FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

THIS IS THE BEGINNING OF MUR # 3749

DATE FILMED 8-30-94 CAMERA NO. 2

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State Executive Committee
REPUBLICAN PARTY OF TEXAS

Fred Meyer
State Chairman

March 10, 1993

MUR 3749

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FEDERAL ELECTION COMMISSION
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The Hon. Scott E. Thomas
Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Mr. Chairman:

This letter constitutes a formal, sworn complaint pursuant to 2 U.S.C. § 437g(a) of the Federal Election Campaign Act ("Act") and sets forth reasons to believe that Friends of Bob Krueger, the 1984 principal campaign committee of Bob Krueger, violated the Act and Federal Election Commission ("FEC") regulations.

Friends of Bob Krueger, which is a political committee registered with the FEC, is in violation of federal election law for settling corporate debts improperly. The improper debt settlements resulted in $138,000 in illegal corporate contributions.

A November 27, 1991, Houston Post article (Exhibit A) states that "Finance reports filed by Friends of Bob Krueger, the fundraising committee for the 1984 senate race, include settlement agreements in which Krueger erased debts of $175,369 by paying a total of $37,188."

The above-referenced settlement agreements, which are identical in language, are apparently "form" agreements drafted by Friends of Bob Krueger for convenient disposition of the debts.

A listing of the settlement agreements (Exhibit B) reflects the following:

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211 East 7th Street, Suite 620 • Austin, Texas 78701 • (512) 477-9821
Prepared and paid for by State Executive Committee, Republican Party of Texas

Consultant '84	$116,490.44	$23,298.11
Dallas Hilton Inn	5,833.90	1,166.78
Futura Press, Inc.	4,721.32	2,101.20
GLB Inc.	27,629.66	6,000.00
Munguia Printers	627.90	125.58
Texas Label Co.	7,958.35	1,600.00
Texas Press Assn.	2,939.91	587.98
Worley Printers	9,168.00	2,309.18
Total	$175,369.48	$37,188.83

Under FEC regulations in existence at the time, a corporation generally " . . . may not forgive prior debts or settle debts which have been incurred by a candidate or political committee or other person for use in connection with a federal election for less than the amount owed on the debt." 11 C.F.R. § 114.10 (1984).

Paragraph (c) of 11 C.F.R. § 114.10 provided the exception:

> A corporation may settle or forgive a debt if the creditor has treated the outstanding debt in a commercially reasonable manner. A settlement will be considered commercially reasonable if:
>
> 1) The initial extension of credit was made in accordance with regulations issued pursuant to 2 U.S.C. 451 or paragraph (a) of this section.
>
> 2) The candidate or political committee or person has undertaken all commercially reasonable efforts to satisfy the outstanding debt; and
>
> 3) The corporate creditor has pursued its remedies in a manner similar in intensity to that employed by the corporation in pursuit of a non-political debtor, including lawsuits if filed in similar circumstances.
>
> The corporation and/or the debtor must file a statement of settlement with the Commission including . . . the steps the debtor has taken to satisfy the debt and remedies pursued by the creditor.

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Friends of Bob Krueger is in violation of the Act because most, if not all, of the vendors that forgave a portion of their debt were corporations and because recent public statements indicate that insufficient effort was made to satisfy the conditions set forth above at 11 C.F.R. § 114.10.

Correspondence on file with the FEC documents the FEC's inquiry into the matter because of a concern that Friends of Bob Krueger was not settling and reporting debt pursuant to the regulations. See May 14, 1987, FEC letter provided as Exhibit C.

In response to the FEC's inquiry, Friends of Bob Krueger Treasurer, Nina Guinn, wrote that "[a]ll possible efforts were made by Friends of Bob Krueger to gain more funds including fundraisers, mailouts, telephone drives, personal contacts, and many more such attempts to obtain contributions to pay the remaining debt." See July 28, 1987, Nina Guinn letter provided as Exhibit D. The Guinn letter goes on to say that "[a]ll efforts have been made by Friends of Bob Krueger to retire this debt."

However, Krueger spokesman, Monte Williams, is reported as saying that "creditors were campaign supporters who were willing to forgive the losing candidate." Fort Worth Star Telegram, March 9, 1993. On information and belief, several of these creditors extended goods and services to a subsequent 1988 campaign by Mr. Krueger for Texas Railroad Commissioner. Mr. Williams' statement casts doubt on whether the original extension of credit by these "campaign supporters" were in the ordinary course of their corporate business practices as required by FEC regulation 114.10(c)(1).

Furthermore, Mr. Krueger publicly contradicted Ms. Guinn's statements to the FEC by acknowledging that his debt retirement "efforts were minimal. 'You don't even try real hard after you lose,'" said Mr. Krueger in the November 27, 1991, Houston Post. (With respect to the sole remaining "creditor," himself, Mr. Krueger's efforts may have been more than minimal. After his election as Texas Railroad Commissioner, Mr. Krueger engaged in fundraising to pay himself over $20,000. He continues to list $535,000 as money owed to himself.)

On the basis of these multiple contemporary statements which contradict material representations made in the past by the Krueger campaign to the Federal Election Commission, I hereby request:

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1. An investigation into the legitimacy of the 1986 "debt settlement" by Friends of Bob Krueger.

2. An investigation into whether the original extensions of credit constituted illegal corporate contributions.

3. Appropriate civil penalties pursuant to 2 U.S.C. § 437g of up to 100% of the amount of the resulting illegal corporate contributions which may total as much as $138,000.

The above complaint is true to the best of my knowledge, information or belief.

Respectfully submitted,

Fred Meyer, Chairman
Republican Party of Texas

Sworn to and subscribed before me this 11th day of March, 1993.

JUDITH E. MORAN
Notary Public, State of Texas
My Commission Expires 09-21-1996

Judith E. Moran, Notary Public
in and for the State of Texas

My Commission Expires: 9/21/96

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244.273 107.2 Krueger, Robert C. (Bob)

Krueger supporters seek funds

Energy interests asked to help with big debt

HOUSTON POST NOV 2 7 1991

By Kim Hiesman
POST AUSTIN BUREAU

AUSTIN — Supporters of Texas Railroad Commissioner Bob Krueger, who does not face re-election until 1996, are asking energy interests to give money to help Krueger recover $635,000 in personal funds he raised to pay debts from his failed 1984 U.S. Senate race.

The fund-raising drive is being mounted by the Austin-based law firm of Scott, Douglass & Luton, which represents clients regulated by the Railroad Commission.

"We are trying to raise him a little money to reimburse him for what he has spent trying to serve the public," said law firm partner Wallace Scott Jr., who signed the letter. "We thought it might be nice to raise some funds for him so he would have a little something."

In a letter sent to clients and friends, the firm hails Krueger as "a spokesman for the energy industry" and calls the money drive an effort to "free him to focus his great energy" on his commission responsibilities.

Government watchdog groups see it as something else.

"It's the perfect situation for what might be called a shakedown in almost any other industry," said Tom Smith, Texas director of Public Citizen.

Suzy Woodford, director of Common Cause of Texas, said it is "unseemly" for elected officials to accept money from interests they regulate.

The three-member Railroad Commission has regulatory power over the oil and gas industry as well as the transportation industry. The commissioners also are members of the Texas High-Speed Rail Authority.

Woodford called the law firm's "art an extreme example of the late train" effect, the process by which contributors buy their way on board with officeholders after an election.

"I think it's clear he has some leverage now," Woodford said, referring to Krueger's regulatory power. "His late train is really late, seven years late."

Krueger said the fund-raising drive was the lawyers' idea, not his, and he has no active role in it. He said he is not concerned that watchdog groups say it looks bad.

"I'm much more concerned if people raise concerns about substance rather than appearance," he said.

"I went ahead and made sure all the creditors (from the 1984 Senate race) were paid by personally borrowing to pay it off. So the campaign has only one person it owes to, and that is Bob Krueger, who paid the debt rather than leave people hanging," Krueger said.

Krueger said he does not know to whom the law firm's letters were sent, but Scott said about 150 copies were mailed. The commissioner said contributions from regulated interests are "inevitable" unless the state shifts to public financing of campaigns.

"You don't get broccoli growers concerned with people who regulate energy and transportation and you don't get truck drivers supporting higher subsidies for peanuts," said Krueger.

In the letter, the law firm says Krueger sold his ranch and borrowed money to clear the 1984 campaign debt. Krueger ran third in the Democratic senatorial primary.

Lloyd Doggett defeated Kent Hance in the runoff, and then lost to Republican Phil Gramm.

The letter lists Krueger's efforts on behalf of the energy industry, including testimony in Washington this year in favor of "reduced federal environmental regulations on oil and gas drilling."

By sending money, contributors will help "free him to focus his great energy on challenges at the Railroad Commission during the next five years," the letter says.

"Please send your checks as soon as possible. Bob has borne the responsibility for this debt by himself for a long time. Now it is time that we help him," says the letter signed by Scott and partner Frank Douglass.

Krueger said he is not in "any precarious financial position," despite being out the $635,495.

"I'm a person who, by choice, sacrificed most of his personal wealth in order that all creditors could be promptly paid," he said.

The amount Krueger claims he is owed reflects settlements worked out with some creditors. He never paid the full amount of all the debts. Finance reports filed by Friends of Bob Krueger, the fund-raising committee for the 1984 Senate race, include settlement agreements in which Krueger erased debts of $175,359 by paying a total of $37,103.

In response to a 1987 Federal Election Commission inquiry about the debt settlements, campaign treasurer Nina Grunn said "all possible efforts" were made to raise more money, including "fund-raisers, mailouts, telephone drives, personal contacts and many more such attempts."

But Krueger said Tuesday the efforts were minimal. "You don't even try real hard after you lose. The people who care most are people who have already given their max," he said.

Scott said the latest attempt is just an effort to "see him at least be able to stay on the Railroad Commission and make a living."

The Railroad Commission post pays $74,693 a year. Krueger established a separate political committee for his commission race. Finance reports filed since its formation in December 1989 and through June 1991 show it has collected $1.5 million and spent $1.27 million, including the March purchase of $20,000 worth of furniture for his Railroad Commission office to replace furniture he called "about 14 years old and faded."

Scott said his sole motivation in attempting to raise money for Krueger is that "he has two real young children and he sold everything he had to pay off his political debts and I know that he is worried financially."

Woodford is not sympathetic to Krueger's plight.

"A lot of people run for office and lose and have a campaign debt and pay it off," she said. "That is part of the business of running for elected office. By coming back now in 1991 and saying we should pay him back for 1984 what we are doing is starting to build a war chest because he is paying himself back for having paid off his debts."

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

26 February 1988

TO : LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH : JOHN C. SURINA
STAFF DIRECTOR

FROM : JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT : DEBT SETTLEMENT REFERRAL

I. DEBTOR: Friends of Bob Krueger (C00165969)
Nina J. Guinn, Treasurer
228 South Sequin Street
P.O. Box 311717
New Braunfels, TX 78131-1717

II. CREDITOR:

A. Bristol & Associates (GLB Inc.)
George L. Bristol
1106 West Avenue
Austin, TX 78701

B. Consultants '84, Inc.
1250 Capital of Tx Highway
Austin, TX 78746

C. Dallas Hilton Inn
General Manager
5600 North Capital Expressway
Dallas, TX 75206

D. Futura Press, Inc.
Secretary Treasurer
P.O. Box 3485
Austin, TX 78764

E. Munguia Printers
P.O. Box 7387
San Antonio, TX 78207

F. Texas Label Co.
1207B East 1st
Austin, TX 78702

G. Texas Press Association
718 West Fifth
Austin, TX 78701

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H. Worley Printing
Neal Worley
731 West 23rd
Austin, TX 78701

I. Corn & Janda (Harvey Corn & Company)
Harvey R. Corn, CPA
Managing Partner
114 West 7th, Suite 400
Austin, TX 78701

J. Long Distance Service (L.D.S., Inc.)
P.O. Box 7387
San Antonio, TX 78291

K. Jenson & Baker (Creative Computers)
Ken Bryan
315 United Bank Tower
Austin, TX 78701

III. DEBT INFORMATION

Attached are eleven (11) debt settlement statements submitted January 29, 1986 and April 14, 1986 by the Friends of Bob Krueger (the "Committee") with the above referenced companies. Further information regarding these debt settlements was submitted on August 27, 1986 and January 29, 1987, in response to a Request for Additional Information sent on August 15, 1986. Further information was also received on July 28, 1987 and September 11, 1987 in response to telephone conversations held on April 22, 1987 and August 10, 1987, respectively, between the treasurer and a Reports Analysis Division analyst. Please refer to Section V for additional information regarding some of the debts submitted for settlement approval. The following is a detailed account of the debts being referred.

A. CREDITOR: Bristol & Associates (GLB Inc.)

- The amount of the original debt. $33,630
- The year and report on which the committee first incurred or began to incur a debt to the creditor. 1984 July Quarterly Report
- The amount paid by the committee, excluding any payment for the settlement of the balance owed. $0
- The percentage of original debt paid off by the committee, excluding any payment for the settlement of the balance owed. 0%

- The amount of the outstanding balance. $33,630
- The amount offered in settlement of the balance. $6,000
- The amount of balance forgiven. 27,630
- The percentage of balance forgiven. 82%

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- The total amount paid by the committee including any settlement amount. $6,000
- The percentage of original debt forgiven. 82%

B. CREDITOR: Consultants '84, Inc.

- The amount of the original debt. $116,490
- The year and report on which the committee first incurred or began to incur a debt to the creditor. 1984 July Quarterly Report
- The amount paid by the committee, excluding any payment for the settlement of the balance owed. $0
- The percentage of original debt paid off by the committee, excluding any payment for the settlement of the balance owed. 0%

- The amount of the outstanding balance. $116,490
- The amount offered in settlement of the balance. $23,298
- The amount of balance forgiven. $93,192
- The percentage of balance forgiven. 80%

- The total amount paid by the committee including any settlement amount. $23,298
- The percentage of original debt forgiven. 80%

C. CREDITOR: Dallas Hilton Inn

- The amount of the original debt. $6,934
- The year and report on which the committee first incurred or began to incur a debt to the creditor. 1984 July Quarterly Report
- The amount paid by the committee, excluding any payment for the settlement of the balance owed. $1,100
- The percentage of original debt paid off by the committee, excluding any payment for the settlement of the balance owed. 16%

- The amount of the outstanding balance. $5,834
- The amount offered in settlement of the balance. $0
- The amount of balance forgiven. $5,834[1/]
- The percentage of balance forgiven. 100%

- The total amount paid by the committee including any settlement amount. $1,100
- The percentage of original debt forgiven. 84%

1/ A written statement from the creditor that was submitted by the Committee on January 29, 1987, indicates an outstanding balance of $5,834 and a payment by the Committee of $1,167; also the Committee's 1987 Mid-Year Report discloses an amount forgiven of $4,667. However, no settlement payment is disclosed to the creditor, and the Committee's Mid-Year amendment of September 11, 1987, indicates that no settlement payment was made and the amount forgiven was $5,834.

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D. CREDITOR: Futura Press, Inc.

- The amount of the original debt. $6,321
- The year and report on which the committee first incurred or began to incur a debt to the creditor. 1984 July Quarterly Report
- The amount paid by the committee, excluding any payment for the settlement of the balance owed. $1,600
- The percentage of original debt paid off by the committee, excluding any payment for the settlement of the balance owed. 25%

- The amount of the outstanding balance. $4,721
- The amount offered in settlement of the balance. $2,101
- The amount of balance forgiven. $2,620
- The percentage of balance forgiven. 55%

- The total amount paid by the committee including any settlement amount. $3,701
- The percentage of original debt forgiven. 41%

E. CREDITOR: Munguia Printers

- The amount of the original debt. $1,928
- The year and report on which the committee first incurred or began to incur a debt to the creditor. 1984 July Quarterly Report
- The amount paid by the committee, excluding any payment for the settlement of the balance owed. $1,300
- The percentage of original debt paid off by the committee, excluding any payment for the settlement of the balance owed. 67%

- The amount of the outstanding balance. $628
- The amount offered in settlement of the balance. $126
- The amount of balance forgiven. $502
- The percentage of balance forgiven. 80%

- The total amount paid by the committee including any settlement amount. $1,426
- The percentage of original debt forgiven. 26%

F. CREDITOR: Texas Label Co.

- The amount of the original debt. $10,158
- The year and report on which the committee first incurred or began to incur a debt to the creditor. 1984 July Quarterly Report

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- The amount paid by the committee, excluding any payment for the settlement of the balance owed. $2,200
- The percentage of original debt paid off by the committee, excluding any payment for the settlement of the balance owed. 22%

- The amount of the outstanding balance. $7,958
- The amount offered in settlement of the balance. $1,600
- The amount of balance forgiven. $6,358
- The percentage of balance forgiven. 80%

- The total amount paid by the committee including any settlement amount. $3,800
- The percentage of original debt forgiven. 63%

G. CREDITOR: Texas Press Association

- The amount of the original debt. $4,840
- The year and report on which the committee first incurred or began to incur a debt to the creditor. 1984 July Quarterly Report
- The amount paid by the committee, excluding any payment for the settlement of the balance owed. $900
- The percentage of original debt paid off by the committee, excluding any payment for the settlement of the balance owed. 19%

- The amount of the outstanding balance. $3,940
- The amount offered in settlement of the balance. $588
- The amount of balance forgiven. $3,352
- The percentage of balance forgiven. 85%

- The total amount paid by the committee including any settlement amount. $1,488
- The percentage of original debt forgiven. 69%

H. CREDITOR: Worley Printing

- The amount of the original debt. $10,869
- The year and report on which the committee first incurred or began to incur a debt to the creditor. 1984 July Quarterly Report
- The amount paid by the committee, excluding any payment for the settlement of the balance owed. $1,700
- The percentage of original debt paid off by the committee, excluding any payment for the settlement of the balance owed. 16%

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- The amount of the outstanding balance. $9,169
- The amount offered in settlement of the balance. $2,309
- The amount of balance forgiven. $6,860
- The percentage of balance forgiven. 75%

- The total amount paid by the committee including any settlement amount. $4,009
- The percentage of original debt forgiven. 63%

I. CREDITOR: Corn & Janda (Harvey Corn & Company)

- The amount of the original debt. $2,452
- The year and report on which the committee first incurred or began to incur a debt to the creditor. 1984 October Quarterly Report
- The amount paid by the committee, excluding any payment for the settlement of the balance owed. $1,100
- The percentage of original debt paid off by the committee, excluding any payment for the settlement of the balance owed. 45%

- The amount of the outstanding balance. $1,352
- The amount offered in settlement of the balance. $0
- The amount of balance forgiven. $1,352
- The percentage of balance forgiven. 100%

- The total amount paid by the committee including any settlement amount. $1,100
- The percentage of original debt forgiven. 55%

J. CREDITOR: Long Distance Service (L.D.S., Inc.)

- The amount of the original debt. $5,224
- The year and report on which the committee first incurred or began to incur a debt to the creditor. 1984 October Quarterly Report
- The amount paid by the committee, excluding any payment for the settlement of the balance owed. $1,200
- The percentage of original debt paid off by the committee, excluding any payment for the settlement of the balance owed. 23%

- The amount of the outstanding balance. $4,024
- The amount offered in settlement of the balance. $807
- The amount of balance forgiven. $3,217
- The percentage of balance forgiven. 80%

- The total amount paid by the committee including any settlement amount. $2,007
- The percentage of original debt forgiven. 62%

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K. CREDITOR: Jenson & Baker (Creative Computers)

- The amount of the original debt. $8,144
- The year and report on which the committee first incurred or began to incur a debt to the creditor. 1984 July Quarterly Report
- The amount paid by the committee, excluding any payment for the settlement of the balance owed. $1,200
- The percentage of original debt paid off by the committee, excluding any payment for the settlement of the balance owed. 15%

- The amount of the outstanding balance. $6,944
- The amount offered in settlement of the balance. $1,400
- The amount of balance forgiven. $5,544
- The percentage of balance forgiven. 80%

- The total amount paid by the committee including any settlement amount. $2,600
- The percentage of original debt forgiven. 68%

IV. COMMITTEE'S BACKGROUND

- 1985-1986 total election cycle receipts. $66,923
- 1985-1986 total election cycle disbursements. $66,7[illegible]4
- 1987-1988 total election cycle receipts. $0
- 1987-1988 total election cycle disbursements. $0
- Total cash-on-hand as of June 30, 1987. $267
- Total amount of debt owed to the committee, if any. $0
- Total amount of debts outstanding (excluding the amount of the debt(s) being settled). $635,495
- Total number of creditors. 2
- The amount of any debt owed to the candidate by the committee. $135,495
- The last new report filed. 1987 Mid-Year Report

V. OTHER RELEVANT INFORMATION

The Committee's 1984 July Quarterly Report discloses debts owed to various creditors with outstanding beginning balances; however, these debts were not disclosed on previous reports with ending balances: Bristol & Associates - $33,167, Consultants '84, Inc. - $116,490, Dallas Hilton Inn - $6,934, Futura Press, Inc. - $5,892, Munguia Printers -$1,927, Texas Label Co. - $10,158, Texas Press Association -$4,840, Jenson & Baker - $8,144, and Worley Printing - $10,869. The Committee filed an amendment to the 1984 July Quarterly Report on October 15, 1984, indicating that the debts were from final billings and were not previously owed.

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The Committee's 1984 October Quarterly Report discloses debts owed to two creditors with outstanding beginning balances; however, these debts were not disclosed on previous reports with outstanding ending balances: Corn & Janda - $2,452 and Long Distance Service - $4,924. The Committee filed an amendment to the 1984 October Quarterly Report on April 24, 1985 indicating that the debts were from final billings and were not previously owed.

For two of the Committee's creditors, Bristol & Associates and Futura Press, Inc., the Committee's April 14, 1986 debt settlement statement discloses outstanding balances forgiven of $27,167 and $2,191, respectively. However, written agreements signed by the creditors disclose apparent discrepancies in the outstanding balances forgiven for the creditors Bristol & Associates and Futura Press, Inc. The Committee's September 11, 1987 Mid-Year amendment discloses that additional debt amounts were in fact owed to the two creditors. Accordingly, the Reports Analysis Division adjusted the original amount of the debt owed to each creditor.

For one of the Committee's creditors, Worley Printing, the treasurer apparently transposed the outstanding beginning balance of the debt on the Committee's amended 1985 Year End Report and carried the transposition forward to the debt settlement statement. The 1985 Year End Report discloses an outstanding beginning balance owed by the Committee of $9,169 and an outstanding ending balance of $9,169. However, the Committee's amended 1985 Year End Report discloses an outstanding beginning balance of $9,619 and an outstanding ending balance of $9,169. The Committee's debt settlement statement also indicates an outstanding beginning balance of $9,619, but a letter from the creditor submitted on January 29, 1987, indicates that the outstanding balance owed was $9,169.

For one of the Committee's creditors, Munguia Printers, the Committee's April 14, 1986 debt settlement statement discloses an outstanding amount owed of $627. However, a written agreement signed by the creditor indicates an outstanding amount owed of $627.90.

For one of the Committee's creditors, Worley Printing, the Committee's April 14, 1986 debt settlement statement discloses a settlement payment of $2,308.18. However, Schedule B of the Committee's 1984 April Quarterly Report discloses a payment of $2,309.18. A written agreement signed by the creditor also discloses a settlement payment of $2,309.18.

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For one of the Committee's creditors, Long Distance Service, the Committee's 1984 October Quarterly Report discloses an outstanding beginning balance of $4,924, a payment of $600, and an outstanding ending balance of $4,624. It appears an additional $300 was owed to the creditor. Accordingly, the Reports Analysis Division adjusted the original amount of the debt owed to the creditor.

The Committee's debt settlement amendment of September 11, 1987 indicates that one of the Committee's creditors, Jenson & Baker (Creative Computers), has been dissolved. The debt was included in this referral since it appears the Committee did settle with this creditor before learning the creditor had been dissolved.

In a telephone conversation with a Reports Analysis Division analyst, the treasurer stated that the $500,000 loan to Alamo Bank was a personal loan to the candidate and has been repaid by him. The repayment has not yet been disclosed.

If you have any further questions, please contact Elaine Corey at 376-2480.

Attachments

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AUG 27 1986

SEP 2 1:42

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1986 SEP -3 AM 10 31
OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES

August 26, 1986

Ms. Linda Tangney
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

ID # C00165969
Ref: Debt Settlement Statement

Dear Ms. Tangney:

In response to your letter of August 15, 1986, written statements have been received from all creditors except two accepting the debt settlement. Although these two accepted and acknowledged the settlement, they have neglected to return the signed form to us. We have again sent a request for these forms. As soon as they are returned to us we will provide all information relating to the settlement of debts. We feel it would be confusing to send a partial report before these two are received. We hope this will be settled with great speed and have requested immediate return of the forms. Thank you for your help.

Yours sincerely,

Nina J. Guinn

Nina J. Guinn
Treasurer, Friends of Bob Krueger

January 28, 1987

Ms. Linda Tangney
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

ID # C00165969
Ref: Debt Settlement Statement

Dear Ms. Tangney:

As requested in your letter of August 15, 1986, listed below are the steps taken by Friends of Bob Krueger to pay all debts. Copies of written statements from creditors acknowledging and accepting the debt settlement are attached.

In January, 1986, Friends of Bob Krueger made final payments on all debts and obligations (excluding loans). Credit was extended by all creditors in the ordinary course of business with terms similar to those granted to nonpolitical debtors of similar credit risk. All efforts have been made by Friends of Bob Krueger to retire these debts, and all creditors have pursued remedies in a manner similar to those used to seek payment from nonpolitical debtors. Written agreements stating the terms of the settlement have been received from all creditors.

Nina J. Guinn, Treasurer
Friends of Bob Krueger
P.O. Box 311717
New Braunfels, Texas 78131-1717

This is an agreement whereby Consultant Pay agrees to give a full and final release of all claims incurred by Friends of Bob Krueger, including the amount of $ 116,490.44. This release shall become effective upon payment by check from Friends of Bob Krueger in the amount of $ 23,298.00, a settlement made in the ordinary course of business practices.

This agreement further stipulates that there are no claims whatsoever by Consultant Pay against Bob Krueger or Krueger Associates.

Agreed to by:

Nina Quinn
NINA QUINN, TREASURER
FRIENDS OF BOB KRUEGER

Date: 14 Jan 86

87 0 0 3 0 1 3

HARVEY CORN & COMPANY

January 15, 1986

Honorable Bob Krueger
P. O. Box 911
New Braunfels, TX 78130

Dear Bob:

I am writing to confirm the content of our discussion of January 8, 1986 concerning professional fees owed by the Krueger campaign to our firm. Please be advised that we consider our fees to have been paid in full as of May 10, 1985.

Thank you for your concern as to the status of this account.

Very truly yours,

Harvey R. Corn, CPA
Managing Partner

HRC/mmb

This is an agreement whereby Dallas Hilton Inn agrees to give a full and final release of all claims incurred by Friends of Bob Krueger, including the amount of $ 5,833.90. This release shall become effective upon payment by check from Friends of Bob Krueger in the amount of $ 1166.78, a settlement made in the ordinary course of business practices.

This agreement further stipulates that there are no claims whatsoever by Dallas Hilton Inn against Bob Krueger or Krueger Associates.

Agreed to by:

Nina Guinn
NINA GUINN, TREASURER
FRIENDS OF BOB KRUEGER

Marty Hank
General Manager
Dallas Hilton Inn

Date: 1/20/86

This is an agreement whereby Futura Press, Inc. agrees to give a full and final release of all claims incurred by Friends of Bob Krueger, including the amount of $ 4721.32. This release shall become effective upon payment by check from Friends of Bob Krueger in the amount of $ 2101.20, a settlement made in the ordinary course of business practices.

This agreement further stipulates that there are no claims whatsoever by Futura Press, Inc. against Bob Krueger or Krueger Associates.

Agreed to by:

Nina Quinn
NINA QUINN, TREASURER
FRIENDS OF BOB KRUEGER

Pres.

Date: 1-22-86

This is an agreement whereby GLB Inc agrees to give a full and final release of all claims incurred by Friends of Bob Krueger, including the amount of $ 27,629.66. This release shall become effective upon payment by check from Friends of Bob Krueger in the amount of $ 600.00, a settlement made in the ordinary course of business practices.

This agreement further stipulates that there are no claims whatsoever by GLB Inc against Bob Krueger or Krueger Associates.

Agreed to by:

Nina Guinn
NINA GUINN, TREASURER
FRIENDS OF BOB KRUEGER

[illegible]
for GLB Inc

Date: 14 Jan '86

37000023022

This is an agreement whereby MUNGUIA PRINTERS agrees to give a full and final release of all claims incurred by Friends of Bob Krueger, including the amount of $ 627 90. This release shall become effective upon payment by check from Friends of Bob Krueger in the amount of $ 125 58, a settlement made in the ordinary course of business practices.

Agreed to by:

Nina Guinn
NINA GUINN, TREASURER
FRIENDS OF BOB KRUEGER

E.C. Ybarra

Date: 1-9-86

C00302246

This is an agreement whereby Texas Label Co. [illegible] give a full and final release of all claims incurred by Friends of Bob Krueger, including the amount of $ 7958.35. This release will become effective upon payment by check from Friends of Bob Krueger in the amount of $ 1600.00, a settlement made in the ordinary course of business practices.

This agreement further stipulates that there are no claims whatsoever by Texas Label Co. against Bob Krueger or Krueger Associates.

Agreed to by:

Nina Quinn
NINA QUINN, TREASURER
FRIENDS OF BOB KRUEGER

[illegible]
for Texas Label Co.

Date: 9 Jan. 1986

This is an agreement whereby Texas Press Assn.

agrees to give a full and final release of all claims incurred by Friends of Bob Krueger, including the amount of $ 2939.91. This release shall become effective upon payment by check from Friends of Bob Krueger in the amount of $ 587.91, a settlement made in the ordinary course of business practices.

Agreed to by:

Nina Guinn
NINA GUINN, TREASURER
FRIENDS OF BOB KRUEGER

Landell Williams
for Texas Press Assn.

Date: 8 January 1982

0003025

This is an agreement whereby Worley Printers agrees to give a full and final release of all claims incurred by Friends of Bob Krueger, including the amount of $ 9168. This release shall become effective upon payment by check from Friends of Bob Krueger in the amount of $ 2309.18, a settlement made in the ordinary course of business practices.

This agreement further stipulates that there are no claims whatsoever by Worley Printers against Bob Krueger or Krueger Associates.

Agreed to by:

Nina Quinn
NINA QUINN, TREASURER
FRIENDS OF BOB KRUEGER

Neal Worley
WORLEY PRINTING

Date: 14 Jan 82

2404356032486

KRUEGER OF TEXAS
Democrat for U.S. Senate

RECEIVED
SECRETARY OF THE SENATE
1986 FEB -3 AM 11:22
HAND DELIVERED ☐

January 24, 1986

To: Secretary of the Senate

From: Friends of Bob Krueger, FEC #C00165969

Re: Settlement of all debts and obligations

For your records, in January Friends of Bob Krueger made final payments on all debts and obligations (excluding loans). Credit was extended by all creditors in the ordinary course of business with terms similar to those granted to nonpolitical debtors of similar credit risk. All efforts have been made by Friends of Bob Krueger to retire these debts, and all creditors have pursued remedies in a manner similar to those used to seek payment from nonpolitical debtors. Written agreements stating the terms of the settlement have been received from all creditors.

These settlements will be indicated on the April 15 Quarterly Report. If there are any questions regarding the procedures taken please notify me; also if there are any additional instructions or requirements regarding settlement of debts and obligations I would appreciate your notifying me.

Nina J. Guinn

Nina J. Guinn, Treasurer
Friends of Bob Krueger
P.O. Box 911
New Braunfels, TX 78130

105 West Riverside Drive • Suite 115 • Austin, Texas 78704 • (512) 692-[illegible]

Paid for by Friends of Bob Krueger Committee, J. B. Anderson, Treasurer, Austin, Texas

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 2 for
LINE NUMBER 10
(Use separate schedule for each numbered line)

Name of Committee (in Full) FRIENDS OF BOB KRUEGER	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Bristol & Ascociates 1106 West Ave. Austin, TX 78701	33,166.88	- 0 -	6,000.00	- 0 -
CREDIT WAS EXTENDED IN THE ORDINARY COURSE OF BUSINESS WITH TERMS SIMILAR TO THOSE GRANTED TO NON-POLITICAL DEBTORS OF SIMILAR CREDIT RISK. ALL EFFORTS HAVE BEEN MADE BY FRIENDS OF BOB KRUEGER TO RETIRE THIS DEBT AND CREDITOR HAS PURSUED REMEDIES IN A MANNER SIMILAR TO THOSE USED TO SEEK PAYMENT FROM NON-POLITICAL DEBTORS. WRITTEN AGREEMENT [illegible]				
Nature of Debt (Purpose): financial consultants				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Consultants '84, Inc. 1515 Capitol of Texas Highway W. Austin, TX 78746	116,490.44	- 0 -	23,298.11	- 0 -
(SETTLEMENT SAME AS ABOVE.)				
Nature of Debt (Purpose): production, printing, consultants				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Dallas Hilton 5600 N. Central Expressway Dallas, TX 75206	5,833.90	- 0 -	- 0 -	- 0 -
(SETTLEMENT SAME AS ABOVE.)				
Nature of Debt (Purpose): catering				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Futura Press P.O. Box 3485 Austin, TX 78764	4,292.00	- 0 -	2,101.20	- 0 -
(SETTLEMENT SAME AS ABOVE.)				
Nature of Debt (Purpose): printing				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Jenson, Baker (Creative Computers) 315 United Bank Tower Austin, TX 78701	6,944.31	- 0 -	1,400.00	- 0 -
(SETTLEMENT SAME AS ABOVE.)				
Nature of Debt (Purpose): phone lists, labels, printing				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Munguia Printers P.O. Box 7387 San Antonio, TX 78207	627.00	- 0 -	125.58	- 0 -
(SETTLEMENT SAME AS ABOVE.)				
Nature of Debt (Purpose): printing				
1) SUBTOTALS This Period This Page (optional)				- 0 -
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS (from Schedule C last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

9 6 2 2 0 9 3 4 7 -

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

LINE NUMBER 10
(Use separate schedule for each numbered line)

Name of Committee (in Full) FRIENDS OF BOB KRUEGER	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Texas Label Co. 1207B E. 1st Austin, TX 78702	7,958.35	- 0 -	1,600.00	- 0 -
Nature of Debt (Purpose): printing	CREDIT WAS EXTENDED IN THE ORDINARY COURSE OF BUSINESS WITH TERMS SIMILAR TO THOSE GRANTED TO NONPOLITICAL DEBTORS OF SIMILAR CREDIT RISK. ALL EFFORTS HAVE BEEN MADE BY FRIENDS OF BOB KRUEGER TO RETIRE THIS DEBT AND CREDITOR HAS PURSUED REMEDIES IN A MANNER SIMILAR TO THOSE USED TO SEEK PAYMENT FROM NONPOLITICAL DEBTORS. WRITTEN AGREEMENT STATING THE TERMS OF THE SETTLEMENT HAS BEEN RECEIVED.			
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Texas Press 718 W. Fifth Austin, TX 78701	3,939.91	- 0 -	587.98	- 0 -
Nature of Debt (Purpose): press clips	(SETTLEMENT SAME AS ABOVE.)			
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Worley Printing 731 W. 23rd Austin, TX 78701	9,618.89	- 0 -	2,308.18	- 0 -
Nature of Debt (Purpose): printing	(SETTLEMENT SAME AS ABOVE.)			
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Corn & Janda 114 West 7th Austin, TX 78701	1,352.00	- 0 -	- 0 -	- 0 -
Nature of Debt (Purpose): C.P.A.	(SETTLEMENT SAME AS ABOVE.)			
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Long Distance Service P.O. Box 7387 San Antonio, TX 78291	4,023.64	- 0 -	806.73	- 0 -
Nature of Debt (Purpose): long distance service	(SETTLEMENT SAME AS ABOVE.)			
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				- 0 -
2) TOTAL This Period (last page this line only)				- 0 -
3) TOTAL OUTSTANDING LOANS (from Schedule C last page only)				635,895.00
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				635,895.00

FEC MAIL

AUG 27 1986

BOB KRUEGER
FOR BOSS
NEW BRAUNFELS, TEXAS

August 26, 1986

RECEIVED
OFFICE OF FILINGS & REGISTRATION
SEP 2 P1:42
SEP -3 AM 10 31
OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES

Ms. Linda Tangney
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

ID # C00165969
Ref: Debt Settlement Statement

Dear Ms. Tangney:

In response to your letter of August 15, 1986, written statements have been received from all creditors except two accepting the debt settlement. Although these two accepted and acknowledged the settlement, they have neglected to return the signed form to us. We have again sent a request for these forms. As soon as they are returned to us we will provide all information relating to the settlement of debts. We feel it would be confusing to send a partial report before these two are received. We hope this will be settled with great speed and have requested immediate return of the forms. Thank you for your help.

Yours sincerely,

Nina J. Guinn

Nina J. Guinn
Treasurer, Friends of Bob Krueger

January 28, 1987

Ms. Linda Tangney
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

ID # C00165969
Ref: Debt Settlement Statement

Dear Ms. Tangney:

As requested in your letter of August 15, 1986, listed below are the steps taken by Friends of Bob Krueger to pay all debts. Copies of written statements from creditors acknowledging and accepting the debt settlement are attached.

In January, 1986, Friends of Bob Krueger made final payments on all debts and obligations (excluding loans). Credit was extended by all creditors in the ordinary course of business with terms similar to those granted to nonpolitical debtors of similar credit risk. All efforts have been made by Friends of Bob Krueger to retire these debts, and all creditors have pursued remedies in a manner similar to those used to seek payment from nonpolitical debtors. Written agreements stating the terms of the settlement have been received from all creditors.

Nina J. Guinn

Nina J. Guinn, Treasurer
Friends of Bob Krueger
P.O. Box 311717
New Braunfels, Texas 78131-1717

This is an agreement whereby CONSULTANTS '86 agrees to give a full and final release of all claims incurred by Friends of Bob Krueger, including the amount of $ 116,490.44. This release shall become effective upon payment by check from Friends of Bob Krueger in the amount of $ 23,298.00, a settlement made in the ordinary course of business practices.

This agreement further stipulates that there are no claims whatsoever by CONSULTANTS '86 against Bob Krueger or Krueger Associates.

Agreed to by:

Nina Guinn
NINA GUINN, TREASURER
FRIENDS OF BOB KRUEGER

Date: 14 JAN 86

8702023010

HARVEY CORN & COMPANY

Certified Public Accountants

January 15, 1986

Honorable Bob Krueger
P. O. Box 911
New Braunfels, TX 78130

Dear Bob:

I am writing to confirm the content of our discussion of January 8, 1986 concerning professional fees owed by the Krueger campaign to our firm. Please be advised that we consider our fees to have been paid in full as of May 10, 1985.

Thank you for your concern as to the status of this account.

Very truly yours,

Harvey R. Corn, CPA
Managing Partner

HRC/mmb

8702002301 9

114 West Seventh, Suite 1000
Austin, Texas 78701
512/476-0794

This is an agreement whereby Dallas Hilton Inn agrees to give a full and final release of all claims incurred by Friends of Bob Krueger, including the amount of $ 5,833.90. This release shall become effective upon payment by check from Friends of Bob Krueger in the amount of $ 1166.78, a settlement made in the ordinary course of business practices.

This agreement further stipulates that there are no claims whatsoever by Dallas Hilton Inn against Bob Krueger or Krueger Associates.

Agreed to by:

Nina Guinn
NINA GUINN, TREASURER
FRIENDS OF BOB KRUEGER

Marlo Hank
General Manager
Dallas Hilton Inn

Date: 1/22/86

8400230207

This is an agreement whereby Futura Press, Inc. agrees to give a full and final release of all claims incurred by Friends of Bob Krueger, including the amount of $ 4721.32. This release shall become effective upon payment by check from Friends of Bob Krueger in the amount of $ 2101.20, a settlement made in the ordinary course of business practices.

This agreement further stipulates that there are no claims whatsoever by Futura Press, Inc. against Bob Krueger or Krueger Associates.

Agreed to by:

Nina Guinn
NINA GUINN, TREASURER
FRIENDS OF BOB KRUEGER

Peggy Stern
Sec-Treas

Date: 1-22-86

2347620 0 0 0 2 3 0 8 2 1 8

This is an agreement whereby GLB Inc agrees to give a full and final release of all claims incurred by Friends of Bob Krueger, including the amount of $ 27,629.66. This release shall become effective upon payment by check from Friends of Bob Krueger in the amount of $ 6000.00, a settlement made in the ordinary course of business practices.

This agreement further stipulates that there are no claims whatsoever by GLB Inc against Bob Krueger or Krueger Associates.

Agreed to by:

Nina Guinn
NINA GUINN, TREASURER
FRIENDS OF BOB KRUEGER

George Shuler Bible
for GLB Inc.

Date: 14 Jan '86

8760200230022

This is an agreement whereby MUNGUIA PRINTERS agrees to give a full and final release of all claims incurred by Friends of Bob Krueger, including the amount of $ 627.90. This release shall become effective upon payment by check from Friends of Bob Krueger in the amount of $ 125 58, a settlement made in the ordinary course of business practices.

Agreed to by:

Nina Guinn
NINA GUINN, TREASURER
FRIENDS OF BOB KRUEGER

E.C. Flores

Date: 1-9-86

8702002302 3

This is an agreement whereby Texas Label Co. agrees to give a full and final release of all claims incurred by Friends of Bob Krueger, including the amount of $ 7958.35. This release shall become effective upon payment by check from Friends of Bob Krueger in the amount of $ 1600.00, a settlement made in the ordinary course of business practices.

This agreement further stipulates that there are no claims whatsoever by Texas Label Co. against Bob Krueger or Krueger Associates.

Agreed to by:

Nina Quinn
NINA QUINN, TREASURER
FRIENDS OF BOB KRUEGER

Daniel Vergara
for Texas Label Co.

Date: 8 Jan. 1986

8700200230324

This is an agreement whereby Texas Press Assn. agrees to give a full and final release of all claims incurred by Friends of Bob Krueger, including the amount of $ 2939.91. This release shall become effective upon payment by check from Friends of Bob Krueger in the amount of $ 587.98, a settlement made in the ordinary course of business practices.

Agreed to by:

Nina Guinn
NINA GUINN, TREASURER
FRIENDS OF BOB KRUEGER

Landell Williams
for Texas Press Assn.

Date: 8 January 1986

8702002302 5

This is an agreement whereby Worley Printers agrees to give a full and final release of all claims incurred by Friends of Bob Krueger, including the amount of $ 768. This release shall become effective upon payment by check from Friends of Bob Krueger in the amount of $ 2309.18, a settlement made in the ordinary course of business practices.

This agreement further stipulates that there are no claims whatsoever by Worley Printers against Bob Krueger or Krueger Associates.

Agreed to by:

Nina Guinn
NINA GUINN, TREASURER
FRIENDS OF BOB KRUEGER

Neal Worley
WORLEY PRINTING

Date: 14 JAN 86

8702002302 6

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

RQ-3

May 14, 1987

Nina J. Guinn, Treasurer
Friends of Bob Krueger
228 South Seguin Street
P.O. Box 311717
New Braunfels, TX 78130

Identification Number: C00165969

Reference: Year End Report (7/1/86-12/31/86)

Dear Ms. Guinn:

This letter is to inform you that as of May 13, 1987, the Commission has not received your response to our request for additional information, dated April 21, 1987. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Linda Tangney on our toll-free number (800) 424-9530 or our local number (202) 376-2488.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

7 53229
TR Dept #155

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

87 SEP 15 AM 11:27

September 9, 1987

Ms. Ellen Corey
Federal Election Commission
999 E Street, N.W.
Washington, D.C.

Re: C00165969

Dear Ms. Corey:

In response to your telephone inquiry concerning the debt settlement of Friends of Bob Krueger for the 1984 senatorial campaign, I enclose the amended FEC Report covering the period of 1/1/87 through 6/30/87. In response to your questions, we have listed below the information needed to complete the inquiry into the debt settlement.

(1) In checking our past records, the Dallas Hilton Inn settlement amount is $5,833.90. Although there were many conversations and a signed letter from the Dallas Hilton Inn, no further amount was billed and the final settlement was $5,833.90. This has been corrected on Schedule D.

(2) Futura Press showed a final billing of $4721.00, rather than $4292.00. This has been corrected on Schedule D.

(3) Bristol & Associates showed a final billing of $27,627.00, rather than $27,167.00. This has been corrected on Schedule D.

(4) In spite of numerous certified letters, return receipts requested, and telephone calls LDS did not return the requested signed form. However, on personal visit and by telephone this settlement was agreed upon and there has been no further billing. A copy of the final settlement check is enclosed.

(5) In spite of numerous certified letters, return receipts requested, and telephone calls Jenson & Baker did not return the requested signed form. However, on personal visit and by telephone this settlement was agreed upon and there has been no further billing. The firm of Jenson & Baker has been dissolved. A copy of the final settlement check is enclosed.

Thank you for your assistance in finalizing the debt settlement, and please do not hesitate to contact me if you have any further questions.

Sincerely,

Nina J. Quinn

NINA J. QUINN
Treasurer, Friends of Bob Krueger

87 SEP 15 PM 12:29

8 / 0 9 2 7 9 0

327

FRIENDS OF BOB KRUEGER 84
P. O. BOX 911 629-7347
NEW BRAUNFELS, TX 78130

302699
DEC 28 1986

PAY TO THE ORDER OF LDS $ 806.73

Eight Hundred Six and 73/100 DOLLARS

New Braunfels National Bank

in full & final settlement Nina J. Dunn

⑆018906786⑆ 0327⑈010950644⑈ ⑈0000080673⑈

0 0 2 7 9 1

DE 06 04 [redacted]

[redacted]

FOR DEPOSIT ONLY
L.D.S., INC.
ACCT. # 606-1966

DE 03 [redacted]

[redacted]

NO REFUNDS
ON FILM

9 4 0 4 3 5 6 3 2 5 8 1 2

318

FRIENDS OF BOB KRUEGER 84
P. O. BOX 911 629-7347
NEW BRAUNFELS, TX 78130

Jan 9 1986 $ 1400.00

Ken Bryan Jenson Baker & Assoc

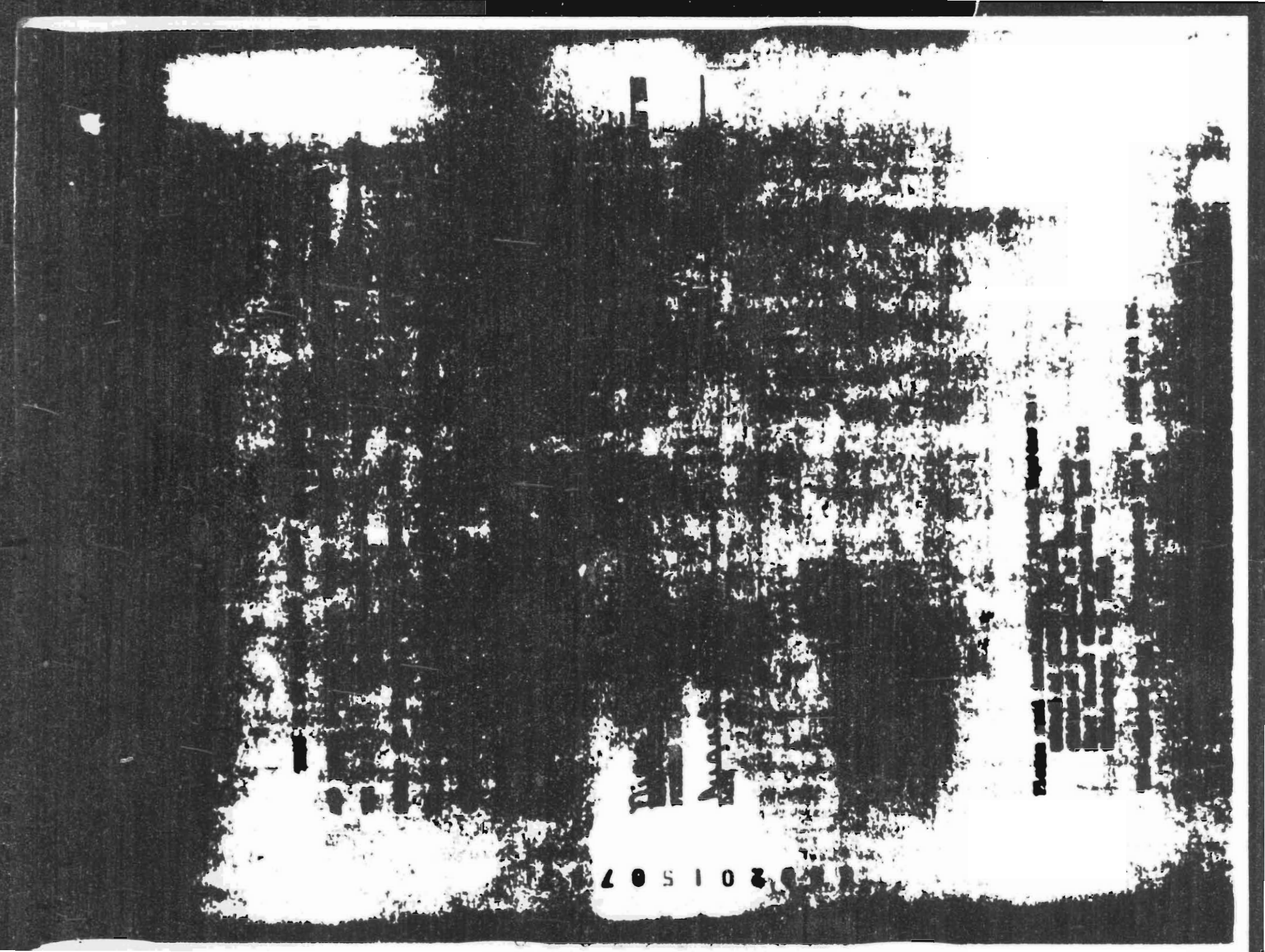
One Thousand, four Hundred and no/100 DOLLARS

New Braunfels National Bank

full & final settlement Nina J. Quinn

⑆ 1 1 4 9 0 6 7 8 6 ⑆ 0318 ⑈ 0 1 0 9 5 0 6 4 ⑈ ⑈ 0 0 0 0 1 4 0 0 0 0 ⑈

Re: Bryan Tensaliotis; Assault
Check to the
Order of
Ken Bryan
For Deposit Only
0185 2334



RECEIVED AT THE FEC

87 JUL 28 PM 2:57

CERTIFIED MAIL
JUL 28 1987

July 28, 1987

RECEIVED
OFFICE OF PUBLIC RECORDS & REGISTRATION
1987 AUG -3 AM 11:14
OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES

Ms. Elaine Corey
Federal Election Commission
999 E St., N.W.
Washington, D.C. 20463

Re: COO[illegible]

Dear Ms. Corey:

As per your request, I am responding to the inquiry from the Federal Election Commission regarding the debt settlement for Friends of Bob Krueger.

All possible efforts were made by Friends of Bob Krueger to gain more funds, including fundraisers, mailouts, telephone drives, personal contacts, and many more such attempts to obtain contributions to pay the remaining debt. Only when it was evident that more funds would not be available were the debt settlements made. As we have stated before, credit was extended in the ordinary course of business with terms similar to those granted to nonpolitical debtors of similar credit risk. Regular billing was sent every month, along with personal contacts and telephone calls. All efforts have been made by Friends of Bob Krueger to retire this debt and creditor has pursued remedies in a manner similar to those used to seek payment from nonpolitical debtors. Written agreement stating the terms of the settlement has been received (and copies sent to the FEC).

If you have any further questions please do not hesitate to contact me at 512/625/7347.

Sincerely,

Nina J. Guinn

Nina J. Guinn, Treasurer
Friends of Bob Krueger
P.O. Box 311717
New Braunfels, Texas 78131

87020090664

311717
Kelly, TX 78131

RETURN RECEIPT
REQUESTED

P 171 411 422

Ms. Elaine Corey
Federal Election Commission
999 E St., N.W.
Washington, D.C. 20463

OCT 31 '92 12:17

WALTER J. STEWART
SECRETARY

United States Senate

OFFICE OF THE SECRETARY

OFFICE OF PUBLIC RECORDS

THE PRECEDING DOCUMENT(S) WAS:

____HAND DELIVERED_____
DATE OF RECEIPT

____INSIDE MAIL_____
DATE OF RECEIPT

____RECEIVED FROM THE HOUSE OFFICE OF RECORDS AND REGISTRATIONS_____
DATE OF RECEIPT

✓ RECEIVED FROM THE FEDERAL ELECTION COMMISSION Dec 3, 1987
DATE OF RECEIPT

____FIRST CLASS MAIL POSTMARKED_____

____REGISTERED/CERTIFIED MAIL POSTMARKED_____

____NO POSTMARK

____POSTMARK ILLEGIBLE

____OTHER_____ POSTMARK_____

AND/OR DATE OF RECEIPT_____

8702009066 6

2404356327 3

WRONBET:000

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1993

Fred Meyer, State Chairman,
Republican Party of Texas
211 East 7th Street
Suite 620
Austin, TX 78701

RE: MUR 3749

Dear Mr. Meyer:

This letter acknowledges receipt on March 12, 1993, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Bob Krueger Campaign and Nina Guinn, as treasurer, Bristol & Associates, Consultants '84 Inc., Dallas Hilton Inn, Futura Press, Inc., Munguia Printers, Texas Label Co., Texas Press Association, Worley Printing, Corn & Janda, Long Distance Service and Jenson & Baker. 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 3749. 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,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosure
Procedures

2404856327 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1993

Nina Guinn, Treasurer
Bob Krueger Campaign
P.O. Box 311717
New Braunfels, TX 78130

RE: MUR 3749

Dear Ms. Guinn:

The Federal Election Commission received a complaint which indicates that Bob Krueger Campaign ("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 3749. 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.

2404356632/75

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

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

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

cc: Robert Krueger

24043563276

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1993

George L. Bristol
Bristol & Associates (GLB Inc.)
1106 West Avenue
Austin, TX 78701

RE: MUR 3749

Dear Mr. Bristol:

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 3749. 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.

7404356332277

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

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

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

24043563278

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1993

Consultants '84 Inc.
1250 Capitol of Texas Highway
Austin, TX 78746

RE: MUR 3749

Dear Sirs:

The Federal Election Commission received a complaint which indicates that Consultants '84 Inc. 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 3749. 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.

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24043563279

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

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

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

9404356329 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1993

General Manager
Dallas Hilton Inn
5600 North Capitol Expressway
Dallas, TX 75206

RE: MUR 3749

Dear Sir:

The Federal Election Commission received a complaint which indicates that the Dallas Hilton Inn 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 3749. 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.

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2404356328 1

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

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

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

2404356322d2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1993

Secretary Treasurer
Futura Press, Inc.
P.O. Box 3485
Austin, TX 78764

RE: MUR 3749

Dear Sir:

The Federal Election Commission received a complaint which indicates that Futura Press, Inc. 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 3749. 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.

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2404356332083

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

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

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

9404356328 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1993

Munguia Printers
P.O. Box 7387
San Antonio, TX 78207

RE: MUR 3749

Dear Sirs:

The Federal Election Commission received a complaint which indicates that Munguia Printers 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 3749. 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.

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9404356325

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

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

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

24043563286

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1993

Texas Label Co.
1207B East 1st
Austin, TX 78702

RE: MUR 3749

Dear Sirs:

The Federal Election Commission received a complaint which indicates that the Texas Label Co. 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 3749. 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.

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24043563287

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

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

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

9404356632888

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1993

Texas Press Association
718 West Fifth
Austin, TX 78701

RE: MUR 3749

Dear Sirs:

The Federal Election Commission received a complaint which indicates that the Texas Press Association 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 3749. 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.

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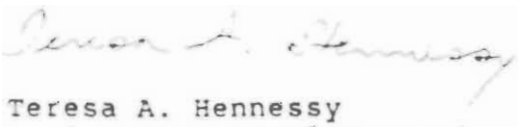
9 4 0 4 3 5 6 5 2 8 9

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

Sincerely,



Teresa A. Hennessy
Assistant General Counsel

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

2404356329 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1993

Neal Worley
Worley Printing
731 West 23rd
Austin, TX 78701

RE: MUR 3749

Dear Mr. Worley:

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 3749. 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.

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9404356329 1

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

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

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

7404356329 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1993

Harvey Corn, CPA
Managing Partner
Corn & Janda (Harvey Corn & Company)
114 West 7th
Suite 400
Austin, TX 78701

RE: MUR 3749

Dear Mr. Corn:

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 3749. 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.

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9404356329 3

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

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

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

9404356329 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1993

Long Distance Service
(L.D.S., Inc.)
P.O. Box 7387
San Antonio, TX 78291

RE: MUR 3749

Dear Sirs:

The Federal Election Commission received a complaint which indicates that Long Distance Service (L.D.S., Inc.) 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 3749. 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.

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2404356329 5

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

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

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

2404356329 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1993

Ken Bryan
Jenson & Baker (Creative Computers)
315 United Bank Tower
Austin, TX 78701

RE: MUR 3749

Dear Mr. Bryan:

The Federal Election Commission received a complaint which indicates that Jenson & Baker (Creative Computers) 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 3749. 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.

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2404356329 7

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

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

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

2404356329 8

DGC 8769

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

Mar 29 10 49 AM '93

TEXAS PRESS ASSOCIATION
SERVING TEXAS NEWSPAPERS SINCE 1880 718 WEST FIFTH STREET AUSTIN, TEXAS 78701-2799 512 477-6755
FAX 512 477-6759

March 25, 1993

93 MAR 29 PM 2:06
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Ms. Teresa A. Hennessy
Assistant General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: MUR 3749

Dear Ms. Hennessy:

This has reference to your letter dated March 18 (received by this office on March 23) stating that this association may have violated the Federal Election Campaign Act of 1971.

While it is true that Mr. Bob Krueger, now serving as the interim U.S. Senator from Texas, utilized our clipping service in 1984, every effort, short of legal action, was taken to collect this $2,939.91 delinquent account before finally signing the agreement on January 8, 1986, to settle the claim for approximately 20 percent of the amount due.

Efforts made to collect the account included:

- In keeping with our normal business practice, when the account first appeared on our 90-day aging report, Ms. Mildred Skapple, the department manager, initiated calls to campaign officials informing them that payments must begin immediately or we would hold the clippings in our files, and mail them only after receiving at least a partial payment. A partial payment was made and the clippings were mailed.

- As the election approached and cost of the current clippings more than offset the partial payment, Ms. Skapple again called and told officials that unless a sizeable payment was made the service would be terminated. A short time later, service was terminated.

- Following the election, which Mr. Krueger lost, this office continued to send statements to the campaign treasurer and finally, to Mr. Krueger's **home address**. Most of those statements were stamped with a notation that unless the account was paid, it would be referred to our collection agency. (See Exhibit A)

- Prior to the beginning of our annual audit in mid-1985, I discussed with our general counsel the advisability of taking court action to collect this account, only to be told that the legal fees would total more than the amount involved, but the attorney suggested that we continue to send statements each month. We continued to do this.

Larry Crabtree, Vernon Daily Record, President
Jim Hudson, Perryton Herald, First Vice President
Dick Richards, Aransas Pass Progress, Second Vice President
Sarah Greene, Gilmer Mirror, Treasurer
Lyndell Williams, TPA Central Office (Austin), Executive Vice President

9404356329 9

On January 8, 1986, Mr. Krueger personally visited my office to explain how difficult it is to raise campaign funds after losing an election. He went on to say that he simply did not have the money to pay all his campaign debts, but that he was prepared to offer 20 cents on the dollar. After considerable hesitation, I finally agreed. My reasoning: 20 cents is better than nothing.

Ms. Hennessy, the statement attributed to Mr. Krueger's spokesman, Monte Williams, that "creditors were campaign supporters who were willing to forgive the losing candidate," as published in the *Fort Worth Star-Telegram* on March 9, 1993, certainly did not apply to the Texas Press Association. We wanted our money!

I strongly believe (as I did when this debt was incurred) that a politician, particularly a former member of Congress, should be above reproach in all his or her business dealings. This unwavering belief is why I can assure you that, if anything, we pursued the collection of this account more vigorously than we perhaps would have had the debt been a non-political one.

As far as this association is concerned, I believe we made an ethical and responsible decision in settling this account, and I trust the general counsel for the Federal Election Commission will reach that conclusion as well.

Sincerely,

Lyndeil Williams
Executive Vice President

Enclosure: Exhibit A

cc: Larry Crabtree, President

LW:s

7404356330 0

9 4 0 4 3 5 6 5 3 0 1

Exhibit A

07/85	BAL FWD	1,844.24
		1,844.24 AMOUNT DUE

IF THIS ACCOUNT IS NOT PAID BY 8/30/85 IT WILL BE [illegible] TO OUR CREDIT [illegible]

DIVISION OF L. C. SYSTEM, INC.

TPS

REPRESENTING TEXAS WEEKLY AND DAILY NEWSPAPERS

BOB KRUEGER FOR U.S. SENATE
ATTN: MATHEW GLEASON
P. O. BOX 911
NEW BRAUNFELS TEXAS 78130

ACCT 90334

TO INSURE PROPER CREDIT PLEASE RETURN PART 3 (PINK COPY) WITH YOUR PAYMENT

DONALD W. RAY (1940-1992)
RANDALL BUCK WOOD
C. RICHARD FINE
RAYMOND R. GRAY
DOUG W. RAY
BERNADETTE B. GONZALEZ

RAY, WOOD & FINE
ATTORNEYS AT LAW
2700 BEE CAVES ROAD
AUSTIN, TEXAS 78746
(512) 328-8877

MAILING ADDRESS
P.O. BOX 165001
AUSTIN, TEXAS 78716
FAX (512) 328-9386

March 31, 1993

Ms. Mary Ann Bumgarner
Federal Elections Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: *Republican Party of Texas Complaint*
MUR 3749

Dear Mr. Bumgarner:

I am representing Consultants '84, Inc. in this matter. I was retained as of Monday, March 29, 1993. I have begun investigating the facts. The 15-day response deadline according to my calculation is April 6, 1993.

This complaint involves matters some of which occurred seven or eight years in the past. I am attempting to find all of the records of Consultants '84 from that period. Also, I am seeking to locate and get sworn statements from the persons who had actual knowledge of the circumstances at the time.

An adequate response cannot be submitted within the 15-day time period. I would request an additional 20 days for investigation and preparation of the response. This would place the response deadline on April 26, 1993.

I ask your consideration in this matter.

Sincerely,

Randall B. Wood

Randall B. Wood

RBW/dlm

93 APR -6 PM 3:30
RECEIVED
FEDERAL ELECTION COMMISSION
24043563302

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 1, 1993

Randall B. Wood, Esquire
Ray, Wood & Fine
2700 Bee Caves Road
Austin, Texas 78746

RE: MUR 3749
Consultants '84, Inc.

Dear Mr. Wood:

This is in response to your letter dated March 31, 1993, which we received on March 31, 1993, requesting an extension of 20 days 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,

Mary Ann Bumgarner

Mary Ann Bumgarner
Attorney

9404356303

BRAGG, CHUMLEA, McQUALITY, SMITHERS & CURRY
A Partnership of Professional Corporations

DALLAS OFFICE
3102 Maple Avenue
Suite 330
Dallas, Texas 75201
214-720-2040

101 East 9th Street, Suite 1005
Austin, Texas 78701
512-474-5573

Telecopy 512-474-5580

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM
APR 2 11 07 PM '93

March 30, 1993

93 APR -2 PM 3:21
RECEIVED
FEDERAL ELECTION COMMISSION

CERTIFIED MAIL, (RRR)

Ms. Teresa A. Hennessy
Assistant General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: Your letter to Texas Label Company dated March 18, 1993;
File No.: MUR 3749

Dear Ms. Hennessy:

This letter is to advise you that I represent Texas Label Company concerning the matter delineated by the referenced letter. After reviewing the complaint and the portions of the Federal Election Commission Regulations, it is obvious that these regulations do not apply to Texas Label Company. Texas Label Company is and has been a partnership since it was created in May, 1982. Enclosed with this letter is an Affidavit of Mr. Daniel Vasquez, Managing Partner of Texas Label Company, which explains this. I have also enclosed the completed "Statement of Designation of Counsel" form.

Should you need anything further, please do not hesitate to contact me.

Sincerely,

Roy O. Smithers

Roy O. Smithers

ROS/cmt

encs.
cc: Texas Label Company

2404235633004

AFFIDAVIT OF DANIEL VASQUEZ

BEFORE ME, the undersigned authority, on this day personally appeared DANIEL VASQUEZ, known to me to be the person whose name is subscribed to the following affidavit, and having been by me duly sworn, upon his oath, deposes and states as follows:

"My name is Daniel Vasquez. I am over 21 years of age and am mentally competent to give this affidavit. The matters set forth as follows are based upon my personal knowledge:

I am the managing partner of Texas Label Co., which is a Texas General Partnership, located at 1207 East 1st Street, Austin, Texas 78702. It was formed in May, 1982, by me, my brother, Robert Vasquez, and Joe Gutierrez. It has remained a partnership with the same partners from its formation up to the present. There is a written partnership agreement signed by the partners on May 25, 1982. Texas Label Co. is not now, nor has it ever been a corporation.

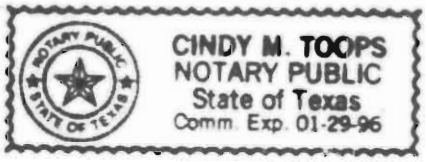
In or about March, 1984, Texas Label Co. printed posters for the Bob Krueger Campaign. The Campaign paid small sums on the debt during 1984 and up until mid-1985. When it appeared that the partnership could not collect the balance due of $7,958.35 from the Bob Krueger Campaign, we contacted our attorney, Roy O. Smithers, about collection of this amount. He advised us of the expenses related to collection, including his hourly fee and costs of litigation. Based upon these costs, our financial condition at the time, and the results of past collection attempts, the partnership decided to continue collection efforts on its own. In or about the latter part of 1985, we were contacted by the Bob Krueger people and offered $1,600.00 in full settlement of the debt. Thinking the partnership would

2 4 0 4 3 5 6 3 3 0 5

received nothing further and considering the costs of collection and litigation, the partnership decided to accept the $1,600.00 settlement for the balance due."

Daniel Vasquez, Affiant

SUBSCRIBED AND SWORN TO before me by DANIEL VASQUEZ, this the 30th day of March, 1993.



Notary Public in and for the
State of Texas

9404356330 6

STATEMENT OF DESIGNATION OF COUNSEL

93 APR -2 PM 3:21

MUR 3749

NAME OF COUNSEL: Roy O. Smithers

ADDRESS: 101 East 9th Street, Suite 1005
Austin, Texas 78701

TELEPHONE: (512) 474-5573
FAX: (512) 474-5580

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.

March 30, 1993
Date

Signature, Daniel Vasquez,
General Partner of Texas Label Co.

RESPONDENT'S NAME: Daniel Vasquez (Texas Label Co.)

ADDRESS: 1207 East 1st Street
Austin, Texas 78702

TELEPHONE: HOME(512) 559-2230
BUSINESS(512) 474-4333

7404356330 7

OGC 3846

DAVIDSON
HOTEL COMPANY®

APR 5 10 54 AM '93

March 30, 1993

93 APR -5 PM 4:05

RECEIVED
FEDERAL ELECTION COMMISSION

Ms. Teresa A. Hennessy
Assistant General Counsel
Federal Election Commission
Washington, DC 20463

Re: Dallas Hilton Inn
MUR 3749

Dear Ms. Hennessy:

We have received your letter of March 18 in which you advise that your office is investigating a complaint which alleges that there were possible violations of the Federal Election Campaign Act of 1971 by the Friends of Bob Krueger campaign committee in a 1984 campaign in Texas. Apparently, there is some reason to believe that the then owners of the Dallas Hilton Inn may have been involved in these activities.

Our company is a hotel management company based in Tennessee. We began managing the former Dallas Hilton Inn in the middle of 1991. At the request of Westinghouse Credit Corporation ("Westinghouse") which assumed ownership of the hotel at that time through an affiliate, First Hotel Investment Corporation ("First Hotel"), we managed the hotel off and on from that time until it was closed by Westinghouse in late 1992.

As a result, we have no knowledge of any kind about the events which you are currently investigating and can offer no assistance to your efforts. I would appreciate your removing our company from your investigation and advising us of such action.

Thank you very much for your consideration.

Very truly yours,

DAVIDSON HOTEL COMPANY

Mark

Mark E. French
Vice President-Finance

MEF:klf

11 Cottonfield Rd., Suite 142, Memphis, TN 38119 Phone (901) 761-4664 Fax (901) 763-384

2 0 4 3 5 6 3 3 0 8

OGC 8850

Munguia Printers, Inc.
2201 Buena Vista
San Antonio, Texas 78207-3799
(512) 225-7206
FAX (512) 225-8089

APR 5 11 15 AM '93

March 30, 1993

93 APR -5 PM 4:14

RECEIVED
FEDERAL ELECTION COMMISSION

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

Re: MUR3749

Dear Ms. Bumgarner:

Munguia Printers, Incorporated did not violate the Federal Election Campaign Act of 1971. We will demonstrate to you that Friends of Bob Krueger which is a political committee registered with the Federal Election Commisssion placed an order for printing with Munguia Printers, Inc. in 1984.

The amount of the printing cost was $1,928.00 in 1984. I personally spoke to Nina Guinn on a regular basis in trying to get the "Friends of Bob Krueger Committee" to pay the incurred debt to Munguia Printers, Inc. Nina Guinn told me on a regular basis that the "Friends of Bob Krueger" were doing everything they could to retire the debt.

The amount paid by the committee in those two years was $1,300.00, the amount still due was $628.00.

On January 9, 1986, Mr. Bob Krueger visited my office and asked if he could speak to me about the monies he owed to Munguia Printers, Inc. Mr. Krueger told me that he did not have any money and he was flat broke. He then asked if he could settle the debt if he paid $125.58. I spoke to Mr. Krueger about his debt and told him I was sorry that he had incurred so much debt and agreed to his proposal and a settlement was made in the ordinary course of business practice.

I must repeat that every effort was made to collect the money that was owed to Munguia Printers, Inc.

Please review the activity that occured in his account during the two years that I mentioned in my letter.

2 4 0 4 3 5 6 3 3 0 9

Munguia Printers, Inc.
2201 Buena Vista
San Antonio, Texas 78207-3799
(512) 225-7206
FAX (512) 225-8089

Year of the debt 1984

Amount of the original debt	$1,928.00
Amount paid by the committee	$1,300.00
Additional monies paid by Bob Krueger	$ 125.58
Total monies paid	$1,425.58

Munguia Printers, Inc. was not a campaign supporter.

Munguia Printers, Inc. clearly demonstrated that every effort was made to collect our monies. Munguia Printers, Inc. would have taken the same action with a non-political debt.

Munguia Printers, Inc. did not extend goods and services to Mr. Bob Krueger's 1988 campaign.

If you have any questions, please call me at (210)225-7206.

Sincerely,
MUNGUIA PRINTERS, INC.

Edward C. Ybarra

Edward C. Ybarra
Vice President

24043563310

DOC 7880

EPSTEIN BECKER & GREEN, P.C.
ATTORNEYS AT LAW
1227 25TH STREET, N.W.
WASHINGTON, D.C. 20037-1156†

(202) 861-0900
TELECOPIER (202) 296-2882
DIRECT LINE

250 PARK AVENUE
NEW YORK, NEW YORK 10177-0077†
(212) 351-4500

1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067-2501
(310) 556-8861

SIX LANDMARK SQUARE
STAMFORD, CONNECTICUT 06901-2704†
(203) 348-3737

ONE RIVERFRONT PLAZA
NEWARK, NEW JERSEY 07102-5401†
(201) 642-1900

101 FEDERAL STREET
BOSTON, MASSACHUSETTS 02110-1800
(617) 342-7052

111 PINE STREET
SAN FRANCISCO, CALIFORNIA 94111-5614
(415) 398-3500

12750 MERIT DRIVE
DALLAS, TEXAS 75251-1209†
(214) 490-3143

116 SOUTH MONROE STREET
TALLAHASSEE, FLORIDA 32301-1530
(904) 681-0596

2400 SOUTH DIXIE HIGHWAY, SUITE 100
MIAMI, FLORIDA 33133
(305) 856-1100

510 KING STREET, SUITE 301
ALEXANDRIA, VIRGINIA 22314-3132
(703) 684-1204

†P.C. NEW YORK, WASHINGTON, D.C., NEW JERSEY, CONNECTICUT AND TEXAS ONLY

April 7, 1993

RECEIVED
FEDERAL ELECTION COMMISSION
93 APR -7 PM 2:38

24043563311

HAND-DELIVERED

Teresa A. Hennessy, Esquire
Assistant General Counsel
Federal Election Commission
999 E Street, N.W.
Room 657
Washington, DC 20463

RE: M.U.R. 3749: Respondent Friends of Bob Krueger '84 and Nina Guinn, as Treasurer

Dear Ms. Hennessy:

As discussed, our firm has been retained by the Friends of Bob Krueger '84 and Nina Guinn, as treasurer ("the Committee") to represent it in the above-referenced matter. Accordingly, enclosed is a completed Statement of Designation of Counsel.

In additional, as also discussed, we hereby request an extension of time of ten business days, from April 12, 1993[1] until April 26, 1993, to respond to this meritless complaint filed by the Republican Party of Texas.

---

[1]To the best of our knowledge, the complaint and your accompanying letter were received by our client in the mail on Thursday, March 25, 1993. Thus, the current due date for the response is April 12, 1993. See 11 C.F.R. §111.2(c).

As our firm was retained only several days ago by the Committee, this additional time is essential for us to familiarize ourselves with the facts in this matter and to accumulate the necessary information to fully respond to the complaint.

Please do not hesitate to contact me at 202/861-1877 if you have any questions regarding our extension-of-time request and any information which you require to resolve this matter.

Sincerely,

Leslie J. Kerman

Leslie J. Kerman

2404356331 2

Enclosure

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3749

NAME OF COUNSEL: Leslie J. Kerman

ADDRESS: Epstein Becker & Green, P.C.
1227 25th Street, N.W., Suite 700
Washington, DC 20037

TELEPHONE: (202) 861-1877

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.

4/6/93
Date

X Nina Guinn
Signature

RESPONDENT'S NAME: Friends of Bob Krueger '84 and Nina Guinn, as treasurer

ADDRESS: P.O. Box 311717
New Braunfels, Texas 78130

TELEPHONE: HOME(---) --------
BUSINESS(210) 625-7347

2404356331 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APRIL 9, 1993

Leslie J. Kerman, Esquire
Epstein Becker & Green, P.C.
1227 25th Steet, N.W., Suite 700
Washington, DC 20037

RE: MUR 3749
Friends of Bob Krueger '84
and Nina Guinn, as treasurer

Dear Ms. Kerman:

This is in response to your letter dated April 7, 1993, which we received on April 7, 1993, requesting an extension of 10 days 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) 219-3400.

Sincerely,

Mary Ann Bumgarner

Mary Ann Bumgarner
Attorney

2404356331 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APRIL 19, 1993

Metro Media Communications
One Meadowland Plaza
E. Rutherford, NJ 07073

RE: MUR 3749
Metro Media Communications

Dear Sir or Madam:

On March 18, 1993, the Federal Election Commission attempted to notify you that Long Distance Service (L.D.S., Inc.) may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). This letter was returned by the Post Office because of an incorrect address. When contacting the Corporate Division in Texas, we were informed that Long Distance Service (L.D.S., Inc.) had merged with Communications Services Inc., and changed its name to Metro Media Communications. Enclosed are the materials which were originally sent to you in this matter.

Please be advised that the matter to which the March 18, 1993 letter relates is still pending. Accordingly, you are still required to provide a response to the complaint in this matter. Because the time period in which this response should have been submitted has already elapsed, you should submit such a response as soon as possible.

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

Sincerely,

Mary Ann Bumgarner

Mary Ann Bumgarner
Attorney

2404356331 5

RANDALL BUCK WOOD

RAY, WOOD & FINE
ATTORNEYS AT LAW
2700 BEE CAVES ROAD
AUSTIN, TEXAS 78746
(512) 328-8877

MAILING ADDRESS:
P.O. BOX 165001
AUSTIN, TEXAS 78716
FAX (512) 328-9386

April 23, 1993

Ms. Mary Ann Bumgarner
Federal Elections Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: *Republican Party of Texas Complaint*
MUR 3749

Dear Ms. Bumgarner:

This is in response to the Federal Elections Commission's notice dated March 18, 1993, of its inquiry generated by the complaint of the Republican Party of Texas. I represent Consultants '84, Inc. in this matter.

Consultants '84, Inc. is no longer in business and was voluntarily dissolved on December 6, 1990. Its principal client in 1984 was the Mondale For President Campaign. Friends of Bob Krueger was a secondary client. The business closed after the 1990 elections.

The affidavit of Judy Trabulsi with supporting documentation is attached hereto. This affidavit describes the business of Consultants '84, Inc. with respect to the Friends of Bob Krueger campaign and the handling of the residual debt.

It should be noted at the outset that Consultants '84 was not a lone creditor which found itself unable to collect the full amount of its bill. There were others. Many of these creditors were not connected to the campaign and were not supporters of Bob Krueger. They, like Consultants '84, found themselves unable to collect the face value of their bills in the face of an unsuccessful political campaign. Although I have not spoken to any of the other creditors, news reports indicate that some of them, like Consultants '84, were unhappy with not being paid in full. However, all of them were faced with the business reality that no additional money was likely to be raised and that Friends of Bob Krueger had no assets from which a judgment could be satisfied.

Consultants '84 attempted to collect the debt for almost a year and a half before agreeing to settle. By 1986, it was abundantly apparent that Friends of Bob Krueger had done everything feasible to raise money to pay all of its debts. The money that was raised

was simply insufficient. Consultants '84 was aware of the futility of further fundraising activities under all of the circumstances.

Consultants '84 had very few options at that point. The remaining funds were to be distributed fairly among the remaining creditors. If Consultants '84 refused the settlement, it was likely to receive nothing. Friends of Bob Krueger was not an ongoing entity which could be threatened by bad credit ratings. Nor was legal action a viable alternative. There were no assets from which a judgment could be executed.

Under those circumstances, to refuse to settle the debt while other creditors were settling for $.20 on the dollar, would have been commercially unreasonable. The management of Consultants '84 had a duty to maximize its income and did so in a prudently reasonable manner.

Finally, Consultants '84 would not have settled without the knowledge that Friends of Bob Krueger had made the ultimate effort to raise funds and that the Federal Elections Commission was being regularly consulted concerning the legality of these settlements.

Consultants '84's conduct in settling this debt was commercially reasonable. The standard in Texas and the Fifth Circuit Court of Appeals for "commercially reasonable" is conduct that would be pursued by "an ordinary and prudent businessman *(sic)* operating under the same or similar circumstances." *FDIC v. Lanier*, 926 F.2d 462 (5th Cir. 1991). Here all of the facts and circumstances support the conclusion that the settlement met such a standard.

If you have any other questions or need additional information, please contact the undersigned immediately.

Sincerely,

Randall B. Wood

RBW/dlm
c:\dlm\l-bumga2.doc

2404356331 7

STATE OF TEXAS §
§ **AFFIDAVIT**
COUNTY OF TRAVIS §

I, Judy Trabulsi, being conscious of my duty to testify truthfully, and having first been duly sworn to do so, depose and say that:

"1. I am of the age of majority, of sound mind, and have personal knowledge of the following facts.

2. I was Vice President of Consultants '84, Inc. at all times relevant to this controversy and have personal knowledge of the facts and circumstances surrounding the matters involved.

3. Consultants '84 acted as the Krueger campaign advisor and media consultant for the 1984 Democratic Primary Election for United States Senator. The campaign was conducted by the Friends of Bob Krueger. Consultants '84, among other things, developed and placed the media for the campaign.

4. The management of Consultants '84 was very familiar with the day to day operations of the Krueger campaign and was in constant contact with the campaign staff and the candidate.

5. The management of Consultants '84 was also aware of the overall political situation in Texas as they had been extensively involved with numerous political campaigns in Texas as well as national campaigns.

6. It was Consultants '84's experience that despite every effort to the contrary, political campaigns invariably have some bills that have not come in or not been paid prior to election day. Such late billings are in the ordinary course of business for entities which are employed to assist candidates for public office.

7. If the client-candidate is unsuccessful in the election, these unpaid bills usually require a considerable fundraising effort by the supporters of the candidate. Depending upon the size of the deficit and the political viability of the candidate, the funds to pay these bills may take a long time to raise. In a few instances, the candidate and his or her supporters simply are unable to raise the monies to pay the bills.

8. The 1984 Senate Campaign was Bob Krueger's second effort. He was the Democratic nominee for the Senate in 1978, but was defeated by then-Senator John Tower by less than 1% of the vote. That campaign ended with unpaid bills, but Krueger's strong showing left him with the ability to raise the funds to cover these expenses. However, the effort took a significant period of time.

2404356331 8

9. In 1984, Krueger found himself in an extremely tight race with two other candidates. The race ended with the three candidates in a virtual dead heat with Krueger missing the run-off by some 900 votes. This outcome was unexpected. However, Krueger, having lost two successive races for the United States Senate and being out of office, was in a very poor position to raise additional funds.

10. The campaign had been very frugal and the outstanding debt at the time of the election was very small. I was informed that the total debt was less than $200,000 after the election, if Krueger's personal loans to the campaign were excluded.

11. I personally kept in contact with the remaining campaign staff. I was aware, as were the others in the management of Consultants '84, Inc., that the staff, many of whom were unpaid, were making every effort to raise the funds to pay the remaining bills. Further, we were aware that Krueger was personally making these efforts.

12. Some monies were raised and some debts retired but it became apparent that Friends of Bob Krueger might not be able to pay the remaining creditors in full. The remaining bills owed by the campaign to Consultants '84 totaled $113,895.00 as of July 31, 1984. See Exhibit "A."

13. In March, 1985, Consultants '84 received a communication from the campaign which is attached as Exhibit "B" giving Consultants '84 an update on the fundraising efforts. During this time, we were also in periodic contact with the campaign about the success or lack thereof of the fundraising.

14. On August 8, 1985, Consultants '84 made further inquiry as to the progress of fundraising activity. From subsequent phone conversations, it was apparent that little if any more money was likely to be raised. See Exhibit "C."

15. In January of 1986, Consultants '84 was aware that further raising efforts were futile. Bob Krueger was not personally liable for these debts and the campaign had little if any money left. There were discussions between Consultants '84 and the campaign about a settlement of this debt. We were aware that we were not the only campaign creditor and that it was proposed to do a *pro rata* distribution of the remaining campaign funds to the creditors. This would result in the outstanding creditors receiving some 20 cents for each dollar outstanding.

16. At this time, we were assured that Friends of Bob Krueger would clear this settlement with the Federal Election Commission. This, in fact, that was done.

17. Attached are Exhibits "D" and "E" which are copies of letters to the campaign from the FEC expressing the opinion that the settlements complied with federal law.

2404356319

18. Consultants '84 was in the business of assisting political campaigns, hopefully for a profit. The entity never intended to forego the payment of any debt. However, like any other business, it had to recognize the reality of the circumstances. There were no funds held by Friends of Bob Krueger from which to be paid and after extensive efforts to raise money had failed, no real prospects that monies would ever exist to pay these debts. Taking legal action would be futile and would cost money, with no prospects of recovery.

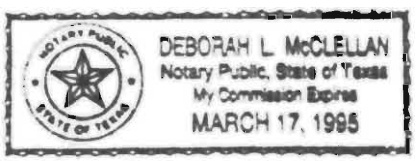
19. Therefore, Consultants '84, like the other creditors, which were in an identical situation, agreed to a settlement of these debts. This was in the ordinary course of business and was a prudent business decision considering all of the facts and circumstances. All of the other creditors certainly appeared to have had the same opinion.

Further Affiant sayeth naught."

Judy Trabulsi

Judy Trabulsi

Sworn to before me and subscribed in my presence this 23rd day of April, 1993.



Deborah L. McClellan

Notary Public, State of Texas

2404356 3320

August 8, 1985

Friends of Bob Krueger Committee
P.O. Box 911
New Braunfels, TX 78130

Attn.: Nina Guinn, Treasurer

Dear Nina:

Our last correspondence from you was dated March 5, 1985. It stated that the committee was planning fundraising activities to reduce the debts resulting from the 1984 Senatorial campaign.

We would like to know if these efforts have been successful and any plans Friends of Bob Krueger may have to reduce the balance carried by Consultants '84. I am enclosing a copy of the final statement submitted.

Your assistance, as always, is greatly appreciated.

Sincerely,

Bonnie Hunter

Bonnie Hunter

enclosure

BH: eam

24043563321

EXHIBIT C

1515 Capital of Tx Hwy, One Cielo Center, Fourth Floor
Austin, Tx 78746 ☎ 512/327-8810

CONSULTANTS '84, INC.

July 31, 1984

Friends of Bob Krueger
P. O. Box 911
New Braunfels, Texas 78130

STATEMENT

	Balance as of 5/31/84	$116,490.44
July 31	Invoice # 5029	(2,594.84)
	Balance as of 8/31/84	$113,895.60

2404356332 2

1515 Capital of Texas Highway South, Suite 500 Austin, Texas 78746 (512) 327-8810

KRUEGER OF TEXAS

Democrat for U.S. Senate

March 5, 1985

Consultants '84, Inc.
One Cielo Center
1250 Capital of Texas Highway
Fourth Floor
Austin, Texas 78746

To Whom It May Concern:

Unfortunately Friends of Bob Krueger Committee still owes a large amount to Consultants '84, Inc., from the 1984 U.S. Senate campaign. It was extremely difficult to raise funds until the general election was over, then the Christmas season. Plans are now underway for more fundraising in the next few months. We will be actively working to erase all debts and will immediately send the money to you as it reaches this office. Thank you for your patience in this matter, and we hope to take care of this as quickly as possible.

Yours sincerely,

Nina Guinn

Nina Guinn
Treasurer

24043563323

EXHIBIT B

P.O. Box 911, New Braunfels, TX 78130
~~105 West Riverside Drive • Suite 135 • Austin, Texas 78704 • (512) 482-0831~~

Paid for by Friends of Bob Krueger Committee. L. D. Brinkman, Finance Chairman

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 26, 1988

Nina J. Guinn, Treasurer
Friends of Bob Krueger
228 South Sequin Street
P.O. Box 31171
New Braunfels, TX 78131-1717

RE: DSR 88-06

Dear Ms. Guinn:

The Commission has reviewed the debt settlement materials submitted on behalf of Friends of Bob Krueger which contain information concerning the settlement of a debt owed to eleven (11) corporate and non-corporate business entities. This review is limited in scope and only addresses itself to the following considerations:

(1) whether the credit was extended in the ordinary course of the creditor's business practices and the terms were substantially similar to extensions of credit to non-political debtors of similar risk and size of obligation;

(2) whether the debtor has undertaken all commercially reasonable efforts to satisfy the outstanding debt;

(3) whether the creditor has pursued its remedies in a manner similar in intensity to that employed by the creditor in pursuit of a non-political debtor, including lawsuits if filed in similar circumstances; and

(4) whether the debtor has filed a statement of settlement with the Commission which includes the initial terms of credit, the steps taken by the debtor to satisfy the debt, and the collection remedies pursued by the creditor.

Based upon this limited review, the Commission has concluded that the proposed settlement with Bristol & Associates (GLB, Inc.); Consultants '84, Inc; Futura Press, Inc.; Munguia Printers; Texas Label Co.; Texas Press Association; Worley Printing; Corn & Janda (Harvey Corn & Company), Long Distance Service (L.S.D., Inc); and Jenson & Baker (Creative Computers) would not result in apparent violations of the Federal Election Campaign Act of 1971, as amended, or the Commission's Regulations.

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EXHIBIT D

The Commission is currently reviewing materials submitted by the Committee regarding the debt settlement agreement with Dallas Hilton Inn. In connection with that review, certain additional information is necessary in order to clarify the matter. According to the debt settlement submitted by the Committee, Dallas Hilton Inn agreed to accept a settlement payment of $1,166.78 in order to give full and final release of all claims incurred by the Committee including the amount of $5,833.90. However, our records disclose that no payment was made by the Committee in settlement of the claim. Please explain this discrepancy and provide supporting documentation. Please respond to this inquiry within 15 days after your receipt of this letter. Should you have any questions please contact Deborah Curry, the attorney assigned to this submission at (202) 376-8200.

This letter, together with the debt settlement materials submitted will be placed on the public record.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

24044356333225

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

October 18, 1988

Nina J. Guinn, Treasurer
Friends of Bob Krueger
228 South Sequin Street
P.O. Box 31171
New Braunfels, TX 78131-1717

RE: DSR 88-06

Dear Ms. Guinn:

The Commission has reviewed the debt settlement materials submitted on behalf of Friends of Bob Krueger which contain information concerning the settlement of a debt owed to Dallas Hilton Inn. This review is limited in scope and only addresses itself to the following considerations:

(1) whether the credit was extended in the ordinary course of the creditor's business practices and the terms were substantially similar to extensions of credit to non-political debtors of similar risk and size of obligation;

(2) whether the debtor has undertaken all commercially reasonable efforts to satisfy the outstanding debt;

(3) whether the creditor has pursued its remedies in a manner similar in intensity to that employed by the creditor in pursuit of a non-political debtor, including lawsuits if filed in similar circumstances; and

(4) whether the debtor has filed a statement of settlement with the Commission which includes the initial terms of credit, the steps taken by the debtor to satisfy the debt, and the collection remedies pursued by the creditor.

Based upon this limited review, the Commission has concluded that the proposed settlement with Dallas Hilton Inn would not result in apparent violations of the Federal Election Campaign Act of 1971, as amended, or the Commission's Regulations.

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EXHIBIT E

This letter, together with the debt settlement materials submitted will be placed on the public record.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

24043563327

WINSTEAD
SECHREST
& MINICK
A Professional Corporation
Attorneys & Counselors

5400 Renaissance Tower
1201 Elm Street
Dallas, Texas 75270

DALLAS HOUSTON AUSTIN
LONDON WASHINGTON, D.C.

(214) 742-1700
Telecopier (214) 745-5390

Direct Dial: 214/745-5659

May 5, 1993

Teresa A. Hennessy, Esq.
Assistant General Counsel
Federal Elections Commission
999 "E" Street - N.W.
Washington, D.C. 20463

VIA TELECOPY NO. 202 219-3923

Re: Investigation (the "Investigation") of possible violations of the Federal Election Campaign Act of 1971 (the "Act") by the Dallas Hilton Inn (MUR 3749)

Dear Ms. Hennessy:

This law firm represents First Hotel Investment Corporation ("FHIC"), a Delaware corporation, with respect to the above-referenced matter. We formally request that your office terminate the Investigation as it pertains to FHIC.

FHIC has had no involvement in the alleged violations of the Act. FHIC became the owner of the Dallas Hilltop Inn (the "Hotel") (formerly known as the Dallas Hilton Inn) following its purchase of said premises at a foreclosure sale held on December 4, 1990. Please find enclosed a photocopy of the Substitute Trustee's Deed which was recorded in the Real Property Records of Dallas County, Texas to evidence the conveyance of the Hotel to FHIC in 1990.

Please note that the Investigation pertains to alleged violations of the Act that occurred in 1984 -- approximately six (6) years prior to FHIC's ownership of the Hotel. We trust that following your review of the enclosure, you would agree with us that FHIC's foreclosure of its lien against real property and improvements six (6) years after the alleged infringement of the Act should not subject FHIC to culpability for such alleged violations or cause it to be a suspect under the Investigation.

In the event, however, that you require further justification or additional information as a prerequisite to termination of the Investigation with respect to FHIC, please so advise the undersigned and grant FHIC fifteen (15) additional days within which to respond.

9 4 0 4 3 5 6 3 3 2 8

Thank you, for your consideration of this matter. Please do not hesitate to call me with any questions or comments you may have.

Very truly yours,

Kenneth D. Martin

KDM/sky
Enclosure

cc: Ronald S. Krasnow, Esq.
Ms. Clarissa Elizinga
J. Richard White, Esq. (of the Firm)

2404356633329

When recorded, return to:

120390/DMIL
W2316-12145

J. Richard White, Esq.
Winstead Sechrest & Minick P.C.
5400 Renaissance Tower
1201 Elm Street
Dallas, Texas 75270

A 1384 2 11.00 DEE 2 12/04/9

SUBSTITUTE TRUSTEE'S DEED

This SUBSTITUTE TRUSTEE'S DEED ("Deed") is executed as of the 4th day of December, 1990, by the undersigned ("Substitute Trustee").

W I T N E S S E T H:

WHEREAS, MOCKINGBIRD CENTRAL, LTD. ("Grantor") executed and delivered to Minnette Carrabba, as trustee ("Trustee"), a Deed of Trust ("Deed of Trust"), dated January 30, 1984, filed of record in Volume 84023, Page 0709 of the Deed of Trust Records of Dallas County, Texas to secure that certain Promissory Note Secured by Lien on Real Property ("Note") of even date therewith in the original principal amount of $1,900,000.00, executed by Grantor and payable to order of Westinghouse Credit Corporation ("WCC"); and

WHEREAS, the Deed of Trust conveyed to the said Trustee, in trust, certain land located in Dallas County, Texas, which is more particularly described in Exhibit "A" attached hereto and incorporated herein by reference for all purposes, together with all improvements thereon and appurtenances thereto (such land, improvements and appurtenances being hereinafter referred to as the "Real Property") and certain personal property ("Personal Property") situated on or related to the Real Property, which is more particularly described on Exhibit "B" attached hereto and incorporated herein by reference for all purposes, subject, however, to any and all exceptions, encumbrances or other matters affecting title to which the lien of the Deed of Trust is subordinate, whether by operation of law or otherwise (the Real Property, the Personal Property and any and all of Grantor's rights, titles and interests in any other property, whether real or personal, as described or otherwise included as collateral under the Deed of Trust are hereinafter, collectively, referred to as the "Mortgaged Property"); and

WHEREAS, the Note and Deed of Trust were modified by that certain (i) Loan Modification Agreement (the "Modification Agreement") dated April 2, 1985 and recorded in Volume 85073, Page 4031, Deed Records of Dallas County, Texas, (ii) Second Loan Modification Agreement (the "Second Modification Agreement") dated May 13, 1987 and recorded in Volume 87094, Page 4608, Deed Records of Dallas County, Texas and (iii) Third Loan Modification Agreement (the "Third Modification Agreement") dated September 11, 1989 and recorded in Volume 90005, Page 3682, Deed Records of Dallas County, Texas (the Modification Agreement, the Second Modification Agreement and the Third Modification Agreement are herein called collectively the "Modification Agreement"); and

WHEREAS, WCC as the then legal owner and holder of the Note and the beneficiary under the Deed of Trust, in accordance with the terms of the Deed of Trust

the terms of the Deed of Trust, removes the Trustee, and the undersigned (the "Substitute Trustee"), was duly appointed as a substitute trustee of the trust created by the Deed of Trust, pursuant to that certain Removal of Trustee and Appointment of Substitute Trustee, dated July 11, 1989, and recorded in Volume 89155, Page 1018 and rerecorded in Volume 89220, Page 3182, Deed Records of Dallas County, Texas.

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WHEREAS, default has occurred under the terms of the Note and Deed of Trust and WCC, as the then current legal owner and holder of the Note and beneficiary under the Deed of Trust, and in accordance with the terms of the Deed of Trust authorized and directed the Substitute Trustee to sell the Mortgaged Property under the provisions of the Deed of Trust; and

WHEREAS, WCC assigned all of its right, title and interest in and to the Note and the Deed of Trust to First Hotel Investment Corporation (herein sometimes called the "Beneficiary") by that certain Assignment of Deed of Trust, Promissory Note and Other Documents dated November 15, 1990 executed by WCC and Beneficiary and recorded in Volume __, Page ___, Deed Records of Dallas County, Texas; and

WHEREAS, pursuant to said authorization and direction and fully in accordance with the terms of the Deed of Trust, the Substitute Trustee sold the Mortgaged Property at public auction at the designated area for foreclosure as specified by the Commissioner's Court of Dallas County, Texas between the hours of 1:00 p.m. and three (3) hours after such time, on Tuesday, the 4th day of December, 1990, after having given written notice pursuant to Notice of Substitute Trustee's Sale (the "Notice") of the time, place and terms of such proposed sale as prescribed by law and by the terms of the Deed of Trust, by means of (i) having posted or having caused to be posted the Notice for at least twenty-one (21) days preceding the date of sale at the Courthouse door of Dallas County, Texas, (ii) having filed or having caused to be filed the Notice with the Clerk of Dallas County, Texas at least twenty-one (21) days preceding the date of sale, and (iii) having served or having caused to be served a copy of the Notice at least twenty-one (21) days preceding the date of sale by certified mail, return receipt requested, on each debtor obligated to pay the debt evidenced by the Note and Deed of Trust at the address for each such debtor according to the current records of Beneficiary, all in accordance with Tex. Prop. Code Ann. §51.002, as heretofore amended; and

WHEREAS, at such sale the Mortgaged Property was sold by the Substitute Trustee to Beneficiary (hereinafter referred to as the "Grantee") at the hour of 2:44 p.m. for and in consideration of the sum SEVEN MILLION AND NO/100 DOLLARS ($7,000,000.00), the Grantee being the best and highest bidder therefor, and said consideration being the best and highest bid therefor.

NOW, THEREFORE, KNOW ALL MEN BY THESE PRESENTS that the Substitute Trustee, by virtue of the powers granted to the Substitute Trustee by the Deed of Trust and the aforesaid Removal of Trustee and Appointment of Substitute Trustee and in consideration of the foregoing premises and of the value expressed above given to the Substitute Trustee, by the said Grantee, the receipt and sufficiency of which are hereby acknowledged and confessed, has GRANTED, SOLD and CONVEYED and by these presents does GRANT, SELL and CONVEY the Mortgaged Property unto the said Grantee.

TO HAVE AND TO HOLD the Mortgaged Property, together with all and singular, the rights and appurtenances thereto and in any wise belonging, to the said Grantee, its successors and assigns, forever; and for and on behalf of the said Grantor, and the successors and assigns of said Grantor, the Substitute Trustee does hereby bind the said Grantor, and the successors and assigns of

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said Grantor, to WARRANT and FOREVER DEFEND, all and singular, the Mortgaged Property, insofar as authorized by said Deed of Trust, unto said Grantee, its successors and assigns, against every person whomsoever lawfully claiming or to claim the same or any part thereof.

7404355633333

WITNESS MY HAND as of the 4th day of December, 1990.

SUBSTITUTE TRUSTEE:

JoAnna Drake

JOANNA DRAKE

STATE OF TEXAS §
§
COUNTY OF DALLAS §

The foregoing instrument was ACKNOWLEDGED on the 4th day of December, 1990, by JoAnna Drake, the Substitute Trustee.

[S E A L]

William P. Davis
Notary Public, State of Texas

My Commission Expires:

WILLIAM P. DAVIS
Printed Name of Notary Public

WILLIAM P. DAVIS
Notary Public, State of Texas
My Comm. Expires 9/24/92

WILLIAM P. DAVIS
Notary Public, State of Texas
My Comm. Expires 9/24/92

ADDRESS OF GRANTEE
FOR TAX STATEMENTS

First Hotel Investment Corporation
One Oxford Centre
301 Grant Street
Pittsburgh, PA 15219
Attn: Vice President, Real Estate Finance

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081489/DMIL
W2316-12145

EXHIBIT "A"

Being a tract or parcel of land situated in the City of Dallas, Dallas County, Texas, and being all of Block 2939 in the City of Dallas, and being more particularly described as follows:

BEGINNING at an iron rod for corner in the intersection of the Northwesterly line of the M. K. & T. Railroad 60.00 feet right-of-way and the South right-of-way line of Mockingbird Lane (80 feet wide);

THENCE South 44 degrees 32 minutes 20 seconds West along the Northwesterly line of the M. K. & T. Railroad 60.00 feet right-of-way a distance of 1219.59 feet to an iron rod for corner in the Easterly right-of-way line of North Central Expressway (variable width);

THENCE North 13 degrees 21 minutes 40 seconds East along the Easterly line of North central Expressway a distance of 537.33 feet to an iron rod for corner;

THENCE North 24 degrees 06 minutes 30 seconds East along the Easterly line of North Central Expressway a distance of 14.87 feet to an iron rod for corner;

THENCE North 29 degrees 28 minutes East and continuing along the Easterly line of North Central Expressway a distance of 587.25 feet to an iron rod for corner;

THENCE North 64 degrees 18 minutes 20 seconds East along the Southeasterly line of the cut-off line between the said Easterly line of North Central Expressway and the said south line of Mockingbird Lane a distance of 37.76 feet to an iron rod for corner in the South line of Mockingbird Lane;

THENCE due East along the South line of Mockingbird Lane (80 feet wide) a distance of 448.48 feet to the point of beginning, and containing 234,737 square feet or 5.388 acres of land.

SAVE AND EXCEPT THE FOLLOWING DESCRIBED TRACT OF LAND:

An easement for the passage of vehicular and pedestrian traffic, together with the customary uses attendant thereto, including drainage and utilities, over, under, through, across and along all that certain lot, tract, or parcel of land situated in the County of Dallas, State of Texas, and described as follows, to wit:

BEING situated in the J.W. SMITH SURVEY, ABSTRACT NO. 1334, Dallas County, Texas, and being in Block 2939, Official City Numbers, and being part of the land conveyed to MOCKINGBIRD CENTRAL, LTD., by MOCKINGBIRD CENTRAL, LTD., by Deed dated March 13, 1959 and recorded in Volume 70052, Page 1429, Deed Records, Dallas County, Texas, and being more particularly described as follows:

BEGINNING at the intersection of the Northwest line of the MK & T Railroad with the South line of Mockingbird Lane, said intersection being the Northeast corner of said MOCKINGBIR CENTRAL, LTD., tract;

THENCE in a Westerly direction, along said line of Mockingbird Lane, a distance of 448.48 feet to the intersection of same with a corner cut-off line between said line of Mockingbird Lane and the Southeast line of North Central Expressway;

THENCE deflect left 25° 41' 40" and in a Southwesterly direction, along said cut-off line [illegible] feet to the intersection of same with the proposed South line of

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a distance of 0.77 feet to the intersection of same with the proposed [illegible] Mockingbird Lane;

THENCE deflect left 154° 18' 20" and in an Easterly direction, along said proposed line, distance of 451.21 feet to the intersection of same with the Northwest line of the MK & T Railroad;

THENCE deflect left 45° 26' 40" and in a Northeasterly direction, along said Northwest line, a distance of 3.51 feet to the POINT OF BEGINNING.

EXHIBIT A - Property Description - Solo Page

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EXHIBIT "B"

Personal Property

1. All of the right, title and interest of Grantor in and to all and singular the rents, issues and profits of the Real Property, all chattels, furniture, equipment, machinery, apparatus, fixtures and articles of personal property of every kind and nature whatsoever located in or upon the Real Property, including, but without limiting the generality of the foregoing, all heating, lighting, laundry, incinerating and power equipment, engines, pipes, pumps, tanks, motors, conduits, switchboards, plumbing, lifting, cleaning, fire prevention, fire extinguishing, refrigerating, ventilating and communications apparatus, air coolings and air conditioning apparatus, elevator, escalators, shades, awnings, screens, storm doors and windows, stoves, wall beds, refrigerators, cabinets, partitions, ducts, compressors, canopies, furnishings, garbage and rubbish disposals, counters, bathtubs, sinks, basins, carpets, floor and wall coverings, drapes, inventory; and proceeds therefrom and all substitutions and replacements therefor.

2. All present and future furnishings, inventory, furniture, appliances, equipment, fixtures, machinery, trade fixtures, business equipment, apparatus, tools, leases of chattels whether the Grantor is the lessor or lessee thereof and options in favor of the Grantor thereunder, service, management and other contracts or agreements, tax refunds, insurance policies and proceeds to be received thereunder or therefrom whether by reason of loss or cancellation, all rents, issues and profits, all of Grantor's present and future accounts, accounts receivable, contract rights, Deeds, chattel paper, goodwill, trade names, trademarks, proprietary choses and other choses in action of every kind and nature, and all other intangibles of Grantor, cash on hand belonging to the Grantor or possessed by the Grantor, and all of the foregoing whether presently owned or possessed by the Grantor, which relate to the Real Property, whether located on the Real Property or wherever else situated, including all proceeds thereof and funds on deposit in banking institutions to the credit of Grantor, and all other personal property of every kind owned by the Grantor and used in the operation of the Mortgaged Property and the proceeds thereof.

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EXHIBIT "B", Personal Property - Solo Page

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FILED

Earl Burch

COUNTY CLERK
DALLAS COUNTY

1990 DEC -4 PM 3 08

Any provision herein which restricts the sale, rental, or use of the described real property because of color or race is invalid and unenforceable under federal law.

STATE OF TEXAS COUNTY OF DALLAS

I hereby certify that this instrument was filed on the date and time stamped hereon by me and was duly recorded in the volume and page of the official records of Dallas County, Texas as stamped hereon by me.

DEC 4 1990

Earl Burch

COUNTY CLERK, Dallas County, Texas

94043563340

METROMEDIA

Andrew M. Gaudin
Assistant General Counsel

METROMEDIA COMMUNICATIONS CORPORATION
One Meadowlands Plaza
East Rutherford, New Jersey 07073
Tel: 201 • 804 • 6895
Fax: 201 • 804 • 6735

May 6, 1993

93 MAY -7 PM 3:33

VIA FACSMILE 202/219-3923
and DHL OVERNIGHT EXPRESS
Mary Ann Bumgarner, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Subject: MUR 3749

Dear Ms. Bumgarner:

I am writing this letter on behalf of Metromedia Communications Corporation, f/k/a Communications Services, Inc. f/k/a, Long Distance Service, Inc. ("Metromedia") in response to the referenced complaint (see Attachment A, Statement of Designation of Counsel by Howard Finkelstein, Metromedia's President). The complaint, which was filed with the Federal Election Commission ("FEC") by Fred Meyer, Chairman of the Republican Party of Texas, alleges that Metromedia accepted check no. 318 in violation of the federal election laws from "Friends of Bob Krueger" in the amount of eight hundred six dollars seventy-three cents ($806.73) (the "Settlement Amount") to settle a debt in the amount of four thousand thirty-three dollars sixty-four cents ($4,033.64).

We have investigated the facts of this matter as thoroughly as possible (recall that the complaint deals with activities that took place several years ago). Based on our investigation of this matter, it is Metromedia's position that no action should be taken against Metromedia.

I have spoken with both former and current employees of Metromedia that have knowledge of the circumstances surrounding this matter. Due to the passage of time, most documentation relating to this matter has been purged from Metromedia's records. We do know the following:

1) Account No. 302699 was the account to which the Settlement Amount was applied. The customer name on this account was "Krueger and Associates", not "Friends of Bob Krueger". We were able to recover a computer page listing this activity (see Attachment B).

2) Attachment A indicates that Gary Holland, formerly of Metromedia, was the individual that made the decision to bring the Krueger and Associates account to zero. In an informal

telephone conversation, Mr. Holland indicated that while he was the collector who performed this act, his manager was responsible for making this decision and in fact ordered Mr. Holland to perform this act.

3) Mr. Holland's manager at the time was Salvatore Butindaro. Mr. Butindaro is not at this time employed by Metromedia. In an informal conversation, Mr. Butindaro advised that when he began working for Metromedia, Metromedia made the decision to "clean up" approximately three million dollars ($3,000,000) worth of the receivables of Long Distance Service, Inc. (which Metromedia had purchased in 1983). Mr. Butindaro said that Krueger and Associates was one of these accounts.

4) According to Mr. Butindaro, each receivable which was written off during this time period had inadequate documentation to support a solid claim, i.e., no documentation that the subject services were ordered by the customer. Mr. Butindaro advised that these accounts were written off in early 1986, (see Attachment C) but that these accounts were also sent either to an attorney or to a collection agency for "a last ditch attempt at collection".

5) Carl Shapiro, a current Metromedia employee, began with Metromedia in 1984 as controller. Mr. Shapiro affirmed all that Mr. Butindero said with respect to the Krueger and Associates account specifically, and the Long Distance Service, Inc. accounts in general.

6) Mr. Shapiro added that when he began working with Metromedia in 1984, it was Metromedia's policy to require customers that were political committee accounts to make a deposit with Metromedia in an amount equal to three (3) months estimated usage on the account. This Metromedia policy was designed for two reasons: (a) because political party customers are high risk customers, and (b) to avoid claims as the present; i.e., that Metromedia forgiving or settling "debts which have been incurred by a candidate or political committee or other person for use in connection with a federal election for less than the amount owed on the debt." 11 C.F.R. Sec. 114.10 (1984). It is highly likely that this policy was in place before September 1984, in which case Metromedia would have required a deposit on the account had it known that it was a political committee.

In addition to the above-stated facts, the FEC has acknowledged Long Distance Service, Inc.'s forgiveness of the debt to "Friends of Bob Krueger" (see February 26, 1988 memorandum from John D. Gibson to Lawrence M. Noble, attached to Mr. Meyer's complaint) without further action against Metromedia. To at this time defend its 1986 actions would be a serious burden for Metromedia. Metromedia would be prejudiced in making such a defense, as many of the persons involved are no longer employed by Metromedia, and most written documentation concerning this matter no longer exists.

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Accordingly, Metromedia respectfully submits that based on the above-stated facts, Metromedia treated the outstanding debt to "Krueger and Associates" in a commercially reasonable manner, as is set forth in paragraph (c) of 11 C.F.R. Sec. 114.10, and not in violation of the federal election laws. The subject account was listed with Metromedia under a name that did not indicate that the customer was a political committee, and treated this debt no differently than it did others during the same general time period. Metromedia wrote off the debt in early 1986, and accepted the Settlement Amount approximately nine months after it wrote the debt off. Finally, the FEC itself has found no need to further investigate the matter until the filing of Mr. Meyer's complaint, which only now occurs during a primary election in which Bob Krueger is running against his party - years after the underlying services were rendered.

Please do not hesitate to contact me should you require anything further in relation to this matter. I would be able to provide you with sworn statements from Mssrs. Holland, Butindero and/or Shapiro if you so require.

Very truly yours,

Andrew M. Gaudin

Attachments

cc: Salvatore Butindaro
Howard Finkelstein
Gary Holland
Carl Shapiro
Arnold Wadler, Esq.

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ATTACHMENT A

7 4 0 4 3 5 6 3 3 4 4

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3749

NAME OF COUNSEL: Andrew M. Gaudin

ADDRESS: Metromedia Communications Corporation
One Meadowlands Plaza
East Rutherford, New Jersey 07073

TELEPHONE: (201) 804-6895

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.

5/6/93
Date

Signature

RESPONDENT'S NAME: Howard Finkelstein, President

ADDRESS: Metromedia Communications Corporation
One Meadowlands Plaza
East Rutherford, New Jersey 07073

TELEPHONE: HOME( ) N/A
BUSINESS(201) 804-6500

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ATTACHMENT B

2 4 0 4 3 5 6 3 3 4 6

302690 M 4

302802

MLD MEMO FILE INFORMATION

ACCT#	ACCT NAME		
302696	COLEMAN, DR LEE W JR		
	02/26/87 ERMA	C/C PER DR.WIL SND 4/RETRN CK#6295 292.14 REV.03/03	0.00
	02/26/87 ERMA	C/C DID NOT SND TO UM SET	0.00
	02/26/87 SANDRAC	C/C PAS.CL SD PMT ON WAY 93.20 SINCE 2/20. AGN PTP 332.82 10.	0.00
	03/20/87 SANDRAC	C/C SNT MEMO TO UM.	0.00
	03/23/87 DIANEGC	C/C PMT'S W/ 87 CASHIERS CL A012160-SNT MEMO TO TOM	0.00
	03/27/87 ERMA	C/C 10.00 RECV FEE/EC SNT RETN CK TO CUST.	0.00
	05/17/87 PATTI	RECO	0.00
	05/17/87 ANNIE	C/C CUST WNTS REINST REFER TO 800 ACCT UM PER GE	0.00
	05/20/87 LG	REFERRED TO C/C	0.00
	05/20/87 ERMA	C/C REFERRED TO UM	0.00
	06/14/87 WILLIS	ADVISED TO CALL NETWORK) PER C/C(CUS) SAYS SHE PAID UM IN FULL	0.00
	04/15/87 MET1	CUST STILL OWES 9.00 PER JEFF ATOM NEED 100.00 SEC DEPOSIT//CE	0.00
	05/11/87 MET4	C/C CUST CLD REQ INFO ON ACCT, ADV OF BAL, WL NL PYMT TO LDS **	0.00
	05/11/87 MET4	C/C ALSO CUST REQ REINSTAT. ADV NEED SEC DEP $100 SEE PRIOR MEMO	0.00
302697	SAN ANTONIO CONSERVATION SOC		
	09/02/86 ROBERTB	INFA.R.B	0.00
	09/16/86 SHIRLEY	B AB A86.57 SW PER L	0.00
302698	U.S.P.A.R.IRA		
	05/14/86 ROBERT	S. BEAU ABUS APR BL ADJPR **	0.00
	05/14/86 ROBERT	CODE-4	0.00
	05/16/86 ROZINA	S.CRD PREV ADJ	0.00
	05/21/86 VIVIAN	C-1-3 DUE JUNE 13	0.00
	05/22/86 VIVIAN	C-1-3 DUE 6-13	0.00
	06/10/86 SHERRYV	S.BEAU AB A23.56 ROZINA-RESEARCH	0.00
	09/29/86 BARBARAC	ENCL ACC'T PER SHARON	0.00
302699	KRUEGER ASSOCIATES		
	11/11/86 ERMA	C/C RECV PYMT FOR 806.73 D4033.64 RWO A3226.91 SETTLEMENT TO ZERO ACCT PER GARY HOLLAND	0.00
302700	HELOTES STATE BANK		
	07/07/86 DARRYL	VERIFY CREDIT BALANCE ON ACCOUNT	0.00
	08/25/86 SHERYL	INVAL/VAL CD WILL DUE TO POSSIBLE COMPUTER HACKER ABUSE	0.00
	08/26/86 SHERYL	SPOKE W/PAULA CONCERNING INVAL CD 31 SHOULD NOT HAVE BEEN WORKING DID NOT NEED NEW CD	0.00
302701	FUCHS, EDDIE		
	05/05/86 VALERIE	LOGS C5-6, BRYAN AB CD 3, ADJ ADJ 663.53, CUST CLLS TOT 18.26	0.00
	06/02/86 DEBORAH	VAL OF ACCTS. ADV TO PYT 18.26	0.00
	06/11/86 WANDA	REF TO ASCH FOR ADJ, SAMA CLS ONLY CUST CLS, 5/19 BILL, CODE	0.00
	06/17/86 CATHY	3-1-0 DUE 6/20 VAL	0.00
	06/17/86 JOE	5/19BL,BRYAN,AUSTIN,DICK/YAELES ABUSE,CUSTOMER ONLY CLAIMS SAMA ADJ,$1317.28 REF TO:VALERIE W	0.00
302702	L.T.E. INCORPORATED		
	06/05/86 SHIRLEY	[illegible] BEAU-AB,A277.98 JM	0.00
302703	BAILEY R.WASSON TRADING CO		
	10/29/86 [illegible]	INVAL CD 5[illegible]/30 DUE TO MAKERS LIST CONTACT TELE # IS DISC. I ENTY THE 10 DIGIT CD	0.00
	03/10/87 JILL	WADR/REF TO EMS,CUST WANTS WATS INFO	0.00
	06/28/87 CAROLS	C/C CK STATUS OF ACCT	0.00
	05/01/87 [illegible]	INVAL CD SCHCEN LST) PER WRADR. TAVL 512/826/7844,7845 & 7878	0.00
	05/05/87 SARA	VADR, REEA	0.00
	05/05/87 ELVIS	INFORMED VICKI OF ALL CODE INFO PER FRANK SHOBERT...ELVIS	0.00
302705	FOOD CITY		

302807

302696 N 4

MLD MEMO FILE INFORMATION

ACCT#	ACCT NAME		
302705	FOOD CITY		
	06/12/86 JANETTE	APRIL21$MAY19/MUNT BRYAN & BEAU AB APRIL=.48 MAY=71.11 A71.59	0.00
	06/17/86 WANDA	4/21, 5/19 [illegible] BEAU ABUS. CODES MODED & CHNGD CR A77.72	0.00
	07/18/86 DAVIDA	GVE PAID TO PAT [illegible] IN DATA ENTRY TO GET CUS SET UP WITH THE DIALER DEPARTMENT	0.00
	08/06/86 CARMEN	7-21,SAN ANTONIO ABUSE CODE 4 A53.92	0.00
	10/03/86 [illegible]	PER VALERIE HAVE INFO ON BILLING ERROR	0.00
	02/05/87 MARGARET	VADR, ASKED GENTLEMAN TO CONTACT CUS. TO HAVE TAVL CDS, SET UP ROAN	0.00
	02/17/87 [illegible]	VRFY 1875.29 POSTED ON TRANS WIST PER REMIT	0.00
	03/13/87 [illegible]	REF PAID TO DIALERS [illegible] CHNG	0.00
	03/17/87 CINDY	ADDRESS CHANGED PER [illegible]	0.00
	04/23/87 CINDY	CLD DIALER 4/17/87 UNABL TO RE- COVER EQUIP, RFND TO .7C CONT..	0.00
	[illegible]	[illegible]	[illegible]

302814 RES - TUXEDOS

07/07/86 [illegible]	VERIFY PAYMENT [illegible]	
07/30/86 [illegible]	[illegible]	
07/30/86 BEVERLY	TRNS/R ANT DUED	

ATTACHMENT C

2404356353348

RUN DATE: 08/16/86 LDS - METROMEDIA LONG DISTANCE PAGE: 10250
RUN TIME: 09:43:08 TRANSACTION HISTORY 02/01/86 - 03/31/86
--- CUSTOMER # SEQUENCE ---

CUSTOMER #	TYPE	TRANSACTION DATE	CHECK NUMBER	AMOUNT	ADJUST REASON	OPER
302696	D	03/28/86	276791	239.38		
302696	09	03/17/86	0	82.05		
302696	FT	03/17/86	0	2.46		
302696	ST	03/17/86	0	3.27		
302696	D	02/24/86	100397	273.89		
302696	FT	02/17/86	0	3.49		
302696	ST	02/17/86	0	4.57		
302696	09	02/17/86	0	116.14		
302697	09	03/17/86	0	7.88		
302697	FT	03/17/86	0	.23		
302697	ST	03/17/86	0	.25		
302697	09	02/17/86	0	.70		
302697	FT	02/17/86	0	.02		
302697	ST	02/17/86	0	.03		
302697	D	02/13/86	432191	11.39		
302698	A	03/18/86	0	91.75	ABUS	SF
302698	FT	03/17/86	0	9.16		
302698	ST	03/17/86	0	7.24		
302698	09	03/17/86	0	305.53		
302698	A	03/07/86	0	119.36	ABUS	SF
302698	D	03/05/86	147733	425.23		
302698	FT	02/17/86	0	12.57		
302698	ST	02/17/86	0	10.23		
302698	09	02/17/86	0	419.10		
302698	A	02/17/86	0	40.63	ABUS	AH
302698	D	02/07/86	0	299.44		
302699	09	03/17/86	0	.00		
302699	FT	03/17/86	0	.00		
302699	ST	03/17/86	0	.00		
302699	WO	02/19/86	0	4035.64	WO	COLLCTOR
302699	09	02/17/86	0	.00		
302699	FT	02/17/86	0	.00		C/o Dates
302699	ST	02/17/86	0	.00		
302700	FT	03/17/86	0	5.55		
302700	ST	03/17/86	0	5.37		
302700	09	03/17/86	0	184.77		
302700	A	03/13/86	0	112.17	ABUS	AH
302700	D	03/05/86	450045	441.05		
302700	09	02/17/86	0	131.99		
302700	FT	02/17/86	0	3.96		
302700	ST	02/17/86	0	4.67		
302700	A	02/12/86	0	145.95	ABUS	AH
302701	FT	03/17/86	0	.04		
302701	ST	03/17/86	0	.02		
302701	09	03/17/86	0	1.11		

RUN DATE: [illegible] LDS - METROMEDIA LONG
RUN TIME: 09:43:08 TRANSACTION HISTORY
--- CUSTOMER # SEQUENC

CUSTOMER #	TYPE	TRANSACTION DATE	CHECK NUM
302804	D	03/17/86	318
302804	FT	02/17/86	
302804	ST	02/17/86	
302804	09	02/17/86	
302806	FT	03/17/86	
302806	ST	03/17/86	
302806	09	03/17/86	
302806	D	03/05/86	449
302806	09	02/17/86	
302806	FT	02/17/86	
302806	ST	02/17/86	
302807	FT	03/17/86	
302807	ST	03/17/86	
302807	09	03/17/86	
302807	D	03/14/86	8
302807	A	02/18/86	
302807	FT	02/17/86	
302807	ST	02/17/86	
302807	09	02/17/86	
302807	D	02/07/86	
302808	09	03/17/86	
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302810	D	02/20/86	13
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RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

JUN 30 3 55 PM '94

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of) Enforcement Priority
)
)

GENERAL COUNSEL'S QUARTERLY REPORT

I. INTRODUCTION

This report is the second Enforcement Priority System Quarterly Report. The purpose of this Quarterly Report is to recommend that the Commission no longer pursue the identified lower priority and stale cases.

II. CASES RECOMMENDED FOR CLOSING

A. Cases Not Warranting Further Pursuit Relative to Other Cases Pending Before the Commission

A critical component of the Priority System is identifying those pending cases that do not warrant the further expenditure of resources. Each incoming matter is evaluated using Commission approved criteria

By closing such cases the Commission is able to use its limited resources to focus on more important cases.

Having evaluated incoming matters, this Office has identified 16 cases which do not warrant further pursuit relative to the other pending cases.[1] A short

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1. These matters are: MUR 3920; MUR 3930; MUR 3934; MUR 3939; MUR 3942; MUR 3943; MUR 3945; MUR 3948; MUR 3953; MUR 3955; MUR 3957; MUR 3964; MUR 3965; MUR 3967; RAD 94L-22; and RAD 94L-25.

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description of each case and the factors leading to assignment of a relatively low priority and consequent recommendation not to pursue each case is attached to this report. See Attachments 1-16. For the Commission's convenience, the narratives for externally-generated matters are immediately followed by the complaint and response(s) and the narratives for internally-generated matters are immediately followed by the referral.

B. Stale Cases

Investigations are severely impeded and require relatively more resources when the activity and evidence are old. Consequently, the Office of General Counsel recommends that the Commission focus its efforts on cases involving more recent activity. Such efforts will also generate more impact on the current electoral process and are a more efficient allocation of our limited resources. To this end, this Office has identified 42 cases that

do not warrant further investment of significant Commission resources.[2] Since the recommendation not to pursue the identified cases is based on staleness, this Office has not prepared separate

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2. These matters are: MUR 3132; MUR 3432; MUR 3466; MUR 3470; MUR 3473; MUR 3495; MUR 3558; MUR 3575; MUR 3581; MUR 3594; MUR 3600; MUR 3625; MUR 3647; MUR 3663; MUR 3684; MUR 3698; MUR 3712; MUR 3733; MUR 3744; MUR 3749; MUR 3756; MUR 3759; MUR 3767; MUR 3776; MUR 3779; RAD 92L-26, RAD 93L-25; RAD 93L-26; RAD 93L-29; RAD 93L-31; RAD 93L-33; RAD 93L-35; RAD 93L-36; RAD 93L-38; RAD 93L-39; RAD 93NF-02; RAD 93NF-03; RAD 93NF-06; RAD 93NF-10; RAD 93NF-12; RAD 93NF-15; and RAD 93NF-20.

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narratives for these cases. However, for externally-generated matters in which the Commission has made no findings, the complaint and response(s) are attached to the report and for internally-generated matters in which the Commission has made no findings, the referral is attached. See Attachments 17-53. Because the Commission has already made findings in five of the stale cases, no additional information is being attached to this report in regard to these cases.[3]

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3. These matters are: MUR 3132, MUR 3432, MUR 3466, MUR 3495, and MUR 3733.

This Office recommends that the Commission exercise its prosecutorial discretion and no longer pursue the identified cases effective August 1, 1994. This will allow the Legal Review Team adequate time to prepare the Pre-MUR and MUR files so that the cases can appear on the public record by September 1, 1994, within 30 days of the August 1, 1994, closing date. This timeframe also will enable this Office to prepare closing letters so that the letters can be mailed on August 2, 1994. Additionally, the Press Office will need time to review the files for inclusion in one of its press releases.

III. RECOMMENDATIONS

A. Decline to open a MUR and close the file in the following matters to be effective on August 1, 1994:

1) RAD 92L-26
2) RAD 93L-25
3) RAD 93L-26
4) RAD 93L-29
5) RAD 93L-31
6) RAD 93L-33
7) RAD 93L-35
8) RAD 93L-36
9) RAD 93L-38
10) RAD 93L-39
11) RAD 94L-22
12) RAD 94L-25
13) RAD 93NF-02
14) RAD 93NF-03
15) RAD 93NF-06
16) RAD 93NF-10
17) RAD 93NF-12
18) RAD 93NF-15
19) RAD 93NF-20

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B. Take no action, close the file effective on August 1, 1994, and approve the appropriate letter in the following matters:

1) MUR 3470
2) MUR 3473
3) MUR 3558
4) MUR 3575
5) MUR 3581
6) MUR 3594
7) MUR 3600
8) MUR 3625
9) MUR 3647
10) MUR 3663
11) MUR 3684
12) MUR 3698
13) MUR 3712
14) MUR 3744
15) MUR 3749
16) MUR 3756
17) MUR 3759
18) MUR 3767
19) MUR 3776
20) MUR 3779
21) MUR 3920
22) MUR 3930
23) MUR 3934
24) MUR 3939
25) MUR 3942
26) MUR 3943
27) MUR 3945
28) MUR 3948
29) MUR 3953
30) MUR 3955
31) MUR 3957
32) MUR 3964
33) MUR 3965
34) MUR 3967

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C. Take no further action, close the file effective on August 1, 1994, and approve the appropriate letter in the following matters:

1) MUR 3132
2) MUR 3432
3) MUR 3466
4) MUR 3495
5) MUR 3733

6/30/94
Date

Lawrence M. Noble
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	Agenda Document
Enforcement Priority	)	#X94-72

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on July 19, 1994, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions with respect to Agenda Document #X94-72:

A. Decline to open a MUR and close the file in the following matters to be effective on August 1, 1994:

1) RAD 92L-26
2) RAD 93L-25
3) RAD 93L-26
4) RAD 93L-29
5) RAD 93L-31
6) RAD 93L-33
7) RAD 93L-35
8) RAD 93L-36
9) RAD 93L-38
10) RAD 93L-39
11) RAD 94L-22
12) RAD 94L-25
13) RAD 93NF-02
14) RAD 93NF-03
15) RAD 93NF-06
16) RAD 93NF-10
17) RAD 93NF-12
18) RAD 93NF-15
19) RAD 93NF-20

(continued)

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B. Take no action, close the file effective on August 1, 1994, and approve the appropriate letter in the following matters:

1) MUR 3470
2) MUR 3473
3) MUR 3558
4) MUR 3575
5) MUR 3581
6) MUR 3594
7) MUR 3600
8) MUR 3625
9) MUR 3647
10) MUR 3663
11) MUR 3684
12) MUR 3698
13) MUR 3712
14) MUR 3744
15) MUR 3749
16) MUR 3756
17) MUR 3759
18) MUR 3767
19) MUR 3776
20) MUR 3779
21) MUR 3920
22) MUR 3930
23) MUR 3934
24) MUR 3939
25) MUR 3942
26) MUR 3943
27) MUR 3945
28) MUR 3948
29) MUR 3953
30) MUR 3955
31) MUR 3957
32) MUR 3964
33) MUR 3965
34) MUR 3967

(continued)

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C. Take no further action, close the file effective on August 1, 1994, and approve the appropriate letter in the following matters:

1) MUR 3132
2) MUR 3432
3) MUR 3466
4) MUR 3495
5) MUR 3733

Commissioners Aikens, Elliott, McDonald, McGarry, Potter, and Thomas voted affirmatively for the decision.

Attest:

7-20-94
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 2, 1994

Fred Meyer, State Chairman
Republican Party of Texas
211 Wast 7th Street, Suite 620
Austin, TX 78701

RE: MUR 3749

Dear Mr. Meyer:

On March 12, 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 exercised its prosecutorial discretion to take no action in the matter. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 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

9404356359

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 2, 1994

Leslie J. Kerman, Esq.
Epstein, Becker & Green, P.C.
1227 25th Street, NW, Suite 700
Washington, DC 20037

RE: MUR 3749
Bob Krueger Campaign and
Nina Guinn, as Treasurer

Dear Ms. Kerman:

On March 18, 1993, the Federal Election Commission notified your clients, the Bob Krueger Campaign and Nina Guinn, 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 exercised its prosecutorial discretion to take no action against your clients. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 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.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 2, 1994

George L. Bristol
Bristol & Associates (GLB Inc.)
1106 West Avenue
Austin, TX 78701

RE: MUR 3749
Bristol & Associates (GLB Inc.)

Dear Mr. Bristol:

On March 18, 1993, the Federal Election Commission notified Bristol & Associates (GLB Inc.) 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 exercised its prosecutorial discretion to take no action against Bristol & Associates (GLB Inc.). This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 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.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 2, 1994

Randall B. Wood, Esq.
Ray, Wood & Fine
2700 Bee Caves Road
Austin, TX 78746

RE: MUR 3749
Consultants '84, Inc.

Dear Mr. Wood:

On March 18, 1993, the Federal Election Commission notified your client, Consultants '84, 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 exercised its prosecutorial discretion to take no action against your client. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 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.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 2, 1994

Kenneth Martin, Esq.
Winstead, Sechrest & Minick
5400 Renaissance Tower
1201 Elm Street
Dallas, TX 75270

RE: MUR 3749

Dear Mr. Martin:

On March 18, 1993, the Federal Election Commission notified the Dallas Hilton Inn 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. On May 5, 1993, we received your letter indicating that your client, the First Hotel Investment Corporation, became owner of the hotel following its purchase on December 4, 1990.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against your client. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 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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If you have any questions, please contact Joan McEnery at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 2, 1994

Secretary-Treasurer
Futura Press, Inc.
P.O. Box 3485
Austin, TX 78764

RE: MUR 3749
Futura Press, Inc.

Dear Sir or Madam:

On March 18, 1993, the Federal Election Commission notified Futura Press, Inc. 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 exercised its prosecutorial discretion to take no action against Futura Press, Inc. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 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.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9404356365

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 2, 1994

Edward C. Ybarra, Vice President
Manguia Printers
2201 Buena Vista
San Antonio, TX 78207

RE: MUR 3749
Manguia Printers

Dear Mr. Ybarra:

On March 18, 1993, the Federal Election Commission notified Manguia Printers 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 exercised its prosecutorial discretion to take no action against Manguia Printers. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 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.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 2, 1994

Roy O. Smithers, Esq.
Bragg, Chumlea, McQuality
Smithers & Curry
101 East 9th Street, Suite 1005
Austin, TX 78701

RE: MUR 3749
Texas Label Company

Dear Mr. Smithers:

On March 18, 1993, the Federal Election Commission notified your client, Texas Label Company, 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 exercised its prosecutorial discretion to take no action against your client. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 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.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9404356367

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 2, 1994

Lyndell Williams, Executive Vice President
Texas Press Association
718 West Fifth
Austin, TX 78701

RE: MUR 3749
Texas Press Association

Dear Mr. Williams:

On March 18, 1993, the Federal Election Commission notified Texas Press Association 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 exercised its prosecutorial discretion to take no action against Texas Press Association. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 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.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

2404356368

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 2, 1994

Neal Worley
Worley Printing
731 West 23rd
Austin, TX 78701

RE: MUR 3749
Worley Printing

Dear Mr. Worley:

On March 18, 1993, the Federal Election Commission notified Worley Printing 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 exercised its prosecutorial discretion to take no action against Worley Printing. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 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.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 2, 1994

Harvey Corn, CPA
Managing Partner
Corn & Janda (Harvey Corn & Company)
114 West 7th, Suite 400
Austin, TX 78701

RE: MUR 3749

Dear Mr. Corn:

On March 18, 1993, the Federal Election Commission notified Corn & Janda (Harvey Corn & Company) 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 exercised its prosecutorial discretion to take no action against Corn & Janda (Harvey Corn & Company). This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 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.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

2404356633370

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 2, 1994

Andrew M. Gaudin, Esq.
Metromedia Communications Corporation
One Meadowlands Plaza
East Rutherford, NJ 07073

RE: MUR 3749
Metromedia Communications
Corporation

Dear Mr. Gaudin:

On April 19, 1993, the Federal Election Commission notified Metromedia Communications Corporation 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 exercised its prosecutorial discretion to take no action against Metromedia Communications Corporation. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 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.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9404356337

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 2, 1994

Ken Bryan
Jenson & Baker (Creative Computers)
315 United Bank Tower
Austin, TX 78701

RE: MUR 3749

Dear Mr. Bryan:

On March 18, 1993, the Federal Election Commission notified Jenson & Baker (Creative Computers) 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 exercised its prosecutorial discretion to take no action against Jenson & Baker (Creative Computers). This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 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.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3749

DATE FILMED 8-30-94 CAMERA NO. 2

CAMERAMAN JMH

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