment  
Narrative

Date the Commission voted to close the file:

DEC 09 1993

23043543513

**MUR 3683  
POLITICAL VICTORY FUND**

The Democratic Congressional Committee (DCCC) filed a complaint alleging that Stokely for Congress Committee accepted, and the National Rifle Association of America Political Victory Fund (NRA) made, contributions totaling \$7,400 toward the 1992 general election. The Committee and the NRA maintain that the Committee misreported the second of the NRA's three contributions, which was made after the primary election to retire the Committee's primary debt. The Committee reports show that a primary debt existed at the time the NRA made the second contribution consisting entirely of loans and debts owed to the candidate.

No substantial amounts or significant issues relative to the other issues pending before the Commission are involved in this matter. The case also had little or no impact on the process and there is no indication of any serious intent to violate the FECA.

23043543514



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Earl D. Milton, Treasurer  
Stokley for Congress  
32 Lariat Drive  
Frisco, TX 75034

RE: MUR 3683  
Stokley for Congress and  
Earl D. Milton, as treasurer

Dear Mr. Milton:

On November 6, 1992, the Federal Election Commission notified Stokley for Congress and you, as treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Stokley for Congress and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Dawn M. Odrowski  
Attorney

Attachment  
Narrative

Date the Commission voted to close the file: DEC 09 1993

23043543515

MUR 3683  
POLITICAL VICTORY FUND

The Democratic Congressional Committee (DCCC) filed a complaint alleging that Stokely for Congress Committee accepted, and the National Rifle Association of America Political Victory Fund (NRA) made, contributions totaling \$7,400 toward the 1992 general election. The Committee and the NRA maintain that the Committee misreported the second of the NRA's three contributions, which was made after the primary election to retire the Committee's primary debt. The Committee reports show that a primary debt existed at the time the NRA made the second contribution consisting entirely of loans and debts owed to the candidate.

No substantial amounts or significant issues relative to the other issues pending before the Commission are involved in this matter. The case also had little or no impact on the process and there is no indication of any serious intent to violate the FECA.

23043543516