



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3748

DATE FILMED 6-14-95 CAMERA NO. 2

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RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

MAR 8 11 33 AM '93

Louis R. Centorani
31 Spring Street
Binghamton, N.Y. 13903
Tel. (607) 723-4186

Mar. 3, 1993

MAR 3748

93 MAR -8 PM 2:28

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE

Federal Election Commission
Washington, D.C. 20463

Dear Sirs;

I am chairman of an ad hoc committee of the Ross Perot Petition Committee of Broome County.

This committee was formed on Nov. 8, 1992 when we asked our coordinator for an accounting of expenditures and the money we raised during the presidential campaign.

At first he told us that all the records had been sent to FEC and that he had nothing to show us and besides, he added, he was not required to do so. Then on another time he said he had forwarded all the records to Perot in Dallas.

Our inquiries to Dallas were futile. We then asked for information from the FEC and your office forwarded a print out of the information they had available but which shed little light on the matter. The print out regarding our coordinator, Mark T. Conlon, 2 S. Mountain Terrace, Binghamton, N.Y., shows very little activity. Toward the end of the campaign we had signed up more than 1,900 volunteers and raised a considerable amount of money.

Mr. Conlon took upon himself to open a checking account and collected all the cash that was raised. Since most of us were new to politics we never questioned his activities until after the election.

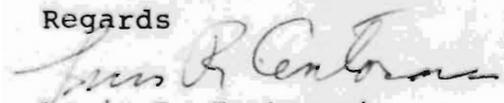
Mr. Conlon refused to furnish this committee the checking account activities and how the cash was disbursed.

I am enclosing copies of three checks I gave the Perot Petition Committee and another check from a volunteer who is a member of the ad hoc committee.

We have exhausted all avenues to get our hands on the records. We now turn to your office for help.

As you will note the back of checks are curious. The checking account numbers do not match. If we can look at the checking account records with the Endicott Trust Bank (now known as M & T Bank a division of Endicott Trust) we believe we can resolve this problem rather quickly. We are prepared to furnish your office with any additional information that is required.

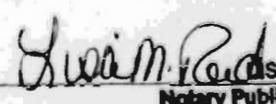
Regards



Louis R. Centorani

LRC/cc

As sworn to before me this 4 Day of March 1993.



LISA M. REID
Notary Public, State of New York
Qualified in Broome County
My Commission Expires Nov. 18, 1993

94043523002

94043523003

LILLIAN M. K... 11-88 543

May 17 19 92 50-781/213

PAY TO THE ORDER OF Perot Petition Committee \$ 10⁰⁰

Ten DOLLARS

Binghamton Savings Bank
NORTHGATE PLAZA OFFICE
1250 FRONT STREET BINGHAMTON NEW YORK 13908

MEMO: Lillian Kumpiker

ISABELLA CENTORANI 4685

May 19 19 92 50-1003/213

PAY TO THE ORDER OF Perot Petition Committee 25.00⁰⁰

Twenty-five dollars & no cents DOLLARS

Endicott Trust
A MIDLANTIC BANK
Endicott Trust Company
35-41 Washington Ave
P.O. Box 8028
Endicott, NY 13760-8028

MEMO: Isabella Centorani

ISABELLA CENTORANI 4735

July 7 19 92 50-1003/213

PAY TO THE ORDER OF Russ Perot Petition Committee \$ 100⁰⁰

One hundred and no cents DOLLARS

Endicott Trust
A MIDLANTIC BANK
Endicott Trust Company
35-41 Washington Ave
P.O. Box 8028
Endicott, NY 13760-8028

MEMO: Isabella Centorani

ISABELLA CENTORANI 4681

May 14 19 92 50-1003/213

PAY TO THE ORDER OF People For Perot \$ 10.00

Ten dollars & no cents DOLLARS

Endicott Trust
A MIDLANTIC BANK
Endicott Trust Company
35-41 Washington Ave
P.O. Box 8028
Endicott, NY 13760-8028

MEMO: Isabella Centorani

ENDORSE HERE

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DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
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MAY 21 92

PAY TO THE ORDER OF
CHEMICAL BANK
NEW YORK, N. Y. 10017
FOR DEPOSIT ONLY
PEOPLE FOR PEROT
092065708

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FEDERAL RESERVE BOARD OF GOVERNORS REG. CC

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For deposit only

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Created by the account or
the within named Payee or Endorser
Endorsement Supplied & Guaranteed by
ENDICOTT TRUST COMPANY
Endicott, New York

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354 AVENUE
ELMWOOD, N. Y. 11732
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

March 17, 1993

Louis R. Centorani
31 Spring St.
Binghamton, N.Y. 13903

RE: MUR 3748

Dear Mr. Centorani:

This letter acknowledges receipt on March 11, 1993, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Mark T. Conlon, Perot '92 and Mike Poss, as treasurer. 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 3748. 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

94043523005



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20461

March 17, 1993

Perot '92
Mike Poss, Treasurer
1700 Lakeside Square
Dallas, TX 75240

RE: MUR 3748

Dear Mr. Poss:

The Federal Election Commission received a complaint which indicates that Perot '92 ("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 3748. 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.

94043523006

Perot '92
Mike Poss, Treasurer
Page 2

If you have any questions, please contact Jose Rodriguez, 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,



Jonathan A. Bernstein
Assistant General Counsel

Enclosures

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

94043523007



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

March 17, 1993

Mark T. Conlon
2 S. Mountain Terrace
Binghamton, N.Y. 13903

RE: MUR 3748

Dear Mr. Conlon:

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 3748. 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.

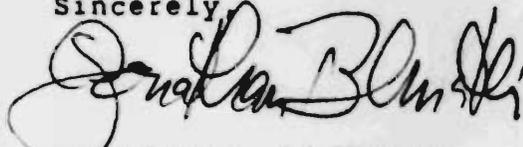
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed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

94043523008

Mark T. Conlon
Page 2

If you have any questions, please contact Jose Rodriguez, 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,



Jonathan A. Bernstein
Assistant General Counsel

Enclosures

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

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RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

MAR 29 10 55 AM '93

PEROT '92
7616 LBJ Freeway, Suite 727
Dallas, Texas 75251

Daniel G. Routman
Associate General Counsel

March 24, 1993

By Facsimile (202-219-3923)
and Regular Mail
Federal Election Commission
Office of the General Counsel
999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
93 MAR 29 PM 2:05

Attn: Jose Rodriguez, Esq. Re: MUR 3748

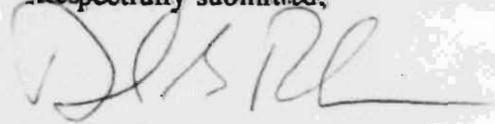
Dear Mr. Rodriguez:

On behalf of respondents Perot '92 and Mike Poss, Treasurer of Perot '92, I respectfully request an extension of time in which to respond to the complaint in the above-referenced matter. Enclosed is an executed Statement of Designation of Counsel appointing the undersigned and R. Clayton Mulford as counsel in connection with this matter.

We request that the Commission provide a 20-day extension of time, until April 26, 1993, to file our response. Perot '92 received the Commission's letter in this matter on March 22, 1993, which would require a submission of any factual or legal materials in response on April 6, 1993. In order to conduct a thorough investigation of the matter, a short extension is needed. Given the nature of the complaint, it is particularly difficult to complete the necessary fact-finding within the 15-day response time. Under these circumstances, and in the interest of developing a full and accurate record, we request that a 20-day extension be provided.

If you have any questions, you may contact me at 214-450-8883 or Clay Mulford at 214-450-8857. Thank you for your consideration of this request.

Respectfully submitted,



Daniel G. Routman
Associate General Counsel

Enclosure

94043523010

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK

93 MAR 29 PM 2:05

MUR 3748

NAME OF COUNSEL: Daniel G. Routman/R. Clayton Mulford

ADDRESS: Perot '92
7616 LBJ Freeway, Suite 727
Dallas, Texas 75251

TELEPHONE: (214) 450-8883

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

3/24/93
Date

J. Michael Poss
Signature

RESPONDENT'S NAME: Perot '92 Mike Poss, Treasurer

ADDRESS: 1700 Lakeside Square
12377 Merit Drive
Dallas, Texas 75251

TELEPHONE: HOME (214) 826-0779

BUSINESS (214) 788-3030

94043523011



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 25, 1993

Daniel G. Routman, Esq.
Associate General Counsel
Perot '92
7616 LBJ Freeway
Suite 727
Dallas, Texas 75251

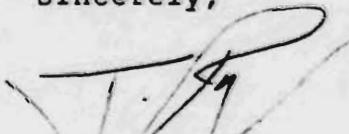
RE: MUR 3748

Dear Mr. Routman:

This is in response to your letter dated March 24, 1993, which we received on the same date, requesting an extension until April 26, 1993, to respond to the complaint in this matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on April 26, 1993.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,



Jose H. Rodriguez
Attorney

94043523012

HUGHES & LUCE, L.L.P.
A REGISTERED LIMITED LIABILITY PARTNERSHIP
INCLUDING PROFESSIONAL CORPORATIONS

1717 MAIN STREET
SUITE 2800
DALLAS, TEXAS 75201
(214) 939-5500
FAX (214) 939-6100
TELEX 730836

1021 MAIN STREET
SUITE 1300
HOUSTON, TEXAS 77002
(713) 754-5200
FAX (713) 754-5206

111 CONGRESS AVENUE
SUITE 900
AUSTIN, TEXAS 78701
(512) 482-6800
FAX (512) 482-6859

RECEIVED
GENERAL ELECTION
COMMISSION
MAIL ROOM
APR 1 9 46 PM '93

Direct Dial Number
(214) 939-5416

March 31, 1993

VIA FAX (202) 219-3923

Federal Election Commission
Office of the General Counsel
999 E. Street, N.W.
Washington, D.C. 20463

Attn: Joe Rodriguez, Esq.

Re: MUR 3748

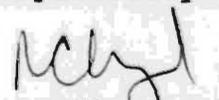
Dear Mr. Rodriguez:

This firm has been retained to represent Mark T. Conlon in connection with MUR 3748. An executed Statement of Designation of Counsel is attached.

We respectfully request that the Commission grant an extension to respond from April 4 until April 26, 1993. Mr. Conlon received the Commission's letter in this matter on March 20, 1993. We were retained several days after March 20, 1993. Given the nature of the complaint, it has been difficult to complete the necessary fact-finding inquiries in fewer than 15 days.

Thank you for your consideration of this request. If you have any questions, please contact me at (214) 939-5416.

Respectfully submitted,


Ross Clayton Mulford

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FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3748

NAME OF COUNSEL: R. Clayton Mulford/Kim J. Askew

FIRM: Hughes & Luce

ADDRESS: 1717 Main Street

Suite 2800

Dallas, TX 75201

TELEPHONE: (214) 939-5416

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

3-25-93
Date


Signature

RESPONDENT'S NAME: Mark I. Conlon

ADDRESS: 2 South Mountain Terrace

Binghamton, NY 13903

TELEPHONE: HOME (607) 722-5652

BUSINESS (607) 772-1444

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FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 1, 1993

Ross Clayton Mulford, Esq.
Hughes & Luce
1717 Main Street
Suite 2800
Dallas, TX 75201

RE: MUR 3748
Mark T. Colon

Dear Mr. Mulford:

This is in response to your letter dated March 31, 1993, which we received on April 1, 1993, requesting an extension until April 26, 1993, to respond to the complaint in this matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on April 26, 1993.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Jose M. Rodriguez
Attorney

94043523015

PEROT '92
7616 LBJ Freeway, Suite 727
Dallas, Texas 75251

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

APR 26 9 49 AM '93

Daniel G. Routman
Associate General Counsel

April 23, 1993

By Federal Express
Federal Election Commission
Office of the General Counsel
Sixth Floor
999 E. Street, N.W.
Washington, D.C. 20463

93 APR 26 PM 3:41

RECEIVED
FEDERAL ELECTION COMMISSION

Attn: Jose Rodriguez, Esq.

Re: MUR 3748

Dear Mr. Rodriguez:

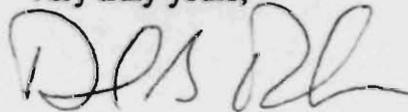
On behalf of Perot '92 and Mark T. Conlon, enclosed in connection with the complaint in this matter are the following documents:

1. Original executed Response of Perot '92 and its Treasurer; and
2. Original executed Response of Mark T. Conlon.

We respectfully request that you file stamp the copy of the first page of each Response and return them to the undersigned in the enclosed stamped, self-addressed envelope. We believe the responses demonstrate that this complaint should be dismissed and that the Commission should close its file on the matter.

If you have any questions, please contact me at 214-450-8883.

Very truly yours,



Daniel G. Routman
Associate General Counsel

Enclosures

cc: Mark T. Conlon
R. Clayton Mulford

94043523016

Before the
FEDERAL ELECTION COMMISSION

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FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL
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)
In the Matter of)
)
Perot '92) MUR 3748
_____)

To: Office of the General Counsel

**RESPONSE OF PEROT '92 AND
MIKE POSS, TREASURER**

Perot '92 and Mike Poss, its Treasurer, hereby respond to the complaint submitted by Louis R. Centorani, dated March 3, 1993.¹

I. INTRODUCTION

Mr. Centorani does not allege that Perot '92 (formerly the Perot Petition Committee² and hereinafter referred to as the "Committee") violated any Federal Election Commission ("FEC") regulations. He only complains that the Committee declined his demand for an accounting of receipts and disbursements with respect to one of the Committee's campaign depository accounts. He also requests that the FEC assist him in obtaining the records for that account. Mr. Centorani has been repeatedly informed, however, that the information he seeks is included in the Committee's reports on file with the FEC and that the Committee is not required to provide him with an accounting of its bank account activities.

In his complaint, Mr. Centorani implies that three contributions in amounts totaling \$135.00 made by Mrs. Centorani and a \$10.00 contribution made by Lillian

¹ By letter dated March 24, 1993, Perot '92 and Mr. Poss requested an extension of time through April 26, 1993 to submit this response. By letter dated March 25, 1993, the Office of the General Counsel granted that extension request.

² By letter dated October 5, 1992, the Perot Petition Committee changed its name to Perot '92 by amending its Statement of Organization.

Before the
FEDERAL ELECTION COMMISSION

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FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL
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)
In the Matter of)
)
Perot '92) MUR 3748
_____)

To: Office of the General Counsel

**RESPONSE OF PEROT '92 AND
MIKE POSS, TREASURER**

Perot '92 and Mike Poss, its Treasurer, hereby respond to the complaint submitted by Louis R. Centorani, dated March 3, 1993.¹

I. INTRODUCTION

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In his complaint, Mr. Centorani implies that three contributions in amounts totaling \$135.00 made by Mrs. Centorani and a \$10.00 contribution made by Lillian

¹ By letter dated March 24, 1993, Perot '92 and Mr. Poss requested an extension of time through April 26, 1993 to submit this response. By letter dated March 25, 1993, the Office of the General Counsel granted that extension request.

² By letter dated October 5, 1992, the Perot Petition Committee changed its name to Perot '92 by amending its Statement of Organization.

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Kumpikas may not have been deposited into the campaign depository account in question. However, the Committee's volunteer coordinator for the area in which Mr. Centorani resides received three of these contributions and deposited them in that campaign depository account. The fourth contribution was not given to the volunteer coordinator but was sent to New York City and deposited in another campaign depository account.

The Committee reported each of these contributions to the FEC. The contributions are not itemized in the Committee's FEC reports, however, because the contributions do not exceed or aggregate in excess of \$200.00. The Committee has maintained proper records concerning these contributions in accordance with FEC regulations.

II. FACTUAL SUMMARY

Mark T. Conlon served as the Committee's volunteer chairman for Broome County, New York and as the volunteer regional coordinator for the surrounding area. See Affidavit of Mark T. Conlon (Tab A). On May 14, 1992, Mike Poss, the Committee's Treasurer, authorized Mr. Conlon to open a bank account at Endicott Trust in Endicott, New York, which the Committee designated as a campaign depository. See Exhibit 1. Mr. Conlon was responsible for keeping proper records of receipts and disbursements in his region and forwarding the records to the state accounting office in New York City, where the Committee prepared its monthly FEC reports for New York. Louis R. Centorani was one of thousands of individuals who occasionally volunteered in the petition drive that placed Mr. Perot's name on the New York ballot. See Affidavit of Mark T. Conlon. Although Mr. Centorani claims to be chairman of the "ad hoc committee of the Ross Perot Petition Committee of Broome County," no such committee exists. See Affidavit of Mark T. Conlon.

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After the election, Mr. Centorani demanded that Mr. Conlon provide him with an accounting of the Committee's campaign depository account activity. Mr. Conlon would not provide Mr. Centorani with this information and referred him instead to the Committee's FEC reports, which are public documents. See Affidavit of Mark T. Conlon. Mr. Centorani was not satisfied and called the Committee's state volunteer coordinator, Ron DiDonna, and again demanded that a full accounting of receipts and disbursements in the Broome County area be made to him. After conferring with Mike Morris, the Committee's chief accounting officer in New York with responsibility for preparing the Committee's FEC report for New York, Mr. DiDonna advised Mr. Centorani that Mr. Conlon's accounting and reports were in order and in compliance with FEC regulations. See Affidavit of Ron DiDonna (Tab B). Mr. Centorani still insisted that a personal accounting be made to him and filed this complaint with the FEC.

**III. THE CONTRIBUTIONS IN QUESTION
WERE DEPOSITED AND REPORTED;
PEROT '92 COMPLIED WITH FEC REGULATIONS**

As volunteer chairman, Mr. Conlon accepted contributions from local supporters, including three of the four contributions to which Mr. Centorani refers in his complaint: two contributions from Mrs. Centorani in the amounts of \$25.00 and \$100.00, respectively, and one contribution from Lillian M. Kumpikas in the amount of \$10.00. In accordance with Committee policy and FEC regulations, Mr. Conlon made copies of each of these checks, deposited them in the campaign depository within ten days and forwarded the records to the Committee's state accounting office in New York City. See Exhibit 2 and Affidavit of Mark T. Conlon. These contributions are included in the Committee's reports filed with the FEC but are not itemized because they are not contributions in amounts in excess of \$200.00.³ See 11 C.F.R. §104.8(a).

³ Mrs. Centorani's \$100.00 contribution will be reported by amendment. The Committee originally filed amendments to its monthly reports every ten days. At the request of Pat F. Sheppard, Senior

Mr. Conlon did not receive Mrs. Centorani's \$10.00 contribution made by check dated May 14, 1992, payable to "People for Perot," a group of volunteers in New York City. See Affidavit of Mark T. Conlon. Mr. Centorani sent this check directly to the People for Perot office in New York pursuant to a mail solicitation. The check was deposited within ten days in a campaign depository in New York City, Chemical Bank, and the records forwarded to the Committee's state accounting office. See Exhibit 3. The contribution is included in the Committee's report filed with the FEC but is not itemized because it is not a contribution in an amount in excess of \$200.00. See 11 C.F.R. §104.8(a). Even when Mrs. Centorani's three contributions are aggregated, they do not meet the \$200.00 threshold and, therefore, are not required to be itemized. See 11 C.F.R. §104.8(b).

Mr. Centorani apparently demands an accounting of the Committee's campaign depository account activity because he claims that the account numbers on the backs of the four checks which he identifies in his complaint "do not match." As documented in this response and the attached Exhibits, however, the four contributions were each deposited within ten days in a campaign depository and the Committee properly reported and maintained records for the contributions in accordance with FEC requirements and the Committee's own policies and procedures. Thus, there is no basis whatsoever for Mr. Centorani's complaint. His insistence on obtaining the Committee's bank account records is misplaced because the information that he is entitled to review is publicly available in the Committee's reports on file with the FEC. Declining to furnish Mr. Centorani with the Committee's bank account records is not a violation of FEC regulations.

Reports Analyst at the FEC, the Committee agreed to file one cumulative amendment. The information concerning Mrs. Centorani's contribution is included in the cumulative amendment to be filed subsequently by the Committee.

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**IV. THERE IS NO REASON TO BELIEVE THAT THERE
WAS ANY AUTHORIZED, SANCTIONED OR CONDONED
VIOLATION OF THE FEC'S REGULATIONS**

As documented in Exhibits 4-8, the Committee and its Treasurer repeatedly sought to inform its volunteer coordinators and treasurers and other volunteers associated with the Committee of the requirements of FEC regulations. The Committee made clear that strict compliance was mandatory, and that any failure to comply would result in separation from the Committee. See Exhibits 4-8. Based on this unequivocal and substantial effort, there is no reason to believe that any authorized, sanctioned, or condoned violation of FEC regulations occurred. Violations, if any, would have been unauthorized and, indeed, directly contrary to the Committee's repeated written instructions.

V. CONCLUSION

For the reasons set forth herein, the Committee and its Treasurer, Mike Poss, deny the complaint of Louis R. Centorani and respectfully request that the Commission find no reason to believe that the complaint sets forth a possible violation of the Act and to find that they have demonstrated that no action should be taken against them in response to the complaint. Therefore, the Committee and its Treasurer, Mike Poss, request that the Commission close its file in the matter of MUR 3748.

Pursuant to 2 U.S.C. § 437g (a) (12) and 11 C.F.R. § 111.21, the undersigned hereby requests confidential treatment of this response, the letter to which this response is directed and all submissions and findings related thereto.

Respectfully submitted,

By:



Daniel G. Routman, Associate General Counsel
PEROT '92
7616 LBJ Freeway
Suite 727
Dallas, Texas 75251
214-450-8883

Attorney for Perot '92 and Mike Poss, Treasurer

Dated: April 23, 1993

9 4 0 4 3 5 2 3 0 2 1

Perot Petition Committee

1100 Lakeside Square
12377 Merit Drive
Dallas, Texas 75251

Phone: 214-419-5000

TO: John Westcott
COMPANY: Endicott Trust
FAX: 607-772-0852
FROM: Mike Poss
DATE: May 14, 1992

This is the first page of 2 pages(s) being transmitted. If you fail to receive the entire transmission, please call the above number.

Attached is a resolution from the Perot Petition Committee authorizing Mark Conlon to establish a checking account on behalf of the Perot Petition Committee.

Please note that although the resolution appears to imply that the style of the account should be "Perot Petition Committee," the New York committee is free to use the style of their choice. For example, they may wish to use "New Yorkers for Perot," or a similar name.

However, the federal identification number to be used on the account should be that of the Perot Petition Committee. That number is 75-2421811.

If you have any questions, do not hesitate to contact me at 214-788-3030.

Thank you for your assistance.

94043523022

Perot Petition Committee

1100 Lakeside Square

Dallas, Texas 75251

IT IS HEREBY RESOLVED, that Mark Conlon shall have authority to open a checking account with Endicott Trust located at 89-91 Court Street, Binghamton, NY 13901 in the name of the Perot Petition Committee with Mark Conlon, Ernest Skiadas and M. Suzanne McMahon as authorized signatories on such account, and to take any and all such action as may be appropriate or advisable in connection with the opening of said account, including the execution of such documents as may be necessary or advisable on behalf of the Perot Petition Committee.

EXECUTED this 14th day of May, 1992.

PEROT PETITION
COMMITTEE

By: Mike Poss
Mike Poss, Treasurer

9 4 0 4 3 5 2 3 0 2 3

2



(607) 757-2922

March 25, 1993

Re: Binghamton Perot Petition Committee
P. O. Box 427 South View Station
Binghamton, New York 13903

Account No. 1400034733

To Whom It May Concern:

This is to certify that the following checks were deposited into the above referenced account by Mark Conlon, a signer on the account, who has no other accounts with M & T Bank:

Check No.	Drawn On	Amount	Written By	Deposit Date
4735	M & T Bank	\$100.00	Isabella Centorani	07-17-92
1277	Citizens & Northern	24.00	Jerry Baldwin	07-17-92
4685	M & T Bank	25.00	Isabella Centorani	05-22-92
115	IBM Credit Union	25.00	Verner D Coombs	05-22-92
543	Binghamton Savings	10.00	Lillian Kumpikas	05-18-92

Copies of these checks are attached, as are copies of the corresponding deposit slips.

If I can be of further assistance, please do not hesitate to call me at 607-723-8245.

Very truly yours,

M & T BANK

Patricia D. Matruski
Patricia D. Matruski
Banking Officer

PDM:mlq

STATE OF NEW YORK
COUNTY OF BROOME

Sworn to and before me on this
25 day of March, 1993.

Mary Lou Quinn

Notary Public

MARY LOU QUINN
Notary Public, State of New York
Qualified in Broome County
My Commission Expires Apr. 30, 1995

94043513024

Director's Committee
 DATE 5/18 1992
 DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

TOTAL FROM OTHER SIDE	1175.00
TOTAL	1788.75

50-1003/213
 USE OTHER SIDE FOR ADDITIONAL LISTING. ENTER TOTAL HERE
 BE SURE EACH ITEM IS PROPERLY ENDORSED

Endicott Trust
 A MIDLAND BANK
 Endicott Trust Company
 35-41 Washington Ave
 P.O. Box 6020
 Endicott, NY 13760-8020

№ 1400034733

CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE PROVISIONS OF THE UNIFORM COMMERCIAL CODE OR ANY APPLICABLE COLLECTION AGREEMENT

icott Trust

Receipt

135090

Account Number 14 000 34733

venience, use your ac-
 to bank 24 hours a day
 omatic teller machines.

The transaction number, date, time, transaction description, and amount appear below. Checks and other items are received for deposit subject to the terms and conditions of the bank's collection agreement.

Thank you! We appreciate your business.

9 4 0 4 3 5 3 0 2 5

7801 7462 DDA DEP MIXED 05/18/92 09:04 \$ ***1788.75

ENTER TOTAL ON THE FRONT OF THIS TICKET

CHECKS LIST SIMPLY	DOLLARS	CENTS
1. w. Benardine	10	00
2. L. Kropfka	10	00
3. T. Brachel	10	00
4. Jones	20	00
5. Greve	25	00
6. J. Schneider	25	00
7. P. Chamberlin	100	00
8. P. Eric	5	00
9. C. Calkley	10	00
10. W. Jackson	10	00
11. Y. Rossen	20	00
12. K. Miller	25	00
13. E. Moore	25	00
14. A. Palmer	100	00
15. K. Egan-Denovan	100	00
16. R. Jarey	100	00
17. D. Cephus	100	00
18. U. Greene	25	00
19. M. Florida	25	00
20. E. Hausmann	25	00
21. L. Hausmann	50	00
22. C. Mitchell	50	00
23. P. Pekar	50	00
24. E. Ryzar	100	00
25. E. T. Glush	15	00
26. G. Phillips	50	00
27. J. Baldwin	25	00
28. D. Kee	25	00
TOTAL	1175	00

Teacher. ME - 754-2884
 Teacher - 784-3705

1788.75
 12.-
 1800.75
 750.-
 1050.75

94043523028

ISABELLA CENTORANI 4735
 [REDACTED]
 July 7 1992 50-1003/213
 PAY TO THE ORDER OF Ross Perot Petition Committee \$ 100⁰⁰
 One hundred and no cents DOLLARS
 Endicott Trust Endicott Trust Company
 A MIDLANTIC BANK 35-41 Washington Ave
 P.O. Box 8026
 Easton, NY 11740-8026
 MEMO Isabella Centorani
 [REDACTED]

JERRY J. OR JANICE I. BALDWIN 1-74 1277
 [REDACTED]
 6-29 1992 88-3315
 PAY TO THE ORDER OF PEROT PETITION COMMITTEE \$ 24.00
 TWENTY FOUR + ⁰⁰/₁₀₀ DOLLARS
 CITIZENS & NORTHERN BANK
 ATHENS, PA 18810
 MEMO DONATION FOR (2) T-SHIRTS Jerry Baldwin
 [REDACTED]

PEOPLE FOR PEROT

11 West 42nd Street - Suite 3100, New York, New York 10036-8002
Telephone: (212) 730-1202 Fax: (212) 730-1280



May 1992

Fellow Perot Supporter:

We were delighted to hear from the Perot Petition Committee in Dallas that you were among the thousands of Americans who volunteered to help place Mr. Perot on the Presidential ballot.

The Perot petition drive in New York is a genuine grass roots volunteer effort to effect a major change in the present political system. It is staffed entirely with volunteers who, like you, are fed up with "business as usual" and a government that is out of touch.

We hope you will take an active part in the independent nomination process in New York because there are very specific ways you can help.

New York law makes it very expensive and difficult for an independent candidate to get on the ballot. We must gather petition signatures from over 20,000 people from at least sixteen of the State's thirty-one Congressional Districts between July 7th and August 18th (unless these dates are changed by pending State legislation). We are preparing to gather at least 100,000 signatures and overcome any challenge to our petitions.

Please let us know how you want to participate by returning the enclosed volunteer form to us right away, or calling us at (212) 730-1202. These activities are underway for each Congressional District:

- 1) We are identifying people who want to sign petitions for Perot and are eligible to do so because they did not vote in the April Democratic Presidential primary and did not sign any Presidential nominating petitions.

94043513029

- 2) We are recruiting people to gather signatures on the petitions. These people will be instructed on how to do it properly so the petition will survive legal challenge.
- 3) We are recruiting additional volunteers to help to organize and support these activities.
- 4) As a grass roots organization, we will need some money for the expense of supporting these activities - printing, postage, telephones, and maintaining headquarters to get Ross Perot on the ballot in New York.

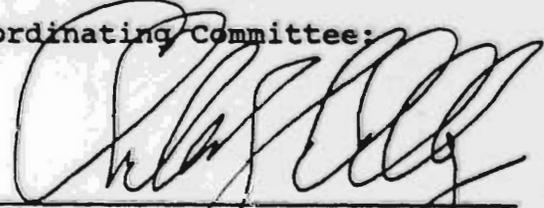
We must accomplish all this in a very short time and will certainly succeed if the people who called in will now go to work. Please fill in the enclosed volunteer form and return it to us right away so we can make the best use of whatever resources you have to offer.

Your response will be referred to the appropriate Congressional District organizers and you will be called soon after you return this form to us.

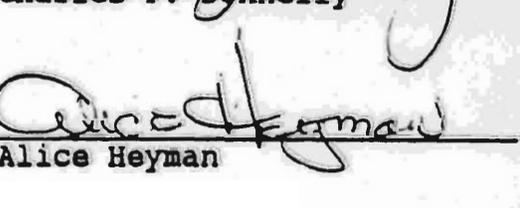
Thanks - we appreciate your help and interest and are proud to be working together with you in an historical effort to place Ross Perot's name on the 1992 New York State Presidential ballot and elect him as an independent President who will involve the people as the real owners of America.

People for Perot Coordinating Committee:


Matthew L. Lifflander


Charles F. Donnelly


Kurt T. Koenig


Alice Heyman

9404353030

To:

PEOPLE FOR PEROT



11 West 42nd Street - Suite 5100, New York, New York 10036-3002

Telephone: (212) 750-1202

Fax: (212) 750-1280

- Sign Petition when the time comes (July 7 - August 18).
- Ask others to sign Petition and let us know who they are.
- Carry Petitions - get others to sign.
- Help organize the campaign by working at headquarters or making phone calls. My particular skills are:

Ask people for money to support the effort.

Enclosed is my own contribution to "People for Perot" in the amount of:

\$5 \$10 \$25 \$50 \$100 \$250 \$500 \$1,000

Name: _____

Address: _____

City: _____

State: _____

Zip: _____

Occupation: _____

Employer: _____

Telephone Number: _____

Daytime Phone: _____

Evening Phone: _____

Individuals are permitted by law to give up to \$1,000 in a General Election. Federal law prohibits corporate contributions. Contributions are not tax-deductible for Federal income tax purposes. We must include the above information for each individual making a contribution.

9 4 0 4 3 5 3 0 3 1

4681

May 14 1972

PAY TO THE ORDER OF People For Perot

Ten dollars + no cents DOLLARS

Endicott Trust Endicott Trust Company
 33-41 Washington Ave.
 P.O. Box 9529
 Edison, NY 1766-9529

MEMO Isabella Centorani

ROT

8002
80

gust 18).

they a e.

- Carry Petitions - get others to sign.
- Help organize the campaign by working at headquarters or making phone calls. My particular skills are:
I'm a former reporter and columnist. I also was a public relation aide for Sen. E. I. Hatchback in Albany and also for Sen. Warren Anderson.

- Ask people for money to support the effort.
- Enclosed is my own contribution to "People for Perot" in the amount of:
 \$5 \$10 \$25 \$50 \$100 \$250 \$500 \$1,000

Name: Louis R. Centorani

Address: 31 Spring Street

City: Binghamton State: N.Y. Zip: 13903

Occupation: retired

Employer: _____

Telephone Number: _____

Daytime Phone: [REDACTED]

Evening Phone: Same

Individuals are permitted by law to give up to \$1,000 in a General Election. Federal law prohibits corporate contributions. Contributions are not tax-deductible for Federal income tax purposes. We must include the above information for each individual making a contribution.

over

9404523032

MAY 18 1972

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MEMORANDUM

TO: State Coordinators
FROM: Perot Petition Committee
DATE: April 7, 1992
RE: Campaign Finance Procedures

Because our effort has grown so dramatically in the past few weeks, it is now vital that we act quickly to comply with federal election laws. These laws require that all contributions to and expenditures by your group be reported to the Federal Election Commission (the "FEC") through the Perot Petition Committee (the "PPC") in Dallas. This memo and the attached information are intended to assist you in this process.

Reports must be filed by the PPC with the FEC on a monthly basis. In order for us to prepare the March report, you will need to send us detailed information regarding all contributions (including cash received, checks deposited, and "in-kind" contributions used) and expenditures prior to March 31, 1992. You need to make a good faith effort to identify and record all contributions and expenditures made on behalf of the petition effort in your state. All information should be included on the attached Schedule A (for receipts) and Schedule B (for expenditures) and returned to Mike Poss, Treasurer of the PPC, via overnight courier NO LATER THAN APRIL 14. It is important that all information on these schedules be completed, including the occupation and employer of all contributors. Beginning Thursday, April 8, please contact Mark Sinclair of Erns & Young at (214) 969-8946 with questions regarding preparation of these schedules.

We are currently developing procedures that will make it easier for you to prepare and submit information on an ongoing basis. You will receive additional information regarding these procedures when they are available.

In addition to the schedules listed above, please complete the attached "Bank Account Information" form and return it to Clay Mulford by facsimile at (214) 939-6100 as soon as possible. If you do not have a bank account, you should open one soon. Accounts may be opened in the name of the Perot Petition Committee or in the name that you are commonly using in your state, such as "Virginians for Perot". If the bank you select requires resolutions or other information from PPC headquarters, or if you have other questions regarding bank accounts, please contact Mike Poss at (214) 788-3030.

Also enclosed is an information sheet entitled "Contribution and Expenditure Guidelines", which will provide you with general guidance regarding limitations on contributions, expenditures, and recordkeeping responsibilities imposed by law. This information will be updated periodically.

For purposes of federal election laws, your group will be considered a state headquarters of the PPC, which is the "Principle Campaign Committee" and has been authorized by Mr. Perot. Accordingly, if you are considering filing any forms directly with the FEC, please do not do so. If you have already filed with the FEC, please contact John Bonnet at (214) 939-5777. If you have other questions regarding legal matters, contact Clay Mulford, John Bonnet, Craig Budner, Ethan Knowlden or John Moore at (214) 939-5500.

We should all keep in mind that even the appearance of a violation, justifiably or not, will be attributed to Mr. Perot. Therefore, it is important that we act carefully in complying with these laws.

We realize that complying with these laws will require a great deal of work on your part, and your efforts and patience are greatly appreciated.

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SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER

Any information obtained 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)

9404323034

A. 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 > \$		
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"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		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"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		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"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		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"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		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"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		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"/> 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)				

SCHEDULE B

ITEMIZED DISBURSEMENTS

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)

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

9404323035

STATE OF _____

BANK ACCOUNT INFORMATION

Account Name or Style: _____

Bank: _____

Bank Address: _____

Authorized Signatories: _____

Person Who Opened Account: _____

ABA Wire No.: _____

Account Officer: _____

Bank Phone Number: _____

Your Name and Phone Number: _____

Copies of authorized resolutions attached? Yes _____ No _____

(Please use multiple copies of this form for more than 1 account)

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6

7. For single disbursements over \$200, your organization must also keep a receipt, invoice or cancelled check.
8. If any loans have been made (for example, to pay for phone lines in setting up your operation) contact Mike Poss, Perot Petition Committee Treasurer (214) 788-3030. (If the expenditure was not tied to a loan with an expectation of repayment from fund raising, it should be reflected in your records as an in-kind contribution valued at cost.)

COMMONLY ASKED QUESTIONS

Our organization wishes to set up a local petition office. My employer (a corporation) has offered to donate excess office space in our building. Can we accept his offer?

No. The usage of office space either owned or leased by a corporation would be considered an in-kind contribution by a corporation and is prohibited under the Federal Election Laws. Your organization may enter into an agreement to lease this facility. The terms of any agreement must be commercially reasonable, including the rental charge.

An individual has offered to donate several phone systems for use by our organization as a phone bank. May we accept this contribution?

Yes, provided that this in-kind contribution by an individual does not exceed \$1,000 in value. Note that the equipment must be owned by this individual and not by any corporation, labor organization, or bank with which this individual is associated.

We are planning an organizational meeting in a local hotel. How can we pay for this room?

Several options are available for payment. It may be possible for the participants to contribute in small amounts (less than \$50 per person) to pay for the room. Although contributions less than \$50 collected at such events need not be individually recorded, such records are encouraged. Also, an individual may advance the amount from his or her personal funds, or make use of a personal credit card. This payment will be considered an in-kind contribution from that individual to the organization, however, subject to the \$1,000 limit until the individual is reimbursed by your organization. The advance must be recorded as a debt of your organization and as a contribution (until reimbursed). If an individual makes such an advance, please contact Mike Poss at the above number regarding the necessary paperwork. In all cases, a record of the expenditure must be retained.

We wish to hold an organizational meeting and set up several locations where petitions will be available to the general public for signing. May we advertise the times and locations of these events?

Yes, BUT any public political advertising that identifies the candidate must also clearly identify the name of the person that paid for the advertisement and indicate whether the advertisement was authorized by the Perot Petition Committee in Dallas. Any advertising that may be construed as a solicitation for contributions also must include a disclaimer stating that contributions to your organization are not deductible as charitable contributions for Federal income tax purposes.

My employer has agreed to allow me to work on the petition effort during regular business hours. Is this a contribution?

No, provided that if you are paid on an hourly or salaried basis, the time taken by you to work on the petition effort is made up within a reasonable time or is bona fide vacation time. If you are paid on a commission or piecework basis and your time is your own, your work on the petition effort is not a contribution by your employer. Uncompensated personal services generally are not a contribution of the individual performing the service.

9404323037

April 7, 1992

PEROT PETITION COMMITTEE COORDINATORS' CONTRIBUTION AND EXPENDITURE GUIDELINES

CONTRIBUTIONS

1. Contributions made by corporations, labor organizations or banks are illegal and cannot be accepted. For example, a dentist who is a "PC" -- professional corporation -- cannot make a contribution drawn on his "PC" account, and the owner of an incorporated "mom and pop" grocery store may not use its business account to make contributions.
2. The prohibition against corporate contributions includes in-kind contributions such as the use of telephones, typewriters, office furniture, stamps, or copy machines owned by a corporation, labor organization, or bank.
3. You may use the facilities of a corporation, labor organization, or bank if you pay the normal and usual rental charge, and may use the space without charge if the corporation has a policy to allow such use free of charge, has done so before and provides the space on a non-partisan basis.
4. Contributions by Federal Government contractors or foreign nationals are illegal.
5. Individuals or partnerships may contribute, in the aggregate, a maximum of \$1,000. This applies to monetary and in-kind contributions (donations of goods and services) valued at market value.
6. Partnership contributions are allocated proportionately among partners -- reducing the amount they may contribute as individuals. For example, if a 3 person partnership gives the maximum \$1,000, those 3 partners are each limited to an additional maximum contribution of \$667 ((\$1,000 - (\$1,000 divided by 3)).
7. Cash contributions over \$100 may not be accepted.
8. An individual may volunteer personal services to your organization without making a contribution as long as the individual is not compensated by anyone (including the volunteer's employer) for the services provided.
9. The entire amount paid to attend a fund raiser or to purchase a fund raising item is a contribution. For example, if a contributor spends \$20 to buy a campaign tee shirt that costs the campaign \$5, the contributor has made a \$20 contribution.
10. All advertisements (except buttons, bumper stickers and other small items) must state "authorized and paid for by Perot Petition Committee" (or identify whoever else has paid for the item).
11. Solicitations for contributions made in print, by television or radio, or by telephone must state "Contributions are not deductible as charitable contributions for Federal income tax purposes."

RECORDKEEPING

1. Records of contributions - including in-kind contributions - must be maintained identifying each contribution by amount, date of receipt, donor's full name and address, occupation and employer.
2. Contributions must be deposited into an authorized bank account (or returned) within 10 days of receipt. Maintain all bank records.
3. Records of small contributions (less than \$50 each) collected at a fund raiser (such as gate receipts and cash contributions) must include only the name of the event, the date of receipt and the total amount of contributions received on each day of the event.
4. An anonymous cash contribution may not exceed \$50 in the aggregate per individual.
5. Records for all expenditures, including purpose, date, amount, and payee name and address must be maintained.
6. A written record of petty cash disbursements must be kept if a petty cash fund is maintained. Payments from petty cash to one person for any one purchase or transaction may not exceed \$100.

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MEMORANDUM

TO: State Coordinator/Treasurer

FROM: Mike Poss, Treasurer, Perot Petition Committee

DATE: April 28, 1992

SUBJECT: CONTRIBUTION LIMITATIONS AND GUIDELINES FOR FEC REPORTING

Due to the complexity of the Federal Election Commission (FEC) regulations and the volume of contributions we must report, we have compiled the basic regulations and requirements needed for proper FEC reporting. These guidelines should be sufficient for the majority of situations you will encounter, but if further information or guidance is needed, please call Tracey Thorburn, Mark Sinclair, or John Harper at 214-788-3043 or leave a message at 214-969-8946.

On the attached pages are guidelines for FEC contribution limitations, record keeping and reporting for:

1. Contributions
2. Disbursements
3. Loans
4. Debts and obligations (other than loans)
5. Helpful suggestions and support needed by the Perot Petition Committee ("the Committee") Dallas office.
6. Attachments
 - Monthly Cash Reconciliation
 - Examples and schedule instructions
 - Answers to commonly asked questions
 - Standard disbursement descriptions
 - Blank forms
 - Volunteer form

The last item, the Volunteer form, should be signed by all volunteers before they begin working on the petition effort. This form states that the volunteer understands the FEC regulations relating to volunteered time and contributions. Please have all volunteers sign this form and maintain it in your files. If a volunteer feels he or she will not be in compliance with this regulation, please call Mark Sinclair, John Harper, or Tracey Thorburn at 214-788-3043 for more details.

9404323039

FEC Guidelines

These guidelines will need to be followed closely in order to attain maximum efficiency and accuracy. The FEC reporting process will ultimately reflect on Ross Perot, so your record keeping and strict adherence to FEC rules and regulations is very important to the efforts of the Committee. It is very important that the state treasurer be responsible for gathering contribution and disbursement information and support from all Committees in his or her state, and consolidating it before sending it to Dallas headquarters. This will ensure the Dallas headquarters that all efforts in the state have been recognized and accounted for and expedite the final consolidation process.

A word of explanation about FEC reporting is in order. The Federal Election Commission requires our report to be filed within twenty days after the close of each calendar month. This does not provide us with much time to complete the steps which are necessary to file the report. Therefore, it is imperative that the contribution and disbursement information be kept up-to-date so that the process can be accomplished as efficiently as possible.

The first step in this process will require the treasurer of each state to consolidate all the financial information for the preceding month from all of the locations in his or her state which are receiving contributions and/or disbursing funds. This consolidation process includes cash transactions as well as In-kind contributions and disbursements. The treasurer of each state will then forward a copy of the report to Dallas. Ideally, the report will be produced by the software package which is explained below. The report should be submitted in hard copy form as well as on a 5 1/4" or 3 1/2" floppy disk. (More information about this process will be forthcoming in a future memo.)

The second step in this process will be performed in Dallas where we will consolidate the reports of the 50 states and the District of Columbia into one report which will be filed with the Federal Election Commission by the 20th of each month.

The problem is clear—we must perform a dual consolidation and report preparation process in a narrow time frame with a large number of reporting entities. The only way we can be successful is for everyone to maintain current records and be ready to prepare reports as soon after the end of the month as possible.

It will be the responsibility of each state treasurer to coordinate the reporting process with each of the other persons who maintain contribution and disbursement information within the state. A suggested schedule of due dates is set out below:

Assistant state treasurers forward information to state treasurer	3rd of the month
State treasurer forwards consolidated state report to Dallas	8th of the month

As the schedule suggests, the emphasis is on the assistant state treasurers to forward their information to the state treasurer as expeditiously as possible. The state treasurer will input the information into the software program (discussed below) for the purpose of preparing one

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state report to be submitted to Dallas. As we become more organized, it should be possible for the assistant state treasurers to produce their reports using a software package for submission to the state treasurer. This is discussed briefly below, and will be discussed more extensively in future memos.

The bottom line is that the preparation of the monthly reports must be approached with a great sense of importance and urgency by everyone involved in the process. We need the help and cooperation of everyone.

Software

We have selected a software package, *Campaign Manager II*, to assist us with the FEC reporting process. This package is produced and distributed by Aristotle Industries. The treasurer of each state should contact Mr. Rob Beams at Aristotle Industries (202-543-8345 ext. 722) for details about ordering the software. It is imperative that each state obtain a copy of this software package so that we can prepare our monthly report in a consistent and timely manner.

Campaign Manager II requires at least a 286 IBM or IBM compatible computer with at least 512 kilobytes of conventional memory. This package will help you keep track of contributions and disbursements, as well as generate direct mail to contributors and voters. Many other features are included to assist in bookkeeping and reporting, and a help line number for technical support is available to answer any questions you may have. After obtaining your copy of the software, you will need to go back and enter March data in order to build a complete history and to reconcile cash accounts.

Contributions (checks/cash, In-kind, contributions, loans) - Schedule A

Disclaimers

- A disclaimer on solicitations must notify donors that their contributions are not tax deductible. The disclaimer should read "Contributions to the Perot Petition Committee are not deductible as charitable contributions for federal income tax purposes." A second disclaimer should read "If your check is for \$200 or more, election law requires that you provide your occupation and employer's name." Also, on any large advertising such as TV, radio, billboards, or mailings, the name of the person or group paying for the advertisement or mailing must be clearly written at the bottom of the advertisement.

Limitations

- No individual may contribute more than \$1,000. This includes checks/cash, In-kind and loans.
- The contribution limit for individuals applies separately to each spouse, regardless of income. Minors may contribute only if those funds were actually under the child's control.

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- Contributions from labor organizations, corporations, government contractors, national banks, foreign nationals, and those made in the name of another, are prohibited.
- All contributions received should be reviewed before accepting and depositing them. If any check or contribution is questionable, call Mark Sinclair, John Harper or Tracey Thorburn at 214-788-3043.

Record keeping

The state treasurer must keep an account of both contributions received and disbursements made. This includes:

- All contributions received by the Committee.
- Although you should attempt to determine name and address on all contributions received, if the contribution is \$50 or more, a record of the contributor's name and address, and the date and amount of the contribution must be kept.
- If the contribution is \$200 or more, the employer and occupation of the contributor, must also be determined.
- If the employer and/or occupation of contributors of \$200 or more is not known, the efforts to request that information must be documented.
- If any required information is not available at the reporting date, the phrase "info requested" should be in the appropriate places on the forms. When the requested information is ascertained, send that information to Dallas with a sufficient description as to the date and amount of the contribution so that we can locate it.

In-kind Contributions

In-kind contributions are goods or services provided to the Committee free of charge or where payments are made for Committee activities directly by an individual. Examples of In-kind contributions consist of billboards, furniture, equipment, or any goods given to the Committee free of charge. Voluntary services are not considered contributions unless the volunteer is being paid by his or her employer while volunteering for the Committee. In this case, the employer is the contributor, and the amount of the In-kind contribution would be the salary of the volunteer for the amount of time given. (See below for discussion of illegal corporate contributions.)

If any item is sold to the Committee for an unusually low price, the difference between the normal price and the amount the Committee paid is considered to be an In-kind contribution.

When reporting an In-kind contribution, the contribution must be listed as a receipt on Schedule A and as a disbursement on Schedule B. The amounts will be the same, thus not

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affecting cash on hand. Under the amount in the amount box, type "In-kind" to distinguish it from a regular contribution or expenditure.

Reporting In-kind disbursements differs slightly from reporting regular disbursements. When completing Schedule D for In-kind disbursements, the name and address of the person who made the In-kind contribution should be used, not the name and address of the person or company to which the disbursement was made. Therefore, the name, address, date, and amount of an In-kind contribution will be the same on both Schedule A and Schedule B. See an example (Rose Buds, Inc.) on Schedule A and B attached.

If a corporate contribution is accidentally accepted and deposited, the total contribution must be refunded within 10 days. When reporting this contribution, complete the applicable boxes on Schedule A and put a footnote at the bottom of the page which reads "Contribution to be refunded by (month) 30, 1992." Use a double asterisk (**) to indicate to which contribution the footnote applies. (See example of reporting a corporate contribution on Schedule A.)

If a contribution that exceeds the individual limit of \$1,000 is accidentally accepted and deposited, the excess over \$1,000 should be refunded within 10 days. This situation should also be footnoted as described above.

The Perot Petition Committee in Dallas will be keeping detailed records of contributions and expenditures for every state. Please make two copies of all contribution checks or supporting documentation for In-kind contributions, keep one for your records and send the second copy with your FEC schedules to Dallas headquarters. Attached are examples of Schedule A for your referral.

Disbursements/Expenditures - Schedule B

Record keeping

Record all disbursements. Include name and address of the person or company to whom the disbursement was made, the amount, date, and the purpose of disbursement. (Refer to "In-kind" above for a description of how the recording of In-kind disbursements differs from the recording of regular disbursements.)

In describing the "Purpose" of the disbursement, please use the Standard Disbursement Descriptions to the extent possible. A copy of those standard descriptions are enclosed.

A petty cash fund may be maintained out of which disbursements may not be in excess of \$100 to any person or company in connection with a single purchase or transaction. A record of petty cash disbursements (to whom the cash was disbursed, the amount, and the purpose) must be kept in accordance with FEC requirements.

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For the Perot Petition Committee-Dallas records, please make copies of all invoices and support for all disbursements made. Write the check number and date paid on the invoice and send one copy with the appropriate FEC schedules to the Perot Petition Committee in Dallas.

If the Committee has a lease for a building, furniture, equipment, etc., please send a copy of the final signed lease to the Perot Petition Committee in Dallas. See reporting for leases under Debts and Obligations below.

Attached are examples of Schedule B.

Loans - Schedule C

Loans owed by the Committee

When a loan is given to the Committee, it must be recorded as a receipt on Schedule A as well as a loan on Schedule C. The following information must be reported on Schedule C in the appropriate boxes: full name, mailing address, and zip code of creditor; the election to which the loan applies (general in this case); the original amount of the loan; cumulative payment to date on the loan; and the outstanding balance at the close of the reporting period (unpaid balance).

The terms of the loan must also be included on Schedule C in the appropriate boxes, including date incurred, date due, interest rate percentage, and endorsers or guarantors of the loan, if any. "By Committee" should be typed at the top of the Schedule C (see sample Schedule C) to denote that this is a loan to be paid by the Committee.

Loans owed to the Committee

When a loan is owed to the Committee, it must be itemized on Schedule B as a disbursement, as well as a loan on Schedule C. The same information must be reported, as above, with respect to the debtor. When a portion or all of the debt is paid, it must be reported on Schedule A as a receipt and on Schedule C as a reduction of the debt. Also, type "To Committee" at the top of the Schedule C (see sample Schedule C) to denote that this loan is to be collected by the Committee.

If any unusual circumstances arise concerning a loan "by" or "to" the Committee, please call Mark Sinclair, John Harper, or Tracey Thorburn at 214-788-3043.

Attached are examples of Schedule C.

Debts and Obligations (excluding loans) - Schedule D

All debts, obligations, or other promises to make an expenditure over \$500 should be reported on Schedule D. If the obligation is \$500 or less, it should be reported as a disbursement on Schedule B at the time of payment or as an obligation on Schedule D no later than 60 days

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after such obligation is incurred, whichever comes first. The amount and nature of outstanding debts owed to or by the Committee shall be reported in Schedule D until paid or extinguished.

Some obligations from the Committee should be reported on Schedule A as well. For example, if a person advances to the Committee an amount to be used to open a bank account or make a deposit for phones, and the person expects to have the funds returned at the end of the campaign or earlier, the advance should be reported on Schedule D as an obligation by the Committee and on Schedule A as a receipt. When the funds are returned, Schedule D should reflect the reduction and Schedule B should show a disbursement for the same amount.

As in the case of a loan, the Committee must report the full name and mailing address of the creditor or debtor (depending upon whether the obligation is owed by or owed to the Committee), the amount of the debt incurred that period, the payments made during the period, and the outstanding balance at the end of the period. A separate Schedule D should be used for the two types of debts/obligations, and "By Committee" or "To Committee" should be typed at the top of the applicable Schedule D in a manner similar to that of Schedule C.

Also, if your Committee is renting office space and you have a written lease, the total amount of all future payments should be reported on Schedule D. The total obligation will be reduced every month as rent is paid. Remember, as rent is paid, you must report it on Schedule B as a disbursement and on Schedule D as a reduction of the obligation.

If any unusual circumstances arise concerning debts or obligations, please call Mark Sinclair, John Harper, or Tracey Thorburn at 214-788-3043 for further details and guidance to report the matter.

Attached are examples of Schedule D.

Complying With FEC Reporting Regulations

When organizing your records and completing the schedules, the Perot Petition Committee Dallas office suggests the following:

- Complete every blank on the appropriate forms and schedules.
- Be sure information is complete for contributions over \$50, and those over \$200.
- Send copies of all checks received as contributions.
- Record all disbursements made by the Committee.
- Be sure information is complete for all disbursements.
- Send copies of checks, invoices, and any other support for disbursements made.

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- When estimating "In-kind" contributions, Send a brief explanation of the estimation process used to support that actual Fair Market Value was used as the amount of the contribution. For example, this would be necessary when a Committee is using a room or office free of charge. The amount that would normally be charged to a paying tenant would be best, if available. If not available, a calculation estimating normal or average rent will be sufficient.
 - For "In-kind" contributions where an individual made a payment on behalf of the Committee (purchased supplies or advertising, etc.), a copy of the receipt should be sent to Dallas with the date, the name and address of the person who made the disbursement, and "In-kind" written on it.
 - Send copies of all leases.
 - Send a copy of the Committee monthly bank statement, if any, including the reconciliation to your month-end cash balance on the FEC report.
 - Send a schedule of cash on hand or in the bank at end of month. Be sure this amount reconciles to the total contributions and disbursements that you will be reporting. Attached is an example of the monthly cash reconciliation which should be used.
 - The federal election code has a provision for "independent expenditures." These expenditures are not reported by the Committee because we have no knowledge of them and they were made without any contact, guidance, consultation, cooperation or encouragement from the candidate, the Committee or anyone associated with the Committee. See the question and answer section for more details. We must be very careful in this area to follow the rules and regulations.

Also attached are examples of Schedules A through D for your referral.

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Monthly Cash Reconciliation

Monthly Cash Reconciliation

State: _____

Person Preparing: _____

Date: _____

Bank Account _____ \$ _____
Bank Account _____
Petty cash at _____
Petty cash at _____
\$ _____

ADD:
Amounts received from Dallas Headquarters \$ _____
Total contributions greater than \$200 (including In-kind)
from Schedule A _____
Total contributions less than \$200 - not itemized _____
\$ _____

LESS:
All disbursements (including In-kind) from Schedule B \$ _____
Disbursements to Dallas Headquarters _____
\$ _____

Ending Cash Balance:
Bank Account _____ \$ _____
Bank Account _____
Petty cash at _____
Petty cash at _____
\$ _____

*Agrees to Summary FEC Report

The ending balance should agree to the check books which should be reconciled to the bank statement, plus petty cash amounts.

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Examples and Schedule Instructions

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Volunteer Form

April 1992

To: Volunteers for _____

From:

Federal Election Law Rules

The Perot Petition Committee greatly appreciates the time and effort you are contributing as a volunteer working for the Perot Petition Committee. This memo is intended to inform you of one important requirement of the federal campaign finance laws related to volunteers.

As you probably know, federal law limits the amount of money or anything of value that an individual can contribute to a political campaign. But the law expressly exempts the value of a volunteer's services from the contribution limit. Thus, you are free (and we hope you will continue) to volunteer as much of your time as you can to the Campaign without becoming subject to the law's limitation.

You should know, however, that the law prohibits the payment by anyone of compensation to a "volunteer" for the purpose of allowing the person to work for a political campaign. Simply put, you are free to volunteer your services on your own time, but you may not be paid by someone else for the time you spend working for a political campaign. That would not be volunteering. It would be a paid job. And, under the law, the person paying for the time you work for the Campaign would be considered to be making a contribution. We would need to know about that.

If you have any questions, please contact me through the Committee office _____ . We are asking that you sign the bottom of this memorandum and return it to me so that we know you have received, read, and understand the rules relating to your volunteer service. Thank you.

I have read the foregoing rules relating to my volunteer services for the Perot Petition Committee and I am in compliance with them.

Date

Signature

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ITEMIZED RECEIPTS

UNITED STATES GOVERNMENT
Form 1042-8
(8)

NAME OF COMMITTEE (in full)

DEMOCRATIC COMMITTEE

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.

DATE (MONTH, DAY, YEAR)

AMOUNT EACH RECEIPT THIS PERIOD

NAME, ADDRESS, CITY, STATE, ZIP CODE JOE DOE 1234 FIRST ST. DALLAS, TX 89145	NAME OF EMPLOYER Sunshine Inc. OCCUPATION ACCOUNTING CLERK AGGREGATE YEAR-TO-DATE \$300.00	RECEIPT FOR Primary General	04-05-92	\$300.00
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NAME, ADDRESS, CITY, STATE, ZIP CODE ROSE BUDS, INC. 84 8th AVENUE DALLAS, TX 89145	NAME OF EMPLOYER ROSE BUDS, INC. OCCUPATION OWNER AGGREGATE YEAR-TO-DATE \$200.00	RECEIPT FOR Primary General	04-30-92	\$200.00
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NAME, ADDRESS, CITY, STATE, ZIP CODE JOHN HARPERISTER 2020 WILD OAK ST. DALLAS, TX 76116	NAME OF EMPLOYER Lankster Co. OCCUPATION MANAGER AGGREGATE YEAR-TO-DATE \$1,050.00	RECEIPT FOR Primary General	04-15-92	\$1,050.00
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NAME, ADDRESS, CITY, STATE, ZIP CODE BILL THORTON 2625 WILLOWBEND CT DALLAS, TX 56203	NAME OF EMPLOYER Green Thumb Inc. OCCUPATION V.P. FINANCE AGGREGATE YEAR-TO-DATE \$252.25	RECEIPT FOR Primary General	04-16-92	\$252.25
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NAME, ADDRESS, CITY, STATE, ZIP CODE DOTTY FERGUSON 2903 WAGONWHEEL JACKSONVILLE, MS 42013	NAME OF EMPLOYER F. CHICO OCCUPATION ADDRESS AGGREGATE YEAR-TO-DATE \$250.00	RECEIPT FOR Primary General	04-01-92	\$250.00
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NAME, ADDRESS, CITY, STATE, ZIP CODE RANDY BROWN 8429 JARVIS FT. WORTH, TX 76133	NAME OF EMPLOYER TEE FLOWER SHOP OCCUPATION OWNER AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR Primary General	04-01-92	\$1,000.00
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NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	OCCUPATION	RECEIPT FOR Primary General	AGGREGATE YEAR-TO-DATE
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NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	OCCUPATION	RECEIPT FOR Primary General	AGGREGATE YEAR-TO-DATE
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SUBTOTAL OF RECEIPTS THIS PAGE (optional) \$3,052.25

TOTAL THIS PERIOD (list page this line number only)

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** CONTRIBUTION TO BE REFUNDED BY MAY 1991
 * THIS INDIVIDUAL EXCEEDED THE CONTRIBUTION LIMIT OF \$1,000.00. CONTRIBUTION IN EXCESS OF LIMIT TO BE REFUNDED BY MAY 1991.

Line Number 11(a),
p. 25

Contributions from
Individuals/Persons
Other Than Political
Committees.

Aggregation

S250 Contribution
Later Returned.

Partnership
Contributions

Memo Entry

In-Kind Contribu-
tion

SCHEDULE A

ITEMIZED RECEIPTS

(Contributions from Persons Other Than Political Committees)

Page 1 of 1
LHA 10/20/88
OMB 1545-0047
Department of the Treasury
Internal Revenue Service

Name of contributor (Print or type name of donor or name of any person or the name of any partnership or other organization if the contributor is a partnership, trust, estate, or other entity, or the name and address of any individual contributor to any partnership, trust, estate, or other organization)			
Fund for a Better Government C00000002			
Name of Employer	Date received, day, year	Amount of cash received this period	
Paul Crouch 4937 Calnehal Street City, SE 00000	City Construction Co. 4/14/82	\$ 25.00	
<input type="checkbox"/> Other (Specify) _____ Occupation: FOREMAN Approximate Year-to-Year: \$ 25.00			
MARINE KAY 637 WASHMAN STREET City, SE 00000	Marlow School 4/19/82	\$ 250.00	
<input type="checkbox"/> Other (Specify) _____ Occupation: TEACHER Approximate Year-to-Year: \$ 250.00			
JOSEPH BEAS 935 ADAM STREET City, SE 00000	SEAR STEEL CORPORATION 4/21/82	\$ 300.00	
<input type="checkbox"/> Other (Specify) _____ Occupation: ACCOUNTANT Approximate Year-to-Year: \$ 300.00			
POWELL SON INCORPORATED 547 NICE SQUARE City, SE 00000	less below for "RECEIVED" 5/14/82	\$1,000.00	
<input type="checkbox"/> Other (Specify) _____ Occupation: LAW FIRM Approximate Year-to-Year: \$ 000.00			
JAMES E. POWELL 2540 ELLINGTON AVENUE City, SE 00000	POWELL & SON 5/14/82	\$ 500.00 (MEMO)	
<input type="checkbox"/> Other (Specify) _____ Occupation: ACCOUNTANT Approximate Year-to-Year: \$ 500.00			
JAMES E. POWELL, JR. 9413 WINDHOLE STREET City, SE 00000	POWELL & SON 5/14/82	\$ 500.00 (MEMO)	
<input type="checkbox"/> Other (Specify) _____ Occupation: ACCOUNTANT Approximate Year-to-Year: \$ 500.00			
JERRY EDY 210 Oakfield Road City, SE 00000	SEAR UNIVERSITY 6/28/82	\$ 254.10 (MEMO FOR LUNCH)	
<input type="checkbox"/> Other (Specify) _____ Occupation: PROFESSOR Approximate Year-to-Year: \$ 254.10			
NETO (Specify This For (Specify) _____)			
TOTAL (Net cash and in-kind gifts)			\$1,829.10

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INSTRUCTIONS FOR PREPARING SCHEDULE A

The Detailed Summary Page is broken down into various categories of receipts. Use Schedule A to list each receipt required to be reported. DO NOT combine more than one category of receipts on the same Schedule A. Instead, use a separate Schedule A for each category of receipts. The line number on the Detailed Summary Page to which each Schedule A pertains should be identified in the upper right corner of each Schedule. In addition, the committee's full name must be entered in the appropriate block. For each receipt required to be reported during the reporting period, the political committee must provide the identification, date and amount of the receipt, and the aggregate year-to-date total.

The term "identification" means, in the case of an individual, his or her full name including first name, middle name or initial, if available, and last name, mailing address, occupation, and the name of his or her employer, and, in the case of any other person, the person's full name and address. Do not abbreviate committee names.

The occupation and name of employer is only required to be provided for receipts from individuals. "Occupation" means the principal occupation of the person of an individual and whether or not self-employed. "Employer" means the organization or person by whom an individual is employed, and not the name of his or her supervisor.

Authorized committees must indicate the election for which the receipt was given. In the event the receipt was given for an election other than the current primary or general election, the "Other" block must be checked and the type of election specified (i.e., "General 1988," "Primary 1988"). The "receipt for" block does not apply to political committees which are not authorized committees. The "aggregate year-to-date" total must be given for each receipt and must equal the total amount that the person has given to the committee for that particular category of receipts for the calendar year. If a receipt is the only receipt from a person during the calendar year, the aggregate year-to-date total must still be entered.

The "Total This Period" amount (the last line on Schedule A) must be added to all other receipts for that category which are not reported and carried forward to Column A of the corresponding line of the Detailed Summary Page.

If a contribution is received from a business entity or is shown on what is or appears to be a business account, the political committee must determine that the contribution is not from a corporation, government contractor, or other prohibited source. If the contribution is from a prohibited source, it must be returned within thirty days of its receipt.

A contribution which appears to be excessive either on its face or when aggregated with other contributions from the same person, may be returned or processed into a campaign decision but not used. If returned, the contributor may be asked if a soft contribution was intended and, if so, to submit a written reassignment of the contribution signed by each contributor. The committee may also be asked to reassign the contribution to a different election if such a contribution would otherwise be permissible. If no reassignment or reassignment is received, the excessive contribution must be returned within thirty days of its receipt. Both reassignments and reassignments are to be reported as memo entries on the report covering the period in which the committee received the reassignments or reassignments, indicate how the contribution(s) was received initially, followed by the reassignment or reassignment (employee). See 11 CFR 104.8 for the reporting of these types of contributions.

Contributions to a candidate or authorized committee which are not designated by the contributor to a specific election must be counted toward the contributor's limitation for the next election after the contributor is made. Contributions may be made for a past election only to the extent that the recipient has net debts outstanding from that particular election.

Contributions In-Kind. Contributions in-kind (i.e., goods and services provided to a political committee) are treated as any other contribution and must be reported and itemized under the appropriate category of receipts. For example, a contribution in-kind from an individual must be reported on Schedule A and reported under the category for "Contributions From Individuals/Persons Other Than Political Committees." The value of each contribution in-kind must be entered in the "Amount of Each Receipt This Period" column. The amount or value of the contribution in-kind is the difference between the actual and normal charge for the goods or services at the time of the contribution and the amount charged the political committee. The "aggregate year-to-date" total must include the total amount of all contributions which the person has contributed to the committee during the calendar year. The term must be labeled "contribution in-kind" and include the nature of the contribution (e.g., equipment, lodging, etc.). Each contribution in-kind must also be reported on the same receipt as all operating expenses on Schedule B and included in the total "Operating Expenses" (NOTE: A political committee which makes a contribution in-kind only reports it as a disbursement and records the transaction on Schedule B with a notation "contribution in-kind." The purpose of the expenditure (e.g., consulting, polling, etc.) and the aggregate year-to-date amount must also be provided. The committee receiving the contribution in-kind must report it as both a receipt and an expenditure.)

Contributions of stocks, bonds, or other assets must be reported as follows:

(1) If the item has not been liquidated at the close of the reporting period, the committee must report it as a memo entry (not as cash) on Schedule A the item's fair market value at the date received, including the date and mailing address (and when in excess of \$200, the occupation and name of the employer, if the

contributor. The total amount of items to be liquidated must be entered under "Total This Period" on the last line of Schedule A. This amount must NOT be carried forward to the Detailed Summary Page.

(2) When the item is sold, the committee must report the proceeds and include them in the appropriate categories on the Detailed Summary Page. It must also report the (i) name and mailing address (and where in excess of \$200, the occupation and name of employer) of the purchaser of Schedule A, if purchased directly from the committee (the purchase is considered to have made a contribution to the committee); and (ii) the identification of the original contributor on Schedule A.

Exempt Legal or Accounting Services. Legal or accounting services rendered to or on behalf of an authorized committee of a candidate or any other political committee are not contributions or expenditures and are not interests subject to the contribution limitations and prohibitions, if the person being paid the services is the regular employer of the individual rendering the services and if the services are solely to ensure compliance with the AC.

The political committee must submit as a memo entry on a separate Schedule A each person who provides legal or accounting services to the political committee in an aggregate value or amount in excess of \$200 within the calendar year, together with the date of receipt and amount or value of the external legal or accounting services, and state that the receipt is for "external legal or accounting services." The total amount of external legal or accounting services must be entered on the line for "Total This Period" on the bottom of Schedule A, but the total amount may not be carried forward to any category or the number on the Detailed Summary Page.

Excessed Contributions. For each earmarked contribution received (regardless of the amount), the political committee must report on Schedule A the name and address of the original contributor, the date of receipt and the amount of the contribution and if the original contributor makes contributions aggregating in excess of \$200 to the political committee during the calendar year, the occupation and name of employer. If the contributor passes through the political committee's account and is transferred to another political committee or Federal candidate, the political committee must include each contributor, regardless of the amount, on both Schedule A and Schedule B and include the amount under the appropriate category of receipts and disbursements. If the contribution was passed on in the form of the contributor's check, the contributor must disclose each contribution on a separate Schedule A assigned to the contributor's (intermediary) next report and the amount of such contributions are not required to be included in the totals for the appropriate categories of receipts and disbursements. If a political committee is not a conduit, but is the intended recipient, the political committee must report each conduit through which the earmarked contribution passed, including the name and address of the conduit, and whether the contribution was passed on in cash, by the contributor's check, or by the conduit's check. If the conduit exercises election and control over the contribution, the earmarked contribution must also be included in the contribution limitations of the conduit.

Checks Returned Due to Insufficient Funds. If a contributor's check is returned to the political committee due to insufficient funds and the receipt or the check was previously received, the political committee must report the return under the appropriate category of receipts as a negative entry and net out the amount of the check from the total for that category. If the original receipt or the check was reported on Schedule A, the return of the check must also be reported as a negative entry on Schedule A. If the receipt or the check was never received, the return of the check should not be reported.

Check Returned to the Contributor. A contribution may be returned to the contributor in one of two ways:

(1) The original check is returned uncashed. If the contribution was received, the return should be reported as a negative entry on Schedule B and the amount of the contribution should be subtracted from the disbursement totals on the line of the Detailed Summary Page that it was reported on.

(2) The original check is not returned and the return is made by a check from the recipient of the contribution. Such a transaction should be reported as a receipt on Schedule A for the appropriate line of the Detailed Summary Page. This procedure is applicable regardless of whether the amount returned is the full or only a partial return of the contribution or whether the contribution was previously reported.

Best Efforts. When the treasurer of a political committee shows that best efforts have been used to obtain, maintain and submit the information required, the committee shall be considered in compliance with the AC.

With regard to reporting the identification of each person whose contributions to the committee and its affiliated committees aggregate in excess of \$200 in a calendar year, the treasurer will not be deemed to have exercised best efforts to obtain the required information unless he or she has made at least one effort per contribution either by written request or by an oral request documented in writing to obtain the information from the contributor. The effort shall consist of a best request for the information (i.e., name, mailing address, occupation, name of employer) which informs the contributor that the reporting of the information is required by law.

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SCHEDULE B-P

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

ITEMIZED DISBURSEMENTS

USE SEPARATE SCHEDULES FOR EACH CATEGORY OF THE DISBURSED SUMMARY SHEET	PAGE	OF (100 or more)
	LINE NUMBER	23

NAME OF COMMITTEE IN FULL
PEROT PETITION COMMITTEE

Any information obtained 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, ADDRESS, CITY, STATE, ZIP CODE	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
ROSE BUDS, INC. 84 BEN AVE. DALLAS, TX 89145	RENT EXPENSE	4/30/92	\$200.00 IN-KIND
DISBURSEMENT FOR: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)			

BILL THORTON 2625 WILLOWBEND CT. DALLAS, TX 56213	ADVERTISING	4/18/92	\$252.25 IN-KIND
DISBURSEMENT FOR: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)			

KINKO'S 1010 SOUTH 23RD ST. DALLAS, TX 56213	PRINTING	4/19/92	\$201.23
DISBURSEMENT FOR: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)			

DISBURSEMENT FOR: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			

DISBURSEMENT FOR: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			

DISBURSEMENT FOR: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			

DISBURSEMENT FOR: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			

DISBURSEMENT FOR: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			

SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional) \$653.48

TOTAL THIS PERIOD (last page this line number only)

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Line Number 19,
2.25

Operating
Expenditures.

S250/S225 Debt
Repayments.

In-Kind Contribu-
tion

SEC. 13 Negative
Entry.

Memo Entry

In-Kind Contribu-
tion.

SCHEDULE B

ITEMIZED DISBURSEMENTS
(Operating Expenditures)

Page 1 of 1
Line 19 of 25
Total amount of disbursements for this category of the Schedule B items: \$1,268.34

Name of Contributor on Form:			
Fund for a Better Government C00000001			
A. Full name, mailing address and ZIP Code	Purpose of Disbursement	Date amount day, year	Amount of Disbursement This Period
Parer, Real Estate 1177 Grant Street City, State 00000	rent	4/15/82	\$ 400.00
B. Full name, mailing address and ZIP Code	Purpose of Disbursement	Date amount day, year	Amount of Disbursement This Period
Acme Business Supplies 3332 Bigelow Boulevard City, State 00000	office equipment	4/20/82	\$ 227.77
C. Full name, mailing address and ZIP Code	Purpose of Disbursement	Date amount day, year	Amount of Disbursement This Period
Star Stationery 490 Fern Avenue City, State 00000	office supplies	5/11/82	\$ 225.77
D. Full name, mailing address and ZIP Code	Purpose of Disbursement	Date amount day, year	Amount of Disbursement This Period
Devis Printing 1976 Commercial Road City, State 00000	printer	5/21/82	\$ 228.50
E. Full name, mailing address and ZIP Code	Purpose of Disbursement	Date amount day, year	Amount of Disbursement This Period
Devis Printing (SEC. 13 of \$321.50 allocated as in-kind contribution; See Schedule B 401-1982-711)	in-kind contribution to Devis Printing	5/21/82	321.50
F. Full name, mailing address and ZIP Code	Purpose of Disbursement	Date amount day, year	Amount of Disbursement This Period
U.S. Postmaster Post Office Building City, State 00000	postage	5/25/82 6/17/82	\$ 102.43 \$ 104.55
G. Full name, mailing address and ZIP Code	Purpose of Disbursement	Date amount day, year	Amount of Disbursement This Period
Deves, Carl City, State 00000	fare (memo)	6/26/82	\$ 267.92
H. Full name, mailing address and ZIP Code	Purpose of Disbursement	Date amount day, year	Amount of Disbursement This Period
MT Corporation 3746 Wilson Avenue City, State 00000	reproduction equipment report on committee	5/23/82	\$ 267.92
I. Full name, mailing address and ZIP Code	Purpose of Disbursement	Date amount day, year	Amount of Disbursement This Period
John Assisi (contribution) 1212 Crescentfield Road City, State 00000	Lunch for committee	6/28/82	\$ 254.10
SUBTOTAL of Disbursements This Period (column 4):			
TOTAL This Period (add last two line numbers only):			\$1,268.34

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INSTRUCTIONS FOR PREPARING SCHEDULE B

The Detailed Summary Page is broken down into various categories of disbursements. Use Schedule B to list each disbursement required to be itemized. DO NOT combine more than one category of disbursements on the same Schedule B. Instead, use a separate Schedule B for each category of disbursements. The line number of the Detailed Summary Page to which each Schedule B pertains should be identified in the upper right corner of each Schedule. In addition, the committee's full name must be entered in the appropriate block.

For each disbursement required to be itemized during the reporting period, the political committee must provide the full name, mailing address, date, amount, and purpose of the disbursement.

The term "purpose" means a brief statement or description of why the disbursement was made. Examples of adequate descriptions include the following: dinner expenses, media, salary, polling, travel, party fees, phone banks, travel expenses, travel expense reimbursement, and catering costs. However, statements or descriptions such as "advance," "election day expenses," "other expenses," "expense reimbursement," "miscellaneous," "outside services," "get-out-the-vote," and "voter registration," would not meet the requirement for reporting the purpose of an expenditure. If the disbursement is a "loan repayment," "contribution refund," or other similar category of disbursement (other than an operating expenditure), the name of the category of disbursement (i.e., "loan repayment," etc.) is sufficient to meet the requirement for reporting the purpose of an expenditure.

For disbursements that are contributions to Federal candidates, or authorized committees, the committee must include under "Purpose of Disbursement:" the name of the

candidate and office sought (including State and congressional district, where applicable) and the aggregate year-to-date total of contributions made to that candidate or committee in the purpose of disbursement box.

For each contribution to a Federal candidate or authorized committee indicate in the election check-off box the election for which the contribution was made. Contributions to a candidate or authorized committee which are not designated by the contributor for a specific election must be counted toward the contributor's limitation for the next election after the contribution is made. Contributions may be made for a past election only to the extent that the recipient has no debts outstanding from that particular election. In the event the contribution was made for an election prior to the current election cycle, the "Other" box must be checked and the type of election specified (e.g., "General 1986," "Primary 1986"). The election check-off boxes provided for each itemized entry on Schedule B should not be used when itemizing operating expenditures.

The "Total This Period" amount (the last line on Schedule B) must be added to all other disbursements for that category which are not itemized and carried forward to Column A of the corresponding line of the Detailed Summary Page.

CONTRIBUTIONS IN-KIND RECEIVED

Contributions in-kind received by the committee which are itemized on Schedule A must also be itemized as an operating expenditure on Schedule B. In addition, in the "Purpose of Disbursement" box include the notation "Contribution In-Kind" and the nature of the expenditure (e.g., consulting, polling, etc.).

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Federal Election Commission
999 F Street, N.W.
Washington, D.C. 20463

LOANS

by Committee

Use separate
schedules for
each category
of the enclosed
summary page

PAGE

OF 1101a-10001

LINE NUMBER

NAME OF COMMITTEE in Full

Baron Petitioner Committee

NAME OF LOAN SOURCE (OR RECIPIENT) Randy Brown		ORIGINAL AMOUNT OF LOAN \$1,000.00	CUMULATIVE PAYMENT TO DATE	BALANCE OUTSTANDING \$1,000.00
ADDRESS (Number and Street) 8429 Jarvis				
CITY, STATE, ZIP CODE Ft. Worth, TX 76113		TYPE OF ELECTION <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify)		
TERMS	DATE INCURRED 04-01-92	DATE DUE 11-01-92	INTEREST RATE (% APR) 7%	SECURED <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

LIST ALL ENDORSERS OR GUARANTORS (if any)

NAME	ADDRESS (Number and Street)	CITY, STATE, ZIP CODE
NAME OF EMPLOYER	OCCUPATION	AMT. OUTSTANDING
NAME	ADDRESS (Number and Street)	CITY, STATE, ZIP CODE
NAME OF EMPLOYER	OCCUPATION	AMT. OUTSTANDING
NAME	ADDRESS (Number and Street)	CITY, STATE, ZIP CODE
NAME OF EMPLOYER	OCCUPATION	AMT. OUTSTANDING

NAME OF LOAN SOURCE (OR RECIPIENT)		ORIGINAL AMOUNT OF LOAN	CUMULATIVE PAYMENT TO DATE	BALANCE OUTSTANDING
ADDRESS (Number and Street)				
CITY, STATE, ZIP CODE		TYPE OF ELECTION <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)		
TERMS	DATE INCURRED	DATE DUE	INTEREST RATE (% APR)	SECURED <input type="checkbox"/> Yes <input type="checkbox"/> No

LIST ALL ENDORSERS OR GUARANTORS (if any)

NAME	ADDRESS (Number and Street)	CITY, STATE, ZIP CODE
NAME OF EMPLOYER	OCCUPATION	AMT. OUTSTANDING
NAME	ADDRESS (Number and Street)	CITY, STATE, ZIP CODE
NAME OF EMPLOYER	OCCUPATION	AMT. OUTSTANDING
NAME	ADDRESS (Number and Street)	CITY, STATE, ZIP CODE
NAME OF EMPLOYER	OCCUPATION	AMT. OUTSTANDING

Carry outstanding balance only to Line 3, Schedule D-P, for this line. If no Schedule D-P, carry forward to appropriate line of Summary.	ORIGINAL AMOUNT OF LOAN	CUMULATIVE PAYMENT TO DATE	BALANCE OUTSTANDING
SUBTOTALS THIS PERIOD THIS PAGE (optional)			\$1,000.00
TOTALS THIS PERIOD (last page in this line only)			

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General Election Commission
 95 - E Street, N.W.
 Washington, D.C. 20463

COMMITTEE
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

USE CAREFULLY
 INFORMATION FOR
 THIS CATEGORY
 OF THE GENERAL
 ELECTIONS (2002)

PAGE

OF 11/15/02

LINE NUMBER

NAME OF COMMITTEE (see Form)	OUTSTANDING BALANCE BEGINNING THIS PERIOD	DATE AND AMOUNT INCURRED THIS PERIOD	PAYMENT THIS PERIOD	OUTSTAND- ING BALANCE CLOSE OF THIS PERIOD
Perot Petition Committee				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Dotty Ferguson 2930 Wagonwheel Jacksonville, MS 42013	04-01-92 \$250.00			\$250.00
Nature of Debt (Purpose): DEPOSIT TO OPEN BANK ACCOUNT				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				\$250.00
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C-2 (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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Answers to Commonly Asked Questions

April 1992

FEC Guidelines -- Contributions

It is crucial that everyone involved in collecting, processing, and soliciting campaign contributions understand the basics of the Federal Election Commission (FEC) rules on contributions. This memorandum, in question and answer format, provides an overview of these rules. Other memoranda on other guidelines will follow.

Q. Let me start with a simple question. What is a contribution?

A. The federal election law broadly defines a contribution to include not only money, but also "anything of value" that is given to the Committee. This includes a loan to the Committee -- even the guarantee of someone else's loan. It also includes all goods and services that are given to the Committee -- "In-kind" contributions. Generally, anything the Committee receives from any source is going to be a contribution to the Committee, unless we pay full market value for it.

Q. Are there any exceptions to this rule?

A. Of course. That's what makes the law complicated. For instance, the law exempts from the definition of contribution the value of services provided by individuals who volunteer their time to the Perot Petition Committee. (Be careful! Volunteers may not be paid by their employers or any other person for the time they spend working for the Committee -- otherwise, their time is considered to be a "contribution" by those employers.)

Also, a volunteer may provide the use of his residence to the Committee for a fundraiser without it being a contribution, and may even spend up to \$1,000 on the cost of invitations, food, and beverages for a fundraising party in his residence. This is not a contribution.

A volunteer may spend up to \$1,000 of his own money on personal transportation expenses related to his volunteer activity, and may pay his own subsistence expenses while he works as a volunteer. None of these are contributions.

Q. O.K. What about limits?

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A. The basic rule is this: **NO PERSON CAN GIVE MORE THAN \$1,000 TO THE PEROT PETITION COMMITTEE.** Ever. This includes all contributions made by the person -- both money and "In-kind."

Q. Can a husband and wife each give \$1,000?

A. Sure -- they are two separate people.

Q. Can they give \$2,000 from a single bank account?

A. Yes -- as long as it is clear that the contribution is from both of them.

Q. Can they make the contribution in a single check?

A. Yes. Again, as long as they indicate either on the check or in an accompanying document that the contribution is from both of them.

Q. What about their kids -- each one can give \$1,000, right?

A. Maybe. A minor (a child under 18) can make a contribution only if the funds are owned or controlled exclusively by the child (for instance, if the child works and has his own income, or if he earns income from a trust in his name or has his own savings account) and only if the decision to contribute is made knowingly and voluntarily by the child. Of course, the law doesn't allow parents to give money to their children simply so the children have their "own" money to contribute. That's an obvious sham.

Q. What you're saying sounds a little legalistic. How do I know whether or not I can accept the contribution?

A. Use your judgment and explain the rules to the contributor. But you do see the problem. A married man with three kids can't just write a \$5,000 check to the Perot Petition Committee and tell us to attribute \$1,000 each to him, his wife, his 13-year-old, his 5-year-old, and his new baby. While the 13-year-old probably could make a "knowing" decision to give us a \$1,000 from the money he is earning mowing lawns, the Federal Election Commission would have a hard time believing a 5-year-old can "knowingly" and "voluntarily" dip into his trust fund for Ross Perot!

If you're uncertain about whether to accept a contribution from a minor, call the headquarters for clarification.

Q. Are you sure that a person can't contribute more than \$1,000 to us?

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A. Positive.

Q. I've heard that independent expenditures are a great way to evade the \$1,000 limit.

A. Well, you probably heard it from someone who doesn't know a great deal about independent expenditures. That's such a tangle we've written a whole separate dialog on it. Read it.

Q. So, let me state a simple rule: We can take a contribution from any person, so long as it is not in excess of \$1,000, right?

A. Yes, almost. A "foreign national" can't make a contribution to the Committee. That means anyone who is not a U.S. citizen or not lawfully admitted for permanent residence in the U.S.

Q. All right. What other rules do you have?

A. There are still a number of important rules. The most important is this: **NEVER, EVER, ACCEPT A CONTRIBUTION FROM A CORPORATION OR UNION.**

Q. Why is a contribution from a corporation or union such a big deal?

A. Well, everyone can get in trouble for this. Corporations and unions are totally prohibited from making campaign contributions in any amount.

This applies as much to a doctor who forms a one-man personal corporation as it does to a large corporation. Do not take a contribution check that is drawn on any kind of corporate account. Do not accept free goods from businesses. Do not even let a corporation charge the Perot Petition Committee less than it charges its other customers for any goods or services.

Q. Why can't my brother, who owns a printing shop, give us a break on what he charges us for printing some Perot brochures? He just wants to help out.

A. That's exactly the point. Corporations can't "help out." If your brother's printing shop is incorporated -- and most business are -- he can't charge us less than he charges all his other customers for doing comparable work. If he does, he is making a prohibited corporate contribution in the amount of the difference between his usual price and his discounted price to us.

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Q. You mean we can't take advantage of discounts from any business?

A. That's not what I said. We can't take advantage of discounts just for us. If a business offers discounts to all of its customers -- political or non-political -- then we can enjoy the discount as well. We just have to pay the "usual and normal" charge for anything we buy. If that business usually gives, say, a discount for bulk purchases, it's fine for us to get that same discount. The bottom line is this: A business has to treat us the same way it treats all of its other customers. It can't treat us any better. And, of course, we don't want it to treat us any worse.

Q. Can we use office space in a corporation?

A. Sure, as long as we pay fair market value for rental of the space.

Q. What about credit? Can the Committee buy something and pay in 90 days?

A. Same rule. It's okay as long as the extension of credit to the Perot Petition Committee is in the ordinary course of the corporation's business. In other words, they must extend credit to their other customers on substantially the same terms (i.e., amount and length of credit, interest rates, etc.) as they extend to us. Any credit given to us beyond the normal business practice is a contribution. That's prohibited.

Q. This is getting pretty long. Any other rules?

A. Let me mention one quick point about cash contributions. As a general rule, don't take them. First of all, they are illegal if in excess of \$100. Second, for cash contributions over \$50, you must have the name and address of the contributor or else you have to return it. Whenever you can, get a check. Of course, if you're selling refreshments at a reception for \$1.25, cash is more practical.

Q. That's interesting. You mean if we sell refreshments, the money we receive is considered to be a contribution?

A. Yes. Or if we sell buttons or any other fundraising item, it's a contribution in the full amount paid. The same is true if we charge money to attend a dinner or concert or reception.

Q. Well now, how do I keep records on all this? Don't we need disclosure information from each contributor? Do I have to get the name and address of everyone who buys a button?

A. Not unless they buy a lot of them. Remember, small cash contributions are fine, although we should always attempt to get the name and address of anyone who

makes a contribution. Over \$50, we must have the name and address of any cash contributor. In general, we need the name, home address, occupation, and name of employer for any contributor who gives over \$200 to the Committee.

- Q. You have practically bored me to tears with all these rules and restrictions and limitations. How am I going to remember all this?
- A. Use your common sense. For most contributions you will come across, the rules are quite straightforward. There is one simple, fail-safe rule. Get the contribution (up to \$1,000) in the form of a personal check, signed by the account holder. Following that rule will eliminate 99% of your questions!
- Q. What about the other one percent?
- A. That's what lawyers are for. Call Mark Sinclair, John Harper or Tracey Thorburn at the Committee headquarters -- 214-788-3043 -- and they will get an answer from the Committee's lawyers.

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FEC Guidelines -- Independent Expenditures

- Q. I've heard that independent expenditures are a great way to evade the \$1,000 contribution limit. That's right isn't it?
- A. Well, that's not the way I would put it. There are essentially two ways a person can support a candidate's election. The person can give money or anything else of value to the candidate for the candidate to use as the candidate sees fit. That's called a contribution and is limited to \$1,000. Or the person can go out and spend money on his own, independently urging voters to support his candidate. That's called an independent expenditure, and there is no limit on how much money a person can spend that way.
- Q. Then I can just tell someone what the Perot Petition Committee wants to do, and then have them go do it without being restricted to a \$1,000 limit?
- A. No. Remember: We are talking about independent expenditures. That means the money spent by the individual must be totally independent of the Perot Petition Committee. There can be no consultation between anyone who works for the Perot Petition Committee and the spender. There can be no cooperation. There can be no guidance. There can even be no encouragement. None.
- Q. What if there is?
- A. If there is any coordination -- direct or indirect -- between the Perot Petition Committee and the so-called "independent" spender, the expenditure is automatically converted into a contribution to the Committee. If the expenditure was over \$1,000, the spender has broken the law because he has made a contribution in excess of the limits. And, if we accept such a contribution, the Committee will break the law -- we must avoid that!
- Q. What do you mean by "any coordination -- direct or indirect?"
- A. The Federal Election Commission has said that an independent expenditure cannot be made "with the cooperation or prior consent of" the candidate, "in consultation with" the candidate or "at the request or suggestion of" the candidate or any agent of the candidate. That's very broad and essentially means we can have nothing to do with any independent expenditures made on behalf of the Perot Petition Committee.
- Q. What if someone wants to make an independent expenditure for us, and I just tell him how we plan to spend our money, but don't say anything about how he should

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spend his money. He then spends it the way he wants. That's an independent expenditure, right?

A. Wrong. The Commission presumes there is coordination if the expenditure is "based on information about the candidate's plans, projects, or needs provided to the expending person by the candidate... (or his agent) with a view toward having an expenditure made." So you can't do what you suggested.

Q. Well, what if I tell my eager spender who our media consultants are, and he "independently" spends his money through the same consultants. That's an independent expenditure, right?

A. Wrong again. The Commission has further said that it will presume there is coordination if the expenditure has been "made by or through" any person who is, or has been:

1. An officer of the candidate's Committee
2. Authorized to raise or spend funds by the Committee
3. Receiving any compensation or reimbursement from the Committee.

So you can't tell your spender to use the Committee's media consultant.

Q. I've got another idea. What if my independent spender wants just to reproduce and distribute material prepared by the Perot Petition Committee?

A. Sorry. That too is going to be considered a contribution by the spender to the Committee. It's subject to the \$1,000 limit.

Q. Well, what do I tell my eager spender?

A. Frankly, not much. If someone wants to discuss with you the idea of making independent expenditures, the best rule is: don't. The more you talk to them, the greater risk both we and they run of inadvertently coordinating, and thus violating the law. About all that you can safely do is offer to give your spender a copy of the FEC guidelines on independent expenditures.

Q. You've been pretty discouraging about all this. Is it really this bleak?

A. I hate to rain on your parade but a lot of people have a mistaken impression about independent expenditures. They are not a big loophole that a campaign can exploit to get around the contribution limits. Rather, we have to be very careful to maintain

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our distance from, and our absolute independence of, anyone who is, or who is planning to, make such expenditures for the Perot Petition Committee.

Q. What if I have a question about independent expenditures?

A. Call us. If we don't know, I will refer your question to the Committee's lawyers.

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FEC Guidelines -- Documentation for Disbursements

- Q. I've heard that the law requires us to keep a lot of paperwork whenever we go out to buy something for the Committee. Is that right?
- A. Well, some paperwork. And it's very important that you do it.
- Q. What's a "proper" disbursement purpose?
- A. It's a pretty liberal standard. It just means that we have to spend our money on Committee-related activities. Any lawful expenditure by the Perot Petition Committee "in connection with" the campaign for nomination qualifies.
- Q. So that's what we have to show?
- A. Exactly. We have to be able to document what we have spent and what it was spent for.
- Q. That sounds fair enough. How do we do it?
- A. The bottom line is this. For every disbursement made by the Perot Petition Committee -- that means every disbursement you make -- we need some written record of who it was to (name and address), how much it was for, what the purpose of the expenditure was, and the date.
- Q. This is starting to sound burdensome.
- A. Not really. There are a number of ways to do this. The best thing to do is to get a receipt or bill from the payee or vendor that states the purpose of the disbursement.
- Q. What if I can't?
- A. Well, the next best thing is to keep our cancelled check that was used to pay the bill and a copy of the invoice itself, as long as it states what the payment is for.
- Q. What if I don't have a bill or invoice?
- A. Well, you can also just keep the cancelled check as long as you have some other documentation that shows the purpose of the expenditure -- a voucher or even a memo to the files that you wrote at the same time as the check.

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- 9404 552 3070
855 hohb
- Q. What about just the cancelled check itself?
- A. We really should try to have something more than just the check. But at a bare minimum, the cancelled check alone will do as long as the check itself states the purpose of the disbursement.
- Q. It sounds like I should always write the purpose of the disbursement on every check. That will provide some protection for us?
- A. Absolutely. It just makes good sense to put the purpose on every check.
- Q. Do these rules apply to all disbursements no matter what their size?
- A. We will be reporting all expenditures to the Federal Election Committee. Therefore, we still need the cancelled check that states who the payment was to, the amount, the date, and the purpose of the payment.
- Q. What if I pay by cash rather than by check?
- A. Don't. Unless it is under \$100 and you get the money from a petty cash fund. Otherwise, all disbursements by the Committee MUST be paid by a check drawn on our bank account.
- Q. But can we make small payments out of petty cash?
- A. Sure. As long as it's under \$100. For those, we still need a written record disclosing who the money was paid to, the amount, the date, and the purpose of the payment.
- Q. What about travel advances?
- A. If it is under \$500, it can be reported as a disbursement to the person receiving the advance (as long as that person is the one who is going to be using the money). But if it's over \$500, we have to report it as a disbursement to the ultimate vendor - the airline, the hotel, the restaurant, etc.
- Q. When you say we have to report the "purpose" of the expenditure, what do you mean? Can I just say, for instance, that it was for "materials"?
- A. No. You have to describe a little more specifically what you used the money for, but you don't have to be exhaustive. Just describe the good or services you bought. A standard list of descriptions for disbursements is enclosed.

Q. What happens to all these records? How long do I have to keep them?

A. Eventually all of our records -- bank records, vouchers, receipts, bills, ledgers, and so forth -- will be collected and made available to the FEC. We have to keep all this material for a least three years. That's one reason we have asked for copies of all support to be sent to headquarters.

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Standard Disbursement Descriptions

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FEROT PETITION COMMITTEE
STANDARD DISBURSEMENT DESCRIPTIONS
SCHEDULE I-P

Air Travel	Meeting Expense
Auto/Van Rental	Notary
Bank Charges	Office Supplies
Bus Charter	Parking
Computer Services	Payroll
Construction/Installation	Payroll Taxes
Consulting	Per Diem
Contract Labor	Personnel
Contribution Refund	Petty Cash
Custodial Services	Phone Bank
Delivery	Postage
Direct Mail	Printing
Event Expense	Promotional Materials
Filing Fees	Reimbursement — Travel
Food for Volunteers	Rent
Furniture/Equipment Lease	Repairs and Maintenance
Furniture/Equipment Purchase	Research Expense
Insurance	Software
Lists	Subscriptions/Publications
Lodging	Telephone Expenses
Media Placement	Transfer of Funds
Media Production	Utilities
	Void Check (SY.,NY.)

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PEROT PETITION COMMITTEE
STANDARD DISBURSEMENT DESCRIPTIONS
IN-KIND
SCHEDULE B-P

- In-kind -- Billboards/other advertising
- In-kind -- Copy machines, telephones, furniture or equipment
- In-kind -- Office Space
- In-kind -- Postage and office supplies
- In-kind -- services (describe)

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Blank Schedules

PLEASE XEROX BEFORE USING

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SCHEDULE A

ITEMIZED RECEIPTS

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

NAME OF COMMITTEE (in Full)

A. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
B. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
C. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from such reports and statements may not be sold or used by any person for the purpose of collecting contributions or for campaign purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (options)

TOTAL This Period (last page this line number only)

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MEMORANDUM

TO: Perot Petition Committee Personnel, Volunteers and State Coordinators

FROM: Perot Petition Committee (PPC)
Mike Poss
Clay Mulford

DATE: June 10, 1992

REMEMBER: Every expenditure made must be drawn on an "authorized" bank account -- that means an account that the FEC has been advised we use via a formal filing. A list of authorized accounts is attached. If you are aware of an account that is not on the list, notify us immediately. Records of disbursements must be kept (showing address of payee, purpose, date and amount). The easiest method is to retain cancelled checks.

REMEMBER: Every contribution must be deposited to an authorized bank account or returned within 10 days of receipt. You must also confirm you have all the information you need (name, amount, address, and if over \$200, occupation and employer) and that the contribution is legal (not over \$1,000 in the aggregate, not from a corporation, not from government contractor or foreign national). Any information not known about a legal contribution (usually employer and occupation for contributions over \$200) must be requested.

Compliance is imperative, both to avoid very substantial fines (between \$5,000 and \$25,000 per occurrence -- each time a deposit is not made or expenditure is not drawn on an authorized account) as well as civil and criminal penalties. In addition, violations (which amount to illegal activity) could damage Mr. Perot's reputation for integrity. **COMPLIANCE IS NOT OPTIONAL.** All transactions need to go through authorized bank accounts and be reported as political contributions and expenditures.

T-SHIRTS, ETC...

We understand some groups sell campaign merchandise to fund volunteer efforts. Because you are dealing with a t-shirt or a button doesn't exempt you from FEC law. Purchases from merchandise vendors (t-shirts, buttons, bumper stickers, etc.) must be by checks drawn on authorized bank accounts. If there is not enough money in the authorized bank account to purchase the merchandise, contact Mike Poss, Treasurer, at PPC headquarters.

All proceeds (not just "profits") from campaign merchandise sales (including t-shirts, buttons and anything else sold) by persons or groups operating or affiliated with us are "political contributions" and must be deposited into an authorized account and reported as a contribution. Even though the button you sell for \$2.00 costs a dollar, the amount of the contribution is \$2.00 (not \$1.00). Most of these receipts will probably be anonymous cash contributions less than

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\$50.00, for which you need only keep records of the date and amount received (eg. "15 anonymous cash contributions of \$20.00 and five of \$5.00 on July 2") with a record of the bank deposit.

Example: If someone orders t-shirts for \$200 and sells them for \$300, pays \$200 to the vendor and \$100 to the campaign, he has broken the law. The \$200 paid to the vendor was not from an authorized account and only \$100 of the \$300 in contributions were deposited into an authorized account. This one set of transactions alone would result in a fine of \$20,000. And if the person put the \$100 cash "profit" in a coffee can at a campaign office for future expenditures (instead of making a deposit), the fine would increase to \$30,000. (Note that the person could have made an in kind contribution of the t-shirts to the campaign, in which case contributions would total \$500 - but the \$300 still needs to be deposited to an authorized account.)

Independent Activities: If persons are operating independently of the PPC (this means independently of Dallas and of any state organization connected in any way to the PPC), then they may sell merchandise in any way they please. To be operating independently, the person must have no contact with us and must not operate in concert with us. If an individual undertook the activity in the example on his own, without our knowledge and consent, and then made a contribution of \$100 profit to the campaign, there is no violation (provided the campaign deposited the \$100 into an authorized account within 10 days and properly recorded the person's name, etc.). The individual could have federal reporting requirements of his own, however, depending on circumstances, and contributions from the person would be subject to a \$1,000 maximum.

ANY PERSON OR GROUP FAILING TO FOLLOW THE REQUIREMENTS OUTLINED ABOVE OR IN THE CAMPAIGN GUIDELINES SENT APRIL 7, 1992 (ATTACHED), MUST AND WILL BE SEPARATED FROM CONTACT WITH THE PPC. FURTHER INVOLVEMENT WITH THAT PERSON OR GROUP WILL BE PROHIBITED.

RCM/ss

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AUTHORIZED BANK ACCOUNTS

<u>Name</u>	<u>Date Authorized</u>
First Alabama Bank P.O. Box 511 Montgomery, AL 36134	4/17
First National Bank of Anchorage P.O. Box 100720 Fairbanks, AK 99707	6/10
Bank of America 6080 East Thomas Road Scottsdale, AZ 85251	4/17
Valley National Bank of Arizona 728 W. Ajo Way P.O. Box 7577 Tucson, AZ 85713	6/10
Bank of Fayetteville One South Block Street Fayetteville, AR 72701	6/10
First National Bank of Fort Smith 602 Garrison Avenue Fort Smith, AR 72901	6/10
First Interstate Bank of California 1 Civic Plaza, Suite 200 Newport Beach, CA 92660	4/17
Women's Bank 821 17th Street P.O. Box 8779 Denver, CO 80201	4/17
Fleet Bank 4707 Main Street Bridgeport, CT	5/13
Delaware Trust Company 101 Lockerman St. Dover, DE 19901	6/10

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Industrial Bank of Washington 4812 Georgia Avenue, N.W. Washington, D.C. 20004	5/13
Barnett Bank of Tallahassee Main Office 315 South Calhoun Street Tallahassee, FL	5/13
Barnett Bank of Broward County, N.A. 2929 East Commercial Blvd. Ft. Lauderdale, FL 33308	5/13
Barnett Bank of Northwest Florida 189 Northeast Eglin Parkway Ft. Walton Beach, FL 32548	5/13
Barnett Bank of South Florida, N.A. 1414 Alton Road Miami, FL 33139	5/13
Barnett Bank of Pinellas County One Progress Plaza St. Petersburg, FL 33701	5/13
Barnett Bank of Jacksonville, N.A. 10455 San Jose Blvd. Jacksonville, FL 32257	6/10
Barnett Bank of Naples 385 14th Avenue South Naples, FL 33940	6/10
Barnett Bank of Palm Beach County 1224 U.S. Highway One North Palm Beach, FL	6/10
Barnett Bank of Central Florida 105 East Robinson Street #100 Orlando, FL 32801	6/10
Bank of the South, N.A. 135 Perimeter Center West Atlanta, GA 30346	4/17

First American Bank 6/10
30. College Avenue
Athens, GA 30601

Wachovia Bank of Georgia, N.A. 6/10
Mulberry St. at Third
Macon, GA 31202

Wachovia Bank 6/10
6301 Abercorn Street
Savannah, GA 31405

Pioneer Federal Savings Bank of Hawaii 6/10
900 Fort St.
Honolulu, HI 96813

Key Bank of Idaho, Capital Center Office 6/10
702 West Idaho St.
P.O. Box 2800
Boise, ID 83702

First of America Bank - Northwest Illinois 6/10
325 N. Milwaukee Street
Libertyville, IL 60048

Bank One 5/13
111 Monument Circle
Indianapolis, IN 45277

Brenton Bank, N.A. 6/10
2840 Ingersoll Avenue
Des Moines, IA 50312

Metcalf State Bank 5/13
P.O. Box 4249
Overland Park, KS 66204

Citizens Fidelity Bank & Trust Company 5/13
1250 Bardstown Road
Louisville, KY 40204-1333

Premier Bank 4/17
3554 South Sherwood Forest Blvd.
P.O. Box 3399
Baton Rouge, LA 70821-3399

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Peoples Heritage Bank 299 Elm Street Biddeford, ME 04005	4/17
Annapolis Bank and Trust 921 Bay Ridge Avenue Annapolis, MD 21403	4/17
Bay Bank Boston, N.A. 5 Tremont Street Boston, MA 02108	4/17
National Bank of Detroit Branch #135 2410 West Road Trenton, MI 48185	4/17
Norwest Bank Minnesota 55 East Fifth Street St. Paul, MN 55101	5/13
Trustmark National Bank P.O. Box 291 Jackson, MS 39205	6/10
Commerce Bank of Springfield 1661 Boonville Springfield, MO 65801	6/10
First Citizens Bank P.O. Box 578 Bozeman, MT 59715	5/13
Union Bank & Trust Company P.O. Box 6155 3643 South 48th Street Lincoln, NE 68506	4/17
First Interstate Bank of Nevada California/Arlington Office 490 California Avenue Reno, NV 89509	4/17
First Interstate Bank 3433 South Maryland Las Vegas, NV 89109	5/13

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Cornerstone Bank 4/17
P.O. Box 326
Derry, NH 03038

United Jersey Bank/Central N.A. 5/13
3140 Princeton Pike
Lawrenceville, NJ 08648

Sunwest Bank of Santa Fe 4/17
P.O. Box 5375
Santa Fe, NM: 87502-5375

United New Mexico Bank 6/10
Zuni at San Mateo SE
Albuquerque, NM 87108

Mutual Building & Loan Association 6/10
510 South Main
Las Cruces, NM 87108

Endicott Trust 6/10
89-91 Court St.
Binghamton, NY 88001

EAB 5/13
114 Old Country Road
Mineola, NY 11501

Chemical Bank 5/13
30 Rockefeller Plaza
New York, NY 11501

Chemical Bank 4/12
1 East 41st Street
New York, NY 10112

Key Bank 5/13
2 Brinkerhoff St.
Plattsburgh, NY 12901

United Carolina Bank 5/13
310 East John Street
Matthews, NC 28105

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North Carolina Nations Bank - North Hills Office P.O. Box 27257 Raleigh, NC 27611	6/10
Bank Center One 1101 East Interstate Ave. Bismarck, ND 58501	5/13
Bank One 65 East State Street Columbus, OH 43271-0333	5/13
Boatmens Bank of Oklahoma P.O. Box 25189 120 N. Robinson Oklahoma City, OK 73215	5/13
Local America Bank P.O. Box 3499 Tulsa, OK 74101	4/12
First Interstate Bank of Oregon 1300 S.W. Fifth Ave. Portland, OR 97201	5/13
Mellon Bank 22 Turner Lane West Goshen, PA 19382	4/12
Old Stone Bank 86 S. Main Street Providence, RI 02903	5/13
South Carolina National Bank 1401 Main Street Columbia, SC 29226	6/10
Peoples Federal Savings & Loan Association 2200 Oak Street Myrtle Beach, SC 29577	5/13

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Norwest Bank 317 E. 4th Street Dell Rapids, SD 57022	6/10
American State Bank 7th & St. Joseph Street Rapid City, SD 57701	6/10
First American National Bank 3021 West End Avenue Nashville, TN 37203	5/13
First Security Bank of Utah, N.A. 230 S. Main Bountiful, UT 84010	4/12
Nations Bank of Virginia, N.A. 12th and Main Streets Richmond, VA 23219-3509	4/12
Citizens Bank 2 Burlington Square Burlington, VT 05402	5/13
U.S. Bank of Washington Fourth & Battery Branch 2411 Fourth Ave. Seattle, WA 98101	5/13
Putname County Bank P.O. Box 308 Hurricane, WV 25526	5/13
Norwest Bank 735 W. Wisconsin Ave. Milwaukee, WI 53223	4/12
Mountain Plaza National Bank 4085 CY Avenue Casper, WY 82604	6/10

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PEROT PETITION COMMITTEE COORDINATORS'
CONTRIBUTION AND EXPENDITURE GUIDELINES

CONTRIBUTIONS

1. Contributions made by corporations, labor organizations or banks are illegal and cannot be accepted. For example, a dentist who is a "PC" - professional corporation - cannot make a contribution drawn on his "PC" account, and the owner of an incorporated "mom and pop" grocery store may not use its business account to make contributions.
2. The prohibition against corporate contributions includes in-kind contributions such as the use of telephones, typewriters, office furniture, stamps, or copy machines owned by a corporation, labor organization, or bank.
3. You may use the facilities of a corporation, labor organization, or bank if you pay the normal and usual rental charge, and may use the space without charge if the corporation has a policy to allow such use free of charge, has done so before and provides the space on a non-partisan basis.
4. Contributions by Federal Government contractors or foreign nationals are illegal.
5. Individuals or partnerships may contribute, in the aggregate, a maximum of \$1,000. This applies to monetary and in-kind contributions (donations of goods and services) valued at market value.
6. Partnership contributions are allocated proportionately among partners - reducing the amount they may contribute as individuals. For example, if a 3 person partnership gives the maximum \$1,000, those 3 partners are each limited to an additional maximum contribution of \$667 ($[\$1,000 - (\$1,000 \text{ divided by } 3)]$).
7. Cash contributions over \$100 may not be accepted.
8. An individual may volunteer personal services to your organization without making a contribution as long as the individual is not compensated by anyone (including the volunteer's employer) for the services provided.
9. The entire amount paid to attend a fund raiser or to purchase a fund raising item is a contribution. For example, if a contributor spends \$20 to buy a campaign tee shirt that costs the campaign \$5, the contributor has made a \$20 contribution.
10. All advertisements (except buttons, bumper stickers and other small items) must state "authorized and paid for by Perot Petition Committee" (or identify whoever else has paid for the item).
11. Solicitations for contributions made in print, by television or radio, or by telephone must state "Contributions are not deductible as charitable contributions for Federal income tax purposes."

RECORDKEEPING

1. Records of contributions - including in-kind contributions - must be maintained identifying each contribution by amount, date of receipt, donor's full name and address, occupation and employer.
2. Contributions must be deposited into an authorized bank account (or retained) within 10 days of receipt. Maintain all bank records.
3. Records of small contributions (less than \$50 each) collected at a fund raiser (such as gate receipts and cash contributions) must include only the name of the event, the date of receipt and the total amount of contributions received on each day of the event.
4. An anonymous cash contribution may not exceed \$50 in the aggregate per individual.
5. Records for all expenditures, including purpose, date, amount, and payee name and address must be maintained.
6. A written record of petty cash disbursements must be kept if a petty cash fund is maintained. Payments from petty cash to one person for any one purchase or transaction may not exceed \$100.

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7. For single disbursements over \$200, your organization must also keep a receipt, invoice or cancelled check.
8. If any loans have been made (for example, to pay for phone lines in setting up your operation) contact Mike Poss, Perot Petition Committee Treasurer (214) 788-3030. (If the expenditure was not tied to a loan with an expectation of repayment from fund raising, it should be reflected in your records as an in-kind contribution valued at cost.)

COMMONLY ASKED QUESTIONS

Our organization wishes to set up a local petition office. My employer (a corporation) has offered to donate excess office space in our building. Can we accept his offer?

No. The usage of office space either owned or leased by a corporation would be considered an in-kind contribution by a corporation and is prohibited under the Federal Election Laws. Your organization may enter into an agreement to lease this facility. The terms of any agreement must be commercially reasonable, including the rental charge.

An individual has offered to donate several phone systems for use by our organization as a phone bank. May we accept this contribution?

Yes, provided that this in-kind contribution by an individual does not exceed \$1,000 in value. Note that the equipment must be owned by this individual and not by any corporation, labor organization, or bank with which this individual is associated.

We are planning an organizational meeting in a local hotel. How can we pay for this room?

Several options are available for payment. It may be possible for the participants to contribute in small amounts (less than \$50 per person) to pay for the room. Although contributions less than \$50 collected at such events need not be individually recorded, such records are encouraged. Also, an individual may advance the amount from his or her personal funds, or make use of a personal credit card. This payment will be considered an in-kind contribution from that individual to the organization, however, subject to the \$1,000 limit until the individual is reimbursed by your organization. The advance must be recorded as a debt of your organization and as a contribution (until reimbursed). If an individual makes such an advance, please contact Mike Poss at the above number regarding the necessary paperwork. In all cases, a record of the expenditure must be retained.

We wish to hold an organizational meeting and set up several locations where petitions will be available to the general public for signing. May we advertise the times and locations of these events?

Yes, BUT any public political advertising that identifies the candidate must also clearly identify the name of the person that paid for the advertisement and indicate whether the advertisement was authorized by the Perot Petition Committee in Dallas. Any advertising that may be construed as a solicitation for contributions also must include a disclaimer stating that contributions to your organization are not deductible as charitable contributions for Federal income tax purposes.

My employer has agreed to allow me to work on the petition effort during regular business hours. Is this a contribution?

No, provided that if you are paid on an hourly or salaried basis, the time taken by you to work on the petition effort is made up within a reasonable time or is bona fide vacation time. If you are paid on a commission or piecework basis and your time is your own, your work on the petition effort is not a contribution by your employer. Uncompensated personal services generally are not a contribution of the individual performing the service.

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MEMORANDUM

TO: Perot Petition Committee Personnel, Volunteers and State Coordinators

FROM: Perot Petition Committee (PPC)
Mike Poss
Clay Mulford

DATE: June 29, 1992

SUBJECT: FEC REPORTING MATTERS

Listed on the following pages are highlights of FEC rules on reporting and recordkeeping, along with several points we wish to emphasize, and a question and answer section.

If you have any questions regarding FEC rules, please contact:

- John Harper - (214) 716-6454
- Chris Wimpee - (214) 716-6452

We, once again, wish to emphasize the importance of compliance with these rules.

JH:bj

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PEROT PETITION COMMITTEE COORDINATORS'
CONTRIBUTION AND EXPENDITURE GUIDELINES

CONTRIBUTIONS

1. Every contribution must be deposited into an authorized bank account or returned within 10 days of receipt.
2. Every disbursement must be drawn from an authorized bank account.
3. Contributions made by corporations, labor organizations or banks are illegal and cannot be accepted. For example, a dentist who is a "PC" -- professional corporation -- cannot make a contribution drawn on his "PC" account, and the owner of an incorporated "mom and pop" grocery store may not use its business account to make contributions.
4. The prohibition against corporate contributions includes in-kind contributions such as the use of telephones, typewriters, office furniture, stamps, or copy machines owned by a corporation, labor organization, or bank.
5. Corporate contributions should be returned within 10 days.
6. You may use the facilities of a corporation, labor organization, or bank if you pay the normal and usual rental charge, and may use the space without charge if the corporation has a policy to allow such use free of charge, has done so before and provides the space on a non-partisan basis.
7. Contributions by Federal Government contractors or foreign nationals are illegal.
8. Individuals or partnerships may contribute, in the aggregate, a maximum of \$1,000. This applies to monetary and in-kind contributions (donations of goods and services) valued at market value.
9. A volunteer may provide the use of his residence to the Committee for a fundraiser without it being a contribution and may even spend up to \$1,000 on the cost of invitations, food, and beverages for a fundraising party in his residence. This is not a contribution.

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10. A volunteer may spend up to \$1,000 of his own money on personal transportation expenses related to his volunteer activity and may pay his own subsistence expenses while he works as a volunteer. None of these are contributions.
 11. Partnership contributions are allocated proportionately among partners -- reducing the amount they may contribute as individuals. For example, if a 3 person partnership gives the maximum \$1,000, those 3 partners are each limited to an additional maximum contribution of \$667 ($[\$1,000 - (\$1,000 \text{ divided by } 3)]$).
 12. Contributions in excess of \$1,000 should be returned/refunded within 10 days.
 13. Cash contributions over \$100 may not be accepted.
 14. An individual may volunteer personal services to your organization without making a contribution as long as the individual is not compensated by anyone (including the volunteer's employer) for the services provided.
 15. A loan to the committee is considered a contribution until it is paid back.
 16. The entire amount paid to attend a fund raiser or to purchase a fund raising item is a contribution. For example, if a contributor spends \$20 to buy a campaign tee shirt that costs the campaign \$5, the contributor has made a \$20 contribution.
 17. All advertisements (except buttons, bumper stickers and other small items) must state "authorized and paid for by Perot Petition Committee" (or identify whoever else has paid for the item).
 18. Solicitations for contributions made in print, by television or radio, or by telephone must state "Contributions are not deductible as charitable contributions for Federal income tax purposes."

RECORD KEEPING

1. Records of contributions in excess of \$50 must be maintained identifying each contribution by amount, date of receipt, donor's full name and address. In addition, if the contribution is in excess of \$200 you must also have occupation and employer.

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2. Contributions must be deposited into an authorized bank account (or returned) within 10 days of receipt. Maintain all bank records.
 3. Records of small contributions (less than \$50 each) collected at a fund raiser (such as gate receipts and cash contributions) must include only the name of the event, the date of receipt and the total amount of contributions received on each day of the event.
 4. An anonymous cash contribution may not exceed \$50 in the aggregate per individual.
 5. Records for all expenditures, including purpose, date, amount, and payee name and address must be maintained.
 6. A written record of petty cash disbursements must be kept if a petty cash fund is maintained. Payments from petty cash to one person for any one purchase or transaction may not exceed \$100.
 7. For single disbursements over \$200, your organization must also keep a receipt, invoice or cancelled check. This documentation must be submitted to Dallas.
 8. Correspondence requesting the above information should be sent and maintained to demonstrate a "good faith effort" to obtain the information. This correspondence should be sent to Dallas for our files.
 9. We must be notified of all loans and leases to properly report these items in our FEC filings. All loans must be reported on Schedule "C" and all leases must be reported on Schedule "D". Copies of these agreements must be forwarded to Dallas immediately.
 10. Obligations over \$500 or in excess of 60-days old should be reported to Dallas as an obligation on Schedule "D".

REMEMBER: Every expenditure made must be drawn on an "authorized" bank account -- that means an account that the FEC has been advised we use via a formal filing. A list of authorized accounts is attached. If you are aware of an account that is not on the list, notify us immediately. Records of disbursements must be kept (showing address of payee, purpose, date and amount). The easiest method is to retain cancelled checks.

REMEMBER: Every contribution must be deposited to an authorized bank account or returned within 15 days of receipt. You must also confirm you have all the information you need (name, amount, address, and if over \$200, occupation and employer) and that the contribution is legal (not over \$1,000 in the aggregate, not from a corporation, not from government contractor or foreign national). Any information not known about a legal contribution (usually employer and occupation for contributions over \$200) must be requested.

Compliance is imperative, both to avoid very substantial fines (between \$5,000 and \$25,000 per occurrence -- each time a deposit is not made or expenditure is not drawn on an authorized account) as well as civil and criminal penalties. In addition, violations (which amount to illegal activity) could damage Mr. Perot's reputation for integrity. **COMPLIANCE IS NOT OPTIONAL.** All transactions need to go through authorized bank accounts and be reported as political contributions and expenditures.

T-SHIRTS, ETC...

We understand some groups sell campaign merchandise to fund volunteer efforts. Because you are dealing with a t-shirt or a button doesn't exempt you from FEC law. Purchases from merchandise vendors (t-shirts, buttons, bumper stickers, etc.) must be by checks drawn on authorized bank accounts. If there is not enough money in the authorized bank account to purchase the merchandise, contact Mike Poss, Treasurer, at PPC headquarters.

All proceeds (not just "profits") from campaign merchandise sales (including t-shirts, buttons and anything else sold) by persons or groups operating or affiliated with us are "political contributions" and must be deposited into an authorized account and reported as a contribution. Even though the button you sell for \$2.00 costs a dollar, the amount of the contribution is \$2.00 (not \$1.00). Most of these receipts will probably be anonymous cash contributions less than \$50.00, for which you need only keep records of the date and amount received (eg. "15 anonymous cash contributions of \$20.00 and five of \$5.00 on July 2") with a record of the bank deposit.

Example: If someone orders t-shirts for \$200 and sells them for \$300, pays \$200 to the vendor and \$100 to the campaign, he has broken the law. The \$200 paid to the vendor was not from an authorized account and only \$100 of the \$300 in contributions were deposited into an authorized account. This one set of transactions alone would result in a fine of \$20,000. And if the person put the \$100 cash "profit" in a coffee can at a campaign office for future expenditures (instead of making a deposit), the fine would increase to \$30,000. (Note that the person could have made an in kind contribution of the t-shirts to the campaign, in which case contributions would total \$500 - but the \$300 still needs to be deposited to an authorized account.)

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Independent Activities: If persons are operating independently of the PPC (this means independently of Dallas and of any state organization connected in any way to the PPC), then they may sell merchandise in any way they please. To be operating independently, the person must have no contact with us and must not operate in concert with us. If an individual undertook the activity in the example on his own, without our knowledge and consent, and then made a contribution of \$100 profit to the campaign, there is no violation (provided the campaign deposited the \$100 into an authorized account within 10 days and properly recorded the person's name, etc.). The individual could have federal reporting requirements of his own, however, depending on circumstances, and contributions from the person would be subject to a \$1,000 maximum.

ANY PERSON OR GROUP FAILING TO FOLLOW THE REQUIREMENTS OUTLINED ABOVE OR IN THE CAMPAIGN GUIDELINES SENT APRIL 7, 1992 (ATTACHED), MUST AND WILL BE SEPARATED FROM CONTACT WITH THE PPC. FURTHER INVOLVEMENT WITH THAT PERSON OR GROUP WILL BE PROHIBITED.

JH:bj

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FEC GUIDELINES - CONTRIBUTIONS

It is crucial that everyone involved in collecting, processing, and soliciting campaign contributions understand the basics of the Federal Election Commission (FEC) rules on contributions. This memorandum, in question and answer format, provides an overview of these rules. Other memoranda on other guidelines will follow.

Q. Let me start with a simple question: What is a contribution?

A. The Federal Election law broadly defines a contribution to include not only money, but also "anything of value" that is given to the Committee. This includes a loan to the Committee -- even the guarantee of someone else's loan. It also includes all goods and services that are given to the Committee -- "In-kind" contributions. Generally, anything the Committee receives from any source is going to be a contribution to the Committee, unless we pay full market value for it.

Q. Are there any exceptions to this rule?

A. Of course. That's what makes the law complicated. For instance, the law exempts from the definition of contribution the value of services provided by individuals who volunteer their time to the Perot Petition Committee. (Be careful! Volunteers may not be paid by their employers or any other person for the time they spend working for the Committee - otherwise, their time is considered to be a "contribution" from those employers.)

Also, a volunteer may provide the use of his residence to the Committee for a fundraiser without it being a contribution and may even spend up to \$1,000 on the cost of invitations, food and beverages for a fundraising party in his residence. This is not a contribution.

A volunteer may spend up to \$1,000 of his own money on personal transportation expenses related to his volunteer activity and may pay his own subsistence expenses while he works as a volunteer. None of these are contributions.

Q. O.K. What about limits?

A. The basic rule is this: **NO PERSON CAN GIVE MORE THAN \$1,000 TO THE PEROT PETITION COMMITTEE.** Ever. This includes all contributions made by the person -- both money and "In-kind."

Q. Can a husband and wife each give \$1,000?

A. Sure -- they are two separate people.

Q. Can they give \$2,000 from a single bank account?

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FEC GUIDELINES - CONTRIBUTIONS

- A. Yes -- as long as it is clear that the contribution is from both of them.
- Q. Can they make the contribution in a single check?
- A. Yes. Again, as long as they indicate either on the check or in an accompanying document that the contribution is from both of them.
- Q. What about their kids -- each one can give \$1,000, right?
- A. Maybe. A minor (a child under 18) can make a contribution only if the funds are owned or controlled exclusively by the child (for instance, if the child works and has his own income, or if he earns income from a trust in his name or has his own savings account) and only if the decision to contribute is made knowingly and voluntarily by the child. Of course, the law doesn't allow parents to give money to their children simply so the children have their "own" money to contribute. That's an obvious sham.
- Q. What you're saying sounds a little legalistic. How do I know whether or not I can accept the contribution?
- A. Use your judgment and explain the rules to the contributor. But you do see the problem. A married man with three kids can't just write a \$5,000 check to the Perot Petition Committee and tell us to attribute \$1,000 each to him, his wife, his 13-year-old, his 5-year-old, and his new baby. While the 13-year-old probably could make a "knowing" decision to give us \$1,000 from the money he is earning mowing lawns, the Federal Election Commission would have a hard time believing a 5-year-old can "knowingly" and "voluntarily" dip into his trust fund for Ross Perot!
- If you're uncertain about whether to accept a contribution from a minor, call the headquarters for clarification.
- Q. Are you sure that a person can't contribute more than \$1,000 to us?
- A. Positive.
- Q. I've heard that independent expenditures are a great way to evade the \$1,000 limit.
- A. Well, you probably heard it from someone who doesn't know a great deal about independent expenditures. That's such a tangle, we've written a whole separate dialog on it. Read it.
- Q. All right. What other rules do you have?
- A. There are still a number of important rules. The most important is this: **NEVER, EVER, ACCEPT A CONTRIBUTION FROM A CORPORATION OR UNION.**

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FEDERAL CAMPAIGN FINANCE ACT GUIDELINES - CONTRIBUTIONS

Q. Why is a contribution from a corporation or union such a big deal?

A. Well, everyone can get in trouble for this. Corporations and unions are totally prohibited from making campaign contributions in any amount.

This applies as much to a doctor who forms a one-man personal corporation as it does to a large corporation. Do not take a contribution check that is drawn on any kind of corporate account. Do not accept free goods from businesses. Do not even let a corporation charge the Perot Petition Committee less than it charges its other customers for any goods or services.

Q. Why can't my brother, who owns a printing shop, give us a break on what he charges us for printing some Perot brochures? He just wants to help out.

A. That's exactly the point. Corporations can't "help out." If your brother's printing shop is incorporated -- and most businesses are -- he can't charge us less than he charges all his other customers for doing comparable work. If he does, he is making a prohibited corporate contribution in the amount of the difference between his usual price and his discounted price to us.

Q. You mean we can't take advantage of discounts from any business?

A. That's not what I said. We can't take advantage of discounts just for us. If a business offers discounts to all of its customers -- political or non-political -- then we can enjoy the discount as well. We just have to pay the "usual and normal" charge for anything we buy. If that business usually gives, say, a discount for bulk purchases, it's fine for us to get that same discount. The bottom line is this: A business has to treat us the same way it treats all of its other customers. It can't treat us any better. And, of course, we don't want it to treat us any worse.

Q. Can we use office space in a corporation?

A. Sure, as long as we pay fair market value for rental of the space.

Q. What about credit? Can the Committee buy something and pay in 90 days?

A. Same rule. It's okay as long as the extension of credit to the Perot Petition Committee is in the ordinary course of the corporation's business. In other words, they must extend credit to their other customers on a substantially the same terms (i.e., amount and length of credit, interest rates, etc.) as they extend to us. Any credit given to us beyond the normal business practice is a contribution. That's prohibited.

Q. This is getting pretty long. Any other rules?

A. Let me mention one quick point about cash contributions. As a general rule, don't take

FEC GUIDELINES - CONTRIBUTIONS

them. First of all, they are illegal if in excess of \$100. Second, for cash contributions over \$50, you must have the name and address of the contributor or else you have to return it. Whenever you can, get a check. Of course, if you're selling refreshments at a reception for \$1.25, cash is more practical.

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- Q. That's interesting. You mean if we sell refreshments, the money we receive is considered to be a contribution?
- A. Yes. Or, if we sell buttons or any other fundraising item, it's a contribution in the full amount paid. The same is true if we charge money to attend a dinner or concert or reception.
- Q. Well, now, how do I keep records on all this? Don't we need disclosure information from each contributor? Do I have to get the name and address of everyone who buys a button?
- A. Not unless they buy a lot of them. Remember, small cash contributions are fine, although we should always attempt to get the name and address of anyone who makes a contribution. Over \$50, we must have the name and address of any cash contributor. In general, we need the name, home address, occupation, and name of employer for any contributor who gives over \$200 to the Committee.
- Q. You have practically bored me to tears with all these rules and restrictions and limitations. How am I going to remember all this?
- A. Use your common sense. For most contributions you will come across, the rules are quite straightforward. There is one simple, fail-safe rule. Get the contribution (up to \$1,000) in the form of a personal check, signed by the account holder. Following that rule will eliminate 99% of your questions!
- Q. What about the other one percent?
- A. That's what lawyers are for. Call John Harper or Chris Wimpee at the Committee's headquarters — 214/716-6454 or 214/716-6452, respectively — and they will get an answer from the Committee's lawyers.

FEC GUIDELINES - DOCUMENTATION FOR DISBURSEMENTS

- Q. I've heard that the law requires us to keep a lot of paperwork whenever we go out to buy something for the Committee. Is that right?
- A. Well, some paperwork. And, it is very important that you do it.
- Q. What is a "proper" disbursement purpose?
- A. It is a pretty liberal standard. It just means that we have to spend our money on Committee-related activities. Any lawful expenditure by the Perot Petition Committee "in connection with" the campaign for nomination qualifies.
- Q. So that's what we have to show?
- A. Exactly. We have to be able to document what we have spent and what is was spent for.
- Q. That sounds fair enough. How do we do it?
- A. The bottom line is this: for every disbursement made by the Perot Petition Committee - - that means every disbursement you make -- we need some written record of who it was to (name and address), how much it was for, what the purpose of the expenditure was, and the date.
- Q. This is starting to sound burdensome.
- A. Not really. There are a number of ways to do this. The best thing to do is to get a receipt or bill from the payee or vendor that states the purpose of the disbursement.
- Q. What if I can't?
- A. Well, the next best thing is to keep our cancelled check that was used to pay the bill and a copy of the invoice itself, as long as it states what the payment is for.
- Q. What if I don't have a bill or an invoice?
- A. Well, you can also just keep the cancelled check as long as you have some other documentation that shows the purpose of the expenditure -- a voucher or even a memo to the files that you wrote at the same time as the check.
- Q. What about just the cancelled check itself?
- A. We really should try to have something more than just the check. But, at a bare minimum, the cancelled check alone will do as long as the check itself states the purpose of the disbursement.

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FEC GUIDELINES - DOCUMENTATION FOR DISBURSEMENTS

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- Q. It sounds like I should always write the purpose of the disbursement on every check. That will provide some protection for us?
- A. Absolutely. It just makes good sense to put the purpose on every check.
- Q. Do these rules apply to all disbursements no matter what their size?
- A. We will be reporting all expenditures to the Federal Election Committee. Therefore, we still need the cancelled check that states who the payment was to, the amount, the date, and the purpose of the payment.
- Q. What if I pay by cash, rather than by check?
- A. Don't. Unless it is under \$100 and you get the money from a petty cash fund. Otherwise, all disbursements by the Committee **MUST** be paid by a check drawn on our authorized bank account.
- Q. But, can we make small payments out of petty cash?
- A. Sure. As long as it is under \$100. For those, we still need a written record disclosing who the money was paid to, the amount, the date, and the purpose of the payment.
- Q. What about travel advances?
- A. If it is under \$500, it can be reported as a disbursement to the person receiving the advance (as long as that person is the one who is going to be using the money). But, if it is over \$500, we have to report it as a disbursement to the ultimate vendor -- the airline, the hotel, the restaurant, etc.
- Q. When you say we have to report the "purpose" of the expenditure, what do you mean? Can I just say, for instance, that it was for "materials"?
- A. No. You have to describe a little more specifically what you used the money for, but you don't have to be exhaustive. Just describe the goods or services you bought. A standard list of descriptions for disbursements is enclosed.
- Q. What happens to all these records? How long do I have to keep them?
- A. Eventually, all of our records -- bank records, vouchers, receipts, bills, ledgers, and so forth -- will be collected and made available to the FEC. We have to keep all this material for at least three years. That's one reason we have asked for copies of all support to be sent to headquarters.

FEC GUIDELINES - INDEPENDENT EXPENDITURES

- Q. I've heard that independent expenditures are a great way to evade the \$1,000 contribution limit. That's right, isn't it?
- A. Well, that's not the way I would put it. There are essentially two ways a person can support a candidate's election. The person can give money, or anything else of value, to the candidate for the candidate to use as the candidate sees fit. That's called a contribution and is limited to \$1,000. Or, the person can go out and spend money on his own, independently urging voters to support his candidate. That's called an independent expenditure, and there is no limit on how much money a person can spend that way.
- Q. Then, I can just tell someone what the Perot Petition Committee wants to do and then have them go do it without being restricted to a \$1,000 limit?
- A. No. Remember: We are talking about independent expenditures. That means the money spent by the individual must be totally independent of the Perot Petition Committee. There can be no consultation between anyone who works for the Perot Petition Committee and the spender. There can be no cooperation. There can be no guidance. There can even be no encouragement. NONE.
- Q. What if there is?
- A. If there is any coordination -- direct or indirect -- between the Perot Petition Committee and the so-called "independent" spender, the expenditure is automatically converted into a contribution to the Committee. If the expenditure was over \$1,000, the spender has broken the law because he has made a contribution in excess of the limits. And, if we accept such a contribution, the Committee will break the law. We must avoid that!
- Q. What do you mean by "any coordination -- direct or indirect?"
- A. The Federal Election Commission has said that an independent expenditure cannot be made "with the cooperation or prior consent of" the candidate, "in consultation with" the candidate or "at the request or suggestion of" the candidate or any agent of the candidate. That's very broad and essentially means we can have nothing to do with any independent expenditures made on behalf of the Perot Petition Committee.
- Q. What if someone wants to make an independent expenditure for us, and I just tell him how we plan to spend our money, but don't say anything about how he should spend his money. He then spends it the way he wants. That's an independent expenditure, right?
- A. Wrong. The Commission presumes there is coordination if the expenditure is "based on information about the candidate's plans, projects, or needs provided to the expending person by the candidate (or his agent) with a view toward having an expenditure made." So you can't do what you suggested.

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FEC GUIDELINES - INDEPENDENT EXPENDITURES

Q. Well, what if I tell my eager spender who our media consultants are and he "independently" spends his money through the same consultants. That's an independent expenditure, right?

A. Wrong again. The Commission has further said that it will presume there is coordination if the expenditure has been "made by or through" any person who is or has been:

1. An officer of the candidate's Committee
2. Authorized to raise or spend funds by the Committee
3. Receiving any compensation or reimbursement from the Committee

So, you can't tell your spender to use the Committee's media consultant.

Q. I've got another idea. What if my independent spender wants just to reproduce and distribute material prepared by the Perot Petition Committee?

A. Sorry. That, too, is going to be considered a contribution by the spender to the Committee. It's subject to the \$1,000 limit.

Q. Well, what do I tell my eager spender?

A. Frankly, not much. If someone wants to discuss with you the idea of making independent expenditures, the best rule is: don't. The more you talk to them, the greater risk both we and they run of inadvertently coordinating and, thus, violating the law. About all that you can safely do is offer to give your spender a copy of the FEC guidelines on independent expenditures.

Q. You've been pretty discouraging about all this. Is it really this bleak?

A. I hate to rain on your parade, but a lot of people have a mistaken impression about independent expenditures. They are not a big loophole that a campaign can exploit to get around the contribution limits. Rather, we have to be very careful to maintain our distance from, and our absolute independence of, anyone who is or who is planning to make such expenditures for the Perot Petition Committee.

Q. What if I have a question about independent expenditures?

A. Call us. If we don't know, we will refer your question to the Committee's lawyers.

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PEROT PETITION COMMITTEE

P.O. Box 517010, DALLAS, TEXAS 75251-7010, TELEPHONE (214)716-6600

TO: State Coordinators
FROM: Mike Poss, Treasurer
DATE: August 3, 1992

SUBJECT: FORMATION OF NEW MOVEMENT

Ross Perot and the staff of the Perot Petition Committee would like to thank you for participating in the meetings held in Dallas on July 29 and 30. Much was accomplished in terms of keeping the momentum of the grassroots effort alive. You are to be commended for your commitment to this movement.

This memorandum relates to the transition from a petition drive to an effort to educate the public about the issues which Ross Perot had been discussing and covers the following topics:

- Closing certain offices
- Closing certain checking accounts
- Opening a new checking account
- Funding for continuing operations
- Continued Federal Election Commission ("FEC") reporting responsibilities
- Use of the name *United We Stand*

Closing certain offices

As we discussed during the meeting, the general plan is to have one office per state. Certain states with larger populations will have more than one office. In your capacity of State Coordinator, you will need to decide upon the location of the office in your state. This office should be located in an existing office of the Perot Petition Committee. This is particularly true where there is an existing lease obligation on the office space for the next three or four months. If, for some reason, a new location is required, you should consult with your field representative from Dallas ("Dallas field rep").

The Dallas field rep will be responsible for closing the remaining offices ("local offices") within your state. He or she will handle the procedures relating to the settlement of property and equipment leases and the payment of outstanding contractual obligations of the Perot Petition Committee arising from those offices. However, he or she may need your assistance with respect to certain situations of which you may have knowledge. In particular, your

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Dallas field rep may have questions about contracts made by local offices for the purchase of merchandise. We will be seeking to resolve all legitimate vendor claims arising under contracts with Dallas (but not alleged obligations via unauthorized actions or alleged statements by volunteers) as quickly as possible. To expedite this process, we have assigned Susan Davidson (214-716-6879) at the Dallas headquarters to handle disputed claims.

In connection with closing the local offices, the Dallas field reps will be responsible for taking a physical inventory of the office furniture and equipment and comparing it to our records. All equipment which has been purchased by the Perot Petition Committee will be returned to Dallas. In the alternative, if the value of the equipment does not justify its transfer to Dallas, the field rep will make arrangements to dispose of it in the city where it is located.

Closing certain checking Accounts

To meet FEC requirements, we must close current checking accounts and obtain all records. We must also reduce the number of checking accounts to one per state. This may prove to be a problem in appearances in those states that have had more than one checking account. We recognize the fact that the people involved in raising the money to fund those accounts may rightfully be somewhat protective of those funds. It will be the responsibility of the Dallas field rep to work with the local offices to close out these accounts. In general, the field rep will make certain that all outstanding invoices and valid claims have been paid or resolved. If a balance remains in a checking account, we would like for that balance to be forwarded to Dallas. Those funds will then be transferred to the new checking account for the state. The intermediate step of transferring the funds to Dallas will ensure that we have properly accounted for the closing of each office.

As we close each office, we also need to obtain the financial records kept there. We are asking our Dallas field rep to obtain all of the supporting documentation for contributions and disbursements which have been stored in each office during the past months. This documentation would include bank statements and invoices. The field rep will forward these items to Dallas. We are also asking the field reps to obtain all of the financial information in the state headquarters office (whether or not that is an office that will close) through July 31, 1992 and forward those documents to Dallas. Obviously, this procedure will have to be delayed until each office can complete its FEC report for the month of July. This report is due in Dallas by August 8.

We anticipate that all regularly recurring invoices, as well as any other invoices, will be received in the local offices by August 15. Therefore, we are asking that all existing checking accounts be closed no later than August 15, 1992. Before closing each account, however, any remaining balance in the account should be used to pay any outstanding invoices. In the event you wish to maintain an existing account as the one primary account for your state, see the details in the following section.

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Opening a new checking account

A form has been attached to this memorandum which sets out the information that we will need with respect to your new checking account. In the event you decide to retain your current account as the one account for the state, please go ahead and complete this form anyway. At a minimum, the account information will need to be updated to include the name of the Dallas field rep who will become a signatory on that account. You will likely want to delete some of the prior signatories. We suggest that the number of signatories be limited to yourself, one other person from your state, plus the Dallas field rep.

In the event you are opening a new checking account, we suggest using the following style:

Perot Petition Committee—*your state name*

The continued use of the name *Perot Petition Committee* is explained on page 4.

When you attempt to open a new account, your bank officer will probably request documentation authorizing you to do so. We will furnish to the bank a resolution authorizing you to open the account. An example of that resolution is included with this memorandum.

When you have completed the *Checking Account Information Sheet*, please mail it to Susan Elley at the Perot Petition Committee headquarters. You may also fax it to her at 214-716-6669. Based upon information contained on that form, she will prepare and issue a resolution enabling you to open the account.

Please note, this procedural explanation assumes that the events will occur in this order:

1. You fill out and return the *Checking Account Information Sheet* to Dallas
2. Dallas will issue a resolution to the bank authorizing you to open the account.

In fact, the procedure may have to be reversed to suit the bank. That is, you may not be able to open the account (and therefore obtain an account number) without the resolution. In that case, fax the following information to Susan Elley:

- Name of person opening the account (probably yourself)
- Signatories on the account, including the Dallas field rep
- Name of the bank
- Street address, city, state, and zip
- Name and fax number of the bank officer

Susan will then fax the resolution to the account officer. Once the account number has been assigned, the *Checking Account Information Sheet* can be completed and returned to Dallas... The account can then be funded as discussed below.

Funding for continuing operations

The account will be funded with a wire transfer of \$7,500 from Dallas upon the receipt by Dallas of a completed *Checking Account Information Sheet* and due authorization of the signatories, including the Dallas field rep, on the account. This amount is intended to cover

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August 3, 1992

the operating expenses of your state operation for the month of August. In those states that contain more than one office, we will send \$7,500 for each additional office at the same time. Assuming your state operation remains active, we will transfer an additional \$7,500 to your account at the beginning of September upon receipt by us from you of documentation of your August receipts and disbursements. We will transfer a final \$7,500 at the beginning of October upon receipt of your September information.

The \$7,500 is intended to cover such items as office rental, equipment rental, utilities and supplies. No salaries may be paid from the \$7,500. You should probably establish a requirement of prior approval (by yourself) for anyone in your operation who will be authorized to spend the funds which have been allocated to your state. This will enable you to stay within your \$7,500 ceiling.

All invoices relating to the operation of the state offices should be paid from the state checking accounts. You should make certain that these invoices are paid in a timely manner and that all necessary supporting documentation is maintained in your files in accordance with FEC requirements.

Continued FEC reporting responsibilities

Even though Ross Perot has announced he is no longer a candidate for president, he remains subject to the FEC reporting requirements. For this reason, you must maintain your records in a manner which will support the FEC requirements. These reporting and record keeping requirements are detailed for you in a separate memorandum which is enclosed. Although this memorandum was originally issued on April 28, 1992 when the effort was directed at getting Ross Perot on the ballot, the principles described therein remain applicable even though the context may now be different. In short, all expenditures must be accompanied by a valid invoice or receipt and the purpose reflected on the "memo" line of the check; any contributions must be "legal" (e.g., not from a corporation or a foreign enterprise) and deposited within 10 days to your authorized account and reflect name, address, amount, and, if over \$200, occupation and employer.

The FEC reporting function will continue to be handled by personnel from Ernst & Young in Dallas. To supplement this effort, we have retained representatives from Aristotle Industries, the producers of the *Campaign Manager II* software package. Representatives from Aristotle will be visiting your office on a periodic basis to answer any questions and assist in the accumulation of documentation that should be returned to Dallas. If you are in need of immediate assistance with the software, please contact Dean Phillips at 214-716-6424 to arrange an earlier visit.

Use of the Name *United We Stand*

The transition from a petition drive to a movement under the name *United We Stand* marks the beginning of a new era in American politics. Because this movement grew out of the unannounced candidacy of Ross Perot, and because he remains subject to the FEC reporting requirements, the use of the name *United We Stand* in conjunction with the Perot Petition

Committee may be somewhat confusing until after the election. Although the following explanation may not resolve the confusion, it will provide a procedural course of action.

For contractual purposes, we suggest that you use the name

Perot Petition Committee — *your state name*

This name should be used for entering into leases, for utility connections, and any other day-to-day transactions. Remember, we are not liable on any such commitments you make — and you as signer could be held liable if you misbudget your resources. We will contact you later about the procedures for transitioning to the use of *United We Stand* for contractual purposes.

You may want to begin to use the name *United We Stand* for operational purposes. For example, you may wish to display the name on a storefront. This is acceptable, but some very important qualifications need to be made clear. If your state organization intends to solicit funds or hold fund raising activities, great caution must be taken. We do not want to mislead anyone into thinking that *United We Stand* is at this time an organization separate and apart from the Perot Petition Committee. The Perot Petition Committee and FEC regulatory control will come to an end soon after the election, but we have every hope that *United We Stand* will continue on as a independent entity. However, for the next three months or so, the two organizations are one and the same for FEC purposes. Any funds collected by your organization under the name of *United We Stand* must be deposited into your authorized checking account of the Perot Petition Committee and must be first approved by Dallas to assure it is raised and recorded in compliance with FEC rules. As an additional measure of disclosure, we have included a new form for the collection of data about a contribution.

Thank you once again for participating in this group. While there may be some procedural uncertainty over the course of the next three months, there was little doubt as to your objectives when you left Dallas last week. The staff of the Perot Petition Committee will attempt to deal with the procedural problems, thereby enabling you to focus on the important issues of your new movement.

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Perot Petition Committee
P. O. Box 517010
Dallas, Texas 75251-7010

IT IS HEREBY RESOLVED, that John Jones shall have authority to open a checking account with Central Bank located at 1234 Main Street, Topeka, Kansas in the name of the Perot Petition Committee with John Jones, Sue Smith, and Bill Harris as authorized signatories on such account, and to take any and all such action as may be appropriate or advisable in connection with the opening of said account, including the execution of such documents as may be necessary or advisable on behalf of the Perot Petition Committee.

EXECUTED this 3rd day of August, 1992.

PEROT PETITION
COMMITTEE

By: _____
Mike Poss, Treasurer

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Date: _____

CHECKING ACCOUNT INFORMATION SHEET

STATE OF _____

Region _____

Account Name or Style: _____

Bank: _____

Bank Street Address: _____

City, State, Zip: _____

Account Officer: _____

Officer's Phone Number: _____

Bank Fax Number: _____

ABA Number of Bank (9 digits): _____

Checking Account Number: _____

Federal Identification Number: _____

State Committee person opening account: _____

Authorized Signatories: State - _____

State - _____

Dallas - _____

State PPC Coordinator: _____

Work Phone: _____ Home Phone: _____

State PPC Treasurer: _____

Work Phone: _____ Home Phone: _____

State PPC Office Street Address: _____

City, State & Zip: _____

State Office Phone Number: _____

State Office Fax Number: _____

Person Completing this form: _____

Person Requesting account: _____

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PEROT PETITION COMMITTEE

P.O. Box 517025
DALLAS, TEXAS 75251-7025
(214)716-6600

ENCLOSED IS MY CONTRIBUTION TO THE "PEROT PETITION COMMITTEE" IN THE AMOUNT OF: _____ (INDIVIDUALS ARE PERMITTED BY LAW TO GIVE UP TO \$1,000 IN A GENERAL ELECTION. FEDERAL LAW PROHIBITS CORPORATE CONTRIBUTIONS).

FORM OF PAYMENT:

- | | |
|---|--|
| <input type="checkbox"/> CURRENCY (LIMIT \$100) | <input type="checkbox"/> PERSONAL CHECK |
| <input type="checkbox"/> MONEY ORDER | <input type="checkbox"/> CASHIER'S CHECK |

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Occupation: _____

Employer: _____

Telephone Number: _____

Daytime: _____ Evening: _____

The Perot Petition Committee must be provided with the above information and data for each person making a contribution.

FEDERAL LAW REQUIRES THE FOLLOWING DISCLOSURE: CONTRIBUTIONS OR GIFTS TO THE PEROT PETITION COMMITTEE ARE NOT DEDUCTIBLE AS CHARITABLE CONTRIBUTIONS FOR FEDERAL INCOME TAX PURPOSES.

PAID FOR BY THE PEROT PETITION COMMITTEE

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AFFIDAVIT OF MARK T. CONLON

STATE OF NEW YORK)
)
) ss.
COUNTY OF BROOME)
)

1. My name is Mark T. Conlon. I served as the volunteer chairman of Broome County, New York and as the regional coordinator for the surrounding area for Perot '92 (formerly the Perot Petition Committee and hereinafter referred to as the "Committee") until the election in November 1992. My address is 2 South Mountain Terrace, Binghamton, New York 13903.

2. As volunteer regional coordinator, I was responsible for accounting for receipts and disbursements, gathering and maintaining records and forwarding the records to the Committee's state accounting office in New York City for preparation of the Committee's reports filed with the Federal Election Commission ("FEC"). I received and reviewed the Committee's memoranda concerning FEC compliance and reporting procedures and outlining its demands for strict compliance by volunteers with FEC regulations.

3. On May 14, 1992, Mike Poss, the Committee's Treasurer, authorized me to open a bank account at Endicott Trust in Endicott, New York, which the Committee designated as a campaign depository. In my position as volunteer coordinator, I accepted contributions from supporters and deposited them in the bank account at Endicott Trust. I also made disbursements out of the account. In accordance with the Committee's policies and procedures, volunteers in our office made a copy of each contribution check received and I deposited the checks in the campaign depository and forwarded the records pertaining to the contributions to the Committee's state accounting office in New York City for inclusion in the Committee's FEC reports. I

9404353112

also accounted for all disbursements made out of the campaign depository account and reported them to the Committee's state accounting office and maintained the appropriate records required by FEC regulations.

4. I came to know of Louis R. Centorani because he was one of thousands of individuals who occasionally volunteered in the petition drive that placed Ross Perot's name on the New York ballot. Mr. Centorani never served the Committee in any official capacity. Although Mr. Centorani claims to be chairman of the "ad hoc committee of the Ross Perot Petition Committee of Broome County," to the best of my information and belief, no such committee exists.

5. I received two contributions from Mr. Centorani's wife, Isabella Centorani, in the amounts of \$25.00 and \$100.00, respectively. I also received one contribution from Lillian Kumpikas in the amount of \$10.00. I made a copy of each check and then deposited the check in the campaign depository account at Endicott Trust within ten days of receiving it. I forwarded the records pertaining to these contributions to the Committee's state accounting office in New York City.

6. I did not receive Mrs. Centorani's contribution made by check dated May 14, 1992, payable to "People for Perot." To the best of my information and belief, Mr. or Mrs. Centorani sent this check to the People for Perot office in New York City pursuant to a mail solicitation that People for Perot volunteers mailed to persons throughout New York.

7. After the election in November, Mr. Centorani demanded that I provide him with an accounting of the receipts and disbursements of the campaign depository account. I declined to give him this information and referred him to the Committee's reports on file with the FEC, which are public documents. Mr. Centorani showed me the three canceled checks that Mrs. Centorani gave as contributions, two of which were payable to the Perot Petition Committee and the other payable to People for Perot. He claimed that these checks were each deposited into different accounts because the

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account numbers on the backs of the checks did not match. I explained to him that the checks I received were all deposited in the campaign depository account at Endicott Trust and that the information was included in the Committee's FEC reports.

8. Neither the Committee, its Treasurer, Mike Poss, nor I ever authorized, sanctioned or condoned any conduct in violation of the FEC's regulations.

9. All of the foregoing is true and accurate to the best of my information and belief.



Mark T. Conlon

Subscribed and sworn to before me this 20th day of April, 1993.

SUSANN L. FALKIN
Notary Public, State of New York
No. 7584633
Residing in Broome County
Expires April 30, 1994

Notary Public

My commission expires: 4/30/94

SEAL

94043523114

AFFIDAVIT OF RON DIDONNA

STATE OF NEW YORK)
)
) ss.
COUNTY OF SCHENECTADY)
)

1. My name is Ron DiDonna. I served as the volunteer state chairman of Perot '92 (formerly the Perot Petition Committee and hereinafter referred to as the "Committee") for New York until the election in November 1992. My address is RD #7, 215 Gower Road, Scotia, New York 12302-9444.

2. As volunteer state coordinator, I organized volunteer efforts in New York for Ross Perot's presidential campaign. I also assisted the Committee in overseeing volunteers' compliance with the Federal Election Commission ("FEC") regulations and the Committee's policies and procedures.

3. Mark T. Conlon served as the Committee's volunteer chairman of Broome County, New York and as the volunteer regional coordinator for the surrounding area. He was responsible for accounting for receipts and disbursements and maintaining proper records in his region and forwarding the records to the Committee's state accounting office in New York City.

4. In November or December 1992, Louis R. Centorani called me and demanded a full accounting of monies raised and spent in Broome County area. I explained that the Committee's reporting obligation was to the FEC, not to individuals. I also advised Mr. Centorani that I would speak with Mike Morris, the Committee's chief accounting officer in New York with responsibility for preparing the Committee's FEC report for New York, to confirm that Mr. Conlon had complied with FEC reporting requirements and the Committee's policies and procedures. Mr. Morris assured me that Mr. Conlon's records were in order and in compliance with FEC

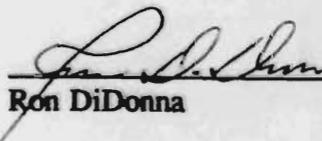
9404353115

regulations. I then called Mr. Centorani and informed him that Mr. Conlon's reports were fully satisfactory. Nevertheless, he insisted that a formal accounting be made to him.

5. To the best of my information and belief, Mr. Centorani never served the Committee in any official capacity. Although Mr. Centorani claims to be chairman of the "ad hoc committee of the Ross Perot Petition Committee of Broome County," to the best of my information and belief, no such committee exists.

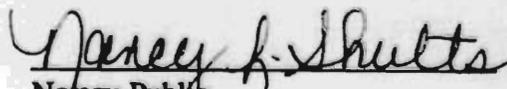
6. Neither the Committee, its Treasurer, Mike Poss, nor I ever authorized, sanctioned or condoned any conduct in violation of the FEC's regulations.

7. All of the foregoing is true and accurate to the best of my information and belief.



Ron DiDonna

Subscribed and sworn to before me this 22nd day of April, 1993.



Notary Public

My commission expires:

NANCY L. SHULTS
Notary Public in the State of New York
Residing in Schenectady County
My Commission Expires Dec. 31, 3-15-95

SEAL

9 4 0 4 3 5 2 3 1 1 6

Before the
FEDERAL ELECTION COMMISSION

_____))
In the Matter of))
Mark T. Conlon)) MUR 3748
_____))

FEDERAL RECEIVED
OFFICE OF THE GENERAL COUNSEL
93 APR 26 PM 3:41

To: Office of the General Counsel

RESPONSE OF MARK T. CONLON

Mark T. Conlon hereby responds to the complaint submitted by Louis R. Centorani, dated March 3, 1993.¹

I. INTRODUCTION

Mr. Centorani does not allege that Mr. Conlon, the volunteer regional coordinator for Perot '92 (formerly the Perot Petition Committee² and hereinafter referred to as the "Committee") for the area in which Mr. Centorani resides, violated any Federal Election Commission ("FEC") regulations. He only complains that Mr. Conlon declined his demand for an accounting of disbursements with respect to the campaign depository account on which Mr. Conlon was signatory. He also requests that the FEC assist him in obtaining the records for that account. Mr. Centorani has been repeatedly informed, however, that the information he seeks is included in the Committee's reports on file with the FEC and that the Committee is not required to provide him an accounting of its bank account activities.

¹ By letter dated March 31, 1993, Mr. Conlon requested an extension of time through April 26, 1993 to submit this response. By letter dated April 1, 1993, the Office of the General Counsel granted that extension request.

² By letter dated October 5, 1992, the Perot Petition Committee changed its name to Perot '92 by amending its Statement of Organization.

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In his complaint, Mr. Centorani implies that three contributions in amounts totaling \$135.00 made by Mrs. Centorani and a \$10.00 contribution made by Lillian Kumpikas may not have been deposited into the campaign depository account. However, Mr. Conlon received three of these contributions and deposited them in the campaign depository account. The fourth contribution was not given to Mr. Conlon but was sent to New York City and deposited in another campaign depository.

Mr. Conlon understands that the Committee has reported each of these contributions to the FEC and maintained proper records concerning these contributions in accordance with FEC regulations. The contributions are not itemized in the Committee's FEC reports, however, because the contributions do not exceed or aggregate in excess of \$200.00.

II. FACTUAL SUMMARY

Mr. Conlon served as the Committee's volunteer chairman of Broome County, New York and as the volunteer regional coordinator for the surrounding area. See Affidavit of Mark T. Conlon (Tab A). On May 14, 1992, Mike Poss, the Committee's Treasurer, authorized Mr. Conlon to open a bank account at Endicott Trust in Endicott, New York, which the Committee designated as a campaign depository. See Exhibit 1. Mr. Conlon was responsible for keeping proper records of receipts and disbursements in his region and forwarding the records to the state accounting office in New York City, where the Committee prepared its monthly FEC reports for New York. Louis R. Centorani was one of thousands of individuals who occasionally volunteered in the petition drive that placed Mr. Perot's name on the New York ballot. See Affidavit of Mark T. Conlon. Although Mr. Centorani claims to be chairman of the "ad hoc committee of the Ross Perot Petition Committee of Broome County," no such committee exists. See Affidavit of Mark T. Conlon.

After the election, Mr. Centorani demanded that Mr. Conlon provide him an accounting of the Committee's campaign depository account activity. Mr. Conlon would not provide Mr. Centorani with this information and referred him instead to the Committee's FEC reports, which are public documents. See Affidavit of Mark T. Conlon. Mr. Centorani was not satisfied and called the Committee's state volunteer coordinator, Ron DiDonna, and again demanded that a full accounting of receipts and disbursements in the Broome County area be made to him. After conferring with Mike Morris, the Committee's chief accounting officer in New York with responsibility for preparing the Committee's FEC report for New York, Mr. DiDonna advised Mr. Centorani that Mr. Conlon's accounting and reports were in order and in compliance with FEC regulations. See Affidavit of Ron DiDonna (Tab B). Mr. Centorani still insisted that a personal accounting be made to him and filed this complaint with the FEC.

**III. MR. CONLON DEPOSITED
THE CONTRIBUTIONS IN QUESTION AND
COMPLIED WITH FEC REGULATIONS**

As volunteer chairman, Mr. Conlon accepted contributions from local supporters, including three of the four contributions to which Mr. Centorani refers in his complaint: two contributions from Mrs. Centorani in the amounts of \$25.00 and \$100.00, respectively, and one contribution from Lillian M. Kumpikas in the amount of \$10.00. In accordance with Committee policy and FEC regulations, Mr. Conlon made copies of each of these checks, deposited them within ten days in the campaign depository, Endicott Trust, and forwarded the records to the Committee's state accounting office in New York City for inclusion in the Committee's FEC report. See Exhibit 2 and Affidavit of Mark T. Conlon. Mr. Conlon understands that these

contributions are included in the Committee's FEC reports but are unitemized because they are not contributions in amounts in excess of \$200.00.³

Mr. Conlon did not receive Mrs. Centorani's \$10.00 contribution made by check dated May 14, 1992, payable to "People for Perot," a group of volunteers in New York City. See Affidavit of Mark T. Conlon. Mr. Centorani sent this contribution directly to the People for Perot office in New York City pursuant to a mail solicitation. See Exhibit 3. Consequently, that check was deposited in a different campaign depository, Chemical Bank. Mr. Conlon understands this contribution is included in the Committee's FEC report but is unitemized.

Mr. Centorani apparently demands an accounting of the Committee's campaign depository account activity because he claims that the account numbers on the backs of the four checks which he identifies in his complaint "do not match." As documented in this response and the attached Exhibits, however, Mr. Conlon deposited the three contributions he received in the campaign depository account at Endicott Trust. The other contribution was not sent to Mr. Conlon but was nevertheless deposited in a campaign depository account at Chemical Bank. Mr. Conlon also forwarded records pertaining to the contributions to the Committee's accounting office and otherwise properly handled the contributions in accordance with FEC requirements and the Committee's policies and procedures. Thus, there is no basis whatsoever for Mr. Centorani's complaint. His insistence on obtaining the Committee's bank account records is misplaced because the only information that he is entitled to review is publicly available in the Committee's reports on file with the FEC. Declining to furnish Mr. Centorani with the Committee's bank account records is not a violation of FEC regulations

³ Mr. Conlon understands that the Committee will report Mrs. Centorani's \$100.00 contribution by amendment to be filed subsequently by the Committee.

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IV. CONCLUSION

For the reasons set forth herein, Mark T. Conlon denies the complaint of Louis R. Centorani and respectfully requests that the Commission find no reason to believe that the complaint sets forth a possible violation of the Act and to find that he has demonstrated that no action should be taken against him in response to the complaint. Therefore, Mr. Conlon requests that the Commission close its file in the matter of MUR 3748.

Pursuant to 2 U.S.C. § 437g (a) (12) and 11 C.F.R. § 111.21, the undersigned hereby requests confidential treatment of this response, the letter to which this response is directed and all submissions and findings related thereto.

Respectfully submitted,

By:

R. Clayton Mulford

R. Clayton Mulford, Esq.
Hughes & Luce, L.L.P.
1717 Main Street
Suite 2800
Dallas, Texas 75201
214-939-5416

Attorney for Mark T. Conlon

Dated: April 23, 1993

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1

FILE COPY

Perot Petition Committee

1100 Lakeside Square
12377 Merit Drive
Dallas, Texas 75251

Phone: 214-419-5000

TO: John Westcott
COMPANY: Endicott Trust
FAX: 607-772-0852
FROM: Mike Poss
DATE: May 14, 1992

This is the first page of 2 pages(s) being transmitted. If you fail to receive the entire transmission, please call the above number.

Attached is a resolution from the Perot Petition Committee authorizing Mark Conlon to establish a checking account on behalf of the Perot Petition Committee.

Please note that although the resolution appears to imply that the style of the account should be "Perot Petition Committee," the New York committee is free to use the style of their choice. For example, they may wish to use "New Yorkers for Perot," or a similar name.

However, the federal identification number to be used on the account should be that of the Perot Petition Committee. That number is 75-2421811.

If you have any questions, do not hesitate to contact me at 214-788-3030.

Thank you for your assistance.

9404353122

Perot Petition Committee

1100 Lakeside Square

Dallas, Texas 75251

IT IS HEREBY RESOLVED, that Mark Conlon shall have authority to open a checking account with Endicott Trust located at 89-91 Court Street, Binghamton, NY 13901 in the name of the Perot Petition Committee with Mark Conlon, Ernest Skiadas and M. Suzanne McMahon as authorized signatories on such account, and to take any and all such action as may be appropriate or advisable in connection with the opening of said account, including the execution of such documents as may be necessary or advisable on behalf of the Perot Petition Committee.

EXECUTED this 14th day of May, 1992.

PEROT PETITION
COMMITTEE

By:

Mike Poss

Mike Poss, Treasurer

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(607) 757-2922

March 24, 1993

Re: Binghamton Perot Petition Committee
P. O. Box 427 South View Station
Binghamton, New York 13903

Account No. 1400034733

To Whom it May Concern:

This is to certify that the following checks were deposited into the above referenced account by Mark Conlon, a signer on the account, who has no other accounts with M & T Bank:

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Check No.	Drawn On	Amount	Written By	Deposit Date
4735	M & T Bank	\$100.00	Isabella Centorani	07-17-92
1277	Citizens & Northern	24.00	Jerry Baldwin	07-17-92
4685	M & T Bank	25.00	Isabella Centorani	05-22-92
115	IBM Credit Union	25.00	Verner D. Coombs	05-22-92
543	Binghamton Savings	10.00	Lillian Kumpikas	05-18-92

Copies of these checks are attached, as are copies of the corresponding deposit slips.

If I can be of further assistance, please do not hesitate to call me at 607-723-8245.

Very truly yours,

M & T BANK

Patricia D. Matruski
Patricia D. Matruski
Banking Officer

PDM:mlq
Enc.

STATE OF NEW YORK
COUNTY OF BROOME

Sworn to and before me on this
25 day of March, 1993.

Mary Lou Quinn

Notary Public

MARY LOU QUINN
Notary Public, State of New York
Qualified in Broome County
My Commission Expires Apr. 30, 1995

Director's Committee
 DATE 5/18 1992
 DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

TOTAL FROM OTHER SIDE	1175.00
TOTAL	1788.75

50-1003/213
 USE OTHER SIDE FOR ADDITIONAL LISTING.
 ENTER TOTAL HERE
 BE SURE EACH ITEM IS PROPERLY ENDORSED

Endicott Trust
 A MIDLAND BANK
 Endicott Trust Company
 35-41 War Jagton Ave.
 P.O. Box 8020
 Endicott, NY 13760-8020

№ 6400034733

CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE PROVISIONS OF THE UNIFORM COMMERCIAL CODE OR ANY APPLICABLE COLLECTION AGREEMENT

icott Trust

Receipt

Account Number 14 000 34733

venience, use your ac-
 to bank 24 hours a day
 omatic teller machines.

The transaction number, date, time, transaction description, and amount appear below. Checks and other items are received for deposit subject to the terms and conditions of the bank's collection agreement.

Thank you! We appreciate your business.

7301 7462 DDA DEP MIXED (05/18/92) 09:04 \$ ###1788.75

CHECKS LIST SEQUENTIAL	DOLLARS	CENTS
1. Bernadette	10.00	00
2. Kumples	10.00	00
3. T. H. Brecht	10.00	00
4. Jones	20.00	00
5. McMillan	25.00	00
6. Schneider	25.00	00
7. Chamberlain	100.00	00
8. Foy	5.00	00
9. etc.	10.00	00
10. Carkey	10.00	00
11. Jackson	20.00	00
12. Ross	45.00	00
13. Miller	25.00	00
14. Malone	25.00	00
15. Ferner	100.00	00
16. Rowan	100.00	00
17. Egan-Dougan	100.00	00
18. Thury	100.00	00
19. Cephus	10.00	00
20. Althuis	25.00	00
21. Greene	25.00	00
22. Mende	25.00	00
23. Hausmann	25.00	00
24. Hausmann	25.00	00
25. Mitchell	50.00	00
26. Baker	50.00	00
27. Resuto	100.00	00
28. T. C. Smith	10.00	00
29. Phillips	15.00	00
30. Baldwin	50.00	00
31. Rice	25.00	00
TOTAL	1175.00	00

ENTER TOTAL ON THE FRONT OF THIS TICKET

Teacher - ME - 750.00
 Teacher - PAGES - 724-3705

1788.75
 12.-
 1800.75
 750.-
 1050.75

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DS

2004/1/15
D.P. 5/15

LILLIAN M. KURPIKAS 11-88 543

[Redacted] May 17 1992

PAY TO THE ORDER OF Peppet Petition Committee \$ 10.00

Ten 00 DOLLARS

Binghamton Savings Bank
MEMBER FDIC
 140 FERRY STREET, BINGHAMTON, NEW YORK 13902

MEMO Lillian Kurpikas

[Redacted]

94043523126

001040261850 551552

689310070 05189209

1111 855 2

DO NOT WRITE STAMP OR SIGN BELOW THIS LINE

FEDERAL RESERVE NOTE

FEDERAL RESERVE NOTE

FEDERAL RESERVE NOTE

↑
C-7 9205

Mark Conlon

9 4 0 4 3 5 3 1 2 7

DEPOSIT TICKET



BINGHAMTON PEROT
PETITION COMMITTEE
P.O. BOX 427 SVS
BINGHAMTON, NY 13903

DATE 7/17 1992
DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

CASH →	483.00
TOTAL	629.40
TOTAL	1112.40



50-1003/213

USE CHECKS ONLY FOR
ADDITIONAL DEPOSITS
• MUST BE PAID TO THE

BE SURE EACH ITEM IS
PROPERLY ENDORSED

M&T Bank
Manufacturers and Traders Trust Company
Endicott Trust Division

M&T Bank
Endicott Trust Division
31-41 Washington Ave
P.O. Box 9027
Endicott, NY 13760-9020

4400034733#

CHECKS	LIST SIGNATURE	DOLLARS	CENTS
1	Bing Perot Petition Com	183	-
2	I. Carpani	100	-
3	J. Baldwin	34	-
4	C. Erle	12	-
5	S. Wells	114	-
6	S. Wells	52	-
7	K. Brister	25	-
8	R. O'Brien	7	-
9	B. Sherman	5	-
10	K. Martin	12	-
11	R. O'Brien	12	-
12	R. Hoban	10	-
13	D. Jackson	23	40
14	D. Houghtalen	50	-
15			
16			
17			
18			
19			
	TOTAL	629	40

ENTER TOTAL ON THE FRONT OF THIS TICKET

94043523128

ISABELLA CENTORANI 4735
 [REDACTED]
 July 7 1992 50-1003/213
 PAY TO THE ORDER OF Ross Perot Petition Committee \$ 100⁰⁰
 One hundred and no cents DOLLARS
 Endicott Trust A MIDLANTIC BANK
 Endicott Trust Company
 35-21 Washington Ave
 P.O. Box 8020
 Endicott, NY 13760-8020
 MEMO Isabella Centorani
 [REDACTED]

JERRY J. OR JANICE I. BALDWIN 1-74 1277
 [REDACTED]
 6-29 1992 50-153/315
 PAY TO THE ORDER OF PEROT PETITION COMMITTEE \$ 24.00
 Twenty Four + ⁰⁰/₁₀₀ DOLLARS
 CITIZENS & NORTHERN BANK
 ATHENS, PA 18810
 MEMO DONATION FOR (2) T-SHIRTS Jerry Baldwin
 [REDACTED]

PEOPLE FOR PEROT

11 West 42nd Street - Suite 3100, New York, New York 10036-8002
Telephone: (212) 750-1202

Fax: (212) 750-1280



May 1992

Fellow Perot Supporter:

We were delighted to hear from the Perot Petition Committee in Dallas that you were among the thousands of Americans who volunteered to help place Mr. Perot on the Presidential ballot.

The Perot petition drive in New York is a genuine grass roots volunteer effort to effect a major change in the present political system. It is staffed entirely with volunteers who, like you, are fed up with "business as usual" and a government that is out of touch.

We hope you will take an active part in the independent nomination process in New York because there are very specific ways you can help.

New York law makes it very expensive and difficult for an independent candidate to get on the ballot. We must gather petition signatures from over 20,000 people from at least sixteen of the State's thirty-one Congressional Districts between July 7th and August 18th (unless these dates are changed by pending State legislation). We are preparing to gather at least 100,000 signatures and overcome any challenge to our petitions.

Please let us know how you want to participate by returning the enclosed volunteer form to us right away, or calling us at (212) 730-1202. These activities are underway for each Congressional District:

- 1) We are identifying people who want to sign petitions for Perot and are eligible to do so because they did not vote in the April Democratic Presidential primary and did not sign any Presidential nominating petitions.

94043523129

- 2) We are recruiting people to gather signatures on the petitions. These people will be instructed on how to do it properly so the petition will survive legal challenge.
- 3) We are recruiting additional volunteers to help to organize and support these activities.
- 4) As a grass roots organization, we will need some money for the expense of supporting these activities - printing, postage, telephones, and maintaining headquarters to get Ross Perot on the ballot in New York.

We must accomplish all this in a very short time and will certainly succeed if the people who called in will now go to work. Please fill in the enclosed volunteer form and return it to us right away so we can make the best use of whatever resources you have to offer.

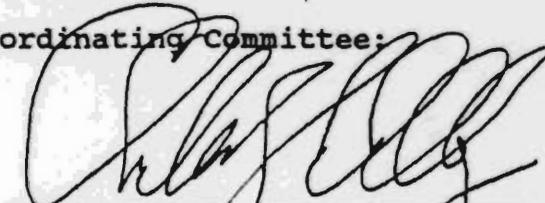
Your response will be referred to the appropriate Congressional District organizers and you will be called soon after you return this form to us.

Thanks - we appreciate your help and interest and are proud to be working together with you in an historical effort to place Ross Perot's name on the 1992 New York State Presidential ballot and elect him as an independent President who will involve the people as the real owners of America.

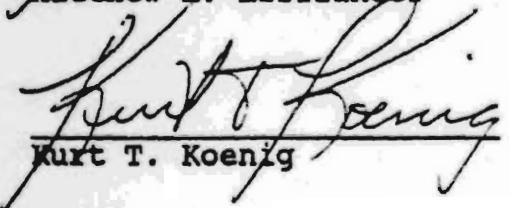
People for Perot Coordinating Committee:



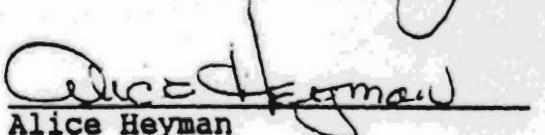
 Matthew L. Lifflander



 Charles F. Donnelly



 Kurt T. Koenig



 Alice Heyman

94043523130

To:

PEOPLE FOR PEROT



11 West 42nd Street - Suite 5100, New York, New York 10036-8002

Telephone: (212) 750-1202

Fax: (212) 750-1280

- Sign Petition when the time comes (July 7 - August 18).
- Ask others to sign Petition and let us know who they are.
- Carry Petitions - get others to sign.
- Help organize the campaign by working at headquarters or making phone calls. My particular skills are:

Ask people for money to support the effort.

Enclosed is my own contribution to "People for Perot" in the amount of:

\$5 \$10 \$25 \$50 \$100 \$250 \$500 \$1,000

Name: _____

Address: _____

City: _____

State: _____

Zip: _____

Occupation: _____

Employer: _____

Telephone Number: _____

Daytime Phone: _____

Evening Phone: _____

Individuals are permitted by law to give up to \$1,000 in a General Election. Federal law prohibits corporate contributions. Contributions are not tax-deductible for Federal income tax purposes. We must include the above information for each individual making a contribution.

9 4 0 4 3 5 3 1 3 1

4681

PAY TO THE ORDER OF People For Perot \$ 10.00

Ten dollars + no cents DOLLARS

Endicott Trust
A MIDLAND BANK

Endicott Trust Company
33-41 Washington Ave.
P.O. Box 9829
Endicott, NY 13760-9829

MEMO Luabella Centorami

ROT

8002

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gust 18).

they are.

- Carry Petitions - get others to sign.
- Help organize the campaign by working at headquarters or making phone calls. My particular skills are:
I'm a former reporter and columnist. I also was a public relation aide for Sen. E. I. Hatchback in Albany and also for Sen. Warren Anderson.

- Ask people for money to support the effort.
- Enclosed is my own contribution to "People for Perot" in the amount of:
 \$5 \$10 \$25 \$50 \$100 \$250 \$500 \$1,000

Name: Louis R. Centorami

Address: 31 Spring Street

City: Binghamton State: N.Y. Zip: 13903

Occupation: retired

Employer: _____

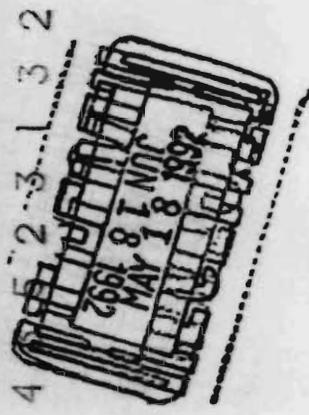
Telephone Number: _____

Daytime Phone: [REDACTED]

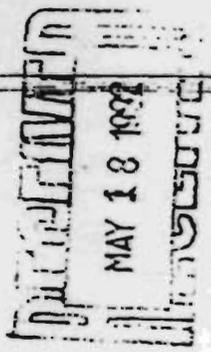
Evening Phone: Same

Individuals are permitted by law to give up to \$1,000 in a General Election. Federal law prohibits corporate contributions. Contributions are not tax-deductible for Federal income tax purposes. We must include the above information for each individual making a contribution.

over



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(A)

AFFIDAVIT OF MARK T. CONLON

STATE OF NEW YORK)
)
) ss.
 COUNTY OF BROOME)
)

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1. My name is Mark T. Conlon. I served as the volunteer chairman of Broome County, New York and as the regional coordinator for the surrounding area for Perot '92 (formerly the Perot Petition Committee and hereinafter referred to as the "Committee") until the election in November 1992. My address is 2 South Mountain Terrace, Binghamton, New York 13903.

2. As volunteer regional coordinator, I was responsible for accounting for receipts and disbursements, gathering and maintaining records and forwarding the records to the Committee's state accounting office in New York City for preparation of the Committee's reports filed with the Federal Election Commission ("FEC"). I received and reviewed the Committee's memoranda concerning FEC compliance and reporting procedures and outlining its demands for strict compliance by volunteers with FEC regulations.

3. On May 14, 1992, Mike Poss, the Committee's Treasurer, authorized me to open a bank account at Endicott Trust in Endicott, New York, which the Committee designated as a campaign depository. In my position as volunteer coordinator, I accepted contributions from supporters and deposited them in the bank account at Endicott Trust. I also made disbursements out of the account. In accordance with the Committee's policies and procedures, volunteers in our office made a copy of each contribution check received and I deposited the checks in the campaign depository and forwarded the records pertaining to the contributions to the Committee's state accounting office in New York City for inclusion in the Committee's FEC reports. I

also accounted for all disbursements made out of the campaign depository account and reported them to the Committee's state accounting office and maintained the appropriate records required by FEC regulations.

4. I came to know of Louis R. Centorani because he was one of thousands of individuals who occasionally volunteered in the petition drive that placed Ross Perot's name on the New York ballot. Mr. Centorani never served the Committee in any official capacity. Although Mr. Centorani claims to be chairman of the "ad hoc committee of the Ross Perot Petition Committee of Broome County," to the best of my information and belief, no such committee exists.

5. I received two contributions from Mr. Centorani's wife, Isabella Centorani, in the amounts of \$25.00 and \$100.00, respectively. I also received one contribution from Lillian Kumpikas in the amount of \$10.00. I made a copy of each check and then deposited the check in the campaign depository account at Endicott Trust within ten days of receiving it. I forwarded the records pertaining to these contributions to the Committee's state accounting office in New York City.

6. I did not receive Mrs. Centorani's contribution made by check dated May 14, 1992, payable to "People for Perot." To the best of my information and belief, Mr. or Mrs. Centorani sent this check to the People for Perot office in New York City pursuant to a mail solicitation that People for Perot volunteers mailed to persons throughout New York.

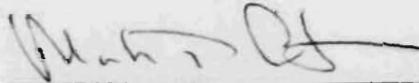
7. After the election in November, Mr. Centorani demanded that I provide him with an accounting of the receipts and disbursements of the campaign depository account. I declined to give him this information and referred him to the Committee's reports on file with the FEC, which are public documents. Mr. Centorani showed me the three canceled checks that Mrs. Centorani gave as contributions, two of which were payable to the Perot Petition Committee and the other payable to People for Perot. He claimed that these checks were each deposited into different accounts because the

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account numbers on the backs of the checks did not match. I explained to him that the checks I received were all deposited in the campaign depository account at Endicott Trust and that the information was included in the Committee's FEC reports.

8. Neither the Committee, its Treasurer, Mike Poss, nor I ever authorized, sanctioned or condoned any conduct in violation of the FEC's regulations.

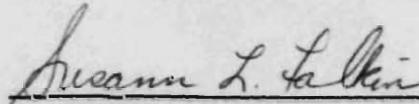
9. All of the foregoing is true and accurate to the best of my information and belief.



Mark T. Conlon

Subscribed and sworn to before me this 20th day of April, 1993.

SUSANN L. FALKIN
Notary Public, State of New York
No. 7584093
Residing in Broome County
My Commission Expires April 30, 1994


Notary Public

My commission expires: 4/30/94

SEAL

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(B)

AFFIDAVIT OF RON DIDONNA

STATE OF NEW YORK)
)
) ss.
COUNTY OF SCHENECTADY)
)

1. My name is Ron DiDonna. I served as the volunteer state chairman of Perot '92 (formerly the Perot Petition Committee and hereinafter referred to as the "Committee") for New York until the election in November 1992. My address is RD #7, 215 Gower Road, Scotia, New York 12302-9444.

2. As volunteer state coordinator, I organized volunteer efforts in New York for Ross Perot's presidential campaign. I also assisted the Committee in overseeing volunteers' compliance with the Federal Election Commission ("FEC") regulations and the Committee's policies and procedures.

3. Mark T. Conlon served as the Committee's volunteer chairman of Broome County, New York and as the volunteer regional coordinator for the surrounding area. He was responsible for accounting for receipts and disbursements and maintaining proper records in his region and forwarding the records to the Committee's state accounting office in New York City.

4. In November or December 1992, Louis R. Centorani called me and demanded a full accounting of monies raised and spent in Broome County area. I explained that the Committee's reporting obligation was to the FEC, not to individuals. I also advised Mr. Centorani that I would speak with Mike Morris, the Committee's chief accounting officer in New York with responsibility for preparing the Committee's FEC report for New York, to confirm that Mr. Conlon had complied with FEC reporting requirements and the Committee's policies and procedures. Mr. Morris assured me that Mr. Conlon's records were in order and in compliance with FEC

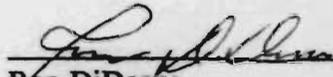
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regulations. I then called Mr. Centorani and informed him that Mr. Conion's reports were fully satisfactory. Nevertheless, he insisted that a formal accounting be made to him.

5. To the best of my information and belief, Mr. Centorani never served the Committee in any official capacity. Although Mr. Centorani claims to be chairman of the "ad hoc committee of the Ross Perot Petition Committee of Broome County," to the best of my information and belief, no such committee exists.

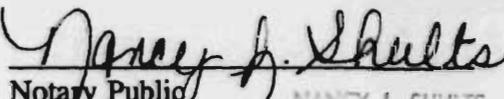
6. Neither the Committee, its Treasurer, Mike Poss, nor I ever authorized, sanctioned or condoned any conduct in violation of the FEC's regulations.

7. All of the foregoing is true and accurate to the best of my information and belief.



Ron DiDonna

Subscribed and sworn to before me this 22nd day of April, 1993.



Notary Public

My commission expires:

NANCY L. SHULTS
Notary Public in the State of New York
Residing in Broome County
My Commission Expires Dec 31 3-15-95

SEAL

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APRIL 30, 1993

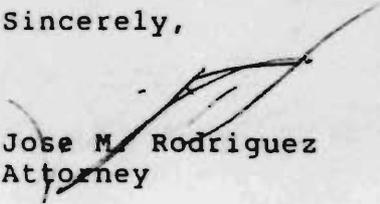
Daniel G. Routman, Esq.
Perot '92
7616 LBJ Freeway
Suite 727
Dallas, TX 75251

RE: MUR 3748
Perot '92 and Mike Poss,
as treasurer
Mark T. Conlon

Dear Mr. Routman:

Enclosed find the requested date stamped copies of the first page of the responses in this matter. Should you have any questions, please contact me at (202) 219-3690.

Sincerely,


Jose M. Rodriguez
Attorney

Enclosures

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Before the
FEDERAL ELECTION COMMISSION

93 APR 26 PM 3:41

RECEIVED
FEDERAL ELECTION COMMISSION

_____)
In the Matter of)
_____)
Perot '92) MUR 3748
_____)

To: Office of the General Counsel

**RESPONSE OF PEROT '92 AND
MIKE POSS, TREASURER**

Perot '92 and Mike Poss, its Treasurer, hereby respond to the complaint submitted by Louis R. Centorani, dated March 3, 1993.¹

I. INTRODUCTION

Mr. Centorani does not allege that Perot '92 (formerly the Perot Petition Committee² and hereinafter referred to as the "Committee") violated any Federal Election Commission ("FEC") regulations. He only complains that the Committee declined his demand for an accounting of receipts and disbursements with respect to one of the Committee's campaign depository accounts. He also requests that the FEC assist him in obtaining the records for that account. Mr. Centorani has been repeatedly informed, however, that the information he seeks is included in the Committee's reports on file with the FEC and that the Committee is not required to provide him with an accounting of its bank account activities.

In his complaint, Mr. Centorani implies that three contributions in amounts totaling \$135.00 made by Mrs. Centorani and a \$10.00 contribution made by Lillian

¹ By letter dated March 24, 1993, Perot '92 and Mr. Poss requested an extension of time through April 26, 1993 to submit this response. By letter dated March 25, 1993, the Office of the General Counsel granted that extension request.

² By letter dated October 5, 1992, the Perot Petition Committee changed its name to Perot '92 by amending its Statement of Organization.

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Before the
FEDERAL ELECTION COMMISSION

_____)
In the Matter of)
_____)
Mark T. Conlon) MUR 3748
_____)

93 APR 26 11 3:41
RECEIVED
FEDERAL ELECTION COMMISSION

To: Office of the General Counsel

RESPONSE OF MARK T. CONLON

Mark T. Conlon hereby responds to the complaint submitted by Louis R. Centorani, dated March 3, 1993.¹

I. INTRODUCTION

Mr. Centorani does not allege that Mr. Conlon, the volunteer regional coordinator for Perot '92 (formerly the Perot Petition Committee² and hereinafter referred to as the "Committee") for the area in which Mr. Centorani resides, violated any Federal Election Commission ("FEC") regulations. He only complains that Mr. Conlon declined his demand for an accounting of disbursements with respect to the campaign depository account on which Mr. Conlon was signatory. He also requests that the FEC assist him in obtaining the records for that account. Mr. Centorani has been repeatedly informed, however, that the information he seeks is included in the Committee's reports on file with the FEC and that the Committee is not required to provide him an accounting of its bank account activities.

¹ By letter dated March 31, 1993, Mr. Conlon requested an extension of time through April 26, 1993 to submit this response. By letter dated April 1, 1993, the Office of the General Counsel granted that extension request.

² By letter dated October 5, 1992, the Perot Petition Committee changed its name to Perot '92 by amending its Statement of Organization.

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GENERAL COUNSEL'S REPORT, DATED APRIL 5, 1994,
AND CERTIFICATION OF COMMISSION VOTE, DATED MAY 5, 1994,
ARE FILED AT THE FOLLOWING MICROFILM LOCATION:

MUR ROLL: 352

FRAMES: 2832-2847

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 6, 1994

Louis R. Centorani
31 Spring Street
Binghamton, NY 13903

RE: MUR 3748

Dear Mr. Centorani:

On March 11, 1993, 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 the respondents. See attached narrative. Accordingly, the Commission closed its file in this matter on June 3, 1994. 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,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

94043523142

MUR 3748
PEROT PETITION COMMITTEE

The complainant, Louis Centorani, alleges that Mark Conlon, the regional coordinator of the Perot Petition Committee, failed to properly account for and report contributions made by four contributors to the Perot Petition Committee. The Perot '92 Committee responded that Mr. Conlon properly accounted for, reported, and deposited contributions received. The Committee states that the contributions at issue were reported in its disclosure reports but that the contributions were not itemized because they were under \$200.

This matter involves less significant issues relative to the other issues pending before the Commission. There is no evidence that the activity had a significant impact on the process and a limited amount of money is involved.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 6, 1994

Kenneth A. Gross, Esq.
Skadden, Arps, Slate,
Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005-2107

RE: MUR 3748
Perot '92 and Mike Poss, as treasurer

Dear Mr. Gross:

On March 17, 1993, the Federal Election Commission notified your clients, Perot '92 and Mike Poss, 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 your clients. See attached narrative. Accordingly, the Commission closed its file in this matter on June 3, 1994.

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.

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Kenneth A. Gross, Esq.
MUR 3748
Page 2

If you have any questions, please contact Joan McEnery at
(202) 219-3690.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

94043523145

MUR 3748
PEROT PETITION COMMITTEE

The complainant, Louis Centorani, alleges that Mark Conlon, the regional coordinator of the Perot Petition Committee, failed to properly account for and report contributions made by four contributors to the Perot Petition Committee. The Perot '92 Committee responded that Mr. Conlon properly accounted for, reported, and deposited contributions received. The Committee states that the contributions at issue were reported in its disclosure reports but that the contributions were not itemized because they were under \$200.

This matter involves less significant issues relative to the other issues pending before the Commission. There is no evidence that the activity had a significant impact on the process and a limited amount of money is involved.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 6, 1994

R. Clayton Mulford, Esq.
Kim J. Askew, Esq.
Hughes & Luce
1717 Main Street, Suite 2800
Dallas, TX 75201

RE: MUR 3748
Mark T. Conlon

Dear Mr. Mulford and Ms. Askew:

On March 17, 1993, the Federal Election Commission notified your client, Mark T. Conlon, 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 your client. See attached narrative. Accordingly, the Commission closed its file in this matter on June 3, 1994.

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.

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R. Clayton Mulford, Esq.
Kim J. Askew, Esq.
MUR 3748
Page 2

If you have any questions, please contact Joan McEnery at
(202) 219-3690.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

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MUR 3748
PEROT PETITION COMMITTEE

The complainant, Louis Centorani, alleges that Mark Conlon, the regional coordinator of the Perot Petition Committee, failed to properly account for and report contributions made by four contributors to the Perot Petition Committee. The Perot '92 Committee responded that Mr. Conlon properly accounted for, reported, and deposited contributions received. The Committee states that the contributions at issue were reported in its disclosure reports but that the contributions were not itemized because they were under \$200.

This matter involves less significant issues relative to the other issues pending before the Commission. There is no evidence that the activity had a significant impact on the process and a limited amount of money is involved.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3748

DATE FILMED 6-14-94 CAMERA NO. 2

CAMERAMAN JM/K

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