



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3888

DATE FILMED 12/15/94 CAMERA NO. 2

CAMERAMAN MMR

4043600677

BEFORE THE
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
94 JUN 21 11 43 AM

CENTER FOR RESPONSIVE POLITICS

1320 19th Street, N.W.
Washington, D.C. 20036
(202) 857-0044

v.

Complainant,

COMPLAINT

MUR 3888

J. A. Elkins, Jr.

Respondent,

COMPLAINT OF CENTER FOR RESPONSIVE POLITICS

1. This complaint charges that the respondent has violated the Federal Election Campaign Act, 2 U.S.C. § 431 et seq., as amended ("FECA"), by making aggregate contributions in excess of the limits permitted by the FECA.

PARTIES

2. The complainant, the Center for Responsive Politics, is a nonprofit, nonpartisan research group incorporated in the State of Iowa and headquartered in Washington, D.C., that studies Congress and related issues. Founded in 1983, it was designed to research matters concerning the organization and operation of Congress as an institution and to examine potential reforms that could improve both its internal operation and its responsiveness to the American public. The patterns of contributions of money to federal candidates has been one of its chief areas of study.

3. The respondent is an individual contributor to various candidates and political committees.

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APPLICABLE STATUTES AND REGULATIONS

4. The FECA limits contributions by any one individual to an aggregate total of \$25,000 per calendar year. Contributions to a candidate or the candidate's authorized committee made in a year other than the calendar year of the election with respect to which the contribution is made are considered to be made during the calendar year in which such election is held. 2 U.S.C. § 441a(a)(3); 11 C.F.R. § 110.5.

GROUND FOR COMPLAINT

5. According to FEC records, respondent J.A. Elkins, Jr. made contributions subject to FECA in the amounts and to the persons identified in the list attached to this complaint as Exhibit 1. Attached as Exhibit 2 are copies of the FEC records for each contribution listed in Exhibit 1. All exhibits reflect the records on file at the FEC as of December 15, 1993.

6. On information and belief, respondent J.A. Elkins, Jr. made contributions attributed to the 1992 calendar year in the amount of \$35,750. These contributions exceeded by \$10,750 the \$25,000 contribution limit imposed by the FECA and Commission regulations on all contributions by any individual in a calendar year.

RELIEF

7. The Center for Responsive Politics respectfully urges the Commission to conduct a prompt and thorough investigation into the allegations in this Complaint, and to declare that the Respondent has violated the FECA and Commission regulations.

Respectfully submitted,



Ellen S. Miller
Executive Director
CENTER FOR RESPONSIVE POLITICS
1320 19th Street, N.W.
Washington, D.C. 20036
(202) 857-0044

Date: January 14, 1994

4043600679

Summary of FEC Data

Recipient	Amount	Date	FEC Microfilm Location
Andrews, Michael A	\$1,000	09/30/91	92HSE/438/2035
Andrews, Michael A	\$500	05/22/92	92HSE/456/0173
Barton, Joe L	\$1,000	06/21/91	91HSE/432/1593
Blum, Edward	\$250	07/27/92	92HSE/474/3024
Bush, George	\$2,000	05/08/92	92FEC/760/2643
Bush, George	\$1,000	10/24/91	92FEC/731/0397
Bush, George	\$1,000	10/28/91	92FEC/731/0083
Bush, George	\$-1,000	06/12/92	92FEC/769/0029
Ervin, Clark Kent	\$1,000	09/10/91	92HSE/440/0364
Fields, Jack	\$500	05/04/92	92HSE/458/0705
Fields, Jack	\$500	04/03/91	91HSE/429/2286
McKenna, Dolly Madison	\$1,000	01/17/92	92hse/443/1049
Nickles, Don	\$1,000	12/30/91	92SEN/003/2788
Republican National Cmte	\$20,000	07/06/92	92FEC/774/1086
Reyes, Ben T	\$1,000	01/31/92	92HSE/443/0696
Texas Republican Congressional Cmte	\$5,000	07/06/92	92FEC/787/3702

Total Contributions Attributed to 1992: \$35,750

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James A. Elkins, Jr.
Exhibit 2

4043600682

Line: 1141

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

NAME OF COMMITTEE

Friends of Dolly Madison McKenna

CONTRIBUTOR

A. Mr. Charles S. Wheeler
1079 Rocky River Road
Houston, TX 77056

EMPLOYER
Self

DATE
02/11/92

AMOUNT
1000.00

OCCUPATION
CEO

Receipt for: Primary

Aggregate YTD: \$ 1000.00

B. Mr. Nathan R. Avery
3456 Inwood
Houston, TX 77019

EMPLOYER
Galveston-Houston Co

DATE
02/19/92

AMOUNT
500.00

OCCUPATION
Executive

Receipt for: Primary

Aggregate YTD: \$ 500.00

C. Mr. Wayne S. Glenn
5783 Indian Circle
Houston, TX 77057

EMPLOYER
Info Requested

DATE
01/31/92

AMOUNT
250.00

OCCUPATION
Info Requested

Receipt for: Primary

Aggregate YTD: \$ 250.00

D. Mr. James A. Elkins, Jr.
101 Parish Circle
Houston, TX 77024

EMPLOYER
First City Bancorp.

DATE
01/17/92

AMOUNT
1000.00

OCCUPATION
Banker

Receipt for: Primary

Aggregate YTD: \$ 1000.00

E. Mr. Joe S. Farmer
9033 Briar Forest Drive
Houston, TX 77024

EMPLOYER
Self

DATE
02/12/92

AMOUNT
529.18

OCCUPATION
Consultant

Cover. in Kind
Voter Contact
Expense - Meeting
Room

Receipt for: Primary

Aggregate YTD: \$ 529.18

F. Mr. Gene Van Dyke
49 Briar Hollow Lane
No. 406
Houston, TX 77027

EMPLOYER
Van Dyke Energy

DATE
02/12/92

AMOUNT
529.18

OCCUPATION
CEO

Cover. in Kind
Voter Contact
Expense - Meeting
Room

Receipt for: Primary

Aggregate YTD: \$ 529.18

G. Mrs. Nancy Dunlap
3606 Chevy Chase
Houston, TX 77019

EMPLOYER
None

DATE
02/07/92

AMOUNT
250.00

OCCUPATION
Civic Volunteer

Receipt for: Primary

Aggregate YTD: \$ 250.00

SUBTOTAL

4058.36

TOTAL This Period (Year to Date)

4043600683

SECTION 1

FINANCIAL DISCLOSURE

This document is required for each category of the Detailed Reporting Page

PAGE: 2 OF 35
FORM LINE NUMBER

11(a)(1)

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

NAME OF CANDIDATE OR FULL
Don Reyes for Congress C00237790

A043600634

9201430136

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
J. Stuart Sargent 1900 Yorktown, Suite 410 Houston, TX 77056	Entertainment One	01/24/92	1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Promotion Co. Executive	Aggregate Year-to-Date > \$ 1,000.00	
S. Full Name, Mailing Address and ZIP Code Samuel A. Jones 800 Bering Drive, Ste. 210 Houston, TX 77057	Horton Cohn Inv Investments	01/24/92	500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Investor	Aggregate Year-to-Date > \$ 500.00	
C. Full Name, Mailing Address and ZIP Code Cynthia M-Klues 800 Bering Drive, Ste. 210 Houston, TX 77057	Horton Cohn Investments	01/24/92	500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Investor	Aggregate Year-to-Date > \$ 500.00	
D. Full Name, Mailing Address and ZIP Code Morton A. Cohn 800 Bering Drive, Ste. 210 Houston, TX 77057	Horton Cohn Investments	01/24/92	1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Investor	Aggregate Year-to-Date > \$ 1,000.00	
E. Full Name, Mailing Address and ZIP Code George D. Kamins P.O. Box 66287 Houston, TX 77066	Yellow Cab Corp.	01/31/92	1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Taxi co. executive	Aggregate Year-to-Date > \$ 1,000.00	
F. Full Name, Mailing Address and ZIP Code J.A. Elkins, Jr. P.O. Box 2387 Houston, TX 77252	First City Bancorporation	01/31/92	1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Banker	Aggregate Year-to-Date > \$ 1,000.00	
G. Full Name, Mailing Address and ZIP Code Rebecca Reyes 6906 El Paso Houston, TX 77020	none	01/31/92	1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Housewife	Aggregate Year-to-Date > \$ 1,000.00	

SUBTOTAL of Receipts This Page (optional) 6,000.00

TOTAL This Period (See page this line number only)

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

NAME OF COMMITTEE

CLARK KENT ERVIN FOR CONGRESS - FEC #C00253550

A. Mr. J. C. Walter III
1212 Main Street, Ste. 240
Houston, TX 77002

EMPLOYER Walter Oil & Gas DATE 09/05/91 AMOUNT 1000.00

OCCUPATION Oil Exploration
Aggregate YTD: \$ 1000.00

Receipt for: Primary

B. Mr. James A. Elkins Jr.
P. O. Box 2387
Houston, TX 77252

EMPLOYER Self-Employed DATE 09/10/91 AMOUNT 1000.00

OCCUPATION Investments
Aggregate YTD: \$ 1000.00

Receipt for: Primary

C. Dean A. Burkhardt
2210 Sul Ross
Houston, TX 77098

EMPLOYER Self-employed DATE 08/30/91 AMOUNT 1000.00

OCCUPATION Investments
Aggregate YTD: \$ 1000.00

Receipt for: Primary

D. Mr. Russell Hawkins
2217 Stanmore
Houston, TX 77019

EMPLOYER Foyes Sarofin & Co. DATE 09/02/91 AMOUNT 250.00

OCCUPATION Investments
Aggregate YTD: \$ 250.00

Receipt for: Primary

E. Mr. David T. Harvin
3300 First City Tower
1001 Pannin
Houston, TX 77002-6760

EMPLOYER Vinson & Elkins DATE 08/22/91 AMOUNT 250.00

OCCUPATION Attorney
Aggregate YTD: \$ 250.00

Receipt for: Primary

F. Mr. Rufus Cormier Jr.
2434 Locke Lane
Houston, TX 77019

EMPLOYER Baker & Botte DATE 08/21/91 AMOUNT 500.00

OCCUPATION Attorney
Aggregate YTD: \$ 500.00

Receipt for: Primary

G. Mr. W. H. Drushel Jr.
3300 First City Tower
1001 Pannin
Houston, TX 77002-6760

EMPLOYER Vinson & Elkins DATE 08/22/91 AMOUNT 1000.00

OCCUPATION Attorney
Aggregate YTD: \$ 1000.00

Receipt for: Primary

SUBTOTAL 5000.00

4043600685



1000.00

SCHEDULE A

ITEMIZED RECEIPTS

Any info. copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purpose, other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: Fields for Congress

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Thomas G. Loeffler Post Office Box 2999 San Antonio TX 78299	Information Requested Attorney	05/04/92	500.00
Receipt for: General	Year-to-Date Total: \$	500.00	

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Thomas L. Mills 643 Ranger Court Davidsonville MD 21035	Kominers, Port, Schlefer Attorney	04/03/92	500.00
Receipt for: General	Year-to-Date Total: \$	500.00	

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
James A. Elkins III 7 Pinehill Lane Houston TX 77019	First City National Bank Chairman	05/04/92	500.00
Receipt for: General	Year-to-Date Total: \$	500.00	

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Ralph T. Bull 1001 Fannin, Ste. 1865 Houston TX 77002	Selfemployed Attorney	04/20/92	500.00
Receipt for: General	Year-to-Date Total: \$	500.00	

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Corbin J. Robertson Jr. 601 Jefferson, 40th Fl. Houston TX 77002	Selfemployed Co-Owner	04/20/92	500.00
Receipt for: General	Year-to-Date Total: \$	500.00	

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
David M. Underwood 1645 Willowick Road Houston TX 77019	Lovett, Underwood, Neuha Stock Broker	04/20/92	500.00
Receipt for: General	Year-to-Date Total: \$	500.00	

SUBTOTAL of Receipts This Page 3000.00

TOTAL This Period

4043600686

SCHEDULE A ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page	Page	67
	For Line Number	11a(1)

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

NAME OF COMMITTEE (in Full)
The Michael A. Anderson for Congress Club

Full Name, Mailing Address and Zip Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt This Period
Mr. Patricia F. Eldridge 2510 Raintree Houston, TX 77055	Brownell & Patterson Attorney	08/08/02	250.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Aggregate Year To Date \$ 250.00			

Full Name, Mailing Address and Zip Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt This Period
Mr & Mrs J.A. ... ET. AL 7708 Sam 2507 Houston, TX 77052	Vinick & Clark Attorney	08/22/02	250.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Aggregate Year To Date \$ 250.00			

Full Name, Mailing Address and Zip Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt This Period
Mr. Randolph S. Pennington 404 S. 10th St. Arlington, VA 22204	None Available Lobbyist	08/08/02	250.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Aggregate Year To Date \$ 250.00			

Full Name, Mailing Address and Zip Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt This Period
Dr. Milton ... Ferguson 6828 Pine Forest Houston, TX 77052	Major, Day & Caldwell Attorney	04/08/02	250.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Aggregate Year To Date \$ 250.00			

TOTAL of Receipts This Page (optional)	1000.00
TOTAL This Period (last page this line number only)	24250.00

4043600687

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 43 OF
FOR LINE NUMBER 11a

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

NAME OF COMMITTEE (in Full):
TEXAS REPUBLICAN CONGRESSIONAL COMMITTEE aka VICTORY '92

1 : 0 3 7 3 7 5 7 0 2

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mr. Bobo Judge P.O. Box 430748 Houston, TX 77043	Information Requested	07/29/92	75.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Information Requested		
	Aggregate Year-to-Date \$	265.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mr. Pat Purvis Fort Worth, TX 76116	Information Requested	09/15/92	1000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Information Requested		
	Aggregate Year-to-Date \$	1000.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mr. Michael T. Hollenby 1101 Westchase Blvd., 8500 Houston, TX 77036	Self	08/14/92	2500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Ecologist		
	Aggregate Year-to-Date \$	2500.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mr. Charlotte Crump 8125 Pine Forest Road Houston, TX 77057	Information Requested	09/01/92	500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Information Requested		
	Aggregate Year-to-Date \$	500.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mr. David S. Chalmers P.O. Box 1564 Houston, TX 77024	Information Requested	08/25/92	1000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Information Requested		
	Aggregate Year-to-Date \$	1000.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mr. James A. Elkins, Jr. First City Bancorp of Texas Post Office Box 2267 Houston, TX 77252	First City Bancorporation	07/06/92	5000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Businessman		
	Aggregate Year-to-Date \$	5000.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mr. Lawrence H. Neeker 6301 Necker Fort Worth, TX 76116	Information Requested	09/15/92	1000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Information Requested		
	Aggregate Year-to-Date \$	1000.00	

SUBTOTAL of Receipts This Page (optional)	11025.00
TOTAL This Period (last page this line number only)	

REPUBLICAN NATIONAL COMMITTEE

PAGE 88

ITEMIZED REPORT COVERING PERIOD FROM 7/01/92 THRU 7/31/92 OVER \$200.00

NAME AND ADDRESS	OCCUPATION/PLACE OF BUSINESS	DATE	THIS CALENDAR PERIOD	YR-TO-DATE
Mr. & Mrs. Eugene T. Ehlers 502 S Marlborough Cr Shreveport LA 71105	INFORMATION REQUESTED 07/17/92	07/17/92	\$150.00	\$225.00
Mrs. Mildred S. Egan Apartment 24 1150 Reef Road Vero Beach FL 32963	Widow	07/27/92	\$100.00	\$300.00
Mr. David Eisenberg 117 Hudson Park Drive Chappaqua NY 10514	Senior Portfolio and Co. Stanford C. Bernstein and Co.	07/05/92 07/24/92	\$200.00 \$200.00	\$700.00
Mr. Donald S. Eldridge Lamb Lake 65 Sandpiper Lane Trafalgar IN 46181	Retired	07/31/92	\$100.00	\$300.00
Mr. Arthur Elkins 13 Chester Pike Buckey PA 15003	Self-employed	07/28/92	\$500.00	\$500.00
Mr. James A. Elkins Jr. P. O. Box 2387 Houston TX 77252	Director First City Bancorp of Texas	07/05/92	\$200,000.00	\$20,000.00
Mr. Gordon Elliott 913 Plaza Towers Springfield MA 01104	CPA Elliott, Robinson & Co.	07/28/92	\$200.00	\$250.00
Mr. George S. Ellison 99 Marlborough Rd Babylon NY 11702	RETIRED	07/05/92 07/21/92	\$55.00 \$55.00	\$373.00
Mr. Joseph R. Ellis Box 571 Waverly PA 16971	C. E. O. The Paper Magic Group	07/28/92	\$1,000.00	\$5,000.00
Mr. John Ellsworth P. O. Box 515 Simsbury CT 06070	Retired	07/05/92	\$250.00	\$500.00

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920374100



SECRET
 FEDERAL BUREAU OF INVESTIGATION
 WASHINGTON, D.C. 20535

UNITED RECEIPTS

UNITED STATES DEPARTMENT OF JUSTICE
 FEDERAL BUREAU OF INVESTIGATION
 WASHINGTON, D.C. 20535

NAME, ADDRESS, CITY, STATE, ZIP CODE		NAME OF EMPLOYER	DATE RECEIVED	AMOUNT OF CONTRIBUTION THIS PERIOD
Name, Mr. Thomas E. 22 Spruce St. Englewood, CT 06070		Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE	01/01/72	01,000.00
Name, Mr. James 652 Riverside Dr. Concord, VT 05721		Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE	01/10/72	01,000.00
Name, Mr. John C. 117 April Drive Guilford, GA 30222		Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE	01/01/72	2575.00
Name, Mr. J. A. Jr. P.O. Box 2387 Houston, TX 77052		Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE	01/12/72	-01,000.00 /R
Name, Mr. Gerald L. 59 East 54th St., 9th Fl. New York, NY 10022		Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE	01/02/72	01,000.00
Name, Mr. John L. Jr. 375 Park Ave. New York, NY 10152		Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE	01/02/72	01,000.00
Name, Mrs. Linda 365 Dix Lee on Drive Fairburn, GA 30213		Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE	01/12/72	2500.00
Name, Mr. John E. 1819 Colorado Square NW Washington, DC 20008		Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE	01/12/72	2500.00
SUBTOTAL OF RECEIPTS THIS PAGE (optional)				24,215.00
TOTAL THIS PERIOD (last page this line number only)				

4043600690



*-Retribution or Resignation Requested

SCHEDULE A-P
 Political Parties, Committees,
 Candidates, etc.
 Washington, D.C. 20540

ITEMIZED RECEIPTS

NAME OF CONTRIBUTOR	DATE RECEIVED	AMOUNT

NAME OF CONTRIBUTOR (SEE INSTRUCTIONS)			DATE RECEIVED (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
ANY INFORMATION OBTAINED FROM SUCH REPORTS AND STATEMENTS MAY NOT BE SOLD OR USED BY ANY PERSON FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OR FOR COMMERCIAL PURPOSES, OTHER THAN USING THE NAME AND ADDRESS OF ANY POLITICAL COMMITTEE TO WHICH CONTRIBUTIONS FROM SUCH COMMITTEE.				
NAME, ADDRESS, CITY, STATE, ZIP CODE Martin, Mr. Leonard C. 220 Calhoun Jackson, MS 39202	NAME OF EMPLOYER John [unclear] OCCUPATION [unclear] RECEIPT FOR [unclear] <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	DATE RECEIVED 05/02/72	AMOUNT 500.00	
NAME, ADDRESS, CITY, STATE, ZIP CODE Terpak, Mrs. Glenn S. 4376 Mastover Place NW Washington, DC 20016	NAME OF EMPLOYER John [unclear] OCCUPATION [unclear] RECEIPT FOR [unclear] <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	DATE RECEIVED 05/02/72	AMOUNT 01,000.00	
NAME, ADDRESS, CITY, STATE, ZIP CODE d'Arce, Mr. John S. One d'Arce Way Wilmington, DE 19809	NAME OF EMPLOYER John [unclear] OCCUPATION [unclear] RECEIPT FOR [unclear] <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	DATE RECEIVED 05/02/72	AMOUNT 01,000.00	
NAME, ADDRESS, CITY, STATE, ZIP CODE Wilmer, Mr. Bill F. 2800 Willeslet Dr. Willeslet, OH 44095	NAME OF EMPLOYER Peter [unclear] OCCUPATION [unclear] RECEIPT FOR [unclear] <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	DATE RECEIVED 05/14/72	AMOUNT 0100.00	
NAME, ADDRESS, CITY, STATE, ZIP CODE Goshberg, Mrs. Robin S. 95 Green Circle Stamford, CT 06905	NAME OF EMPLOYER John [unclear] OCCUPATION [unclear] RECEIPT FOR [unclear] <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	DATE RECEIVED 05/14/72	AMOUNT 01,000.00	
NAME, ADDRESS, CITY, STATE, ZIP CODE Conno, Mr. Michael E. 1432 Union Church Rd. Mc Lean, VA 22102	NAME OF EMPLOYER American Petrol Inst. OCCUPATION [unclear] RECEIPT FOR [unclear] <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	DATE RECEIVED 05/02/72	AMOUNT 01,000.00	
NAME, ADDRESS, CITY, STATE, ZIP CODE DiPerci, Mr. Joseph P. 7975 Nashell Ave Van Nuys, CA 91406	NAME OF EMPLOYER John [unclear] OCCUPATION [unclear] RECEIPT FOR [unclear] <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	DATE RECEIVED 05/02/72	AMOUNT 01,000.00	
NAME, ADDRESS, CITY, STATE, ZIP CODE Elkins, Mr. J. A. Jr. P.O. Box 2387 Houston, TX 77252	NAME OF EMPLOYER John [unclear] OCCUPATION [unclear] RECEIPT FOR [unclear] <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	DATE RECEIVED 05/02/72	AMOUNT 02,000.00 /	
SUBTOTAL OF RECEIPTS THIS PAGE (optional)			07,500.00	
TOTAL THIS PERIOD (see page six line number only)			07,500.00	

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 22037502643

*-Reproduction or Resubmission Requested

SCHEDULE A-P
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20543

ITEMIZED RECEIPTS

Use spaces scheduled for each category of the detailed summary page	PAGE 300	OF THIS REPORT 1200
LINE NUMBER 120		

NAME OF COMMITTEE (in Full)			DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
DEM-BATTLE '92 PRIMARY COMMITTEE				
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.				
NAME, ADDRESS, CITY, STATE, ZIP CODE Chua, Ms. Serene H. Chen 38 Forest Knolls San Francisco, CA 94131	NAME OF EMPLOYER Sidney Chen Accountants OCCUPATION Accountant AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	10/15/91	\$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE Cullen, Mr. Roy H. 601 Jefferson, 40TH Floor Houston, TX 77002	NAME OF EMPLOYER Self OCCUPATION Oil Operator AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	10/24/91	\$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE Bindley, Mr. William E. 6212 N. 71st Street Indianapolis, IN 46268	NAME OF EMPLOYER Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	10/22/91	\$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE O'Donnell, Mr. Peter Jr. 1481 Elm St. Ste. 3366 Dallas, TX 75202	NAME OF EMPLOYER Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	10/12/91	\$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE Elkins, Mr. J. A. Jr. P.O. Box 2387 Houston, TX 77252	NAME OF EMPLOYER Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	10/24/91	\$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE Dreyer, Mr. William E. 6 Southmoor St. Louis, MO 63105	NAME OF EMPLOYER Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	10/22/91	\$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE Keenan, Mr. James F. 217 East Street Aiken, SC 29801	NAME OF EMPLOYER Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	10/16/91	\$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE Rays, Mr. Samuel H. Jr. 2226 Edgewood Cv Memphis, TN 38104	NAME OF EMPLOYER Rays, Samuel H. Jr. Attorney AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	10/08/91	\$1,000.00
SUBTOTAL OF RECEIPTS THIS PAGE (optional)				\$4,000.00
TOTAL THIS PERIOD (last page this line number)				

4043600692

*-Retribution or Resignation Requested

SCHEDULE A-P

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

ITEMIZED RECEIPTS

Use separate schedules for each category of the detailed summary page	PAGE	OF VOUCHERS
	72	1200
LINE NUMBER		120

NAME OF CONTRIBUTOR (in Full)		DATE (MONTH, DAY, YEAR)		AMOUNT OF EACH RECEIPT THIS PERIOD
DEM-BAYL '92 PRIMARY COMMITTEE				
<p>Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.</p>				
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER			
Yodanis, Mr. F. J. 28 Rakoczy Ave. Fairfield, CT 06430	Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$350.00	RECEIPT FOR Info Requested <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	11/22/91	\$100.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER			
Burns, Mr. Edward C. 9210 Lake Point Wichita, KS 67226	Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$250.00	RECEIPT FOR Info Requested <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	11/25/91	\$250.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER			
Rancack, Mr. M. Jason 126 Chesters Road Bridgford, CT 06877	Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR Info Requested <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	11/14/91	\$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER			
Ree, Mr. Dennis J. 61 Byron Shore Rd. Greenwich, CT 06830	Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR Info Requested <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	11/14/91	\$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER			
Kennedy, Mr. William T. 121 Juniper Way Basking Ridge, NJ 07620	Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$500.00	RECEIPT FOR Info Requested <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	11/14/91	\$500.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER			
Stechman, Mr. David A. 215 Clapboard Ridge Road Greenwich, CT 06831	Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR Info Requested <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	11/14/91	\$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER			
Elkins, Mr. James A. III 7 Pinonhill Lane Houston, TX 77019	Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR Info Requested <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	10/28/91	\$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER			
Bernhart, Mrs. Carol A. 87 Briarwood Court Houston, TX 77019	Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR Info Requested <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	10/28/91	\$1,000.00
SUBTOTAL OF RECEIPTS THIS PAGE (optional)				\$5,450.00
TOTAL THIS PERIOD (last page this line number only)				

14043600693
2037310033

X

--Reattribution or Redesignation Requested

SCHEDULE A

ITEMIZED RECEIPTS

E

Any info. copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purpose, other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: Friends of Senator Nickles

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
F.H. Richardson 11640 Greenbay Houston TX 77024	Shell Oil Company President	12/30/91	500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
J.A. Elkins Jr. P. O. Box 2387 Houston TX 77252	First City Bancorporat Director	12/30/91	1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Elizabeth Larson 888 7th Avenue New York NY 10106	Soros Fund Mgmt. Director	12/30/91	1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Michael Valadez 1531 Defense Highway Gambrills MD 21054	Self Attorney	12/30/91	1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Frank West 53 D Street, SE Washington DC 20003	Self Attprney	12/30/91	500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Richard Gelb 345 Park Avenue New York NY 10154	Bristol-Myers Squibb C Chairman & CEO	12/30/91	1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

SUBTOTAL of Receipts This Page 5000.00

TOTAL This Period

4043600694

SCHEDULE A

ITEMIZED RECEIPTS

E

Use separate schedule for each category of the Detailed Summary Page

PAGE 2 of 8
FOR LINE NUMBER 11 (A) (1)

CONTRIBUTIONS FROM INDIVIDUALS/PERSONS

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

NAME OF COMMITTEE (in Full)

EDWARD BLUM FOR US CONGRESS 76-0358902

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
ALLEN AND ETHEL CARRUTH PO BOX 1388 HOUSTON TX 77251	JOHN L WORTHAM & SONS INSURANCE	7-20-92	300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation INSURANCE BROKER Aggregate Year-to-Date > \$ 300.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
DENTON A. COOLEY MD PO BOX 20660 HOUSTON TX 77225	SELF EMPLOYED	9-17-92	250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation DOCTOR Aggregate Year-to-Date > \$ 250.00		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
MR AND MRS H MARKLEY CROSSWELL 3756 KNOLLWOOD DR HOUSTON TX 77019	SELF EMPLOYED	7-22-92	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation INVESTOR Aggregate Year-to-Date > \$ 500.00		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
ROD AND SUE ANN CUTSINGER 4 BRIARWOOD COURT HOUSTON TX 77019		9-29-92	250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation RETIRED Aggregate Year-to-Date > \$ 250.00		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
T.H. DINERSTEIN 6363 WOODWAY SUITE 1000 HOUSTON TX 77057	SELF EMPLOYED	8-5-92	250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation DEVELOPER Aggregate Year-to-Date > \$ 250.00		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
MR AND MRS JOHN I EBELING 417 HEDWIG ROAD HOUSTON TX 77024	INTERPRISE RENTALS	9-14-92	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation SALES Aggregate Year-to-Date > \$ 500.00		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
MR AND MRS JA ELKINS PO BOX 2387 HOUSTON TX 77252	TCB	7-27-92	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation BANKER Aggregate Year-to-Date > \$ 500.00		

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92014743024

TOTAL of Receipts This Page (optional)	2,550.00
TOTAL This Period (last page this line number only)	

SCHEDULE A

Any info. copied from such reports or statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purpose, other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: Fields for Congress

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Ernest M. Cockrell 1600 Smith #4600 Houston TX	Cockrell Oil & Gas owner	04/15/91	250.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Roy H. Cullen 601 Jefferson, #4000 Houston TX	Selfemployed/Investor Investor	04/03/91 04/15/91	500.00 250.00

Receipt for: Primary Year-to-Date Total: \$ 750.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Carol C. Curran 1600 Smith #4600 Houston TX	Cockrell Oil & Gas owner	04/15/91	250.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
James A. Elkins III 7 Pinhill Lane Houston TX	First City National Ba Chairman	04/03/91	500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Roger Hall 6009 Annapolis Houston TX	Corporate Realty Int'l Lease Agent	04/15/91 04/15/91	500.00 500.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Ralph T. Hull 1801 Fannin, Ste. 1865 Houston TX	Selfemployed Attorney	04/03/91	500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

SUBTOTAL of Receipts This Page 3250.0

TOTAL This Period

4043600696

SCHEDULE A

STANDARD RECEIPTS

FORM 1041-92

The Congressman Joe Barton Building 194861

FOR LINE NUMBER 11A

<p>A. James B. Silina P. O. Box 2397 Houston TX 77232 For: 1992 PRIMARY</p>	<p>Occupation: Director EMP: First City Savings Receipts this Period: 1,000.00 Aggregate Year-to-Date: 1,000.00 06/21/91 1,000.00</p>
<p>B. Billie Brooks P. O. Box 1428 Conroe TX 77385 For: 1992 PRIMARY</p>	<p>Occupation: Housewife Receipts this Period: 500.00 Aggregate Year-to-Date: 500.00 06/21/91 500.00</p>
<p>C. C. B. Rand Rand Oil Company P. O. Box 108 Groesbeck TX 76642 For: 1992 PRIMARY</p>	<p>Occupation: Phillips 66 Jobber EMP: Rand Oil Company Receipts this Period: 250.00 Aggregate Year-to-Date: 250.00 06/24/91 250.00</p>
<p>D. Harry Lucas P. O. Box 56467 Houston TX 77256 For: 1992 PRIMARY</p>	<p>Occupation: Investments EMP: Self-Employed Receipts this Period: 250.00 Aggregate Year-to-Date: 250.00 06/24/91 250.00</p>
<p>E. Thomas L. Rhodes Goldman, Sachs & Co. 85 Broad Street New York NY 10004 For: 1992 PRIMARY</p>	<p>Occupation: Investment Banker EMP: Goldman, Sachs & Co. Receipts this Period: 1,000.00 Aggregate Year-to-Date: 1,000.00 06/24/91 1,000.00</p>
<p>F. James S. Garvey Garvey Enterprises P.O. Box 9888 Fort Worth TX 76147 For: 1992 PRIMARY</p>	<p>Occupation: Investments EMP: Garvey Enterprise Receipts this Period: 1,000.00 Aggregate Year-to-Date: 1,000.00 06/24/91 1,000.00</p>
<p>G. Shirley Garvey P. O. Box 9400 Fort Worth TX 76147 For: 1992 PRIMARY</p>	<p>Occupation: Investor EMP: Self Employed Receipts this Period: 1,000.00 Aggregate Year-to-Date: 1,000.00 06/24/91 1,000.00</p>
<p>H. Ralph Wilson 5086 Sunflower Temple TX 76782 For: 1992 PRIMARY</p>	<p>Occupation: Retired EMP: Praxair International Receipts this Period: 1,000.00 Aggregate Year-to-Date: 1,000.00 06/24/91 1,000.00</p>
<p>I. Felix Ankele 1220 Pennsylvania Avenue Fort Worth TX 76104 For: 1992 PRIMARY</p>	<p>Occupation: Florist EMP: Gordon Boswell Flowers Receipts this Period: 1,000.00 Aggregate Year-to-Date: 1,000.00 06/24/91 1,000.00</p>
<p>SUBTOTAL OF RECEIPTS THIS PAGE 7,000.00</p>	

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UNIFIED RECEIPTS

A. *E.*

For each receipt (see instructions for details on the reverse side of this page)

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Committee (In Full)
 Michael A. Andrews for Congress Cmte

8
 0
 6
 2
 0
 0
 3
 4
 0

Name, Mailing Address and Zip Code	Name of Employer (and Job Company)	Date (month, day, year)	Amount of Each Receipt This Period
Mr. J. Carroll Jr 80 Montrose Blvd # 17-A Houston, TX 77006			500.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation Vice President Aggregate Year To Date: \$ 500.00		

Name, Mailing Address and Zip Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mr. James W. Cronover 634 Cedar Creek Houston, TX 77056	McKinsey & Co		1000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation Managing Director Aggregate Year To Date: \$ 1000.00		

Name, Mailing Address and Zip Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mr. J. A. Elkins P. Box 2387 Houston, TX 77252	Vinson & Elkins		1000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation Attorney Aggregate Year To Date: \$ 1000.00	04/30/91	

Name, Mailing Address and Zip Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Genard W. Gross 2700 Post Oak Boulevard Suite 1670 Houston, TX 77056	Gross Investments		1000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation Real Estate Investor Aggregate Year To Date: \$ 1000.00	10/04/91	

Total of Receipts This Page (optional) 3500.00

Total This Period (last page this line number only) 61750.00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 28, 1994

Ellen S. Miller, Executive Director
Center for Responsive Politics
1320 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 3888

Dear Ms. Miller:

This letter acknowledges receipt on January 21, 1994, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by James A. Elkins, Jr. The respondent 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 3888. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar
Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

4043600699



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 28, 1994

James A. Elkins, Jr.
101 Parish Circle
Houston, TX 77024

RE: MUR 3888

Dear Mr. Elkins:

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 3888. 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.

4043600700

James A. Elkins, Jr.
Page 2

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

4043600701



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

FEB 15 1994

J. Stanley Huckaby, Treasurer
Bush-Quayle '92 Primary Committee, Inc.
228 S. Washington Street
Suite 200
Alexandria, VA 22314

RE: MUR 3888

Dear Mr. Huckaby:

The Federal Election Commission received a complaint which indicates that the Bush-Quayle '92 Primary Committee, Inc., Bush-Quayle '92 Compliance Committee, Inc. ("Committees") 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 3888. 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 Committees 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.

4043600702

J. Stanley Huckaby, Treasurer
Bush-Quayle '92 Primary Committee, Inc.
Page 2

If you have any questions, please contact Joan McEnergy at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

4043600703

WINSON & ELKINS L.L.P.
(REGISTERED LIMITED LIABILITY PARTNERSHIP)
ATTORNEYS AT LAW

2500 FIRST CITY TOWER
1001 FANNIN
HOUSTON, TEXAS 77002-6760
TELEPHONE (713) 758-2222
FAX (713) 758-2346

HUNGARIAN EXPORT BUILDING
UL. POVARSKAYA (FORMERLY VOROVSKOGO), 21
121089 MOSCOW, RUSSIAN FEDERATION
TELEPHONE 011 (70-95) 202-8418
FAX 011 (70-95) 202-0295

THE WILLARD OFFICE BUILDING
1485 PENNSYLVANIA AVE., N.W.

WASHINGTON, D.C. 20004-1008

TELEPHONE (202) 639-6500
FAX (202) 639-6604

WRITER'S DIRECT DIAL

(202) 639-6576

February 18, 1994

3700 TRAMMELL CROW CENTER
2001 ROSS AVENUE
DALLAS, TEXAS 75201-2975
TELEPHONE (214) 220-7700
FAX (214) 220-7716

ONE AMERICAN CENTER
600 CONGRESS AVENUE
AUSTIN, TEXAS 78701-3200
TELEPHONE (512) 495-8400
FAX (512) 495-8612

47 CHARLES ST., BERKELEY SQUARE
LONDON W1X 7PB, ENGLAND
TELEPHONE 011 (44-71) 491-7236
FAX 011 (44-71) 499-5320

By Messenger

Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463
Attn: Ms. Mary L. Taksar

Re: MUR 3888

Dear Ms. Taksar:

Reference is hereby made to Complaint MUR 3888 (the "Complaint"), filed by the Center for Responsive Politics (the "Complainant"), against Mr. J.A. Elkins, Jr. (the "Respondent"). This letter constitutes Mr. Elkins' response for consideration by the Federal Election Commission ("Commission") in determining whether there exists reason to believe that the Complaint sets forth a possible violation of the Federal Election Campaign Act of 1971, as amended (the "Act") and the regulations thereunder (the "Regulations"). On the basis of the facts set forth below, the Commission should take no action in this matter.

Facts

Respondent is an individual residing in Houston, Texas. Respondent and his wife, Mrs. Margaret Elkins, have made contributions to various candidates and political committees in connection with federal campaigns. Respondent concurs with Complainant regarding 12 of the 16 entries listed in Exhibit 1 to the Complaint.

4043600704

<i>Recipient</i>	<i>FEC Microfilm Location</i>	<i>Date</i>	<i>Amount Per Complainant</i>	<i>Amount Per Respondent</i>
Andrews, Michael A.	92HSE/436/2035	09/30/91	\$ 1,000	\$ 1,000
Andrews, Michael A.	92HSE/456/0173	05/22/92	\$ 500	\$ 500
Barton, Joe L.	91HSE/432/1593	06/21/91	\$ 1,000	\$ 1,000
Blum, Edward	92HSE/474/3024	07/27/92	\$ 250	\$ 250
Bush, George	92FEC/760/2643	05/08/92	\$ 2,000	\$ 2,000
Bush, George	92FEC/731/0397	10/24/91	\$ 1,000	\$ 1,000
Bush, George	92FEC/731/0083	10/28/91	\$ 1,000	- 0 -
Bush, George	92FEC/769/0029	06/12/92	\$-1,000	\$-1,000
Ervin, Clark Kent	92HSE/440/0364	09/10/91	\$ 1,000	\$ 1,000
Fields, Jack	91HSE/438/0705	05/04/92	\$ 500	- 0 -
Fields, Jack	91HSE/429/2386	04/03/91	\$ 500	- 0 -
McKenna, Dolly Madison	92HSE/443/1049	01/17/92	\$ 1,000	\$ 1,000
Nickles, Don	92SEN/003/2788	12/30/91	\$ 1,000	\$ 1,000
Republican National Committee	92FEC/774/1006	07/06/92	\$20,000	\$10,000
Reyes, Ben T.	92HSE/443/0696	01/31/92	\$ 1,000	\$ 1,000
Texas Republican Congressional Committee	92FEC/787/3702	07/06/92	\$ 5,000	\$ 5,000
TOTAL			\$35,750	\$23,750

The shaded entries, however, represent contributions that Respondent disputes. The facts surrounding these contributions are summarized in the following table:

<i>Recipient</i>	<i>Amount Disputed</i>	<i>Date</i>	<i>Reason Disputed</i>
Bush, George	\$ 1,000	10/28/91	These contributions were made by Mr. James A. Elkins, III, the adult son of Mr. J.A. Elkins, Jr.
Fields, Jack	\$ 500	05/04/92	
Fields, Jack	\$ 500	04/03/91	
Republican National Committee	\$10,000	07/06/92	This \$20,000 contribution was intended to be made jointly by Respondent and Mrs. J.A. Elkins. When Respondent determined that it had been attributed solely to him, he requested and received a refund of \$10,000 of the contribution.

4043600705

The October 28, 1991 contribution to George Bush in the amount of \$1,000 and the April 3, 1991 and May 4, 1992 contributions to Jack Fields each in the amount of \$500 were not contributed by Respondent. These contributions were made by Mr. James A. Elkins, III, who is the adult son of Respondent. The reports filed by the recipients clearly reflect that the contributor was Mr. James A. Elkins, III (see attached Exhibits A, B, and C).

The July 6, 1992 contribution to the Republican National Committee in the amount of \$20,000 was intended to be made jointly by Respondent and Mrs. Margaret Elkins, with \$10,000 attributable to Respondent and \$10,000 attributable to Mrs. Margaret Elkins (see attached Exhibits D and E). When Mr. Elkins determined that the entire \$20,000 had been attributed to him, he immediately contacted the Republican National Committee (the "RNC") and requested a refund of \$10,000 (see attached Exhibit F). This refund was made to Respondent on October 6, 1993 (see attached Exhibit G). This payment was clearly reflected as refund in the RNC's November 1993 FEC report (see attached Exhibit H).

Law and Analysis

The Act permits individuals to contribute up to \$25,000 per year to political committees in connection with federal elections. 2 U.S.C. § 441(a)(3) (1988); 11 C.F.R. § 110.5 (1993). Contributions to a federal candidate's primary campaign committee, to the federal account of a state party committee or a national party committee, and to the federal account of any other political committee count toward this aggregate limit. 2 U.S.C. § 441(a)(1) (1988); 11 C.F.R. § 110.1 (1993).

Contributions by Mr. James A. Elkins, III

Three contributions totalling \$2,000 were made not by Respondent, but by Mr. James A. Elkins, III. It appears that the Complainant mistakenly attributes these contributions to Respondent. Accordingly, these contributions should be disregarded in computing Respondent's total 1992 contributions.

Although not stated, Complainant may be attempting to assert that Respondent exercised control over these funds and attempted, through his son, to avoid the limitations. In general, an individual may not increase his or her contributions by contributing money in the name of any other person. 11 C.F.R. § 110.4(b) (1993). Contributions made by an individual's child must be made knowingly and voluntarily by the child out of his or her own funds in order to avoid classification as a prohibited contribution. 11 C.F.R. § 110.1(i)(2) (1993). Mr. James A. Elkins, III, however, was 38 years old during 1992 and made his own decisions regarding his political contributions. Respondent did not have any contact with Mr. James A. Elkins, III regarding these contributions and, in fact, had no knowledge of these contributions prior to review of FEC records. Thus, these three contributions are irrelevant in determining Respondent's total 1992 contributions.

4043600706

Contribution to the Republican National Committee

The Regulations permit joint contributions. 11 C.F.R. § 110.1(k). Respondent and Mrs. Margaret Elkins intended that half of the \$20,000 check dated July 6, 1992 to the RNC be attributed to Respondent and half to Mrs. Margaret Elkins. Once he discovered that the contribution had been attributed entirely to Mr. Elkins, Respondent immediately requested a refund of \$10,000. The RNC granted Respondent's request and issued a check dated October 6, 1993 for \$10,000. The request and receipt of a \$10,000 refund was appropriate and demonstrates the Elkins' intent that the contribution be attributed evenly between Respondent and Mrs. Elkins.

Respondent's actions also are consistent with the regulatory scheme and the Commission's interpretation of the Act. The Commission has recognized that, where a contribution exceeds the limitations established in the Act, two courses of action are appropriate: reattribution of the excess or refund of the excess. For example, the Regulations provide procedures for reattributing contributions where, in the absence of the reattribution, a contribution would exceed established limitations. See 11 C.F.R. § 110.1(k)(ii)(B). In addition, where a reattribution cannot be made, a refund of the excess is appropriate. *Id.*; see also Advisory Opinions 1984-52, 1980-37, and 1977-40. When Respondent and Mrs. Elkins discovered that their contribution was not attributed according to their intent and that the misattribution might cause FEC records to indicate that Respondent had exceeded the \$25,000 aggregate limitation, Respondent requested and received a refund. Thus, the refund was an appropriate method of insuring his compliance with the contribution limitation.

Therefore, Respondent's federal contributions for 1992 total \$23,750. These contributions are \$1,250 less than the \$25,000 annual aggregate limitation. Accordingly, there is no reason to believe that Mr. Elkins has committed or is about to commit a violation of the Act or the regulations. The Commission should close this file and take no action regarding this matter. If you have any questions regarding this response or need any additional documentation, please contact the undersigned.

Respectfully submitted,



Russell W. Sullivan

Attachments

cc: Mr. J.A. Elkins, Jr.

4043600707

LIST OF EXHIBITS

- Exhibit A** Excerpt from Fields for Congress Committee FEC Report, showing James A. Elkins, III as contributor
- Exhibit B** Excerpt from Fields for Congress Committee FEC Report, showing James A. Elkins, III as contributor
- Exhibit C** Excerpt from Bush-Quayle '92 Primary Committee FEC Report, showing James A. Elkins, III as contributor
- Exhibit D** Affidavit of Respondent regarding intent of contribution to the Republican National Committee
- Exhibit E** Affidavit of Margaret W. Elkins regarding intent of contribution to the Republican National Committee
- Exhibit F** Letter from Respondent to Republican National Committee requesting \$10,000 refund
- Exhibit G** Copy of refund check from Republican National Committee
- Exhibit H** Excerpt from Republican National Committee November 1993 FEC Report showing refund to Respondent

4043600708

EXHIBIT A

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 13
for Line Number 11a

Any info. copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purpose, other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: Fields for Congress

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Thomas S. Loeffler Post Office Box 3999 San Antonio TX 78299	Information Requested Attorney	05/04/92	500.00

Receipt for: General Year-to-Date Total: \$ 500.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Thomas L. Hille 643 Ranger Court Davidsonville MD 21035	Miners, Port, Schlefer Attorney	04/03/92	500.00

Receipt for: General Year-to-Date Total: \$ 500.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
James A. Elkins III 7 Pinehill Lane Houston TX 77019	First City National Bank Chairman	05/04/92	500.00

Receipt for: General Year-to-Date Total: \$ 500.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Ralph T. Hall 1001 Fannin, Ste. 1065 Houston TX 77002	Selfemployed Attorney	04/20/92	500.00

Receipt for: General Year-to-Date Total: \$ 500.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Carbin J. Robertson Jr. 601 Jefferson, 40th Fl. Houston TX 77002	Selfemployed Co-Owner	04/20/92	500.00

Receipt for: General Year-to-Date Total: \$ 500.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
David H. Underwood 1648 Willevick Road Houston TX 77019	Levett, Underwood, Neuha Stock Broker	04/20/92	500.00

Receipt for: General Year-to-Date Total: \$ 500.00

SUBTOTAL of Receipts This Page 3000.00

TOTAL This Period

4043600709

SCHEDULE A

Any info. copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purpose, other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: Fields for Congress

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Ernest M. Cockrell 1600 Smith #4600 Houston TX	Cockrell Oil & Gas owner	04/15/91	250.00
Receipt for: Primary		Year-to-Date Total: \$	250.00
B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Roy M. Cullen 601 Jefferson, #4000 Houston TX	Selfemployed/Investor Investor	04/03/91 04/15/91	500.00 250.00
Receipt for: Primary		Year-to-Date Total: \$	750.00
C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Carol C. Curran 1600 Smith #4600 Houston TX	Cockrell Oil & Gas owner	04/15/91	250.00
Receipt for: Primary		Year-to-Date Total: \$	250.00
D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
James A. Elkins III 7 Pinhill Lane Houston TX	First City National Bk Chairman	04/03/91	500.00
Receipt for: Primary		Year-to-Date Total: \$	500.00
E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Roger Mall 6009 Annapolis Houston TX	Corporate Realty Int'l Lease Agent	04/15/91 04/15/91	500.00 500.00
Receipt for: Primary		Year-to-Date Total: \$	1000.00
F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Ralph T. Null 1001 Pannin, Ste. 1865 Houston TX	Selfemployed Attorney	04/03/91	500.00
Receipt for: Primary		Year-to-Date Total: \$	500.00
SUBTOTAL of Receipts This Page			3250.0
TOTAL This Period			

4043600710

SCHEDULE A-P
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20543

ITEMIZED RECEIPTS

Use spaces provided for each receipt of the attached primary page	PAGE	OF THIS PERIOD
	78	129
LINE NUMBER		
129		

NAME OF CONTRIBUTOR (in Full)		DATE (MONTH, DAY, YEAR)		AMOUNT OF EACH RECEIPT THIS PERIOD
INDIVIDUAL OR PRIVATE ENTITY				
<p>Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.</p>				
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER			
Yadlows, Dr. F. J. 28 Schaefer Ave. Fairfield, CT 06430	Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$250.00	RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	11/22/91	\$100.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER			
Burns, Dr. Edward C. 9219 Lake Point Mickle, IL 61226	Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$250.00	RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	11/25/91	\$250.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER			
Burton, Dr. V. Jason 126 Limestone Road Bridgford, CT 06677	Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	11/14/91	\$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER			
Bass, Dr. Dennis J. 61 Byron Shore Rd. Greenwich, CT 06830	Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	11/14/91	\$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER			
Conroy, Dr. William T. 121 Juniper Way Basking Ridge, NJ 07020	Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$500.00	RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	11/14/91	\$500.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER			
Crutcher, Dr. David A. 215 Clapboard Ridge Road Greenwich, CT 06831	Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	11/14/91	\$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER			
Flynn, Dr. James A. III 7 Pinhill Lane Hartford, CT 06119	Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	10/28/91	\$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER			
Bernhart, Mrs. Carol A. 67 Briarwood Court Hartford, CT 06119	Info Requested OCCUPATION Info Requested AGGREGATE YEAR-TO-DATE \$1,000.00	RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	10/28/91	\$1,000.00
SUBTOTAL OF RECEIPTS THIS PAGE (options)				\$5,650.00
TOTAL THIS PERIOD (list page this line number on)				

4043600711
0237310033

-Redistribution or Redesignation Request-

AFFIDAVIT OF JAMES A. ELKINS, JR.

STATE OF TEXAS)
)
COUNTY OF HARRIS) ss:

BEFORE ME, the undersigned authority, on this day personally appeared JAMES A. ELKINS, JR. who, being by me duly sworn, on oath states as follows:

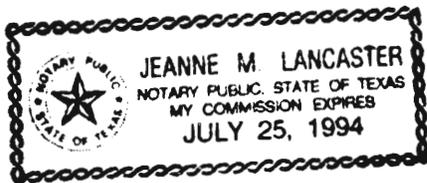
1. My name is James A. Elkins, Jr.
2. I am over 21 years of age and am competent to testify to the matters set forth in this affidavit. I have personal knowledge of the matters set forth herein.
3. On July 6, 1992, on behalf of my wife, Margaret W. Elkins, and myself, I signed a check drawn from our joint checking account made payable to the Republican National Committee in the amount of \$20,000. It was our intention that the contribution from our joint account would be half from me and half from my wife. Thus, we each intended to contribute \$10,000 individually.
4. I declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Further Affiant saith not.

J. A. Elkins, Jr.

JAMES A. ELKINS, JR.

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority, on this the 16th day of February, 1994, to certify which witness my hand and seal of office.



Jeanne M. Lancaster

Notary Public in and for the
State of Texas

My commission expires: _____

4043600712

AFFIDAVIT OF MARGARET W. ELKINS

STATE OF TEXAS)
)
COUNTY OF HARRIS) ss:

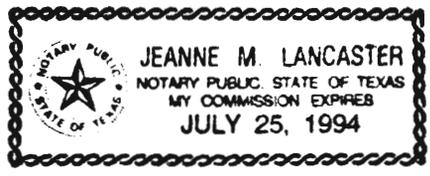
BEFORE ME, the undersigned authority, on this day personally appeared MARGARET W. ELKINS who, being by me duly sworn, on oath states as follows:

- 1. My name is Margaret W. Elkins.
- 2. I am over 21 years of age and am competent to testify to the matters set forth in this affidavit. I have personal knowledge of the matters set forth herein.
- 3. On July 6, 1992, my husband, James A. Elkins, Jr., on behalf of both of us, signed a check drawn from our joint checking account made payable to the Republican National Committee in the amount of \$20,000. It was our intention that the contribution from our joint account would be half from me and half from my husband. Thus, we each intended to contribute \$10,000 individually.
- 4. I declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Further Affiant saith not.

Margaret W. Elkins
MARGARET W. ELKINS

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority, on this the 16th day of February, 1994, to certify which witness my hand and seal of office.



Jeanne M. Lancaster
Notary Public in and for the
State of Texas

My commission expires: _____

4043600713

J. A. ELKINS, JR.
1166 FIRST CITY TOWER
1001 FANNIN
HOUSTON, TEXAS 77002

October 4, 1993

Ms. Nancy Thawley
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003

Dear Nancy:

As you know, I have been a regular supporter of the Republican National Committee for several years and have contributed substantial sums to your organization.

For the year 1992, some of the campaign organizations to which my wife Margaret and I contributed attributed the entire sum to me, despite our intent that the amount be divided evenly between Margaret and me. Consequently, I may have inadvertently exceeded the \$25,000 limitation on contributions to federal campaigns and organizations supporting federal campaigns. In order to assure that I have complied with federal campaign finance law, I must request a refund in the amount of \$10,000.

Please send the refund to me at 1166 First City Tower, 1001 Fannin, Houston, Texas 77002. Thank you for your cooperation in this matter.

Yours very truly,


J. A. Elkins, Jr.

JAE:jl

4043600714

EXHIBIT G

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2738

REPUBLICAN NATIONAL FINANCE COMMITTEE
310 FIRST STREET, SE
WASHINGTON, D.C. 20003

OCTOBER 6 19 93 ~~10~~ 1475

PAY TO THE ORDER OF MR. J. A. ELKINS, JR.

\$ 10,000.00***

TEN THOUSAND AND 00/100

DOLLARS

SIGNET BANK
Member FDIC

FOR REFUND 1992

⑆00002738⑆ ⑆056004089⑆ 651-7220663⑆

FEB 11 '94 14:36

4043600715

REPUBLICAN NATIONAL COMMITTEE
FINISHED STATEMENTS

PAGE 1 OF 3
LINE #20(a)

SCHEDULE B

NAME ADDRESS	PURPOSE OF STATEMENTS	DATE	AMOUNT DISBURSED
MR. JOHN H. LINDSEY 921 MAIN ST HOUSTON TX 77002	REFUND	10/05/93	250.00
MR. J.A. BLIKINS JR 1166 FIRST CITY TOWER 1001 FARMIN HOUSTON TX 77002	REFUND	10/06/93	10,000.00
MR. ROBERT BARTHAKE P O BOX 340 MINNEAPKA MN 55404	REFUND	10/07/93	40.00
MR. ERIC BRINSON 1240 SHERBURY DENVER CO 80202	REFUND	10/17/93	10,000.00
MR. EARL SAMUELIAN 333 SOUTH HOPE ST LOS ANGELES CA 90071	REFUND	10/07/93	5,000.00
MR. EDWARD A. LOSICK 358 BISHOP ROAD HIGHLAND HEIGHTS OH 44143	REFUND	10/11/93	15,000.00
MR. FREDERICK A KLINGHOFFER 787 SEVENTH AVE NEW YORK NY 10019	REFUND	10/12/93	5,000.00
		TOTAL	45,290.00

4043600716
3336672042

ORIGINAL

OGC 129

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3888

NAME OF COUNSEL: Russell W. Sullivan

ADDRESS: Vinson & Elkins L.L.P.

1455 Pennsylvania Ave., N.W.

Suite 700

Washington, D.C. 20004

TELEPHONE: (202) 639-6578

94 FEB 18 PM 3:21

FEDERAL COMMISSION

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.

2-16-94
Date

J. Elkins
Signature

RESPONDENT'S NAME: James A. Elkins, Jr.

ADDRESS: 101 Farish Circle

Houston, TX 77024

HOME PHONE: _____

BUSINESS PHONE: (713) 652-2020

4043600717



RECEIVED
FEDERAL ELECTION COMMISSION
94 MAR -3 PM 12:26

Stan Huckaby
Treasurer

February 23, 1994

Ms. Mary Taksar
Office of General Counsel
Federal Election Commission
999 E Street NW
Washington, DC 20463

RE: MUR 3888

Dear Ms. Taksar:

The Bush-Quayle '92 Primary Committee, Inc., ("the Primary Committee") and the Bush-Quayle '92 Compliance Committee, Inc., ("the Compliance Committee") received on February 17, 1994 your letter dated February 15, 1994, regarding this MUR.

The information contained in Exhibit 1 accompanying the MUR is inaccurate, and does not correspond with the information contained in Exhibit 2. Mr. J. A. Elkins, Jr. made a \$ 1,000 contribution to the Primary Committee on October 24, 1991. He made no additional contribution to the Primary Committee. Mr. James A. Elkins III made a \$ 1,000 contribution to the Primary Committee on October 28, 1991. Therefore, the Primary Committee is not in violation of any FEC regulation with respect to Mr. James A. Elkins, Jr.'s contribution.

Mr. James A. Elkins, Jr. then made a \$ 2,000 contribution to the Compliance Committee on May 8, 1992. On June 12, 1992, the Compliance Committee received written authorization from Mr. Elkins, Jr. and his wife, Mrs. J.A. Elkins, Jr., to reattribute to Mrs. Elkins \$ 1,000 from the May 8, 1992 contribution. Mr. J. A. Elkins, Jr. made no additional contribution to the Compliance Committee. Therefore, the Compliance Committee is not in violation of any FEC regulation with respect to Mr. James A. Elkins, Jr.'s contribution.

The documentation necessary to support the activity referenced above has already been provided to, and verified by, the Commission's Audit Division. As a result, I request that the Commission determine that no action should be taken against these Committees with respect to MUR 3888.

Sincerely:

J. Stanley Huckaby, Treasurer
Bush-Quayle '92 Primary Committee, Inc., and
Bush-Quayle '92 Compliance Committee, Inc.

4043600718

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
) Enforcement Priority
)

GENERAL COUNSEL'S MONTHLY REPORT

SENSITIVE

I. INTRODUCTION

This report is the second Enforcement Priority System Monthly Report. The purpose of this September Monthly 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 and cases that, based on their rating, do not warrant pursuit relative to other pending cases are placed in this category. 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 44 cases which do not warrant further pursuit

4043600719

relative to the other pending cases.¹ A short 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 1-44. For the Commission's convenience, the narratives for the externally-generated matters are immediately followed by the complaint and response(s) and the narrative for the internally-generated matter is 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 2 cases that have remained inactive and assigned to the Central Enforcement Docket for one year and which it believes do not warrant further investment of significant Commission resources.² Since the recommendation not to pursue the identified cases is

1. These matters are: PM 299; MUR 3856; MUR 3859; MUR 3860; MUR 3861; MUR 3863; MUR 3864; MUR 3865; MUR 3868; MUR 3869; MUR 3870; MUR 3871; MUR 3872; MUR 3873; MUR 3874; MUR 3875; MUR 3877; MUR 3878; MUR 3880; MUR 3881; MUR 3882; MUR 3883; MUR 3884; MUR 3885; MUR 3887; MUR 3888; MUR 3889; MUR 3897; MUR 3900; MUR 3901; MUR 3906; MUR 3909; MUR 3910; MUR 3913; MUR 3914; MUR 3915; MUR 3916; MUR 4029; MUR 4030; MUR 4034; MUR 4035; MUR 4038; MUR 4039; and MUR 4040.

2. These matters are RAD 93L-66 and RAD 93L-69.

4043600720

based on staleness, this Office has not prepared separate narratives for these cases. However, the referrals for these internally-generated matters are attached. See Attachments 45-46.

This Office recommends that the Commission exercise its prosecutorial discretion and no longer pursue the cases listed below effective November 14, 1994. By closing the cases effective November 14, 1994, CED and the Legal Review Team will respectively have the additional time necessary for preparing the closing letters and the case files for the public record for this fairly large number of cases.

4043600721

III. RECOMMENDATIONS

A. Decline to open a MUR and close the file effective November 14, 1994 in RAD 93L-66 and RAD 93L-69.

B. Decline to open a MUR, close the file effective November 14, 1994, and approve the appropriate letter in PM 299.

C. Take no action, close the file effective November 14, 1994, and approve the appropriate letter in the following matters:

- 1) MUR 3856
- 2) MUR 3859
- 3) MUR 3860
- 4) MUR 3861
- 5) MUR 3863
- 6) MUR 3864
- 7) MUR 3865
- 8) MUR 3868
- 9) MUR 3869
- 10) MUR 3870
- 11) MUR 3871
- 12) MUR 3872
- 13) MUR 3873
- 14) MUR 3874
- 15) MUR 3875
- 16) MUR 3877
- 17) MUR 3878
- 18) MUR 3880
- 19) MUR 3881
- 20) MUR 3882
- 21) MUR 3883
- 22) MUR 3884
- 23) MUR 3885
- 24) MUR 3887
- 25) MUR 3888
- 26) MUR 3889
- 27) MUR 3897
- 28) MUR 3900
- 29) MUR 3901
- 30) MUR 3906
- 31) MUR 3909
- 32) MUR 3910
- 33) MUR 3913
- 34) MUR 3914
- 35) MUR 3915

4043600722

- 36) MUR 3916
- 37) MUR 4029
- 38) MUR 4030
- 39) MUR 4034
- 40) MUR 4035
- 41) MUR 4038
- 42) MUR 4039
- 43) MUR 4040

10 26 94
Date

Lawrence M. Noble
Lawrence M. Noble
General Counsel

Attachments

14043600723

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
James Elkins, Jr.

)
)
)

MUR 3888

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 2, 1994, the Commission decided by a vote of 6-0 to take no action, close the file in MUR 3888 effective November 14, 1994, and approve the appropriate letter, as recommended in the General Counsel's Report dated October 26, 1994.

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

Attest:

11-3-94
Date

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

Received in the Secretariat: Thurs., Oct. 27, 1994 3:16 p.m.
Circulated to the Commission: Fri., Oct. 28, 1994 2:00 p.m.
Deadline for vote: Wed., Nov. 02, 1994 4:00 p.m.

bjr

4043600724



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

NOV 21 1994

Ellen S. Miller, Executive Director
Center for Responsive Politics
1320 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 3888

Dear Ms. Miller:

On January 21, 1994, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the respondents. See attached narrative. Accordingly, the Commission closed its file in this matter on November 14, 1994. This matter will become part of the public record within 30 days.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

4043600725

MUR 3888

JAMES ELKINS, JR.

The Center for Responsive Politics filed a complaint alleging that James Elkins, Jr. exceeded his 1992 \$25,000 annual limit by \$10,750 because his contributions attributable to 1992 total \$35,750. The contributions identified in the complaint raised the issue of whether the Bush-Quayle '92 Primary Committee, Inc., accepted contributions which exceeded the \$1,000 limit.

In response to the complaint, Mr. Elkins indicates that three of the contributions at issue, which total \$2,000, were made by his adult son, James Elkins, III and that these contributions were identified as such in the recipient committees' disclosure reports. He also indicates that the \$20,000 contribution to the Republican National Committee was intended to be a joint contribution from him and his wife and that when he discovered that it had been attributed solely to him, he requested a \$10,000 refund. Mr. Elkins provided a copy of an October 6, 1993 refund check from the RNC in the amount of \$10,000. Mr. Elkins indicates that his 1992 contributions are therefore within the \$25,000 annual limit.

The Bush-Quayle '92 Primary Committee responds that James A. Elkins, Jr. made one \$1,000 contribution to the Committee, and that a James A. Elkins, III made a \$1,000 contribution to the Committee. The Committee also states that on May 8, 1992 the Compliance Committee received a \$2,000 contribution from James A. Elkins, Jr. and that on June 12, 1992, it received written authorization from Mr. and Mrs. Elkins to reattribute \$1,000 of the contribution to Mrs. Elkins.

This matter involves less significant issues relative to other matters pending before the Commission.

4043600726



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

NOV 21 1994

James A. Elkins, Jr.
101 Farish Circle
Houston, TX 77024

RE: MUR 3888

Dear Mr. Elkins:

On January 28, 1994, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against you. See attached narrative. Accordingly, the Commission closed its file in this matter on November 14, 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 Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

4043600727

MUR 3888
JAMES ELKINS, JR.

The Center for Responsive Politics filed a complaint alleging that James Elkins, Jr. exceeded his 1992 \$25,000 annual limit by \$10,750 because his contributions attributable to 1992 total \$35,750. The contributions identified in the complaint raised the issue of whether the Bush-Quayle '92 Primary Committee, Inc., accepted contributions which exceeded the \$1,000 limit.

In response to the complaint, Mr. Elkins indicates that three of the contributions at issue, which total \$2,000, were made by his adult son, James Elkins, III and that these contributions were identified as such in the recipient committees' disclosure reports. He also indicates that the \$20,000 contribution to the Republican National Committee was intended to be a joint contribution from him and his wife and that when he discovered that it had been attributed solely to him, he requested a \$10,000 refund. Mr. Elkins provided a copy of an October 6, 1993 refund check from the RNC in the amount of \$10,000. Mr. Elkins indicates that his 1992 contributions are therefore within the \$25,000 annual limit.

The Bush-Quayle '92 Primary Committee responds that James A. Elkins, Jr. made one \$1,000 contribution to the Committee, and that a James A. Elkins, III made a \$1,000 contribution to the Committee. The Committee also states that on May 8, 1992 the Compliance Committee received a \$2,000 contribution from James A. Elkins, Jr. and that on June 12, 1992, it received written authorization from Mr. and Mrs. Elkins to reattribute \$1,000 of the contribution to Mrs. Elkins.

This matter involves less significant issues relative to other matters pending before the Commission.

4043600728



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

NOV 21 1994

J. Stanley Huckaby, Treasurer
Bush-Quayle '92 Primary Committee, Inc.
228 S. Washington Street, Suite 200
Alexandria, VA 22314

RE: MUR 3888

Dear Mr. Huckaby:

On February 15, 1994, the Federal Election Commission notified Bush-Quayle '92 Primary Committee, Inc., Bush-Quayle '92 Compliance Committee, Inc. ("Committees") and you, as treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the Committees and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter on November 14, 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 Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

4043600729

NUR 3888

JAMES ELKINS, JR.

The Center for Responsive Politics filed a complaint alleging that James Elkins, Jr. exceeded his 1992 \$25,000 annual limit by \$10,750 because his contributions attributable to 1992 total \$35,750. The contributions identified in the complaint raised the issue of whether the Bush-Quayle '92 Primary Committee, Inc., accepted contributions which exceeded the \$1,000 limit.

In response to the complaint, Mr. Elkins indicates that three of the contributions at issue, which total \$2,000, were made by his adult son, James Elkins, III and that these contributions were identified as such in the recipient committees' disclosure reports. He also indicates that the \$20,000 contribution to the Republican National Committee was intended to be a joint contribution from him and his wife and that when he discovered that it had been attributed solely to him, he requested a \$10,000 refund. Mr. Elkins provided a copy of an October 6, 1993 refund check from the RNC in the amount of \$10,000. Mr. Elkins indicates that his 1992 contributions are therefore within the \$25,000 annual limit.

The Bush-Quayle '92 Primary Committee responds that James A. Elkins, Jr. made one \$1,000 contribution to the Committee, and that a James A. Elkins, III made a \$1,000 contribution to the Committee. The Committee also states that on May 8, 1992 the Compliance Committee received a \$2,000 contribution from James A. Elkins, Jr. and that on June 12, 1992, it received written authorization from Mr. and Mrs. Elkins to reattribute \$1,000 of the contribution to Mrs. Elkins.

This matter involves less significant issues relative to other matters pending before the Commission.

4043600730



FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

THIS IS THE END OF MUR # 3888
DATE FILMED 12/15/94 CAMERA NO. 2
CAMERAMAN HMR

4043600731

BEFORE THE
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
94 JAN 21 PM 4:31

CENTER FOR RESPONSIVE POLITICS

1320 19th Street, N.W.
Washington, D.C. 20036
(202) 857-0044

v.

Complainant,

COMPLAINT

MUR 3889

James Bronce Henderson

Respondent,

COMPLAINT OF CENTER FOR RESPONSIVE POLITICS

1. This complaint charges that the respondent has violated the Federal Election Campaign Act, 2 U.S.C. § 431 et seq., as amended ("FECA"), by making aggregate contributions in excess of the limits permitted by the FECA.

PARTIES

2. The complainant, the Center for Responsive Politics, is a nonprofit, nonpartisan research group incorporated in the State of Iowa and headquartered in Washington, D.C., that studies Congress and related issues. Founded in 1983, it was designed to research matters concerning the organization and operation of Congress as an institution and to examine potential reforms that could improve both its internal operation and its responsiveness to the American public. The patterns of contributions of money to federal candidates has been one of its chief areas of study.

3. The respondent is an individual contributor to various candidates and political committees.

4043600732