



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20461

THIS IS THE BEGINNING OF MUR # 3702

DATE FILMED 10/29/93 CAMERA NO. 2

CAMERAMAN MC

93040992895



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FEDERAL ELECTION  
COMMISSION  
MAIN COPY ROOM

OCT 23 10 23 AM '92

# Texas Democratic Party

October 22, 1992

Mr. Lawrence Noble, Esq.  
General Counsel  
Federal Election Commission  
999 E Street N.W.  
Washington, D. C.

FEDERAL ELECTION COMMISSION  
92 OCT 23 PM 3:04

Dear Mr. Noble:

In the midst of a campaign for the House of Representatives in the Sixteenth District of Texas, a television broadcast station, KDBC ("the station"), appears to be taking sides in violation of Section 441b of the Federal Election Campaign Act of 1971, as amended, prohibiting corporate contributions in federal elections. There is evidence, in particular, that the station is illegally subsidizing the candidacy of one of its former employees, Mr. Chip Taberski, with reduced rate production and dubbing for his campaign commercials. A Commission investigation is required and should be immediately undertaken.

The Complaint identifies also another apparent corporate subsidy in support of the Taberski campaign, this time through a Company, Sun City Productions, which provided for a get-out-the-vote phone banking operation during the primary.

### KDBC AND THE TABERSKI CAMPAIGN

Mr. Taberski is a former employee of the station. His campaign manager, Rick Rash, is a current employee of the station. His current media director is a former employee of KDBC. The relationship of the Taberski campaign and KDBC is close and personal.

It appears also on the available evidence to be illegal. Mr. Rash has acted simultaneously as sales manager for the station and representative of the campaign in placing orders for buys and other services. Exhibit 1. He has managed in this capacity to arrange attractive deals for the campaign. In particular, Exhibit 2, a Production Order for spots, shows Mr. Rash arranged for a "1st time advertiser package" in which one spot is produced without charge. As it happens, the spot qualifying for free production is the more expensive of the two produced under this order.

This is one amenity. There may have been others. Mr. Rash's superior, Mr. John Burton, informed a representative of the campaign of Mr. Taberski's opponent that he had no problem with Mr. Rash's extensive activities on station premises in support of Mr. Taberski. His reasoning: Mr. Rash still "puts the station's work first."

930409286

FEDERAL ELECTION COMMISSION  
PM 3:04



Lawrence Noble, Esq.  
page 3  
October 22, 1992

SUN CITY PRODUCTIONS

Nor is the corporate support in violation of the law from KDBC the sole continuing violation of this kind by Mr. Taberski and his campaign. Upon information and belief, and as evidenced by reports filed by the Commission by Mr. Taberski, his campaign used Sun City Productions for extensive get-out-the-vote phone banking services in the primary campaign, but did not pay the fair market value of such services. Exhibit 3. No payment of any kind is, in fact, reported -- only two in-kind contributions from the President of Sun City, Mr. Steve Pandak. The Pandak contributions are plainly too small to meet the true cost of the effort. This apparent corporate subsidy, like the one provided by KDBC, requires the Commission's immediate attention.

8 Bob Slagle  
9 Bob Slagle, Chairman  
8 Texas Democratic Party

2 Certificate of Acknowledgement:

9 The State of Texas  
9 The County of Travis

0 Before me Mary R. Morey, a notary public, on this day personally appeared  
4 Bob Slagle, known to me to be the person whose name is subscribed to the  
0 foregoing instrument and acknowledged to me that he executed the same for  
0 the purposes and consideration therein expressed.

3 Given under my hand and seal of office this 22nd day of October, 1992.

9 Mary R. Morey  
Mary R. Morey  
Notary Public



My commission expires 11/23/95

EXHIBIT 1

ADERSKI CAMPAIGN FUND 01-92  
303 TEXAS AVENUE - SUITE 600  
EL PASO, TX 79901

0112

88-6/1120

FEBRUARY 13, 19 92

pay to the  
order of

KDBC TV

\$ 2,267.50

TWO THOUSAND TWO HUNDRED SIXTY SEVEN DOLLARS AND 50/100 Dollars



STATE NATIONAL

915 532-9922  
Box 10772  
El Paso, Texas 79958-0001

H101 and \$100 Production

Richard Rash

⑈000112⑈ ⑆112000066⑆7483659772⑈

93040992899

92 OCT 23 PM 3:04

RECEIVED  
OFFICE OF THE ATTORNEY GENERAL  
COMMISSION

Exhibit



# AGREEMENT: FORM FOR POLITICAL BROADCASTS

STATION and LOCATION \_\_\_\_\_ February 17, 1992

I, Rick Rash (being) on behalf of CNR TABERSKI

a legally qualified candidate of the Republican political party for the office of U.S. HOUSE OF REPRESENTATIVES

in the Primary election to be held on April 10, 1992, do hereby request station time as follows:

LENGTH OF BROADCAST \_\_\_\_\_ HOURS \_\_\_\_\_ DATE \_\_\_\_\_ TIMES PER WEEK \_\_\_\_\_ TOTAL NO WEEKS \_\_\_\_\_ DATE \_\_\_\_\_

DATE OF FIRST BROADCAST	DATE OF LAST BROADCAST

Total Charges: \_\_\_\_\_

The broadcast time will be used by \_\_\_\_\_  
I represent that the advance payment for the above-described broadcast time has been furnished by \_\_\_\_\_

\_\_\_\_\_ and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is ( ) a corporation; ( ) a committee; ( ) an association; or ( ) other unincorporated group. The names and offices of the chief executive officers of the entity are: \_\_\_\_\_

It is my understanding that: if the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest out-of-pocket charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

It is agreed that use of the station for the above-stated purposes will be governed by the Communications Act of 1934, as amended, and the FCC's rules and regulations, particularly those provisions regarding on-the-air conduct, which I have read and understand. I further agree to indemnify and hold harmless the station for any damages or liability that may ensue from the performance of the above-stated broadcasts. For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered to the station at least \_\_\_\_\_ before the time of the scheduled broadcast (note: the rules preceding sentences are not applicable if the candidate is personally using the time).

Date: 2/17/92 Richard Rash  
(Candidate, Supporter or Agent)

Accepted/Rejected ) by \_\_\_\_\_ Title \_\_\_\_\_

This application, whether accepted or rejected, will be available for public inspection for a period of two years in accordance with FCC regulations (AM, Section 73.150; FM, Section 73.350; TV, Section 73.657).

93040992900

Exhibit 1

SALES DEPARTMENT

OPERATIONS DEPARTMENT

DATE 5/12/73  
 SALESMAN MIF  
 ADVERTISER Comp. Tabular  
 PRODUCT/LOG LINE \_\_\_\_\_  
 START DATE 5/12/73  
 SOURCE \_\_\_\_\_ PHONE # \_\_\_\_\_  
 CONTACT PERSON 1/12/73 (1)

SPECIAL INSTRUCTIONS

Lotch 2 spots early  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

FOR OPERATIONS DEPARTMENT USE ONLY

INSTRUCTIONS RECEIVED BY \_\_\_\_\_  
 DATE \_\_\_\_\_ TIME \_\_\_\_\_

93040992901

EE B

ITEMIZED DISBURSEMENTS

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

PAGE	OF
2	2
FOR LINE NUMBER	
17	

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)

CHIP TABERSKI CAMPAIGN FUND

93040992902

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
BAUMAN COMPANY P.O. BOX 1706 EL PASO, TEXAS 79949	ADVERTISING Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) RUN-OFF	03/18/92	1,940.00
B. Full Name, Mailing Address and ZIP Code	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
FRANCIS COMMUNICATIONS 11227 PELLICANO EL PASO, TEXAS 79935	PAGERS Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) RUN-OFF	03/23/92	81.39
C. Full Name, Mailing Address and ZIP Code	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
KVIA-TV 4140 RIO BRAVO EL PASO TEXAS 79902	ADVERTISING Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) RUN-OFF	02/21/92 02/28/92	956.25 599.25
D. Full Name, Mailing Address and ZIP Code	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
U.S. POSTAL SERVICE 5300 E. PAISANO EL PASO, TEXAS 79910	POSTAGE Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) RUN-OFF	02/27/92	4.46
E. Full Name, Mailing Address and ZIP Code	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
UNIVERSITY OF TEXAS AT EL PASO EL PASO, TEXAS 79912	ADVERTISING Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) RUN-OFF	02/28/92	500.00
F. Full Name, Mailing Address and ZIP Code	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
KDBC TV 2201 E. WYOMING EL PASO, TEXAS 79903	ADVERTISING Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) RUN-OFF	02/28/92	425.00
G. Full Name, Mailing Address and ZIP Code	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional) .....

4,506.15

TOTAL This Period (last page this line number only) .....

6,361.58

LE B

ITEMIZED DISBURSEMENTS

EXHIBIT 1

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

PAGE 1 OF 2  
FOR LINE NUMBER 17

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NAME OF COMMITTEE (in Full)

CHIP TABERSKI CAMPAIGN FUND

93040992903

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
THE BAUMAN COMPANY P.O. BOX 1706 EL PASO, TEXAS 79949	BILLBOARD	1-23-92	900.00
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2-6-92	2,065.00
B. Full Name, Mailing Address and ZIP Code U.S. POSTAL SERVICE 5300 E. PAISANO EL PASO, TEXAS 79910	POSTAGE	2-6-92	108.75
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2-13-92 2-13-92	29.00 1,701.60
C. Full Name, Mailing Address and ZIP Code TEXAS PRINTING 1228 WYOMING EL PASO, TEXAS 79902	PRINTING	2-10-92	745.30
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2-3-92	61.70
D. Full Name, Mailing Address and ZIP Code KDBC TV 2201 E. WYOMING EL PASO, TEXAS 79903	ADVERTISING	1-13-92	2,267.50
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
E. Full Name, Mailing Address and ZIP Code KTSM TV 801 N. OREGON EL PASO, TEXAS 79902	ADVERTISEMENT	1-19-92	446.25
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and ZIP Code CHIP TABERSKI 247 MARICOPA EL PASO, TEXAS 79912	GASOLINE	1-14-92	39.00
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code CHIP TABERSKI 247 MARICOPA EL PASO, TEXAS 79902	MEALS	1-14-92	39.72
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code CHIP TABERSKI 247 MARICOPA EL PASO, TEXAS 79902	PHOTOS	1-14-92	63.60
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code CHIP TABERSKI 247 MARICOPA EL PASO, TEXAS 79902	SUPPLIES	1-14-92	300.01
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional) .....

8,767.43

TOTAL This Period (last page this line number only) .....

Exhibit 2

**KDBC PRODUCTIONS**

PRODUCTION ORDER		Airdate	Adv #	Advertiser
KDBC <b>4</b>				Chip Tabersti
Billing		Agency #	Title & Spot #	Agency
N/C <i>at head</i>			Political - 2 spots	
CHECK	BY	CHARGES	TIME	
Field			1.5 hrs	
Studio				
Post		112.50	75	
VO Tax				
CO Tax				
DUBBING				
1 inch				
3/4 inch				
VHS				
Audio 1/4				
Copy Purchase				
TYPE				
Commercial				
Promo				
PSA				
TOTAL CHARGES		112.50		
Sales # 18		Date Completed 2/4/92		Production 18

1st Time Advertiser P.S.  
1st spot Free

93040992904

ITEMIZED RECEIPTS

EXHIBIT 3

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)

CHIP TABERSKI CAMPAIGN FUND

93040992905

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
JEAN P. TABERSKI 16214 106TH AVE. SUN CITY, AZ 85351	RETIREED	1-21-92	1000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1,000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
HARRY BRUCE 4333 DONNYBROOK EL PASO, TEXAS 79925	RETIREED	1-21-92	300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 300.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
ERNEST E. TABERSKI 16214 106TH AVE. SUN CITY, AZ 85351	SELF EMPLOYED	1-24-92	1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1,000.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
OLGA OSTERBERG 3840 BRENTWOOD EL PASO, TEXAS 79902	HFIB, INC.	1-24-92	1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1,000.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
ROBERT OSTERBERG 3840 BRENTWOOD EL PASO, TEXAS 79902	HFIB, INC.	1-24-92	1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1,000.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
STEVE PANDAK 5016 HERCULES EL PASO, TEXAS 79904	SUN CITY PRODUCTIONS, INC	2-7-92	500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 500.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
RICHARD G. RASH 700 DE LEON EL PASO, TEXAS 79912	KDBC TV	1-21-92	250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

RECEIVED  
 FEDERAL ELECTION COMMISSION  
 JAN 23 1992  
 3:05

UBTOTAL of Receipts This Page (optional)	5,050.00
TOTAL This Period (last page this line number only)	5,050.00

ITEMIZED RECEIPTS

EXHIBIT 3

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

PAGE 1 OF 1  
FOR LINE NUMBER 11(a)(1)

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 uses, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

CHIP TABERSKI CAMPAIGN FUND

93040992906

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
STEPHEN M. YOUNG 805 ROCOSO EL PASO, TEXAS 79912	STEVE YOUNG INSURANCE	02/28/92	1,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): RUN-OFF	Occupation: OWNER	Aggregate Year-to-Date > \$ 1,000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
JEAN TABERSKI 16214 106TH AVE. SUN CITY, ARIZONA 85351	RETIRED	03/13/92	1,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): RUN-OFF	Occupation	Aggregate Year-to-Date > \$ 2,000.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
KENT HALLA 907 S. CHIHUAHUA EL PASO, TEXAS 79901	KENT HALLA REAL ESTATE	03/16/92	1,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): RUN-OFF	Occupation: OWNER	Aggregate Year-to-Date > \$ 1,000.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
STEVE PANDAK 5016 HERCULES EL PASO, TEXAS 79904	SUN CITY PRODUCTIONS, INC.	03/18/92	500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): RUN-OFF	Occupation: PRESIDENT	Aggregate Year-to-Date > \$ 1,000.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
JOHN MACGUIRE 1209 THUNDERBIRD EL PASO, TEXAS 79912	SELF-EMPLOYED	03/18/92	250.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): RUN-OFF	Occupation: INVESTMENTS	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
ERNEST TABERSKI 16214 106TH AVE. SUN CITY, ARIZONA 85351	SELF EMPLOYED	03/23/92	1,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): RUN-OFF	Occupation: INVESTOR	Aggregate Year-to-Date > \$ 2,000.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
CLIFF EISENBERG 1201 E. YANDELL EL PASO, TEXAS 79902	AMERICAN FINANCE	01/21/92	100.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): RUN-OFF	Occupation: BUSINESS OWNER	Aggregate Year-to-Date > \$ 250.00	

SUBTOTAL of Receipts This Page (optional)	4,850.00
TOTAL This Period (last page this line number only)	4,850.00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 3, 1992

Bob Slagle, Chairman  
Texas Democratic Party  
815 Brazos, Suite 200  
Austin, Texas 78701

Dear Mr. Slagle:

This is to acknowledge receipt on October 23, 1992, of your letter dated October 22, 1992. The Federal Election Campaign Act of 1971, as amended ("the Act") and Commission Regulations require that the contents of a complaint meet certain specific requirements. One of these requirements is that a complaint be sworn to and signed in the presence of a notary public and notarized. Your letter was not properly sworn to.

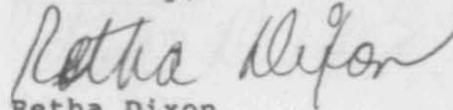
In order to file a legally sufficient complaint, you must swear before a notary that the contents of your complaint are true to the best of your knowledge and the notary must represent as part of the jurat that such swearing occurred. The preferred form is "Subscribed and sworn to before me on this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_." A statement by the notary that the complaint was sworn to and subscribed before her also will be sufficient. We are sorry for the inconvenience that these requirements may cause you, but we are not statutorily empowered to proceed with the handling of a compliance action unless all the statutory requirements are fulfilled. See 2 U.S.C. § 437g.

Enclosed is a Commission brochure entitled "Filing a Complaint." I hope this material will be helpful to you should you wish to file a legally sufficient complaint with the Commission. The file regarding this correspondence will remain confidential for a 15 day time period during which you may file an amended complaint as specified above. If the defects are not cured and the allegations are not refiled, no additional notification will be provided and the file will be closed.

93040992907

If you have any questions concerning this matter, please contact me at (202) 219-3410.

Sincerely,



Retha Dixon  
Docket Chief

Enclosure

cc: KDBC  
Sun City Productions  
Taberski Campaign

93040992908



Texas Democratic Party

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIN COPY ROOM

Nov 10 10 59 AM '92

MUR 3702

November 7, 1992

Ms. Retha Dixon  
Docket Chief  
Federal Election Commission  
Washington, D.C. 20463

92 NOV 10 PM 3:41

RECEIVED  
FEDERAL ELECTION COMMISSION

Dear Ms. Dixon:

Enclosed is my complaint against Chip Taberski amended to reflect today's date with the acknowledgement you requested.

Thank you for your consideration.

Sincerely,

Bob Slagle  
Chairman

BS/mm

93040992909



Texas Democratic Party

RECEIVED  
FEDERAL ELECTION  
COMMISSION

Nov 10 10 59 AM '92

92 NOV 10 PM 3:41

FEDERAL ELECTION COMMISSION  
OFFICE OF THE GENERAL COUNSEL

November 7, 1992

Mr. Lawrence Noble, Esq.  
General Counsel  
Federal Election Commission  
999 E Street N.W.  
Washington, D. C.

Dear Mr. Noble:

In the midst of a campaign for the House of Representatives in the Sixteenth District of Texas, a television broadcast station, KDBC ("the station"), appears to be taking sides in violation of Section 441b of the Federal Election Campaign Act of 1971, as amended, prohibiting corporate contributions in federal elections. There is evidence, in particular, that the station is illegally subsidizing the candidacy of one of its former employees, Mr. Chip Taberski, with reduced rate production and dubbing for his campaign commercials. A Commission investigation is required and should be immediately undertaken.

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Lawrence Noble, Esq.  
page 3  
November 7, 1992

SUN CITY PRODUCTIONS

Nor is the corporate support in violation of the law from KDBC the sole continuing violation of this kind by Mr. Taberski and his campaign. Upon information and belief, and as evidenced by reports filed by the Commission by Mr. Taberski, his campaign used Sun City Productions for extensive get-out-the-vote phone banking services in the primary campaign, but did not pay the fair market value of such services. Exhibit 3. No payment of any kind is, in fact, reported -- only two in-kind contributions from the President of Sun City, Mr. Steve Pandak. The Pandak contributions are plainly too small to meet the true cost of the effort. This apparent corporate subsidy, like the one provided by KDBC, requires the Commission's immediate attention.

*Bob Slagle*  
\_\_\_\_\_  
Bob Slagle, Chairman  
Texas Democratic Party

Subscribed and sworn to before me on this 7th day of November, 1992.

*Mary R. Morey*  
\_\_\_\_\_  
Mary R. Morey  
Notary Public



93040992912



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 18, 1992

Texas Democratic Party  
Bob Slagle, Chairman  
815 Brazos, Suite 200  
Austin, TX 78701

RE: MUR 3702

Dear Mr. Slagle:

This letter acknowledges receipt on November 10, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by KDBC, and John Burton, President, Sun City Productions, Chip Taberski, Chip Taberski for U.S. Congress Committee and Ronald Pate, Treasurer, and Richard G. Rash. 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 3702. 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,

Jonathan A. Bernstein  
Assistant General Counsel

Enclosure  
Procedures

93040992913



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 18, 1992

Chip Taberski  
247 Maricopa  
El Paso, TX 79902

RE: MUR 3702

Dear Mr. Taberski:

The Federal Election Commission received a complaint which indicates that you 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 3702. 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 you 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.

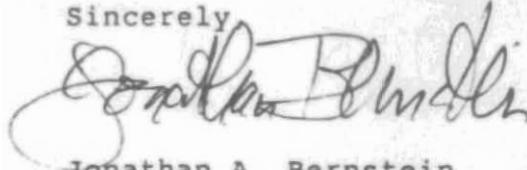
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed 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.

93040992914

Chip Taberski  
Page 2

If you have any questions, please contact Richard M. Zanfardino, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely



Jonathan A. Bernstein  
Assistant General Counsel

Enclosures

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

93040992915



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 18, 1992

Chip Taberski for U.S. Congress Committee  
Ronald Pate, Treasurer  
303 Texas Ave., Suite 600  
El Paso, TX 79901

RE: MUR 3702

Dear Mr. Pate:

The Federal Election Commission received a complaint which indicates that Chip Taberski for U.S. Congress Committee ("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 3702. 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 and 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.

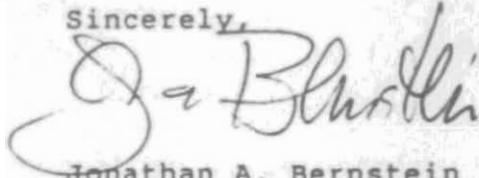
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed 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.

93040992916

Chip Taberski for U.S. Congress Committee  
Ronald Pate, Treasurer  
Page 2

If you have any questions, please contact Richard M. Zanfardino, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Jonathan A. Bernstein  
Assistant General Counsel

Enclosures

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

93040992917



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 18, 1992

KDBC  
John Burton, President  
2201 E. Wyoming  
El Paso, TX 79903

RE: MUR 3702

Dear Mr. Burton:

The Federal Election Commission received a complaint which indicates that KDBC and you, as President, 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 3702. 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 KDBC and you, as President 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.

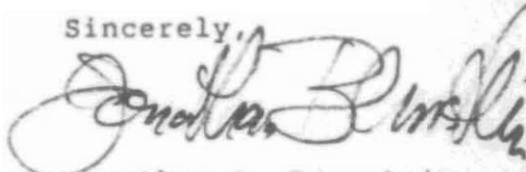
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed 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.

93040992918

KDBC  
John Burton, President  
Page 2

If you have any questions, please contact Richard M. Zanfardino, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Jonathan A. Bernstein  
Assistant General Counsel

Enclosures

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

93040992919



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 18, 1992

Sun City Productions  
Steve Pandak, President  
7700 Alabama, Suite H  
El Paso, TX 79904

RE: MUR 3702

Dear Mr. Pandak:

The Federal Election Commission received a complaint which indicates that Sun City Productions 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 3702. 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 Sun City Productions 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.

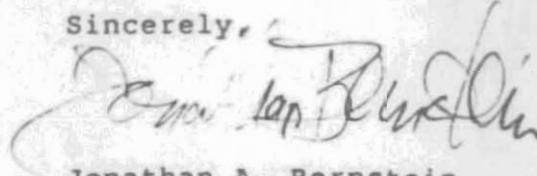
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed 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.

93040992920

Sun City Productions  
Steve Pandak, President  
Page 2

If you have any questions, please contact Richard M. Zanfardino, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Jonathan A. Bernstein  
Assistant General Counsel

Enclosures

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

23040992921



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 18, 1992

Richard G. Rash  
700 De Leon  
El Paso, TX 79912

RE: MUR 3702

Dear Mr. Rash:

The Federal Election Commission received a complaint which indicates that you 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 3702. 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 you 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.

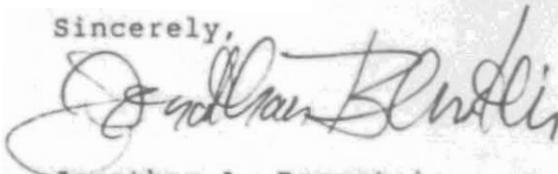
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed 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.

93040992922

Richard G. Rash  
Page 2

If you have any questions, please contact Richard M. Zanfardino, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Jonathan A. Bernstein  
Assistant General Counsel

Enclosures

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

93040992923



RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIN COPY ROOM

DEC 2 2 28 PM '92

December 1, 1992

Mr. Jonathan A. Bernstein  
Assistant General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Dear Mr. Bernstein:

The following constitutes the formal response of KDBC-TV to the complaint, numbered MUR 3702, filed by Mr. Bob Slagle, Chairman of the Texas Democratic Party.

Regarding the matter under review:

1) Mr. John M. Burton is General Sales Manager of KDBC, not President as purported in the complaint. Mr. Stan Siegal is Vice President & General Manager of KDBC, chief executive officer for the station.

2) The Taberski Campaign Manager was Mr. Rick Rash. Mr. Rash was employed by KDBC as a local advertising sales representative from August, 1988 through May, 1990 and has been employed in the same capacity from August, 1990 through the present. He is not nor has he ever been "sales manager" of KDBC, as purported in the complaint. His immediate supervisor is Mr. John Burton, General Sales Manager. In his capacity as local sales representative, Mr. Rash is compensated on a "commission-only" basis, paid every two weeks on a draw against his earned commissions on sales. He is not paid a salary nor does he accrue sick leave, vacation, or holidays as do regular full-time employees. As with all local sales representatives, Mr. Rash's income is derived solely through commissions earned on advertising sales he generates for the station. His work day and work hours for KDBC are determined solely by his own goals and motivations to produce advertising revenues and commissions.

3) 16th District Congressional Republican Candidate Chip Taberski was employed as a sportscaster by KDBC from April, 1981 through January 9, 1992. He formally resigned in order to declare his candidacy on January 10, 1992. He has had no employer-employee relationship with KDBC since that time.

4) The Taberski Campaign Media Director was Mr. Tim Hartman. Mr. Hartman was employed by KDBC as a news reporter from July, 1982 through December, 1989 and again from October, 1991 through December, 1991. He has had no employer-employee relationship with KDBC since that time.

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FEDERAL ELECTION  
COMMISSION

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5) When Mr. Taberski announced his candidacy and Mr. Rash was announced as Campaign Manager, KDBC management discussed with Mr. Rash the implications of his role as Campaign Manager. Management applauded the exercise of his right to participate in the electoral process and told him that the station did not see a conflict as long as a) no federal, state, or local election laws or policies were violated, and b) that his involvement with the campaign did not interfere with his primary responsibilities as a sales representative for KDBC. It was agreed by all parties that on-going evaluations of the situation would be made and that all incidental expenses, if any, incurred by the station, ie.- long distance phone calls or faxes, use of copy machines, etc., would be paid by the campaign. Mr. Rash continued throughout the campaign to meet and exceed revenue goals and, indeed, has emerged as the KDBC sales leader for 1992, both in terms of total sales volume and percentage of total regional and local revenues. Management monitored his performance throughout the year and saw no conflict with or impedance of his revenue-producing efficiency. As the end of the campaign approached, Mr. Rash submitted to management a list of expenses which he had incurred at the station throughout the campaign: \$98.75 worth of long-distance calls, faxes, and copies. KDBC billed the Taberski campaign for the expenses and the station was immediately reimbursed (See attached invoice and cancelled check). These are the only expenses which "increased the overhead" of KDBC during the campaign and the station has been reimbursed by the campaign. No other "contributions or expenditures" of any kind were made at any time by the station, including use of facilities, staff time, secretarial support of any kind, or any other resource of the station.

6) For the past two years, KDBC has, in the normal course of its business, offered to "first-time advertisers" a special consideration which allows for free production of their first commercial announcement when they commit to a broadcast schedule of at least \$2000.00. Attached are copies of other such production orders which have been filled for other advertisers during 1992. Also attached is a copy of the KDBC "More For Your Money" New Advertiser Incentive Program brochure which specifies the guidelines for the new or first-time advertiser package. Since Federal Communications Commission (FCC) regulations require that the same policies which apply to "most favored advertisers" also apply to political advertisers, KDBC was prepared to make available to political advertisers, under the "equal opportunity" guidelines of the FCC, the same production package that it makes available to first-time advertisers. Mr. Taberski's campaign was the only campaign to take advantage of the opportunity. KDBC was told by Congressman Coleman's campaign that all commercial production and media buys would be handled by Rindy & Associates of Austin, Texas.

Other candidates also informed us that their production needs would be met through other production sources or that their total expenditures with KDBC would not meet the \$2000 minimum spending level. Had other candidates offered KDBC the opportunity to discuss or bid on production services, the station would have readily treated them in a like fashion.

7) Regarding the KDBC production order designated as Exhibit 2 of the complaint, it should be noted that the Taberski campaign wanted to produce two initial commercial spots to begin its televised campaign. Video for both spots was shot at the same time, thus drastically reducing the time needed to produce two spots separately. 1.5 hours was spent in shooting the video in the field and was not charged to the advertiser since KDBC allows up to two hours of field production and two hours of post-production under the first-time advertiser package (See "New Advertiser Incentive Program" brochure). An additional 3/4 of an hour was spent in post-production and was charged at regular rates to the advertiser (See attached KDBC Production Rate Card). Neither of the two spots produced was "more expensive" than the other, as alleged in the complaint. It should be noted that this production order was treated in exactly the same way as those of all first-time advertisers, according to FCC regulations.

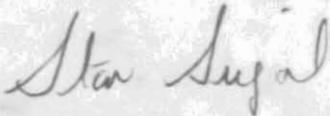
8) Regarding the allegations within the complaint that "Mr. Rash's arrangements on other orders for the Taberski campaign may well have involved additional subsidies for the Taberski campaign in violation of the Act," it is the position of KDBC that these allegations are completely without merit. The 1992 political file of KDBC, which is maintained under regulations of the FCC and which contains all records of inquiries, time sales, advertising rates, logs, and payment histories of all political advertisers, was made available to all political advertisers and/or their representatives during regular business hours throughout the campaign season. It should be noted that a representative of the Congressman Coleman campaign visited KDBC on almost a daily basis during the last month of the campaign and was allowed to review the file, make copies, ask questions, and have full access to all information relative to political advertising on KDBC. As with all candidates and/or their representatives, KDBC was cooperative and provided full access to the political file as required under law. The allegations of the Texas Democratic Party that KDBC and Mr. Rash made "arrangements" which "may well have involved additional subsidies for the Taberski campaign" after its repeated full access, through a representative of the Coleman campaign, to the complete political file of KDBC, are considered totally groundless.

93040992926

The preceding constitutes the formal reply of KDBC-TV to the complaint, MUR 3702. KDBC believes that neither the station nor any of its employees or representatives were involved in any way with any alleged violation whatsoever of Section 441b of the Federal Election Campaign Act of 1971 or any other federal, state, or municipal law or ordinance governing political campaigns and/or television advertising. KDBC believes that the complaint filed by the Texas Democratic Party is completely without merit and that this reply and all attached documentation will sufficiently support that belief.

Please advise regarding any further development in this matter.

Respectfully Submitted;



Stan Siegal  
Vice President & General Manager

SS/jb  
attachments

93040992927

KDBC TV El Paso

TEL 9.00

Oct 27 92 10:00 P.02



DATE: October 26, 1992

BILL TO: TABERSKI FOR CONGRESS CAMPAIGN  
 303 Texas  
 Suite 600  
 El Paso, Texas 79901

REMIT TO: KDBC-TV  
 P.O. Box 1799  
 El Paso, Texas 79999

PAYMENT DUE: Upon Receipt

RECEIVED  
 FEDERAL ELECTION COMMISSION  
 92 DEC -2 PM 3:54

93040992928

DATE OF CHARGE	DESCRIPTION	CURRENT CHARGES	PAST DUE CHARGES
10/26/92	Services provided by Rick Rash between January 10, 1992 and October 23, 1992		
	35 Copies @ .25	\$8.75	
	15 Long Distance Faxes @ 2.00	\$30.00	
	50 Long Distance Phone Calls @ .20 per minute	\$60.00	
		<b>CURRENT MONTH</b>	<b>TOTAL DUE</b>
		\$ 98.75	\$ 98.75

PO BOX 1700 • EL PASO, TEXAS 79900 • 915-532-6351 • FAX 915/844-2591  
 8201 WYOMING STREET • EL PASO, TEXAS 79903

CHIP TABERSKI CAMPAIGN

01-92

0470

303 TEXAS AVENUE - SUITE 600  
EL PASO, TX 79901

88-6/1120

OCTOBER 27, 19 92

Pay to the  
order of

KDBC TV

\$ 98.75

NINETY EIGHT DOLLARS AND 75/100

Dollars



STATE  
NATIONAL

915 532-9922  
Box 1072  
El Paso, Texas 79958-0001

INVOICE DATE 10/26/92

*Ronald E Pati*

For

⑈000470⑈ ⑆112000066⑆7483659772⑈

93040992929

## "More For Your Money" Rules & Regulations:

- Prizes will be awarded to "buying entities" only.
- Spending levels will be calculated at the end of each quarter. Qualifying advertisers will be notified of their total prize values within ten days after the end of each quarter.
- Prize catalogs and/or travel certificates will be distributed to winners for redemption upon full payment of all quarterly balances due KDBC, or may be accrued for future redemption after all payments to KDBC. Prizes will be shipped, prepaid, directly to winners 2-4 weeks after order. Travel certificates may be redeemed at Sun Travel, Inc. All trips subject to availability. All prizes must be redeemed before May 1, 1993. Other restrictions may apply.
- In many cases, prize values will require selection of prizes from more than one catalog. Such selection will be at the discretion of the winner, so long as the combined total of prize values selected does not exceed the total earned.
- Prize values may not be applied to debt balances.

### 1992 Planning Guide

	Budget	Actual
1992 1st Qtr.	\$ _____	\$ _____
1992 2nd Qtr.	\$ _____	\$ _____
1992 3rd Qtr.	\$ _____	\$ _____
1992 4th Qtr.	\$ _____	\$ _____
1992 TOTAL	\$ _____	\$ _____

Thank you for your commitment to KDBC-TV. Please contact your KDBC sales executive if you have any questions or comments regarding the 1992 "More For Your Money" program.

Good Luck!



**KDBC-TV 4**

Your Sales Executive is:

(915)532-6551

9 3 0 4 0 9 2 6 6 0 7 0 3 0

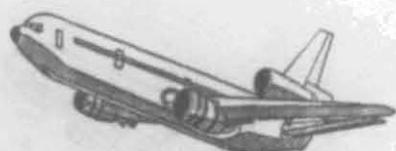
RECEIVED  
92 DEC -2 PM 3:54

1992

## NEW ADVERTISER INCENTIVE PROGRAM

OFFERED BY

**KDBC-TV**  
EL PASO - LAS CRUCES



Discover the value of advertising with KDBC-

TV and earn valuable prizes at the same time!

In addition to great ratings strength, strong demographics, and smart cost efficiency, reward yourself by buying KDBC advertising in 1992.

By reaching specific spending levels, you'll earn yourself choices of valuable prizes, including chances for one or more all-expense-paid trips to such exciting locales as Las Vegas, Disneyland, New Orleans, Acapulco, and the Bahamas.



## Here's how the "More For Your Money" program works:

- If you commit to an advertising contract of \$1000, production of your first :30 commercial (including 2 hours on-location and 2 hours in-studio) will be available for only \$200. A \$1500 contract will result in production charges of only \$100. A \$2000+ contract will be rewarded with free production of your first :30 commercial.
- If you spend a minimum of \$3000 with KDBC during 1992, you will earn your choice of prizes from the exciting Amagift Gift Service Catalogs at the following exchange rates:

Amount of Investment	Value of Prize (Incl. Tax & Shipping)
\$3000 - \$3999	\$150
\$4000 - \$4999	\$200
\$5000 - \$5999	\$250
\$6000 - \$6999	\$300
\$7000 - \$7999	\$350
\$8000 - \$8999	\$400
\$9000 - \$9999	\$450
\$10000+	5% of Spending

- If you prefer, you may exchange your catalog prize values at 90% of face value for Travel Gift Certificates from Sun Travel, Inc. These certificates are redeemable for exciting travel at your convenience.
- Prizes may be redeemed at the end of each quarter or may be accrued during the year and applied to larger prize pools and trip opportunities at the end of the year.



PRODUCTION RATE CARD

FIELD PRODUCTION ..... \$150.00 per hour  
 STUDIO PRODUCTION ..... \$150.00 per hour  
 POST PRODUCTION ..... \$150.00 per hour

(MINIMUM CHARGE \$75.00)

CANCELLATION

A \$25.00 charge will be billed to any client/agency who cancels with less than 24 hours notice. Any client/agency who arrives more than 30 minutes late for scheduled production without notice will be charged \$25.00 cancellation fee and must reschedule.

AUDIO/VIDEO TAGS ..... \$ 25.00

DUB CHARGE

Audio only ..... \$ 15.00  
 10/30/60 seconds ..... \$ 15.00  
 1-5 minutes ..... \$ 20.00  
 6-15 minutes ..... \$ 30.00  
 16 minutes-1 hour ..... \$ 40.00

TAPE PURCHASE

VHS ..... \$ 10.00  
 3/4 U-Matic ..... \$ 20.00  
 1 inch (60 minutes) ..... \$100.00

(PRODUCTION CHARGES ARE NON-COMMISSIONABLE COSTS)

KDBC-TV owns all footage that it shoots. Clients can have raw field/studio footage stored indefinitely at KDBC for an additional charge of \$20.00. If the client wishes to retain the footage themselves, there will be a "buyout" charge of \$75.00 plus tape purchase. Agencies paying flat rate will own all raw footage. (Applicable tape purchase charges will apply).

93040992932

# KDBC PRODUCTIONS

<b>PRODUCTION ORDER</b>   <small>EL PASO-LAS CRUCES</small>		Airdate		Adv # <i>100</i>	Advertiser <i>MICKEY MILLIGAN</i>		
		Billing <i>\$ 100</i>		Agy #	Title & Spot #		Agency <i>NA</i>
CHECK	BY	CHARGES	TIME	<i>5766 N. MESA</i> <i>EIRASC 79912</i> <i>584-9899</i>			
<input checked="" type="checkbox"/> Field	<i>✓</i>	<i>100.00</i>	<i>2.5 hrs.</i>				
<input type="checkbox"/> Studio							
<input type="checkbox"/> Post			<i>2 hrs.</i>				
<input type="checkbox"/> VO Tag							
<input type="checkbox"/> CG Tag							
<input checked="" type="checkbox"/> DUBBING							
<input type="checkbox"/> 1 inch	<i>(15.00)</i>						
<input type="checkbox"/> 3/4 inch							
<input type="checkbox"/> VHS							
<input checked="" type="checkbox"/> Audio 1/4							
<input checked="" type="checkbox"/> Tape Purchase	<i>(10.00)</i>						
<input type="checkbox"/> TYPE							
<input type="checkbox"/> Commercial							
<input type="checkbox"/> Promo							
<input type="checkbox"/> PSA							
<b>TOTAL CHARGES</b>		<i>\$100.00</i>					
				Sales # <i>65</i>	Date Completed <i>3/3</i>	Production	

9 3 0 4 0 9 9 2 9 3 3

# KDBC PRODUCTIONS

<b>PRODUCTION ORDER</b> <b>KDBC 4</b> <small>EL PASO-LAS CRUCES</small>		Airdate <i>9/28</i>	Adv # <i>New</i>	Advertiser <i>Cielo Vista Baptist Church</i>	
BY <i>N/C</i>		Bill to <i>Client</i> 1st spot <i>Free</i>	Agy #	Title & Spot # "Mother" "Father"	Agency
CHECK	BY	CHARGES	TIME	<p style="font-size: 1.2em;"> <i>\$250.00 Produce 2 spots</i>  <i>- Discounted per Jamie</i>  <i>1st spot ! Shoot Free</i> </p>	
Field Weekend		450.00	3hrs.		
Studio					
Post		300.00	2hr.		
VO <sup>over</sup> Tag		50.00			
CG Tag					
DUBBING					
1 inch					
3/4 inch					
VHS					
Audio 1/4					
Tape Purchase					
TYPE					
Commercial					
Promo					
PSA					
<b>TOTAL CHARGES</b>		300.00			
		Sales # <i>18</i>		Date Completed <i>9/28/92</i>	Production

9 3 0 4 0 9 9 2 9 3 4

# KDBC PRODUCTIONS

PRODUCTION ORDER <b>KDBC 4</b>  <small>EL PASO-LAS CRUCES</small>		Airdate 3-2-92	Adv # New	Advertiser MACK CASNER - Attorney		
		Billing N/C <i>[Signature]</i>	Agcy # N/A	Title & Spot #	Agency _____	
	CHECK	BY	CHARGES	TIME	Time - Lets Discuss copy prior to production. Simple spot.	
<input checked="" type="checkbox"/>	Field			2:11.		
<input checked="" type="checkbox"/>	Studio					
<input checked="" type="checkbox"/>	Post			2:11		
<input checked="" type="checkbox"/>	VO Tag					
<input checked="" type="checkbox"/>	CG Tag					
	DUBBING					
1	1 inch					
	3/4 inch					
1	VHS					
<input checked="" type="checkbox"/>	Audio 1/4					
<input checked="" type="checkbox"/>	Tape Purchase					
	TYPE					
	Commercial					
	Promo					
	PSA		<i>N/C</i>			
	TOTAL CHARGES					
			Sales # 54	Date Completed 2/25/92	Production	

9 3 0 4 0 9 9 2 9 3 5

# KDBC PRODUCTIONS

<b>PRODUCTION ORDER</b> 		Airdate <i>1-17-92</i>	Adv #	Advertiser <i>NORTH PARK MALL</i>	
		Billing <i>N/C</i>	Agency # <i>creative EDGE</i>	Title & Spot #	Agency
	CHECK BY	CHARGES	TIME		
<input checked="" type="checkbox"/>	Field		<i>2 hrs.</i>	<i>SHOOT &amp; EDIT</i>	
<input checked="" type="checkbox"/>	Studio				
<input checked="" type="checkbox"/>	Post		<i>2 hrs.</i>		
<input type="checkbox"/>	VO Tag				
<input type="checkbox"/>	CG Tag				
<input type="checkbox"/>	DUBBING				
<input type="checkbox"/>	1 inch				
<input type="checkbox"/>	3/4 inch				
<input type="checkbox"/>	VHS				
<input type="checkbox"/>	Audio 1/4				
<input checked="" type="checkbox"/>	Tape Purchase				
<input checked="" type="checkbox"/>	TYPE				
<input type="checkbox"/>	Commercial				
<input type="checkbox"/>	Promo				
<input type="checkbox"/>	PSA			<i>FIRST-TIME ADV.</i>	
<input type="checkbox"/>	TOTAL CHARGES	<i>N/C</i>		<i>N/C</i>	
		Sales #	Date Completed	<i>6/</i>	Production

9 3 0 4 0 9 9 2 9 3 6

*Stew*

# KDBC PRODUCTIONS

PRODUCTION ORDER <b>KDBC 4</b> <small>© 1987-1988 KDBC</small>		Airdate	Adv # NEW-	Advertiser MANUEL BAVOLA	
		Billing N/C	Agy #	Title & Spot # MANUEL BAVOLA	Agency
CHECK	BY	CHARGES	TIME	Raw Ramas  JUNE 16TH COURTHOUSE 13: 12TH FLOOR JUNE 17- WED 1PM EDT.  First time	
Field			2hrs ✓		
Studio					
Post			2hrs ✓		
VO Tag					
CG Tag					
DUBBING					
1 inch					
3/4 inch					
VHS					
Audio 1/4					
Tape Purchase					
TYPE					
Commercial					
Promo					
PSA		N/C			
TOTAL CHARGES					
			Sales # 61	Date Completed	Production

9 3 0 4 0 9 9 2 9 3 7

# KDBC PRODUCTIONS

PRODUCTION ORDER <b>KDBC 4</b>  <small>EL PASO-LAS CRUCES</small>		Airdate on		Adv # 2908	Advertiser AXTRON
		Billing E 7-PROD PLAN		Agy #	Title & Spot # GENERIC
CHECK	BY	CHARGES	TIME	4101 Dyer St  Shoot TV'S, STEREO'S, ETC. on location - STOW FRONT location. will have SEVERAL SCRIPTS for client to APPROVE.  Thanks Jan	
Field	✓	2 hrs.			
Studio					
Post	✓	2 HR.			
VO Tag					
CG Tag					
DUBBING					
1 inch					
3/4 inch					
VHS	✓				
Audio 1/4					
Tape Purchase					
TYPE					
Commercial					
Promo					
PSA					
TOTAL CHARGES					
N/C			Sales # 65	Date Completed	20 MAY
			Production		

8 2 6 2 6 6 0 4 0 2 6

# KDBC PRODUCTIONS

PRODUCTION ORDER

KDBC



© 1980-LAS CRES

Airdate

3-9

Adv #

NEW

Advertiser

JACUCCO BYOS.

Billing

N/C

Agcy #

Title & Spot #  
GENERIC

Agency

- CHECK
- Id
- Studio
- Post
- VO Tag
- CG Tag
- DUBBING
- 1 inch
- 3/4 inch
- VHS
- Audio 1/4
- Tape Purchase
- TYPE
- Commercial
- Promo
- PSA
- TOTAL CHARGES

BY

✓

✓

✓

CHARGES

TIME

2 hr

2 hr

N/C

NEW SPOT

SHOOT 1<sup>30</sup> TUES MARCH 3RD

7124 N. MESA.

N/C

Thank you

Sales #61

Date Completed

3/5/92

Production

NEW

9304092939

OGC 7792

REGISTERED

DEC 03 1992

Chip Taberski

CANDIDATE  
U. S. Congress

RECEIVED  
ELECTION COMMISSION

82 DEC -7 PM 3:19

303 TEXAS SUITE 600  
EL PASO, TX 79901

CAMPAIGN OFFICE  
(915) 585-8008  
PUBLIC RELATIONS  
(915) 532-8331

December 2, 1992

Mr. Jonathan A. Berstein  
Assistant Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR3702

Dear Mr. Berstein:

Pursuant to your correspondence dated November 18, 1992, I hereby respond to the accusations leveled against the Chip Taberski for U.S. Congress Committee (the "Committee") in Bob Slagle's November 7, 1992 correspondence. I attach to my response, the responses of KDBC-TV and Richard Rash. I adopt their defenses and conclusions as if fully set forth herein below. As I understand the allegations made by Bob Slagle against the Committee, they fall into two categories:

1. Richard Rash allegedly increased KDBC-TV's overhead through the use of their facilities to further the Committee; and
2. Sun City Productions allegedly gave corporate contributions to the Committee for get-out-the-vote activities.

As Treasurer for the Committee, I feel it is my duty to affirmatively state that the Committee has not done anything illegal pursuant to any applicable law.

I. INCREASE OF KDBC-TV'S OVERHEAD:

Although Richard Rash did use KDBC-TV's telephones, copiers and fax machines for the occasional telephone call, copy, or fax, it is imperative that I point out that at all times during the primary and the general election, the Committee had our own fax machines, photocopy machines and telephones. Mr. Rash, at all

OFFICE OF THE CLERK  
U.S. HOUSE OF REPRESENTATIVES  
1992 DEC -7 PM 12:25  
OFFICE OF RECORDS & REGISTRATION

9304092940

times, used those facilities when they were available. On the rare occasion when it was inconvenient or impossible to use campaign facilities, he did, indeed, use KDBC-TV's facilities. However, as KDBC-TV has indicated in their response, the Committee, through Mr. Rash, had an oral agreement with KDBC-TV before Mr. Taberski announced his intentions to run for U.S. Congress that if any expenses were incurred on behalf of the Committee, that the campaign would reimburse them and that those expenses would be kept to a bare minimum. Although Mr. Slagle does correctly point out that the Taberski campaign must reimburse the station for any use of facilities which increases its overhead, it is clear that KDBC-TV has been reimbursed as is evidenced by the attachments to KDBC-TV's response. All these arrangements have been done in full compliance with 11 C.F.R. §114.9(a).

II. SUN CITY PRODUCTIONS:

As to Sun City Productions ("Sun City"), if the Commission looks closely at the attached exhibit "3" to Mr. Slagle's correspondence, you will find that Mr. Slagle has inaccurately characterized the contributions of Mr. Steve Pandac. In the correspondence by Mr. Slagle, he refers to those contributions as in-kind contributions. However, a review of exhibit "3" indicates those contributions were cash contributions in the primary and in the run-off of \$500.00 each. Clearly, accepting a cash contribution of \$1,000.00 over two races does not in any way violate any FEC regulations.

The allegations that Sun City gave corporate support to "get-out-the-vote phone banking services" has no validity. Although Sun City did allow the Taberski campaign to use approximately six of their telephones, all such services were provided after the close of business, for local telephoning purposes, and all telephoning was done by volunteers. There was no additional increase in cost of overhead for Sun City. Alternatively, if the FEC determines that the campaign should reimburse Sun City for the use of their telephones, the question arises to whom should we submit the check. For example, if the fair market value of six telephone lines is \$300.00, does the Committee pay Sun City \$300.00? If so, then Sun City has a windfall of \$300.00. It seems that the intent of the regulation was to require the Committee to pay fair market value for the use of corporate facilities. Since the corporation in question already had the lines installed, and since Southwestern Bell does not charge its business clients (or residential clients) for local calls, the fair market value for the use of the telephones would be zero. Since Sun City paid nothing additional to Southwestern Bell, there was no increase in overhead for Sun

93040992941

Mr. Jonathan  
Federal  
December  
Page 3

Commission

no corporate subsidy as alleged by Mr.

CONCLUSION:

I find it outrageous that the Texas Democratic Party has charged the Committee, as well as KDBC-TV and Richard Rash, of any impropriety or illegal actions. If the FEC determines that the Committee failed to properly report an item, it was clearly unintentional and certainly does not rise to the level of behaviour for which Mr. Slagle accuses us. Furthermore, it is clear that these allegations have been made to harass and intimidate any challenger to the Democratic Party's candidate, Mr. Coleman, and to intimidate any Republican challengers in the future.

With this obvious political agenda in mind, I sincerely request that the Federal Elections Commission terminate its investigation of this matter with prejudice.

Sincerely,

*Ronald E. Pate*

Ron Pate  
Treasurer for the Chip Taberski  
for U.S. Congress Committee

Enclosures

0025

930409

REGISTERED

DEC 03 1992

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK  
92 DEC -7 PM 3:19

December 2, 1992

Mr. Jonathan A. Berstein  
Assistant Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR3702

Dear Mr. Berstein:

Pursuant to your correspondence dated November 18, 1992, I hereby respond to the accusations leveled against me in Bob Slagle's November 7, 1992 correspondence. I attach to my response, the responses of KDBC-TV and the Chip Taberski for U.S. Congress Committee. I adopt their defenses and conclusions as if fully set forth herein below. As I understand the allegations made by Bob Slagle against me, they fall into three categories:

1. I was paid by KDBC-TV to lend support to the Chip Taberski campaign as its Chairman;
2. I used my influences within KDBC-TV to provide "most-favored" treatment for the Chip Taberski campaign; and
3. I allegedly increased KDBC-TV's overhead through the use of their facilities to further the goals of the Chip Taberski campaign.

Before I begin, I believe it is imperative to state emphatically that I deny any wrongdoing on my part, on behalf of KDBC-TV, and on behalf of the Chip Taberski for U.S. Congress Committee. At no time have any of us, or anyone connected with our campaign, misrepresented or otherwise intended to violate any rules of the FCC or FEC. Indeed, we have spent much time and effort to insure that all of our actions fully complied, not only with the letter of the law, but the spirit as well. Furthermore, not one statement made by Mr. Slagle is true; as I hope my response will clearly demonstrate.

93040992943

OFFICE OF THE CLERK  
U.S. HOUSE OF REPRESENTATIVES

1992 DEC -7 PM 12:25

OFFICE OF RECORDS & ADMINISTRATION

I. MY SALARY:

On several occasions, the Democratic Party of El Paso sent an "observer" (for lack of a better term) to KDBC-TV to question the station about its actions concerning the Chip Taberski campaign. Many times Mr. Burton was asked how I was compensated. Each time, the observer was told that I was paid strictly on a commission basis as an outside salesman. If I sold no advertisements, then I made no money. I am proud to say that although my many hours and efforts on the behalf of Chip Taberski ultimately resulted in a lost race, my production for the year has made me KDBC-TV's top salesperson.

Furthermore, at no time did I receive a direct commission from campaign commercials aired on KDBC-TV. All campaign commercial commissions from all candidates were pooled and then divided among the salespeople evenly to further remove any implications of impropriety on the part of KDBC-TV or anyone connected with KDBC-TV. As can be seen, KDBC-TV at no time paid me a salary thereby enabling me to help Chip Taberski run his campaign.

II. "MOST-FAVORED" TREATMENT:

My relationship with KDBC-TV was one of a salesperson and at no time was I the sales manager of KDBC-TV as alleged by Mr. Slagle in his correspondence. As KDBC-TV has responded, Mr. Taberski simply took advantage of the "first-time advertisers" special package. At no time was I approached by Mr. Coleman to determine if KDBC-TV had any special package he could buy and, likewise, I did not contact Mr. Coleman's campaign to advise them that such a package existed. The full explanation of the package can be found in KDBC-TV's response, as well as a copy of the terms and conditions of that package. Furthermore, I did not sell to the Chip Taberski campaign any advertising time that was used by the campaign. This was handled through Margie La Fleur. She was appointed by KDBC-TV to oversee all campaign advertisements so that there could be no questions of any impropriety on the part of KDBC-TV or any of its salespersons, especially myself.

I affirmatively set forth that at no time did I ever assert what little, if any, influence I have at KDBC-TV to gain favored treatment for Chip Taberski or his campaign. Furthermore, at no time did I influence any political campaign decisions of KDBC-TV concerning any candidate, including Mr. Chip Taberski. I found it particularly interesting that the Democratic Party, after having spent nearly every day of the campaign at KDBC-TV was

93040992944

unable to uncover anything which might indicate any impropriety on the part of KDBC-TV or myself. Instead, they include as an allegation in their Complaint that: "This is one amenity. There may have been others." This is obviously an attempt to imply that other illegal or inappropriate activity took place on KDBC-TV's property when, indeed, after continual monitoring by the Texas Democratic Party on a daily basis, they could find nothing to support this obvious, inflammatory allegation. I resent that my conduct, as well as the integrity of KDBC-TV has been put into question after the Texas Democratic Party did extensive investigations and found no evidence of wrongdoing.

III. INCREASE OF KDBC-TV'S OVERHEAD:

Although I admit the use of KDBC-TV's telephones, copiers and fax machines for the occasional telephone call, copy, or fax, it is imperative that I point out that at all times during the primary and the general election, the Taberski headquarters had their own fax machines, their own photocopy machines and their own telephones. I, at all times, used those facilities when they were available. On the rare occasion when it was inconvenient or impossible to use campaign facilities, I did, indeed, use KDBC-TV's facilities. However, as KDBC-TV has indicated in their response, I had an oral agreement with Mr. Burton before Mr. Taberski announced his intentions to run for U.S. Congress that if any expenses were incurred on behalf of the Chip Taberski campaign, that the campaign would reimburse them and that those expenses would be kept to a bare minimum. Although Mr. Slagle does correctly point out that the Taberski campaign must reimburse the station for any use of facilities which increases its overhead, it is clear that KDBC-TV has been reimbursed as is evidenced by the attachments to KDBC-TV's response.

IV. CONCLUSION:

I find it outrageous that the Texas Democratic Party has charged me, as well as KDBC-TV and the Chip Taberski campaign, of any impropriety or illegal actions. Especially, in light of the fact that the Texas Democratic Party daily investigated KDBC-TV and for all practical purposes maintained a constant presence at KDBC-TV. Had the Democratic Party been able to uncover anything of substance during their tenure with KDBC-TV, they would have raised those specific points in their correspondence. Failure to do so obviously indicates they were unable to find any evidence of wrongdoing and they, therefore, have filed this Complaint to harass and intimidate any challenger to Mr. Coleman to prevent a challenger in the future.

93040992945

Mr. Jonathan A. Berstein  
Federal Election Commission  
December 2, 1992  
Page 4

With this obvious political agenda in mind, I sincerely request that the Federal Elections Commission terminate its investigation of this matter with prejudice.

Sincerely,

*Richard Rash*

Richard Rash

Enclosures

0025

93040992946



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

APRIL 22, 1993

Ronald E. Pate, Treasurer  
Chip Taberski for U.S. Congress  
Committee  
303 Texas Suite 600  
El Paso, TX 79901

RE: MUR 3702  
Chip Taberski for U.S. Congress  
Committee and Ronald E. Pate, as  
treasurer

Dear Mr. Pate:

On March 3, 1993, you requested that the Federal Election Commission permit Chip Taberski for U.S. Congress Committee ("Committee") to terminate pursuant to 2 U.S.C. § 433(d) and Section 102.3 of the Commission's Regulations. Because of the ongoing enforcement matter involving your Committee, this request has been denied. Therefore, you are reminded that the Committee must continue to file all the required reports with the Commission until such time as the enforcement matter has been closed as to the Committee.

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

Sincerely,

Holly Baker  
Attorney

cc: Reports Analysis Division

93040992947

MUR # 3702

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

93040992948



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20461

THIS IS THE End of MUR# 3702

DATE FILMED 10/29/93 CAMERA NO. 2

CAMERAMAN MC

93040992949



FEDERAL ELECTION COMMISSION  
WASHINGTON D.C. 20463

Microfilm  
 Public Records  
 Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3702.

12/10/93

23043543600

**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.

23043543601



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Bob Slagle, Chairman  
Texas Democratic Party  
815 Brazos, Suite 200  
Austin, Texas 78701

RE: MUR 3702

Dear Mr. Slagle:

On November 10, 1992, the Federal Election Commission received your complaint 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 Chip Taberski; Chip Taberski for U.S. Congress Committee and Ronald Pate, as treasurer; Sun City Productions and Steve Pandak, as president; KDBC-TV; and Richard Rash. 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,

*Holly Baker*  
Holly Baker  
Attorney

Attachment  
Narrative

DEC 09 1993

Date the Commission voted to close the file: \_\_\_\_\_

23043543602

MUR 3702  
CHIP TABERSKI FOR CONGRESS

This complaint by the Texas Democratic Party alleges that KDBC-TV and a production company made illegal in-kind contributions to the campaign of Chip Taberski. The TV station states that all use of facilities by the Taberski campaign was incidental and that the campaign reimbursed the station. The station also states that the Taberski campaign was charged the same amount as non-political advertisers, and it submitted documents to support its claim. The campaign admits it used the phones of another company for a get-out-the-vote drive, but denies that the use created any reimburseable charges.

No substantial amounts are involved, there is no indication of any serious intent by Respondents to violate the FECA, there is no significant issue relative to the other issues pending before the Commission, and this is a first time candidacy.

23043543603



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Stan Siegal, Vice President and General Manager  
KDBC-TV  
P.O. Box 1799  
El Paso, Texas 79999

RE: MUR 3702  
KDBC-TV

Dear Mr. Siegal:

On November 18, 1992, the Federal Election Commission notified you 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 KDBC-TV. See attach 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,

*Holly Baker*  
Holly Baker  
Attorney

Attachment  
Narrative

DEC 09 1993

Date the Commission voted to close the file: \_\_\_\_\_

23043543604

MUR 3702  
CHIP TABERSKI FOR CONGRESS

This complaint by the Texas Democratic Party alleges that KDBC-TV and a production company made illegal in-kind contributions to the campaign of Chip Taberski. The TV station states that all use of facilities by the Taberski campaign was incidental and that the campaign reimbursed the station. The station also states that the Taberski campaign was charged the same amount as non-political advertisers, and it submitted documents to support its claim. The campaign admits it used the phones of another company for a get-out-the-vote drive, but denies that the use created any reimburseable charges.

No substantial amounts are involved, there is no indication of any serious intent by Respondents to violate the FECA, there is no significant issue relative to the other issues pending before the Commission, and this is a first time candidacy.

23043543605



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Chip Taberski  
247 Maricopa  
El Paso, Texas 79902

RE: MUR 3702  
Chip Taberski

Dear Mr. Taberski:

On November 18, 1992, the Federal Election Commission notified you 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 you. 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,

*Holly Baker*  
Holly Baker  
Attorney

Attachment  
Narrative

Date the Commission voted to close the file: \_\_\_\_\_

DEC 09 1993

3043543606

MUR 3702  
CHIP TABERSKI FOR CONGRESS

This complaint by the Texas Democratic Party alleges that KDBC-TV and a production company made illegal in-kind contributions to the campaign of Chip Taberski. The TV station states that all use of facilities by the Taberski campaign was incidental and that the campaign reimbursed the station. The station also states that the Taberski campaign was charged the same amount as non-political advertisers, and it submitted documents to support its claim. The campaign admits it used the phones of another company for a get-out-the-vote drive, but denies that the use created any reimburseable charges.

No substantial amounts are involved, there is no indication of any serious intent by Respondents to violate the FECA, there is no significant issue relative to the other issues pending before the Commission, and this is a first time candidacy.

23043543607



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

DEC 10 1993

Ronald Pate, Treasurer  
Chip Taberski for U.S. Congress Committee  
303 Texas Ave., Suite 600  
El Paso, Texas 79901

RE: MUR 3702  
Chip Taberski for U.S. Congress  
Committee and Ronald Pate, as  
treasurer

Dear Mr. Pate:

On November 18, 1992, the Federal Election Commission notified you 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 Chip Taberski for U.S. Congress Committee, 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,

Holly Baker  
Attorney

Attachment  
Narrative

Date the Commission voted to close the file:

DEC 09 1993

23043543608

MUR 3702

CHIP TABERSKI FOR CONGRESS

This complaint by the Texas Democratic Party alleges that KDBC-TV and a production company made illegal in-kind contributions to the campaign of Chip Taberski. The TV station states that all use of facilities by the Taberski campaign was incidental and that the campaign reimbursed the station. The station also states that the Taberski campaign was charged the same amount as non-political advertisers, and it submitted documents to support its claim. The campaign admits it used the phones of another company for a get-out-the-vote drive, but denies that the use created any reimburseable charges.

No substantial amounts are involved, there is no indication of any serious intent by Respondents to violate the FECA, there is no significant issue relative to the other issues pending before the Commission, and this is a first time candidacy.

23043543609



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Richard Rash  
700 De Leon  
El Paso, Texas 79912

RE: MUR 3702  
Richard Rash

Dear Mr. Rash:

On November 18, 1992, the Federal Election Commission notified you 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 you. 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,

*Holly Baker*  
Holly Baker  
Attorney

Attachment  
Narrative

Date the Commission voted to close the file: \_\_\_\_\_

DEC 09 1993

23043543610

MUR 3702  
CEIP TABERSKI FOR CONGRESS

This complaint by the Texas Democratic Party alleges that KDBC-TV and a production company made illegal in-kind contributions to the campaign of Chip Taberski. The TV station states that all use of facilities by the Taberski campaign was incidental and that the campaign reimbursed the station. The station also states that the Taberski campaign was charged the same amount as non-political advertisers, and it submitted documents to support its claim. The campaign admits it used the phones of another company for a get-out-the-vote drive, but denies that the use created any reimburseable charges.

No substantial amounts are involved, there is no indication of any serious intent by Respondents to violate the FECA, there is no significant issue relative to the other issues pending before the Commission, and this is a first time candidacy.

23043543611



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Steve Pandak, President  
Sun City Productions  
7700 Alabama, Suite H  
El Paso, Texas 79904

RE: MUR 3702  
Sun City Productions and  
Steve Pandak, President

Dear Mr. Pandak:

On November 18, 1992, the Federal Election Commission notified you 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 you or your company. 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,

Holly Baker  
Attorney

Attachment  
Narrative

Date the Commission voted to close the file: \_\_\_\_\_

DEC 09 1993

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**MUR 3702  
CHIP TABERSKI FOR CONGRESS**

This complaint by the Texas Democratic Party alleges that KDBC-TV and a production company made illegal in-kind contributions to the campaign of Chip Taberski. The TV station states that all use of facilities by the Taberski campaign was incidental and that the campaign reimbursed the station. The station also states that the Taberski campaign was charged the same amount as non-political advertisers, and it submitted documents to support its claim. The campaign admits it used the phones of another company for a get-out-the-vote drive, but denies that the use created any reimburseable charges.

No substantial amounts are involved, there is no indication of any serious intent by Respondents to violate the FECA, there is no significant issue relative to the other issues pending before the Commission, and this is a first time candidacy.

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