



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 488



FEDERAL ELECTION COMMISSION

2 Letters from George Watterd to the FEC.

Final GC Report On the Case of the ~~W~~Watterds.

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- |  |   |
|--|---|
| <input type="checkbox"/> (1) Classified Information                                | <input checked="" type="checkbox"/> (6) Personal privacy                  |
| <input type="checkbox"/> (2) Internal rules and practices                          | <input type="checkbox"/> (7) Investigatory files                          |
| <input type="checkbox"/> (3) Exempted by other statute                             | <input type="checkbox"/> (8) Banking Information                          |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input type="checkbox"/> (5) Internal Documents                                    |   |

Signed

Mauro T. Donaldeen

date

6-1-78



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

June 1, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Dow H. Heard, Esquire  
1300 First City National Bank Building  
Houston, TX 77002

Re: MUR 488  
George F. and  
Joan Watford

Dear Mr. Heard:

The Federal Election Commission has determined there is no reasonable cause to believe that your clients, George F. and Joan Watford, contributed to the Friends of Bob Krueger in the name of another in violation of 2 U.S.C. §441f. Accordingly, the Commission intends to close its file in this matter as it relates to you.

If you have any questions regarding this matter, please call Susan Donaldson at (202) 523-4026.

Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script, appearing to read "William C. Oldaker".

William C. Oldaker  
General Counsel

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Dow H. Heard, Esquire  
1300 First City National Bank Building  
Houston, TX 77002

Re: MUR 488  
George F. and  
Joan Watford

Dear Mr. Heard:

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If you have any questions regarding this matter, please call Susan Donaldson at (202) 523-4026.

Thank you for your cooperation.

Sincerely,

William C. Oldaker  
General Counsel

7 3 0 4 7 7 5 1 5 2 7

WD  
5/30/78

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
George F. and Joan Watford )

MUR 488

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on May 24, 1978, the Commission determined by a vote of 6-0 to adopt the recommendation of the General Counsel to find no reasonable cause to believe that George F. and Joan Watford made contributions to the Friends of Bob Krueger in the names of their children in violation of 2 U.S.C. Section 441f, send the letter attached to the General Counsel's Report signed May 18, 1978, and close the file in the above-captioned matter.

Accordingly, the file has been closed.

*Marjorie W. Emmons*  
\_\_\_\_\_  
Marjorie W. Emmons  
Secretary to the Commission

Date 5/26/78

700-000-1528



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Dow H. Heard, Esquire  
1300 First City National Bank Building  
Houston, TX 77002

Re: MUR 488  
George F. and  
Joan Watford

Dear Mr. Heard:

The Federal Election Commission has determined there is no reasonable cause to believe that your clients, George F. and Joan Watford, contributed to the Friends of Bob Krueger in the name of another in violation of 2 U.S.C. §441f. Accordingly, the Commission intends to close its file in this matter as it relates to you.

If you have any questions regarding this matter, please call Susan Donaldson at (202) 523-4026.

Thank you for your cooperation.

Sincerely,

William C. Oldaker  
General Counsel



Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Regarding: Federal Election Commission  
inquiry MUR 488. (77)

Gentlemen;

I made a personal Contribution  
OF one thousand dollars (\$1000) to the  
Bob Krueger Senate Campaign.

yours truly,

Randy W. Tonking

Federal Election Commission  
1325 K. Street, N.W.  
Washington, D.C. 20463

Re: Federal Election Commission  
inquiry MUR #488 (77)

Gentlemen,

I made a personal contribution  
of \$1,000 to the Bob Kueger  
Senate Campaign.

Sincerely,

Jerry Woodford  
3620 Woodchase  
#105  
Houston, TX 77042

Federal Election Commission  
1325 K Street N.W.  
Washington D.C. 20463

Regarding: Federal Election Commission  
Inquiry MUR 488 (77)

Gentlemen:

I made a personal contribution  
of one thousand dollars (\$1,000<sup>00</sup>)  
to the Bob Krueger Campaign for  
the senate.

Yours truly,  
Joseph F. Watford

219 Renion  
Houston Tex. 77079

LAW OFFICES OF  
**DOW H. HEARD**  
1300 FIRST CITY NATIONAL BANK BUILDING  
HOUSTON, TEXAS 77002  
TELEPHONE 713-651-1141

May 4, 1978

200 3985  
RECEIVED  
FEDERAL ELECTION  
COMMISSION

'78 MAY 8 PM 1:27

To: Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

802499

Attention: Ms. Susan Donaldson

Re: Federal Election Commission  
Inquiry MUR 488 (77)

Gentlemen:

Enclosed is a letter from George F. Watford, in response to your letter of April 11, 1978, received April 17th. You agreed, due to counsel's being out of the United States, to a reply thereto mailed by May 5th.

We feel that the "source" of the money in the "family fund" was definitively answered by Mr. Watford's letter of February 14, 1978, and by the three separate letters you received on March 9, 1978, from Jenny, Randy and Joseph.

However, we suggest for your consideration that the enclosed further letter from Mr. Watford is conclusive.

We, his lawyers, have some wonderment concerning the relevancy of the third paragraph of your April 11th letter: "We also request information as to how the \$3,000 in the fund was replaced following the contribution". And, that Mr. Watford "did not explain how the 'family fund' may have been replenished."

It seems to us immaterial whether or not the family fund has been "replenished". Frankly, we as his attorneys do not regard it as being any of our business and we fail to see why it should be of concern to the Federal Election Commission or its employees how, or even whether, the fund has been "replenished".

However, Mr. Watford elected to go forward and answer your inquiry. We deem his answer decisive.

To: Federal Election Commission  
May 4, 1978  
Page Two  
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Lastly, we suggest for your consideration that Ms. Susan Donaldson will agree that Mr. Watford's attorneys have cooperated, on every occasion, with her in her inquiries to us. We thank her for her personal courtesy to us.

Very truly yours,



Dow H. Heard, Jr.



Marion Sanford, Jr.

DHH:ed  
Enclosures

LAW OFFICES OF

DOW H. HEARD

300 FIRST CITY NATIONAL BANK BUILDING

HOUSTON, TEXAS 77002

REGISTERED

*2/12/80*  
12:1 PM 0 MAY 81

Attention: Ms. Susan Donaldson

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

HOUSTON TEXAS



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

May 2, 1978

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS *MJE*  
SUBJECT: MUR 488 (77) - Interim Report dated 4-28-78  
Received in the Office of Commission  
Secretary: 4-28-78, 3:45

The above-mentioned document was circulated on a 24 hour  
no-objection basis at 2:00 p.m., May 1, 1978.

As of 2:00 p.m., this date, no objections have been  
received in the Office of Commission Secretary to the Interim  
Report.

April 28, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 488

Please have the attached Interim Report on MUR 488 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

78010031537





FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

April 28, 1978

Marion Sanford, Jr.  
Vinson & Elkins, Attorneys  
2100 First City National Bank Building  
Houston, Texas 77002

Re: MUR 488

Dear Mr. Sanford:

This letter will confirm the approval of an extension until May 5, 1978, to respond to the Commission's questions in connection with MUR 488 as it applies to your clients, George F. and Joan Watford.

If you have any questions concerning this matter, please do not hesitate to contact Susan Donaldson at (202) 523-4026.

Sincerely

A handwritten signature in black ink, appearing to read "Charles N. Steele".

Charles N. Steele  
Associate General Counsel



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

April 11, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Dr. Ralph G. (Jr.) and Melba D. Greenlee  
4441 Belfort Place  
Dallas, Texas 75205

Re: MUR 488

Dear Dr. and Mrs. Greenlee:

The Federal Election Commission has determined there is no reasonable cause to believe that you contributed to the Friends of Bob Krueger in the name of another in violation of 2 U.S.C. §441f. Accordingly, the Commission intends to close its file in this matter as it relates to you.

If you have any questions regarding this matter, please call Susan Donaldson at (202) 523-4026.

Thank you for your cooperation.

● SENDER: Complete items 1., 2., and 3. Add your address in the "RETURN TO" space on reverse.	
1. The following service is requested (check one). <input type="checkbox"/> Show to whom and date delivered <input checked="" type="checkbox"/> Show to whom, date, and address of delivery <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> Show to whom and date delivered. <input type="checkbox"/> RESTRICTED DELIVERY. <input type="checkbox"/> Show to whom, date, and address of delivery. \$ _____ (CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESSED TO: <b>DR. RALPH G. &amp; MELBA GREENLEE</b> <b>4441 BELFORT PLACE</b> <b>DALLAS, TEXAS 75205</b>	
3. ARTICLE DESCRIPTION: REGISTERED NO. <b>943337</b>	INSURED NO. _____ (Always obtain signature of addressee or agent) I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent <i>Susan Donaldson</i>
4. DATE OF DELIVERY <b>APR 11 1978</b>	POSTMARK 
5. ADDRESS (Complete only if requested)	
6. UNABLE TO DELIVER BECAUSE:	
CLERK'S INITIALS 	



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

April 11, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

David and Jean Witts  
5353 First International Building  
Dallas, Texas, 75270

Re: MUR 488

Dear Mr. and Mrs. Witts:

The Federal Election Commission has determined there is no reasonable cause to believe that you contributed to the Friends of Bob Krueger in the name of another in violation of 2 U.S.C. §441f. Accordingly, the Commission intends to close its file in this matter as it relates to you.

If you have any questions regarding this matter, please call Susan Donaldson at (202) 523-4026.

Sincerely,

William C. Oldaker  
General Counsel

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. The following service is requested (check one): <input type="checkbox"/> Show to whom and date delivered <input checked="" type="checkbox"/> Show to whom, date, and address of delivery <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> Show to whom and date delivered <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> Show to whom, date, and address of delivery \$ _____ (CONSULT POSTMASTER FOR FEES)		2. ARTICLE ADDRESSED TO: David & Jean Witts 5353 First International Bldg. Dallas, Texas 75270	
3. ARTICLE DESCRIPTION: REGISTERED NO. 9435445 CERTIFIED NO. _____ INSURED NO. _____ (Always obtain signature of addressee or agent)		I have received the article described above. SIGNATURE _____ Address _____ <input type="checkbox"/> Authorized agent	
5. ADDRESS (Complete only if requested) DATE OF DELIVERY _____ POSTMARK APR 18 1978		6. UNABLE TO DELIVER BECAUSE: _____ CLERK'S INITIALS _____	

*Donaldson 488*





FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

April 11, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

R. H. and Jan Pickens  
3926 Potomac  
Dallas, Texas 75205

Re: MUR 488

Dear Mr. And Mrs. Pickens:

The Federal Election Commission has determined there is no reasonable cause to believe that you contributed to the Friends of Bob Krueger in the name of another in violation of 2 U.S.C. §441f. Accordingly, the Commission intends to close its file in this matter as it relates to you.

If you have any questions regarding this matter, please call Susan Donaldson at (202) 523-4026.

Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "William C. Oldaker".

William C. Oldaker  
General Counsel



*Donaldson 488*

PS Form 3811, Apr. 1977

● SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)

Show to whom and date delivered \_\_\_\_\_ c

Show to whom, date, and address of delivery \_\_\_\_\_ c

RESTRICTED DELIVERY  
Show to whom and date delivered \_\_\_\_\_ c

RESTRICTED DELIVERY  
Show to whom, date, and address of delivery. \$\_\_\_\_\_

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
*RH + Jan Picheas  
3926 Potomac  
Dallas, Texas 75205*

3. ARTICLE DESCRIPTION:  
REGISTERED NO. | CERTIFIED NO. | INSURED NO.  
*943541*

(Always obtain signature of addressee or agent)

I have received the article described above.  
SIGNATURE:  Addressee  Authorized agent  
*Jan Picheas*

4. DATE OF DELIVERY | POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: | CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

April 11, 1978

Mr. Frank M. Crossen  
4600 Republic National Bank Towers  
Dallas, Texas 75201

Re: MUR 488

Dear Mr. Crossen:

The Federal Election Commission has determined there is no reasonable cause to believe that you contributed to the Friends of Bob Krueger in the name of another in violation of 2 U.S.C. §441f. Accordingly, the Commission intends to close its file in this matter as it relates to you.

If you have any questions regarding this matter, please call Susan Donaldson at (202) 523-4026.

Thank you for your cooperation.

Sincerely,

William C. Oldaker  
General Counsel

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. The following service is requested (check one):  
 Show to whom and date delivered.  
 Show to whom, date, and address of delivery.  
 RESTRICTED DELIVERY  
 Show to whom and date delivered.  
 RESTRICTED DELIVERY.  
 Show to whom, date, and address of delivery: \$  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
 FRANK M. CROSSEN  
 4600 Republic National Bank Towers  
 DALLAS, TEXAS 75201

3. ARTICLE DESCRIPTION: REGISTERED NO. INSURED NO.  
 98542

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE: *John Webster*  Addressee  Authorized agent

4. DATE OF DELIVERY: APR 17 1978 DALLAS, TX D.M.

5. ADDRESS (Complete only if requested)  
 Same as above

6. UNABLE TO DELIVER BECAUSE OF:  SPEAK'S MAILS

Donaldson 488

APR 17 1978  
 U.S. MAIL

7. GPO: 1977-O-234-337



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

April 11, 1978

Mr. Don E. McMahon  
5749 Indian Circle  
Houston, Texas 77057

Re: MUR 488

Dear Mr. McMahon:

The Federal Election Commission has determined there is no reasonable cause to believe that you contributed to the Friends of Bob Krueger in the name of another in violation of 2 U.S.C. §441f. Accordingly, the Commission intends to close its file in this matter as it relates to you.

If you have any questions regarding this matter, please call Susan Donaldson at (202) 523-4026.

Thank you for your cooperation.

Sincerely,

William C. Oldaker  
General Counsel

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. The following service is requested (check one):  
 Show to whom and date delivered  
 Show to whom, date, and address of delivery  
 RESTRICTED DELIVERY  
 RESTRICTED DELIVERY  
 Show to whom and date delivered  
 RESTRICTED DELIVERY  
 Show to whom, date, and address of delivery \$  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
 DON E. McMAHON  
 5749 Indian Circle  
 HOUSTON, TEXAS 77057

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. 493543 INSURED NO.  
 (Always obtain signature of addressee or agent)

I have received the article described above,  by Signature  by Address  by Authorized agent

DATE OF DELIVERY 4/11/78 POSTMARK

5. ADDRESS (Complete only if requested)  
 5749 Indian Circle  
 Houston, Texas 77057

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

PS Form 3811, Apr. 1977

488



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

April 11, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Dow H. Heard, Esquire  
Law Offices of Dow H. Heard, Attorneys  
1300 First City National Bank Building  
Houston, Texas 77002

Re: MUR 488  
George F. and Joan Watford

Dear Mr. Heard:

On January 26, 1978, the Commission determined there was reason to believe that your clients, George F. and Joan Watford, may have violated 2 U.S.C. §441f of the Federal Election Campaign Act, as amended, by making contributions to the Friends of Bob Krueger Committee in the names of their children. The Commission has reviewed Mr. Watford's sworn letter dated February 14, 1978, and the statements signed by the children which we received on March 9, 1978.

Based on the information we presently possess, we are unable to determine whether the childrens' contributions were within the provisions of 11 C.F.R. §110.1(i)(2). Mr. Watford did not disclose the source of the money in the "family fund" and he did not explain how the "family fund" may have been replenished. 11 C.F.R. §110.1(i)(2) states that "Minor children may contribute up to \$1000 to a candidate for an election if (i) The decision to contribute is made knowingly and voluntarily by the minor child; (ii) The funds, goods, or services contributed are owned or controlled exclusively by the minor child.; and (iii) The contribution is not made from the proceeds of a gift, the purpose of which was to provide funds to be contributed, or is not in any other way controlled by



another individual."

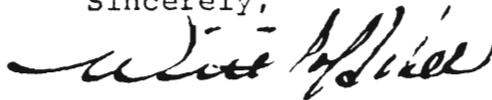
We also request information as to how the \$3000 in the fund was replaced following the contribution.

Please submit any factual or legal materials which you believe will show the source of the funds from which the childrens' contributions were made. Your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter at (202) 523-4026.

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "William C. Oldaker".

William C. Oldaker  
General Counsel

cc: Marion Sanford, Jr.  
George F. and Joan Watford

488 SD

PS Form 3811, Apr. 1977

● SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one):  
 Show to whom and date delivered  
 Show to whom, date, and address of delivery  
 RESTRICTED DELIVERY  
 Show to whom and date delivered  
 RESTRICTED DELIVERY  
 Show to whom, date, and address of delivery \$  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
 Dow H. Heard  
 1300 First City Natl Bank Building  
 Houston, TX 77002

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
 943539

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE \_\_\_\_\_ Address \_\_\_\_\_ Authorized agent \_\_\_\_\_

4. DATE OF DELIVERY APR 14 1978 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: \_\_\_\_\_ CLERK'S INITIALS \_\_\_\_\_

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

GPO 1977-O-234-337

Donaldson 485

PS Form 3811, Apr. 1977

● SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one):  
 Show to whom and date delivered  
 Show to whom, date, and address of delivery  
 RESTRICTED DELIVERY  
 Show to whom and date delivered  
 RESTRICTED DELIVERY  
 Show to whom, date, and address of delivery \$  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
 MARION SANFORD, JR.  
 2100 1ST CITY NAT. BANK BLDG.  
 HOUSTON, TEXAS 77002

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
 943514

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE \_\_\_\_\_ Address \_\_\_\_\_ Authorized agent \_\_\_\_\_

4. DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: \_\_\_\_\_ CLERK'S INITIALS \_\_\_\_\_

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

GPO 1977-O-234-337

Donaldson 486

PS Form 3811, Apr. 1977

● SENDER Complete item 1. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one):  
 Show to whom and date delivered  
 Show to whom, date, and address of delivery  
 RESTRICTED DELIVERY  
 Show to whom and date delivered  
 RESTRICTED DELIVERY  
 Show to whom, date, and address of delivery \$  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
 MR & MRS. GEORGE F. WATFORD  
 2200 HOUSTON NATURAL GAS BLDG  
 HOUSTON, TEXAS 77002

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
 943547

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE \_\_\_\_\_ Address \_\_\_\_\_ Authorized agent \_\_\_\_\_

4. DATE OF DELIVERY APR 17 1978 POSTMARK

5. ADDRESS (Complete only if requested)  
 2200 HNGS

6. UNABLE TO DELIVER BECAUSE: \_\_\_\_\_ CLERK'S INITIALS \_\_\_\_\_

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

GPO 1977-O-234-337



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

April 11, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Garry Mauro, Campaign Manager  
Friends of Bob Krueger Committee  
P.O. Box 911  
New Braunfels, Texas 78130

Re: MUR 488

Dear Mr. Mauro:

The Federal Election Commission has determined there is no reasonable cause to believe that the Friends of Bob Krueger Committee knowingly received contributions made in the name of another in violation of 2 U.S.C. §441f. Accordingly, the Commission intends to close its file in this matter as it relates to your committee.

If you have any questions regarding this matter, please call Susan Donaldson at (202) 523-4026.

Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "W. C. Oldaker".

William C. Oldaker  
General Counsel



MUR 488 SD

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER (Complete items 1-6)  
Add your address in the "RETURN TO" space on reverse

1. The following service is requested (check one)
- Show to whom and date delivered \_\_\_\_\_ c
  - Show to whom, date, and address of delivery \_\_\_\_\_ c
  - RESTRICTED DELIVERY  
Show to whom and date delivered \_\_\_\_\_ c
  - RESTRICTED DELIVERY  
Show to whom, date, and address of delivery \$ \_\_\_\_\_
- (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
*Sandy Mauro*  
*P.O. Box 91* 78130  
*New Braunfels, TX*

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943539	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE  Addressee  Authorized agent

4. DATE OF DELIVERY  
*APR 14 1978*



5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS  
*[Signature]*

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Friends of Bob Krueger Committee; )  
Frank M. Crossen; R. H. and Jan Pickens; )  
David and Jean Witts; George F. and Joan )  
Watford; Dr. Ralph G. (Jr.) and Melba )  
Greenlee; Don E. McMahon )

MUR 488

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 6, 1978, at an Executive Session of the Federal Election Commission at which a quorum was present, the Commission determined by a vote of 4-0 to take the following actions in the above-captioned matter:

1. Find no reasonable cause to believe that the Friends of Bob Krueger Committee knowingly received contributions made in the name of another in violation of 2 U.S.C. Section 441f, and to send the draft letter attached to the General Counsel's Report.

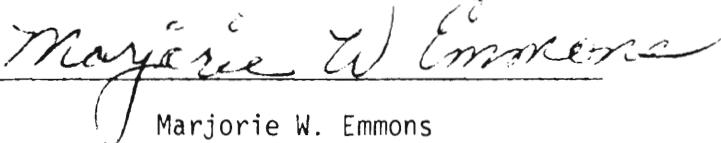
To close the file with respect to this respondent.

2. Find no reasonable cause to believe that Frank M. Crossen, R. H. and Jan Pickens, David and Jean Witts, Dr. and Mrs. Ralph G. Greenlee, Jr., and Don E. McMahon made contributions to the Friends of Bob Krueger Committee in the names of their children in violation of 2 U.S.C. Section 441f, and to send the draft letter attached to the General Counsel's Report.

To close the file with respect to these respondents.

3. To send the draft letter to Mr. and Mrs. Watford to obtain further information.

Commissioners Thomson and Tiernan were not present at the time of the vote on this matter.

  
\_\_\_\_\_  
Marjorie W. Emmons  
Secretary to the Commission

Date: April 7, 1978

BEFORE THE FEDERAL ELECTION COMMISSION  
March 28, 1978

In the Matter of )  
 )  
Friends of Bob Krueger Committee; )  
Frank M. Crossen; R. H. and Jan Pickens; ) MUR 488  
David and Jean Witts; George F. and )  
Joan Watford; Dr. Ralph G. (Jr.) and )  
Melba Greenlee; Don E. McMahon )

GENERAL COUNSEL'S REPORT

I. Allegations

A review of the Friends of Bob Krueger (Senate) Committee reports noted eleven \$1,000 contributions from individuals whose occupations were reported as "student". In each case, an individual with the same last name and/or address had also contributed to the committee on or about the same date. In addition, a columnist in a December 29, 1977, Washington Post article alleged that the Friends of Bob Krueger accepted "dubious" contributions from the children of oil executives. It was alleged that the \$1,000 contributions may have been made by parents in the names of minor children in violation of 2 U.S.C. §441f.

II. Previous Commission Action

On January 26, 1978, the Commission determined there was reason to believe that the Friends of Bob Krueger Committee violated 2 U.S.C. §441f by knowingly receiving contributions made in the names of other. The Commission also determined there was reason to believe that Frank M. Crossen, R. H. and Jan Pickens, David and Jean Witts, George F. and Joan Watford, Dr. Ralph G. (Jr.) and Melba Greenlee, and Don E. McMahon

violated 2 U.S.C. §441f by making contributions to the Friends of Bob Krueger in the names of others. Reason to believe notification letters were sent to the respondents on February 2, 1978.

### III. Evidence

#### A. Friends of Bob Krueger Committee

Garry Mauro, Campaign Manager and Legal Counsel for the Friends of Bob Krueger Committee responded to the Commission in a letter dated February 16, 1978 (Attachment I). Mr. Mauro explained the circumstances surrounding each contribution in question and submitted a photocopy of each check. In each case where it appeared that a contribution came from a "minor" child, the Krueger Committee mailed letters to the contributors questioning the source of the contributions (Attachment II). These letters were mailed in November 1977, before the Washington Post column, and before the investigation was undertaken by the Commission.

#### B. Frank M. Crossen

It appeared that Frank M. Crossen may have made a \$1000 contribution in the name of his daughter, Criss Crossen. Mr. Crossen responded to the Commission in a letter dated February 17, 1978 (Attachment III). Criss Crossen is 19 years of age and her \$1000 contribution was made with a check drawn on her personal checking account.

#### C. R. H. and Jan Pickens

It appeared that R.H. and Jan Pickens contributed \$1000 in the names of their daughters, Anne (age 11) and Paige

(age 13) Pickens. Mr. and Mrs. Pickens responded to the Commission in a letter dated February 9, 1978 (Attachment IV). The daughters' contributions were made from trust accounts from which the daughters are the sole beneficiaries. Anne and Paige Pickens signed statements that they were aware of the contributions to the Bob Krueger Campaign Fund. Subsequent to the June 27, 1977, contributions from the trust accounts, R.H. Pickens and Garry Mauro, Campaign Manager of the Krueger Committee determined that the contributions were not in the minors' exclusive control and therefore might not be allowable under the Commission's regulations. The contributions were refunded on November 28, 1977.

D. David and Jean Witts

It appeared that David and Jean Witts contributed \$1000 in the name of their daughter, Elane Witts. Mr. Witts responded to the Commission in a letter dated February 10, 1978 (Attachment V). According to the letter, Ms. Witts is 21 years old and she contributed \$1000 to the Friends of Bob Krueger from a check drawn on her personal checking account.

E. George F. and Joan Watford

It appeared that George F. and Joan Watford contributed \$1000 each in the names of each of their children: Joseph E. Watford (age 14); Jenny Lynn Watford (age 20); and Randy W. Tonking (age 21). Mr. Watford responded to the Commission in a sworn statement dated February 14, 1978 (Attachment VI). Mr. Watford stated that each of the children had more than a \$1000 interest in a cash fund which they keep around the house for emergencies. Following a family discussion in mid-August

1977, each of the three children took \$1000 out of the fund and gave it to Mr. Watford for the purpose of contributing to the Friends of Bob Krueger Committee. Mr. Watford wrote \$1000 checks drawn on his account to the Friends of Bob Krueger in the name of each child. Each child has provided the Commission with a statement that they made a \$1000 personal contribution to the Bob Krueger Senate Campaign. Mr. Watford filed a letter with the Commission dated February 15, 1978, as a conduit for the contributions from his children to the Friends of Bob Krueger Committee (Attachment VII). Mr. Watford did not disclose the source of the "family fund" and he did not explain how the "family fund" may have been replenished. Therefore, we cannot determine whether the contributions were legal within the provisions of 11 C.F.R. §110.1(i)(2).

F. Dr. Ralph G. (Jr.) and Melba Greenlee

It appeared that Dr. and Mrs. Greenlee contributed \$1000 to the Friends of Bob Krueger Committee in the names of their children: Ralph G. Greenlee III (age 14); Geraldine Davis Greenlee (age 11); and Helen Hubbard Greenlee (age 9). Dr. Greenlee responded to the Commission in a letter dated March 6, 1978 (Attachment VIII). Copies of checks submitted by the Friends of Bob Krueger Committee show that the \$1000 contributions from the children came from the childrens' personal checking accounts, and were signed by the Greenlees' accountant. Dr. Greenlee stated that the money from the childrens' bank accounts was extant long before the contributions

were made, and the members of his family decided to contribute to the Friends of Bob Krueger Committee after several family discussions. Subsequent to Dr. Greenlee's receipt of the reason to believe notification from the Commission, he and Garry Mauro of the Friends of Bob Krueger Committee determined that the childrens' contributions should be refunded because the children did not have absolute control over the account. The childrens' contributions were refunded on February 6, 1978.

G. Don E. McMahon

It appeared that Don E. McMahon contributed \$1000 in the name of his son, Mark McMahon. Mr. McMahon responded to the Commission in a letter dated February 8, 1978 (Attachment IX). Mr. McMahon stated that his son, Mark McMahon, is 26 years old, a junior executive with U.S. Steel Company, and his \$1000 contribution was written on a check drawn on his personal checking account.

IV. Legal Analysis

A. In view of the actions taken by the Friends of Bob Krueger Committee, it appears that the Committee did not knowingly receive contributions from persons made in the names of others in violation of 2 U.S.C. §441f.

B. (1) The information provided by Frank Crossen, David and Jean Witts, and Don E. McMahon, revealed that their children are over 18 years of age, and they made contributions from checks drawn on their personal checking accounts. It does not appear that Frank Crossen, David and Jean Witts, and Don E. McMahon contributed to the Friends of Bob Krueger Committee in the names of their

children in violation of 2 U.S.C. §441f.

(2) The information provided by R.H. and Jan Pickens and Dr. Ralph G. and Melba Greenlee, Jr. revealed that their children did not have exclusive control over the funds contributed. Based on the fact that the contributions were refunded, we believe no further action should be taken.

While the Commission could further investigate the sources of funds and deposits made to the personal accounts of some of the children involved, we believe that subpoenaing the bank records would, based on the facts we have, not be a good use of the Commission's limited resources.

C. The information provided by George F. and Joan Watford does not explain the source of the "family fund" from which the childrens' contributions were made. Therefore, we are unable to determine whether George F. and Joan Watford contributed to the Friends of Bob Krueger Committee in the names of their children in violation of 2 U.S.C. §441f.

V. Recommendations

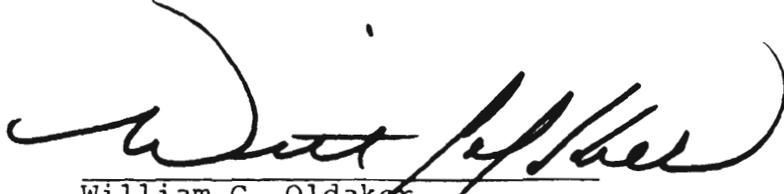
1. Find no reasonable cause to believe that the Friends of Bob Krueger Committee knowingly received contributions made in the name of another in violation of 2 U.S.C. §441f. Send attached letter. Close the file.

2. Find no reasonable cause to believe that Frank M. Crossen, R.H. and Jan Pickens, David and Jean Witts, Dr. and Mrs. Ralph G. Greenlee, Jr., and Don E. McMahon made contributions to the Friends of Bob Krueger Committee in the names of their children in violation of 2 U.S.C. §441f. Send attached letters. Close the file.

100-1057

3. Make no further determination in connection with George F. and Joan Watford at this time. Send attached letter.

Date: 3/29/78

  
William C. Oldaker  
General Counsel

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FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Garry Mauro, Campaign Manager  
Friends of Bob Krueger Committee  
P.O. Box 911  
New Braunfels, Texas 78130

Re: MUR 488

Dear Mr. Mauro:

The Federal Election Commission has determined there is no reasonable cause to believe that the Friends of Bob Krueger Committee knowingly received contributions made in the name of another in violation of 2 U.S.C. §441f. Accordingly, the Commission intends to close its file in this matter as it relates to your committee.

If you have any questions regarding this matter, please call Susan Donaldson at (202) 523-4026.

Thank you for your cooperation.

Sincerely,

William C. Oldaker  
General Counsel





FEDERAL ELECTION COMMISSION

1325 K STREET NW  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Letter to be sent to:

Frank M. Crossen, R. H. and Jan Pickens,  
David and Jean Witts, Dr. Ralph G. (Jr.)  
and Melba Greenlee, Don E. McMahon

Re: MUR 488

Dear

The Federal Election Commission has determined there is no reasonable cause to believe that you contributed to the Friends of Bob Krueger in the name of another in violation of 2 U.S.C. §441f. Accordingly, the Commission intends to close its file in this matter as it relates to you.

If you have any questions regarding this matter, please call Susan Donaldson at (202) 523-4026.

Thank you for your cooperation.

Sincerely,

William C. Oldaker  
General Counsel





FEDERAL ELECTION COMMISSION

1325 K STREET NW  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Dow H. Heard, Esquire  
Law Offices of Dow H. Heard, Attorneys  
1300 First City National Bank Building  
Houston, Texas 77002

Re: MUR 488  
George F. and Joan Watford

Dear Mr. Heard:

On January 26, 1978, the Commission determined there was reason to believe that your clients, George F. and Joan Watford, may have violated 2 U.S.C. §441f of the Federal Election Campaign Act, as amended, by making contributions to the Friends of Bob Krueger Committee in the names of their children. The Commission has reviewed Mr. Watford's sworn letter dated February 14, 1978, and the statements signed by the children which we received on March 9, 1978.

Based on the information we presently possess, we are unable to determine whether the childrens' contributions were within the provisions of 11 C.F.R. §110.1(i)(2). Mr. Watford did not disclose the source of the money in the "family fund" and he did not explain how the "family fund" may have been replenished. 11 C.F.R. §110.1(i)(2) states that "Minor children may contribute up to \$1000 to a candidate for an election if (i) The decision to contribute is made knowingly and voluntarily by the minor child; (ii) The funds, goods, or services contributed are owned or controlled exclusively by the minor child..; and (iii) The contribution is not made from the proceeds of a gift, the purpose of which was to provide funds to be contributed, or is not in any other way controlled by



another individual."

We also request information as to how the \$3000 in the fund was replaced following the contribution.

Please submit any factual or legal materials which you believe will show the source of the funds from which the childrens' contributions were made. Your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter at (202) 523-4026.

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker  
General Counsel

cc: Marion Sanford, Jr.  
George F. and Joan Watford

# KRUEGER OF TEXAS

INDEPENDENT DEMOCRAT FOR U.S.SENATE

February 16, 1978

Re: #C00076968  
MUR 488

Mr. William C. Oldaker  
General Counsel  
Federal Election Commission  
1325 K Street N.W.  
Washington, D.C. 20463

Dear Mr. Oldaker,

The following information is supplied in response to your letter of February 2, 1978.

Friends of Bob Krueger set up a Committee of 200, which has 200 members pledged to solicit \$5,000 in contributions. All the contributions below were received as a result of solicitation by members of the Committee of 200. There have also been numerous follow-up letters urging these same people to solicit anyone who might be interested in the Bob Krueger campaign. Bob Krueger has met personally with each of these members listed below and personally solicited each of them to help solicit others for campaign contributions.

Frank Crossen  
David Witts  
George Watford  
Dr. Ralph Greenlee  
Don McLaughon  
Bob Pickens

#### CHRIS CROSSEN

The check was received June 30, 1977. Xerox copy of check enclosed. Although Ms. Crossen has the same last name as Frank Crossen, a member of the Committee of 200, the check was drawn on another bank other than the one received from Mr. Crossen. Further check through a phone call in November ascertained that Ms. Crossen is 19 years old, and her residence is Austin. Because of her age, her personal signature on a check drawn on her own account in a different city from Frank Crossen, we felt there was no reason to investigate further the legality of this contribution. Unless the FEC rules otherwise Friends of Bob Krueger is satisfied with the legality of this contribution.

#### PAIGE G. PICKENS

Contribution received June 22, 1977. At the time the treasurer raised the question with the committee lawyer on legality, a telephone call was made to a member of the FEC staff. It was ascertained from the telephone call that minors could contribute legally. On November 10th the question was reopened with legal counsel. After discussions with Mr. Doug Patton a letter was sent to Miss Paige Pickens

P.O. Box 911/New Braunfels, Texas 78130/(512) 625-7347  
614 West 6th/Austin, Texas 78701/(512) 478-1978

asking her the three key questions in the regulations. Enclosed is a copy of the letter dated November 17th. Paige and Anne Pickens' father via a telephone conversation answered questions one and three satisfactorily, but on question two the question of "exclusivity" arose. It seems the contributions came from accounts Bob Pickens has to co-sign. I felt that moved the accounts out of the minor's "exclusive control," so the contributions were refunded on November 22, 1977.

ANNE A. PICKENS

Same as above - see enclosed checks.

ELANE WITTS

Contribution received June 28, 1977. Ms. Witts is 21 years old. The check we received was made on a personalized bank account with her signature, signed on a different bank, on a different date than the contributions received from her father and mother. Because of the age and the personal signature and the different date, there was no provision of the regulations indicating that we should pursue this further. No follow-up letter was sent, but in November a phone call was made to the Witts family.

GERALDINE D. GREENLEE

RALPH G. GREENLEE, III

HELEN H. GREENLEE

On September 18th I received the three contributions from the three Greenlee children. Enclosed are the checks. On November 15th they were sent certified letters asking the questions as advised by Mr. Doug Patton. I did not hear from Dr. Greenlee until February 6th. Upon talking to Dr. Greenlee, the three children's legal guardian, the three checks were refunded. The reason being that although the children made the contributions knowingly and the contribution was not given as a result of a gift, they did not have "exclusive control of their funds" as the contributions came from trust funds that required his authority for action.

MARK MCMAHON

A check was received September 18th from Mark McMahon, written on his own account and signed personally by him on a different date on a different bank from his father or mother. At that time, I had no reason to question this contribution. After conversations with Doug Patton we felt there was no reason to investigate further. Mr. McMahon is 26 years old and a business executive with U.S. Steel. It appears that we made a bookkeeping error in describing his occupation as a student.

JOSEPH E. WATFORD

Received contribution August 29, 1977. A letter was received from George Watford stating that Joseph E. Watford was in the 8th grade. The contribution was received several weeks later than the contribution received from his parents, but on the same day his brother's and sister's checks came in. After my November 10th conversation with Doug Patton of the FEC a letter was sent to him on November 17, 1977. Upon receipt of the letter Joseph Watford had his lawyer, Dow Heard of Houston, call me and assure me of the legality of the contribution. I explained very carefully the questions of "exclusive control," "gift," and a "knowing contribution." I was told the money was earned by Joseph, and he determined how it was spent, that there might be some Christmas or birthday gifts co-mingled, but these were not made for the purpose of a campaign contribution and that Joseph was a strong supporter who had made a speech in civics class for Krueger; also, that it was after a

family discussion that he had made the decision to make his contribution. After having these facts related I concluded this was a legal contribution.

JENNY LYNN WATFORD

Received contribution August 29, 1977, same day as brother and sister. On November 17th I sent the enclosed letter. Dow Heard of Houston called in reply to the letter stating she was 20 years old, and therefore was not a minor; but for the record she decided to make the contribution after a family political discussion. The funds came from her own earnings that she had given her father for the express purpose of passing along to Friends of Bob Krueger.

RANDY W. TONKING

Received contribution August 29, 1977, same as brother and sister. On November 17th sent enclosed letter. Dow Heard of Houston called in reply to the letter stating Randy was 21 years old, a college student, and therefore not a minor; but for the record he had decided to make the contribution after a family political discussion. The funds came from his own earnings that he had passed along to his father for the express purpose of sending to Friends of Bob Krueger.

If you have any further questions, please do not hesitate to contact me.

Sincerely,



GARRY MAURO  
Campaign Manager & Legal Counsel

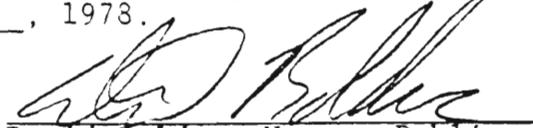
GM:ng

Enclosures (34)

I DULY SWEAR THAT THESE FACTS ARE TRUE AS STATED.



SUBSCRIBED AND SWORN TO before me, the undersigned authority  
on this the 15<sup>th</sup> day of March, 1978.



David Bolduc, Notary Public  
in and for Travis County, Texas



R. H. PICKENS, TRUSTEE

577



**REPUBLIC  
NATIONAL BANK  
OF DALLAS**

32-62  
1110  
(17)

179

DALLAS, TEXAS June 27, 19 77

CHECK NUMBER

PAY TO THE ORDER OF - - - - FRIENDS OF BOB KRUEGER - - - - - \$ 1,000.00

One Thousand and no/100 - - - - - DOLLARS



Contribution \$1,000.00

PAIGE GARDNER PICKENS, TRUST  
R. H. PICKENS, TRUSTEE

*Paige Gardner Pickens*

⑆ 1110 006 2⑆ ⑈ 106 405 3⑈

1 3 3 7





First National Bank in Dallas

DALLAS, TEXAS

A 311419

PURCHASER

\* JEAN WITTS

JUN 22 77

JUN 28 1977

PAY TO THE ORDER OF

1000.00000000

\* FRIENDS OF BOB KRUEGER

CASHIER'S CHECK

⑆311419⑆ ⑆1110⑆0000⑆ 00 2206 1977



First National Bank in Dallas

DALLAS, TEXAS

A 311419

PURCHASER

\* DAVID WITTS

JUN 22 77

JUN 28 1977

PAY TO THE ORDER OF

1000.00000000

\* FRIENDS OF BOB KRUEGER

CASHIER'S CHECK

⑆311419⑆ ⑆1110⑆0000⑆ 00 2206 1977

JUN 28 1977

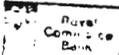
ELANE WITTS

6007 GLENDORA 361-1056  
DALLAS, TEXAS 75230

330

PAY TO THE ORDER OF

Friends of Bob Krueger  
One thousand dollars and 00/100  
\$1000.00  
6-16-1977 32-103  
1110  
DOLLARS



Elane Witts

MEMO

⑆1110⑆0103⑆ 46 0095 81⑆

AUG 1 1977 1125  
 GEORGE F. WATFORD  
 RENOIR 465-7515  
 HOUSTON, TEXAS 77079  
 August 1 19 77 35-120  
 1130  
 PAY TO THE ORDER OF Friends of Bob Krueger \$ 1,000.00  
 One Thousand Dollars and No/100----- DOLLARS  
**MAIN BANK**  
 PO BOX 948  
 DOWNTOWN HOUSTON 77001  
 MEMO Joan Watford Contribution  
 924 381

1977 1126  
 GEORGE F. WATFORD  
 219 RENOIR 465-7515  
 HOUSTON, TEXAS 77079  
 August 1 19 77 35-120  
 1130  
 PAY TO THE ORDER OF Friends of Bob Krueger \$ 1,000.00  
 One Thousand Dollars and No/100----- DOLLARS  
**MAIN BANK**  
 PO BOX 948  
 DOWNTOWN HOUSTON 77001  
 MEMO George Watford Contribution  
 924 381

108  
 GEORGE F. WATFORD  
 500 THE MAIN BLDG. 225-5413  
 HOUSTON, TEXAS 77002  
 August 26 19 77 35-122  
 1130  
 PAY TO THE ORDER OF Krueger of Texas \$ 1,000.00  
 One Thousand Dollars and No/100----- DOLLARS  
**Southern National Bank**  
 of HOUSTON  
 Main at McKinney  
 P.O. Box 2529  
 Houston, Texas 77001  
 MEMO Randy W. Tonking contribution  
 726 851

AUG 29 1977 109  
 GEORGE F. WATFORD  
 500 THE MAIN BLDG. 225-5413  
 HOUSTON, TEXAS 77002  
 August 26 19 77 35-122  
 1130  
 PAY TO THE ORDER OF Krueger of Texas \$ 1,000.00  
 One Thousand Dollars and No/100----- DOLLARS  
**Southern National Bank**  
 of HOUSTON  
 Main at McKinney  
 P.O. Box 2529  
 Houston, Texas 77001  
 MEMO Jenny Lynn Watford contribution  
 924 381

AUG 29 1977

GEORGE F. WATFORD  
500 THE MAIN BLDG. 225-5413  
HOUSTON, TEXAS 77002

110 (4)

August 26 19 77  $\frac{95.122}{1130}$

PAY TO THE ORDER OF Krueger of Texas

\$1,000.00

One Thousand Dollars and No/100-----DOLLARS



**Southern  
National  
Bank**

of Houston  
Main of M. F. Finney  
Box 2529  
P.O. Houston, Texas  
77001

MEMO Joseph F. Watford contribution

*George F. Watford*

⑆1130⑆0122⑆⑆ 726 85⑆⑆

71

1977  
Geraldine Davis Greenlee  
P. O. Box 1727  
Midland, Texas 79701

134

September 14 1977

88-389  
1163

PAY TO THE ORDER OF Krueger Campaign Committee

\$ 1,000.00

One Thousand and No/100

DOLLARS



The Midland National Bank

MIDLAND, TEXAS

*James C. Lee*

⑆1163⑉0389⑆

368-016-9

1977

Helen Hubbard Greenlee  
P. O. Box 1727  
Midland, Texas 79701

135

September 14 1977

88-389  
1163

PAY TO THE ORDER OF Krueger Campaign Committee

\$ 1,000.00

One Thousand and No/100

DOLLARS



The Midland National Bank

MIDLAND, TEXAS

*James C. Lee*

⑆1163⑉0389⑆

368-021-5

SEP 18 1977

RALPH G. GREENLEE, III  
RALPH G. GREENLEE, JR., CUSTODIAN  
BOX 333 1727  
MIDLAND, TEXAS 79701

133<sup>18</sup>

September 15 1977

88-389  
1163

PAY TO THE ORDER OF Krueger Campaign Committee

\$ 1,000.00

One Thousand and No/100

DOLLARS



The Midland National Bank

MIDLAND, TEXAS

*James C. Lee*

⑆1163⑉0389⑆

⑈368 016 2⑈

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT	
DATE	AMOUNT
2-6-78	1000.00
<i>Refund - Student</i>	
TOTAL OF INVOICES	
LESS % DISCOUNT	
LESS	
TOTAL DEDUCTIONS	
AMOUNT OF CHECK	1000.00

**FRIENDS OF BOB KRUEGER** Copy Non - Negotiable  
 P. O. BOX 911 625-7347 OR 658-5361  
 NEW BRAUNFELS, TEXAS 78130

(22) 1116

PAY TO THE ORDER OF *Prudence Dawn Brubaker*  
 Copy Non - Negotiable

Feb 6 1978 88-678  
 1149

*One thousand* DOLLARS

 **New Braunfels**  
 NATIONAL BANK  
 P.O. Box 813/New Braunfels, Texas 78130

*Arthur Westwater*  
*Hayden*

Copy Non - Negotiable

⑆149⑆0678⑆ ⑈800 404 8⑈ ⑆3⑆0000⑆00000⑆

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT	
DATE	AMOUNT
2-6-78	1000.00
<i>Refund - Student</i>	
TOTAL OF INVOICES	
LESS % DISCOUNT	
LESS	
TOTAL DEDUCTIONS	
AMOUNT OF CHECK	

**FRIENDS OF BOB KRUEGER** Copy Non - Negotiable  
 P. O. BOX 911 625-7347 OR 658-5361  
 NEW BRAUNFELS, TEXAS 78130

(21) 1118

PAY TO THE ORDER OF *Ralph H. Brubaker*  
 Copy Non - Negotiable

Feb 6 1978 88-678  
 1149

*One thousand* DOLLARS

 **New Braunfels**  
 NATIONAL BANK  
 P.O. Box 813/New Braunfels, Texas 78130

*Mrs J. Brubaker*  
*Hayden*

Copy Non - Negotiable

⑆149⑆0678⑆ ⑈800 404 8⑈ ⑆3⑆0000⑆00000⑆



SEP 18 1977

MARK McMAHON  
5749 INDIAN CIRCLE  
HOUSTON, TEXAS 77057

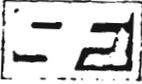
172

09/15 1977

PAY TO THE ORDER OF

Friends of Bob Krueger \$ 1,000

One thousand and no/100 → DOLLARS



San Felipe National Bank  
BOX 42430  
HOUSTON, TEXAS 77042

campaign  
donation

⑆1130⑉0478⑆

Mark D. McMahon  
30 1592 0⑈

SEP 18 1977

DON E. McMAHON  
POST OFFICE BOX 22738  
HOUSTON, TEXAS 77027

No. 548

AUGUST 26, 1977

1000 Dollars

DOLLARS \$ 1,000.00

PAY

TO THE ORDER OF

FRIENDS OF BOB KRUEGER  
P. O. BOX 911  
NEW BRAUNFELS, TEXAS 78130

DON E. McMAHON

*Don E. McMahon*



FIRST CITY NATIONAL BANK OF HOUSTON  
P.O. BOX 22237 HOUSTON, TEXAS 77008

⑆1130⑉0000⑆

50 5149 5⑈

NOV 9 1977

MRS. D. E. McMAHON  
5749 INDIAN CIRCLE 789-8100  
HOUSTON, TEXAS 77057

38378

PAY TO THE ORDER OF

Friends of Bob Krueger \$ 500.00  
Five Hundred and no/100

Nov 5, 1977

35-104  
1130

FIRST CITY BANK  
OF HIGHLAND VILLAGE  
P.O. BOX 22237 HOUSTON, TEXAS 77027

DOLLARS

MEMO

⑆1130⑉0104⑆

20 4533 8⑈

*Mrs. D. E. McMahon*

November 17, 1977

(27)

Ms. Anne Alison Pickens  
3926 Potomac  
Dallas, Texas 75205

Dear Anne:

Recently there has been some discussion about several contributions made to the Bob Krueger campaign. Your contribution was one of those questioned. The new Federal Election Commission rules and regulations clearly allow for minor children to make contributions to political candidates from their own funds.

On the face of your contribution, I feel there is no problem. But, in keeping with the spirit of the law, I think I should ask three key questions, most of which the answers are obvious.

- 1) Did you make the contribution yourself?
- 2) Did the money come out of your own funds?
- 3) Was the contribution made from the proceeds of a gift made for the express purpose of giving Bob Krueger a contribution?

If the decision to contribute was one that you did not make, or if the contribution was from funds other than your own checking account or savings account, or if the contribution was from the proceeds of a gift given for the purpose of making a contribution to Bob Krueger, then I need to refund to you the contribution we received.

If the contribution was from funds that are not controlled by you, then you could reissue a check to this campaign from your checking account.

I am sure this all seems rather confusing, so if you have any questions, please feel free to call me. I don't think we have any serious problems here, but we just need to clear the air.

Sincerely,

Garry Mauro  
Campaign Manager

GM:tmw

(28)

November 17, 1977

Ms. Paige Gardner Pickens  
3926 Potomac  
Dallas, Texas 75205

Dear Paige:

Recently there has been some discussion about several contributions made to the Bob Krueger campaign. Your contribution was one of those questioned. The new Federal Election Commission rules and regulations clearly allow for minor children to make contributions to political candidates from their own funds.

On the face of your contribution, I feel there is no problem. But, in keeping with the spirit of the law, I think I should ask three key questions, most of which the answers are obvious.

- 1) Did you make the contribution yourself?
- 2) Did the money come out of your own funds?
- 3) Was the contribution made from the proceeds of a gift made for the express purpose of giving Bob Krueger a contribution?

If the decision to contribute was one that you did not make, or if the contribution was from funds other than your own checking account or savings account, or if the contribution was from the proceeds of a gift given for the purpose of making a contribution to Bob Krueger, then I need to refund to you the contribution we received.

If the contribution was from funds that are not controlled by you, then you could reissue a check to this campaign from your checking account.

I am sure this all seems rather confusing, so if you have any questions, please feel free to call me. I don't think we have any serious problems here, but we just need to clear the air.

Sincerely,

Garry Mauro  
Campaign Manager

CM:tmw

777

November 17, 1977

(29)

Mr. Randy W. Tonking  
500 The Main Building  
Houston, Texas 77002

Dear Randy:

Recently there has been some discussion about several contributions made to the Bob Krueger campaign. Your contribution was one of those questioned. The new Federal Election Commission rules and regulations clearly allow for minor children to make contributions to political candidates from their own funds.

On the face of your contribution, I feel there is no problem. But, in keeping with the spirit of the law, I think I should ask three key questions, most of which the answers are obvious.

- 1) Did you make the contribution yourself?
- 2) Did the money come out of your own funds?
- 3) Was the contribution made from the proceeds of a gift made for the express purpose of giving Bob Krueger a contribution?

If the decision to contribute was one that you did not make, or if the contribution was from funds other than your own checking account or savings account, or if the contribution was from the proceeds of a gift given for the purpose of making a contribution to Bob Krueger, then I need to refund your contribution.

If the contribution was from funds that are not controlled by you, then you could reissue a check to this campaign from your checking account.

I am sure this all seems rather confusing, so if you have any questions, please feel free to call me. I don't think we have any serious problems here, but we just need to clear the air.

Sincerely,

Garry Mauro  
Campaign Manager

GM:tmw

November 17, 1977

30

Mr. Joseph F. Watford  
500 The Main Building  
Houston, Texas 77002

Dear Joseph:

Recently there has been some discussion about several contributions made to the Bob Krueger campaign. Your contribution was one of those questioned. The new Federal Election Commission rules and regulations clearly allow for minor children to make contributions to political candidates from their own funds.

On the face of your contribution, I feel there is no problem. But, in keeping with the spirit of the law, I think I should ask three key questions, most of which the answers are obvious.

- 1) Did you make the contribution yourself?
- 2) Did the money come out of your own funds?
- 3) Was the contribution made from the proceeds of a gift made for the express purpose of giving Bob Krueger a contribution?

If the decision to contribute was one that you did not make, or if the contribution was from funds other than your own checking account or savings account, or if the contribution was from the proceeds of a gift given for the purpose of making a contribution to Bebe Krueger, then I need to refund your contribution.

If the contribution was from funds that are not controlled by you, then you could reissue a check to this campaign from your checking account.

I am sure this all seems rather confusing, so if you have any questions, please feel free to call me. I don't think we have any serious problems here, but we just need to clear the air.

Sincerely,

Garry Mauro  
Campaign Manager

GM:tmj

November 17, 1977

(31)

Ms. Jenny Lynn Watford  
500 The Main Building  
Houston, Texas 77002

Dear Jenny:

Recently there has been some discussion about several contributions made to the Bob Krueger campaign. Your contribution was one of those questioned. The new Federal Election Commission rules and regulations clearly allow for minor children to make contributions to political candidates from their own funds.

On the face of your contribution, I feel there is no problem. But, in keeping with the spirit of the law, I think I should ask three key questions, most of which the answers are obvious.

- 1) Did you make the contribution yourself?
- 2) Did the money come out of your own funds?
- 3) Was the contribution made from the proceeds of a gift made for the express purpose of giving Bob Krueger a contribution?

If the decision to contribute was one that you did not make, or if the contribution was from funds other than your own checking account or savings account, or if the contribution was from the proceeds of a gift given for the purpose of making a contribution to Bob Krueger, then I need to refund your contribution.

If the contribution was from funds that are not controlled by you, then you could reissue a check to this campaign from your checking account.

I am sure this all seems rather confusing, so if you have any questions, please feel free to call me. I don't think we have any serious problems here, but we just need to clear the air.

Sincerely,

Garry Mauro  
Campaign Manager

GM:tmw

14

Mr. Ralph G. Greenlee, III  
P. O. Box 1727  
Midland, Texas 79701

Dear Ralph:

Recently there has been some discussion about several contributions made to the Bob Krueger campaign. Your contribution rules and regulations clearly allow for minor children to make contributions to political candidates from their own funds. The new Federal Election Commission rules and regulations clearly allow for minor children to make contributions to political candidates from their own funds. On the face of your contribution, I feel there is no problem. But, in keeping with the spirit of the law, I think I should ask three key questions, most of which the answers are obvious

- 1) Did you make the contribution yourself?
- 2) Did the money come out of your own funds?
- 3) Was the contribution made from the proceeds of a gift made for the express purpose of giving Bob Krueger a contribution?

If the decision to contribute was one that you did not make, or if the contribution was from funds other than your own checking account or savings account, or if the contribution was from the proceeds of a gift given for the purpose of making a contribution to Bob Krueger, then I need to refund to you the contribution we received.

If the contribution was from funds that are not controlled by you, then you could reissue a check to this campaign from your checking account.

I am sure this all seems rather confusing, so if you have any questions, please feel free to call me. I don't think we have any serious problems here, but we just need to clear the air.

Sincerely,

Garry Mauro  
Campaign Manager  
GM:tmw

November 17, 1977

Ms. Geraldine Davis Greenlee  
P. O. Box 1727  
Midland, Texas 79701

(33)

11

Dear Geraldine:

Recently there has been some discussion about several contributions made to the Bob Krueger campaign. Your contribution was one of those questioned. The new Federal Election Commission rules and regulations clearly allow for minor children to make contributions to political candidates from their own funds.

On the face of your contribution, I feel there is no problem. But, in keeping with the spirit of the law, I think I should ask three key questions, most of which the answers are obvious.

- 1) Did you make the contribution yourself?
- 2) Did the money come out of your own funds?
- 3) Was the contribution made from the proceeds of a gift made for the express purpose of giving Bob Krueger a contribution?

If the decision to contribute was one that you did not make, or if the contribution was from funds other than your own checking account or savings account, or if the contribution was from the proceeds of a gift given for the purpose of making a contribution to Bob Krueger, then I need to refund to you the contribution we received.

If the contribution was from funds that are not controlled by you, then you could reissue a check to this campaign from your checking account.

I am sure this all seems rather confusing, so if you have any questions, please feel free to call me. I don't think we have any serious problems ~~here~~ but we just need to clear the air.

Sincerely,

Carry Mauro  
Campaign Manager

Gf:tmw

November 17, 1977

Ms. Helen Hubbard Greenlee  
P. O. Box 1727  
Midland, Texas 79701

8

34

Dear Helen:

Recently there has been some discussion about several contributions made to the Bob Krueger campaign. Your contribution was one of those questioned. The new Federal Election Commission rules and regulations clearly allow for minor children to make contributions to political candidates from their own funds.

On the face of your contribution, I feel there is no problem. But, in keeping with the spirit of the law, I think I should ask three key questions, most of which the answers are obvious.

- 1) Did you make the contribution yourself?
- 2) Did the money come out of your own funds?
- 3) Was the contribution made from the proceeds of a gift made for the express purpose of giving Bob Krueger a contribution?

If the decision to contribute was one that you did not make, or if the contribution was from funds other than your own checking account or savings account, or if the contribution was from the proceeds of a gift given for the purpose of making a contribution to Bob Krueger, then I need to refund to you the contribution we received.

If the contribution was from funds that are not controlled by you, then you could reissue a check to this campaign from your checking account.

I am sure this all seems rather confusing, so if you have any questions, please feel free to call me. I don't think we have any serious problems here, but we just need to clear the air.

Sincerely,

Garry Mauro  
Campaign Manager

4600 Republic National Bank Tower  
Dallas, Texas, 75201

'78 FEB 22 PM 3:14

February 17, 1978

Ms. Susan Donaldson  
Federal Election Commission  
1325 K Street N.W.  
Washington, D. C., 20463

Re: MUR 488(77)

Dear Ms. Donaldson:

I am writing to answer the questions contained in the letter of February 2, 1978 which Mr. William C. Oldaker, General Counsel for the Commission, sent to me.

(1) By my check dated June 29, 1977, I contributed \$1,000 to "Friends of Bob Krueger" toward Mr. Krueger's campaign for the Democratic nomination for the office of United States Senator. A copy of the front and back of my cancelled check is enclosed. By her check of the same date, my daughter, Criss Crossen contributed \$1,000 to "Friends of Bob Krueger" for the same purpose. My daughter was in Dallas at that time, having recently returned from Austin, Texas where she had previously resided. On June 29, 1977, my daughter was 19 years of age. In Texas, a person who has attained the age of 18 is of legal age for all purposes.

(2) Mr. Bob Krueger solicited a contribution from me in June of 1977 (sometime prior to June 29) at an organization meeting for his campaign which took place in Kerrville, Texas. On or shortly prior to June 29, 1977, I suggested to my daughter that she also make a contribution to Mr. Krueger's campaign.

(3) Neither of the above contributions have been returned or refunded.

As I have indicated in my answers to the questions in Mr. Oldaker's letter, my adult daughter and I each made separate contributions to the Friends of Bob Krueger Committee. I did not make a contribution in the name of my daughter, and I was not then aware, and am not now aware, of any impropriety or illegality of her making a contribution to a political campaign upon my recommendation.

Sincerely yours,

  
Frank M. Crossen

/rb

*R. H. Pickens*  
800 Preston Bank Building  
Dallas, Texas 75225

February 9, 1978

FEDERAL ELECTION

FEB 13 1978 : 11:46 AM  
Area Code 214

369-7471

Mr. William C. Oldaker  
Federal Election Commission  
1325 K Street N. W.  
Washington, D. C. 20463

RE: MUR 488 (77)

Dear Mr. Oldaker:

We received your certified letter dated February 2, 1978, on February 3, 1978.

In answer to your letter we offer the following information:

- 1) The following contributions were made to the "Friends of Bob Krueger" Committee on June 27, 1977:
  - (a) R. H. Pickens - \$1,000.00
  - (b) Jan Rymer Pickens (wife), age 35 - \$1,000.00
  - (c) Anne Alison Pickens Trust - R. H. Pickens, Trustee (our daughter, age 11) - \$1,000.00
  - (d) Paige Gardner Pickens Trust - R. H. Pickens, Trustee (our daughter, age 13) - \$1,000.00
  - (e) Ruth Gardner Pickens (mother of R. H. Pickens, age 68) \$900.00 (her contribution was made September 8, 1977)
- 2) To the best of my remembrance the only solicitation for Bob Krueger came from Mr. Ted Enloe, P. O. Box 5644, Dallas, Texas 75222.
- 3) The contributions of \$1,000.00 each from the Trusts noted in item 1) were refunded. Subsequent to the date of the contributions, it was brought to my attention by my accountant that these contributions might not be allowable under FEC regulations since I am the Trustee of both trusts. I then contacted Mr. Gary Mauro in Mr. Krueger's Austin, Texas, office and requested the contributions from the Trusts be refunded. The refunds were received on November 28, 1977, and deposited into the Trust accounts on November 30, 1977.

In compliance with your request, enclosed are copies of the above mentioned checks that deal directly with my immediate family.

If I may be of further assistance or provide additional information, please advise.

Sincerely,

*R. H. Pickens*  
R. H. Pickens

*Jan R. Pickens*  
Jan Rymer Pickens

100 Potomac  
Dallas, Texas 75205

Ms. Susan Donaldson  
FEDERAL ELECTION COMMISSION  
1325 K Street N.W.  
Washington, D.C. 20463

Dear Ms. Donaldson:

This is to assure whomever it may concern that I am aware that a gift of \$1,000.00 was made to the Bob Krueger Campaign Fund from the ANNE ALISON PICKENS TRUST of which I am to be the sole beneficiary; and R. H. Pickens, my father, is the Trustee.

It is my understanding that in accordance with my father's instructions the money was refunded because of possible conflict with the Federal Election Commission Rules.

Signed this 2 day of March, 1978.

Anne Alison Pickens  
ANNE ALISON PICKENS

SUBSCRIBED AND SWORN TO, before me a Notary Public, this 2nd  
day of March, 1978.

Eric Patrick  
Notary Public in and for  
Dallas County, Texas  
My Commission Expires: Nov. 1, 1978

205  
Ms. Susan Donaldson  
FEDERAL ELECTION COMMISSION  
125 K Street N.W.  
Washington, D.C. 20463

Dear Ms. Donaldson:

This is to assure whomever it may concern that I am aware that a gift of \$1,000.00 was made to the Bob Krueger Campaign Fund from the PAIGE GARDNER PICKENS TRUST of which I am to be the sole beneficiary; and R. H. Pickens, my father, is the Trustee.

It is my understanding that in accordance with my father's instructions the money was refunded because of possible conflict with the Federal Election Commission Rules.

Signed this 2nd day of March, 1978.

Paige Gardner Pickens  
PAIGE GARDNER PICKENS

SUBSCRIBED AND SWORN TO, before me a Notary Public, this 2nd  
day of March, 1978.

Joe F. [Signature]  
Notary Public in and for  
Dallas County, Texas  
My Commission Expires: May 11, 1978

DAVID A. WITTS

ATTORNEY & COUNSELOR

RECEIVED  
FEDERAL ELECTION  
COMMISSION

5353 FIRST INTERNATIONAL BUILDING

DALLAS, TEXAS 75270

70 FEB 11 PM 1:13

(214) 741-7561

February 10, 1978

Mr. William C. Oldaker  
General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

Re: MUR 488(77)

Mr. Oldaker,

After reading your indictment by typewriter,

"specifically it appears that you may have violated  
2 U.S.C. §441f by making contributions in the name  
of your child,"

I can only presume that MUR stands for "Machinations Unrestricted."

I believe all the information you requested is a matter of public  
information, except our ages, which are:

- (a) myself - age 57
- (b) my daughter - age 21
- (c) my wife - (you'll have to extract that yourself  
since I'm under a non-disclosure order)

Your request for relevant factual material is hereby submitted:

1. My daughter commenced working when she was in the 8th  
Grade and has worked regularly ever since.

2. She has at least two checking accounts, several savings  
accounts, personal investments, personal earnings, and last year  
paid Federal income taxes of approximately \$15,000.

3. She has been brought up in the oil business, having  
been exposed to it all her life. She knows that government  
controls don't produce oil, people produce oil.

4. She was aware of Bob Krueger's fight to decontrol gas  
and she supports him, since it made no sense to her to pay the  
OPECs \$15 a barrel and Americans only \$5.00.

Mr. William C. Oldaker  
February 10, 1978

Page 2

5. She is fundamentally opposed to senseless government restrictions. Having traveled most of the world, she has seen for herself the differences between government controls and personal freedom. Standing on the border of Red China and looking at the barbed wire barricades, she asked me "if Communism is so great, why are the people trying to escape?"

6. Although still attending college, she is currently raising garden vegetables for food and sale. Only this weekend she told me she had contracted with a restaurant to supply their pickles and onions. (In this endeavor, she also knows that government controls don't produce food - only people produce food.)

7. As you have surmised, I am terribly proud of my daughter. I have encouraged her to work, to think and to produce.

I would hope that your letter, couched in its ominous bureaucratise and grounded on nothing more than "it appears that you may have violated. . ." would not encourage her to turn her back on our system, nor discourage her from being a productive American.

I think you'll find a lot of college students today are getting sick and tired of government playing Russian roulette with their lives and their future.

Very truly yours,



DAW/ds

cc- Congressman Robert Krueger

George F. Watford  
2200 Houston Natural Gas Building  
Houston, Texas 77002

August 26, 1977

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

Dear Bob:

Attached is the card that I have filled out as a member of the Committee of 200.

Mrs. Watford and I each mailed you a check for \$1,000.00 recently. Attached are 3 additional \$1,000.00 checks:

1. One is for Randy W. Tonking (Mrs. Watford's son and my step son and dependent) who is beginning his senior year at A&M University.
2. Another is for Jenny Lynn Watford (my daughter and Mrs. Watford's step daughter) who is beginning her junior year at the University of Houston.
3. The third is for Joseph F. Watford (our son) who is beginning the 8th grade here in Houston.

Good luck, & God bless



George F. Watford

GFW/rw

Enclosures

Texas OGGIES  
THE STATION TEXAS



Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Regarding: Federal Election Commission  
inquiry MUR 488. (77)

Gentlemen;

I made a personal Contribution  
OF one thousand dollars (\$1000) to the  
Bob Krueger Senate Campaign.

yours truly,

Randy W. Tonking

Federal Election Commission  
1325 K. Street, N.W.  
Washington, D.C. 20463

Re: Federal Election Commission  
inquiry MUR # 488 (77)

Gentlemen,

I made a personal contribution  
of \$1,000 to the Bob Kueger  
Senate Campaign.

Sincerely,

Genry Woodford

3620 Woodchase

#105

Houston, TX 77042

Federal Election Commission  
1325 K Street N.W.  
Washington D.C. 20463

Regarding: Federal Election Commission  
Inquiry MUR 488 (77)

Gentlemen:

I made a personal contribution  
of one thousand dollars (\$1,000<sup>00</sup>)  
to the Bob Kueger Campaign for  
the senate.

Yours truly,  
Joseph F. Watford

219 Renion  
Houston Tex. 77079

GEORGE F. WATFORD  
2200 Houston Natural Gas Building  
Houston, Texas 77002

February 15, 1978

Secretary of Senate  
Capitol Station  
Washington, D.C.

Re: Campaign Contributions

Dear Sir:

Pursuant to Federal Election Commission regulations published at 11 CFR §110.6, the following report is made to you.

Name of intermediary or conduit:

George F. Watford  
219 Renoir  
Houston, Texas 77079

Name of Candidate or Committee to whom  
contribution was made:

Friends of Bob Krueger Committee  
514 West 5th  
Austin, Texas 78701

Office which Mr. Krueger seeks:

U.S. Senator from Texas

Attached are the schedules for receipts and expenditures called for by the regulation. If you need any further information,

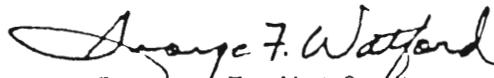
Secretary of Senate

February 15, 1978

Page 2

please contact me or one of my attorneys, Mr. Dow Heard, 1300 First City National Bank Building, Houston, Texas 77002 (713/651-1141 or Mr. Marion Sanford, Jr., 2100 First City National Bank Building, Houston, Texas 77002 (713/651-2510).

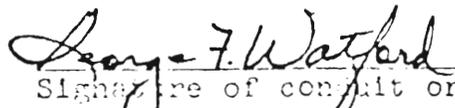
Very truly yours,

  
George F. Watford

Attachments

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

George F. Watford  
(typed name of conduit or  
intermediary)

  
Signature of conduit or  
intermediary

2-15-78  
Date

**Schedule A**

July 1976  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20045

**Itemized Receipts,  
Contributions, Ticket Purchases, Loans,  
Rebates and Transfers for Line  
Numbers 15, 16, 17 and/or 18 of FEC Form 3**  
(see instructions on back)

Page \_\_\_\_\_ of \_\_\_\_\_ for

LINE NUMBER \_\_\_\_\_  
(Use separate line for each number)

Name of Candidate or Committee or Full Intermediary or Conduit

George F. Watford

Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period						
Jenny L. Watford, 3620 Woodchase, Apt. 105, Houston, Texas 77402	8/26/77	\$1,000						
<table border="1"> <tr> <td>Principal place of business</td> <td>Occupation</td> </tr> <tr> <td>University of Houston 4800 Calhoun Houston, TX</td> <td>Student <input type="checkbox"/> Check if Contributor is self-employed</td> </tr> <tr> <td colspan="2">Aggregate Year-to-date ..... ▶ \$1,000</td> </tr> </table>	Principal place of business	Occupation	University of Houston 4800 Calhoun Houston, TX	Student <input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year-to-date ..... ▶ \$1,000			
Principal place of business	Occupation							
University of Houston 4800 Calhoun Houston, TX	Student <input type="checkbox"/> Check if Contributor is self-employed							
Aggregate Year-to-date ..... ▶ \$1,000								
Randy W. Tonking, 1601 Holleman, Apt. 1-P, College Station, Texas 77840	8/26/77	\$1,000						
<table border="1"> <tr> <td>Principal place of business</td> <td>Occupation</td> </tr> <tr> <td>Texas A &amp; M University College Station, TX</td> <td>Student <input type="checkbox"/> Check if Contributor is self-employed</td> </tr> <tr> <td colspan="2">Aggregate Year-to-date ..... ▶ \$1,000</td> </tr> </table>	Principal place of business	Occupation	Texas A & M University College Station, TX	Student <input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year-to-date ..... ▶ \$1,000			
Principal place of business	Occupation							
Texas A & M University College Station, TX	Student <input type="checkbox"/> Check if Contributor is self-employed							
Aggregate Year-to-date ..... ▶ \$1,000								
Joseph F. Watford, 219 Renoir, Houston, Texas 77079	8/26/77	\$1,000						
<table border="1"> <tr> <td>Principal place of business</td> <td>Occupation</td> </tr> <tr> <td>Spring Forrest Jr. High 14240 Memorial, Houston, TX</td> <td>Student <input type="checkbox"/> Check if Contributor is self-employed</td> </tr> <tr> <td colspan="2">Aggregate Year-to-date ..... ▶ \$1,000</td> </tr> </table>	Principal place of business	Occupation	Spring Forrest Jr. High 14240 Memorial, Houston, TX	Student <input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year-to-date ..... ▶ \$1,000			
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Principal place of business	Occupation							
	<input type="checkbox"/> Check if Contributor is self-employed							
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	<input type="checkbox"/> Check if Contributor is self-employed							
Aggregate Year-to-date ..... ▶ \$								
<table border="1"> <tr> <td>Principal place of business</td> <td>Occupation</td> </tr> <tr> <td></td> <td><input type="checkbox"/> Check if Contributor is self-employed</td> </tr> <tr> <td colspan="2">Aggregate Year-to-date ..... ▶ \$</td> </tr> </table>	Principal place of business	Occupation		<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year-to-date ..... ▶ \$			
Principal place of business	Occupation							
	<input type="checkbox"/> Check if Contributor is self-employed							
Aggregate Year-to-date ..... ▶ \$								
Subtotal of receipts this period (last page)		▶ \$						
Total this period (last page this line number only)		▶ \$ 3,000.00						

Schedule B

July 1976  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Itemized Expenditures  
Campaign Fundraising, Loans, and Transfers  
for Lines 20, 22, 23, and for 24 of FEC Form 3

(see Instructions on back)

Page \_\_\_\_\_ of \_\_\_\_\_ for

LINE NUMBER \_\_\_\_\_

① ② ③ ④ ⑤ ⑥ ⑦ ⑧ ⑨ ⑩ ⑪ ⑫ ⑬ ⑭ ⑮ ⑯ ⑰ ⑱ ⑲ ⑳ ㉑ ㉒ ㉓ ㉔ ㉕ ㉖ ㉗ ㉘ ㉙ ㉚ ㉛ ㉜ ㉝ ㉞ ㉟ ㊱ ㊲ ㊳ ㊴ ㊵ ㊶ ㊷ ㊸ ㊹ ㊺

Name of ~~Contributor~~ ~~Account Holder~~ Intermediary or conduit  
George F. Watford

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
FRIENDS OF BOB KRUEGER COMMITTEE 614 West 6th Austin, Texas 78701	Campaign Contrl. from Jenny L. Watford	8/26/77	\$1,000
FRIENDS OF BOB KRUEGER COMMITTEE 614 West 6th Austin, Texas 78701	Campaign Contrl. from Randy W. Tonking	8/26/77	1,000
FRIENDS OF BOB KRUEGER COMMITTEE 614 West 6th Austin, Texas 78701	Campaign Contrl. from Joseph F. Watford	8/26/77	1,000
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period

Subtotal of expenditures this page (optional)	▶	\$
Total this period (last page this line number only)	▶	\$ 3,000.00

RALPH G. GREENLEE, JR., M.D.  
MEDICAL NEUROLOGY  
TEXAS NEUROLOGICAL INSTITUTE AT DALLAS, P.A.  
7777 FOREST LANE, SUITE 2420  
DALLAS, TEXAS 75230

March 6, 1978

Federal Election Commission  
1325 "K" Street, N.W.  
Washington, D.C. 20463

RE: MUR 488

Dear Sirs:

In response to your inquiry of February 2, I have had several phone conversations with Ms. Susan Donaldson and at this point I believe you are in possession of all of the transactions relevant to my children's contributions.

Basically, my wife, myself and my three children made contributions to the Friends of Bob Kreuger Committee in the amounts of \$1,000.00 per person. These contributions were unsolicited. My interest in Representative Kreuger was generated from reading papers and having assessed his positions during his television appearances in this area. I was convinced, as were the members of my family, that he is an unusual candidate, a man of broad educational background, intelligence and apparent integrity. Thus, after several conversations within the family it was decided to assist his campaign to the maximal extent which we thought was legally possible. Accordingly, I contacted Mr. L. D. Brinkman by telephone and volunteered to contribute to Congressman Kreuger's campaign.

Let me emphasize that neither my wife nor myself in any way anticipated we were violating the Federal Election Code by asking the children to make contributions to the Friends of Bob Kreuger Committee. I had read in the paper that several other families were making contributions with the junior members of their families being listed as students. Accordingly, it seemed appropriate that our children, each of whom has their own separate bank account, to make contributions. The money from those bank accounts was extant long before the contributions were made and no monies were deposited into the accounts to specifically cover the contributions.

In my conversations with Ms. Donaldson, the major fault would appear that the children did not have absolute control of their accounts. It was my ignorance that they had to have such control and make such independent judgements or I would have never requested that they participate in this contribution. It was not until some time in January

when I received a notice from Mr. Gary ~~Morrow~~<sup>Morrow</sup> notifying that I might be in violation that I was aware there was any question about the contributions. I discussed the matter with Mr. ~~Morrow~~<sup>Morrow</sup> and he felt that since the contributions came from independent accounts and since the children were aware that they made the contributions that no law had been violated. Accordingly, I took no action at that time.

My subsequent communication has been with yourselves. As you are aware, the checks which were forwarded to the Friends of Bob Kreuger Committee have now been returned by them and you are in possession of these documents. These, in fact, are the only documents I have to substantiate these contributions. I have not actively solicited other people, nor have I been actively solicited for money for Mr. Kreuger's campaign by anyone else. However, I fully intend to do so hopefully within the constraints of the election code.

I would like to keep this matter confidential if at all possible. However, I feel I have nothing to hide and in no way intentionally was trying to deviate from established law. If there are further questions which you might have, please do not hesitate to contact me.

Sincerely yours,



Ralph G. Greenlee, Jr., M.D.

RGG/jg

Donald E. McMahon

February 8, 1978

Mr. William C. Oldaker  
General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR 488(77)

Dear Mr. Oldaker:

This acknowledges receipt of your certified mail letter of February 2, 1978 with respect to my contributions to the Friends of Bob Krueger Committee and requesting certain information in connection therewith.

Mr. Bob Krueger has been a friend of mine of long standing. Although I am a Republican, I feel that Bob has a lot to offer and would make a great U.S. Senator and for this reason my family has decided to support him. In support of his candidacy I have made a personal contribution of \$1,000.00. Likewise, my wife, Collette Marie McMahon, has made a donation of \$500.00. My son, Mark McMahon, who is age 26 and a Junior Executive with U.S. Steel Company has made a contribution of \$1,000.00. For your information, copies of the checks from each of us are enclosed herewith.

No one solicited us for contributions as they were made of our one free will and accord. None of the contributions made to the Friends of Bob Krueger Committee have been returned or refunded.

We do not feel that we have violated any provisions of the Federal Election Campaign Act of 1971, as amended, and if this is the case we would certainly like to be advised of any specific violations. If there is any



4002913

RALPH G. GREENLEE, JR., M.D.  
MEDICAL NEUROLOGY  
TEXAS NEUROLOGICAL INSTITUTE AT DALLAS, P.A.  
7777 FOREST LANE, SUITE 2420  
DALLAS, TEXAS 75230

March 6, 1978

Federal Election Commission  
1325 "K" Street, N.W.  
Washington, D.C. 20463

RE: MUR 488

Dear Sirs:

In response to your inquiry of February 2, I have had several phone conversations with Ms. Susan Donaldson and at this point I believe you are in possession of all of the transactions relevant to my children's contributions.

Basically, my wife, myself and my three children made contributions to the Friends of Bob Kreuger Committee in the amounts of \$1,000.00 per person. These contributions were unsolicited. My interest in Representative Kreuger was generated from reading papers and having assessed his positions during his television appearances in this area. I was convinced, as were the members of my family, that he is an unusual candidate, a man of broad educational background, intelligence and apparent integrity. Thus, after several conversations within the family it was decided to assist his campaign to the maximal extent which we thought was legally possible. Accordingly, I contacted Mr. L. D. Brinkman by telephone and volunteered to contribute to Congressman Kreuger's campaign.

Let me emphasize that neither my wife nor myself in any way anticipated we were violating the Federal Election Code by asking the children to make contributions to the Friends of Bob Kreuger Committee. I had read in the paper that several other families were making contributions with the junior members of their families being listed as students. Accordingly, it seemed appropriate that our children, each of whom has their own separate bank account, to make contributions. The money from those bank accounts was extant long before the contributions were made and no monies were deposited into the accounts to specifically cover the contributions.

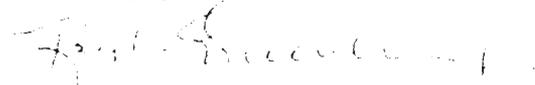
In my conversations with Ms. Donaldson, the major fault would appear that the children did not have absolute control of their accounts. It was my ignorance that they had to have such control and make such independent judgements or I would have never requested that they participate in this contribution. It was not until some time in January

when I received a notice from Mr. Gary Morrow<sup>1/2/78</sup> notifying that I might be in violation that I was aware there was any question about the contributions. I discussed the matter with Mr. Morrow<sup>1/2/78</sup> and he felt that since the contributions came from independent accounts and since the children were aware that they made the contributions that no law had been violated. Accordingly, I took no action at that time.

My subsequent communication has been with yourselves. As you are aware, the checks which were forwarded to the Friends of Bob Kreuger Committee have now been returned by them and you are in possession of these documents. These, in fact, are the only documents I have to substantiate these contributions. I have not actively solicited other people, nor have I been actively solicited for money for Mr. Kreuger's campaign by anyone else. However, I fully intend to do so hopefully within the constraints of the election code.

I would like to keep this matter confidential if at all possible. However, I feel I have nothing to hide and in no way intentionally was trying to deviate from established law. If there are further questions which you might have, please do not hesitate to contact me.

Sincerely yours,



Ralph G. Greenlee, Jr., M.D.

RGG/jg

RALPH G. GREENLEE, JR., M.D.

MEDICAL NEUROLOGY

TEXAS NEUROLOGICAL INSTITUTE AT DALLAS, P.O.

7777 FOREST LANE, SUITE 2420

DALLAS, TEXAS 75230



Federal Election Commission  
1325 "K" Street, N.W.  
Washington, D.C. 20463

1744 Ma Susan Greenlee

5002918

LAW OFFICES OF  
**DOW H. HEARD**  
1300 FIRST CITY NATIONAL BANK BUILDING  
**HOUSTON, TEXAS 77002**  
TELEPHONE 713-651-1141

March 7, 1978

77 100 9 11 12:14

To: Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Attention: Ms. Susan Donaldson

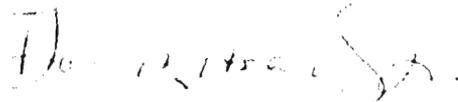
Re: Federal Election Commission  
Inquiry MUR 488 (77)

Gentlemen:

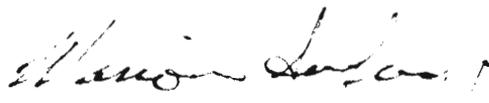
Pursuant to Ms. Susan Donaldson's telephone call to us on Tuesday, February 28th, last, a week ago today, we forward to you herewith three separate letters, one each from Randy W. Tonking, Jenny Lynn Watford and Joseph F. Watford. Ms. Donaldson requested that Randy, Jenny and Joseph, each, write a separate letter stating simply that they each made a personal contribution of \$1,000 to the Bob Krueger Senate Campaign.

We trust that the three enclosed letters dispose of this matter.

Very truly yours,



Dow H. Heard, Jr.



Marion Sanford, Jr.

DHH:ed

Texas Aggies  
COLLEGE STATION, TEXAS



Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Regarding: Federal Election Commission  
inquiry MUR 488.(77)

Gentlemen;

I made a personal Contribution  
OF one thousand dollars (\$1000) to the  
Bob Krueger Senate Campaign.

yours truly,

Randy W. Tonking

7  
F  
Texas A. & M. University



Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: Federal Election Commission  
inquiry MUR #488 (77)

Gentlemen,

I made a personal contribution  
of \$1,000 to the Bob Kueger  
Senate Campaign.

Sincerely,

Jenny Wafford  
3620 Woodchase

#105  
Houston, TX 77042

Blair Woodhouse #105  
Houston, Texas 77042

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Federal Election Commission  
1325 K Street N.W.  
Washington D.C. 20463

Regarding: Federal Election Commission  
Inquiry MUR 488 (??)

Gentlemen:

I made a personal contribution  
of one thousand dollars (\$1,000<sup>00</sup>)  
to the Bob Kueger Campaign for  
the senate.

Yours truly,  
Joseph F. Watford

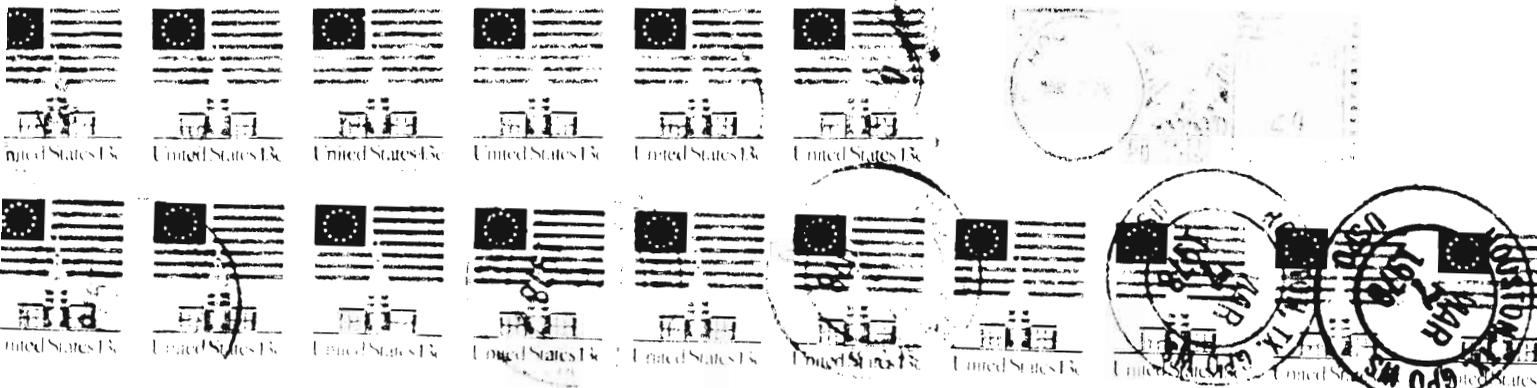
219 Renion  
Houston Tex. 77079

78040051610

19 Renoir  
Houston Tex  
7079

7804005161

Federal Election Commission  
1325 K Street N.W.  
Washington D.C. 20463



DOW H. HEARD  
HOUSTON, TEXAS 77002

2191612

To  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20403  
Attention: Ms. Susan Donaldson

REGISTERED  
6870

RETURN RECEIPT  
REQUIRED

FIRST CLASS MAIL

MAR 12 1998

FEB 1998

File 2281

R. H. Pickens  
800 Preston Bank Building

2

7 AM Dallas Texas 75225

Area Code 214  
369-7471

March 2, 1978

Ms. Susan Donaldson  
FEDERAL ELECTION COMMISSION  
1325 K Street N.W.  
Washington, D. C. 20463

RE: MUR 488 (77)

Dear Ms. Donaldson:

Please find enclosed two original letters, one signed by Anne Alison Pickens and the other by Paige Gardner Pickens, which are being mailed to you per the request of Gary Mauro at Bob Krueger's office in Austin.

If you have any questions, or need any additional information, please do not hesitate to let us know.

Very truly yours,

R. H. PICKENS



Ms. Fae Pafford  
Secretary to R. H. Pickens

:fp

Enclosures

cc: Mr. Gary Mauro  
614 West 6th  
Austin, Texas 78701

3926 Potomac  
Dallas, Texas 75205

Ms. Susan Donaldson  
FEDERAL ELECTION COMMISSION  
1325 K Street N.W.  
Washington, D.C. 20463

Dear Ms. Donaldson:

This is to assure whomever it may concern that I am aware that a gift of \$1,000.00 was made to the Bob Krueger Campaign Fund from the ANNE ALISON PICKENS TRUST of which I am to be the sole beneficiary; and R. H. Pickens, my father, is the Trustee.

It is my understanding that in accordance with my father's instructions the money was refunded because of possible conflict with the Federal Election Commission Rules.

Signed this 2 day of March, 1978.

Anne Alison Pickens  
ANNE ALISON PICKENS

SUBSCRIBED AND SWORN TO, before me a Notary Public, this 2nd  
day of March, 1978.

Eric J. Ford  
Notary Public in and for  
Dallas County, Texas  
My Commission Expires: April 1, 78

3926 Potomac  
Dallas, Texas 75205

Ms. Susan Donaldson  
FEDERAL ELECTION COMMISSION  
1325 K Street N.W.  
Washington, D.C. 20463

Dear Ms. Donaldson:

This is to assure whomever it may concern that I am aware that a gift of \$1,000.00 was made to the Bob Krueger Campaign Fund from the PAIGE GARDNER PICKENS TRUST of which I am to be the sole beneficiary; and R. H. Pickens, my father, is the Trustee.

It is my understanding that in accordance with my father's instructions the money was refunded because of possible conflict with the Federal Election Commission Rules.

Signed this 2nd day of March, 1978.

Paige Gardner Pickens  
PAIGE GARDNER PICKENS

SUBSCRIBED AND SWORN TO, before me a Notary Public, this 2nd  
day of March, 1978.

W. H. [Signature]  
Notary Public in and for  
Dallas County, Texas  
My Commission Expires: May 11, 1978

*R. H. Pickens*  
*800 Preston Bank Building*  
*Dallas, Texas 75225*

01 : 6 17 4 11 36

Ms. Susan Donaldson  
FEDERAL ELECTION COMMISSION  
1325 K Street N.W.  
Washington, D.C. 20463

# KRUEGER OF TEXAS

MO02871

## INDEPENDENT DEMOCRAT FOR U.S. SENATE

February 16, 1978

Re: #C00076968  
MUR 488

Mr. William C. Oldaker  
General Counsel  
Federal Election Commission  
1325 K Street N.W.  
Washington, D.C. 20463

Dear Mr. Oldaker,

The following information is supplied in response to your letter of February 2, 1978.

Friends of Bob Krueger set up a Committee of 200, which has 200 members pledged to solicit \$5,000 in contributions. All the contributions below were received as a result of solicitation by members of the Committee of 200. There have also been numerous follow-up letters urging these same people to solicit anyone who might be interested in the Bob Krueger campaign. Bob Krueger has met personally with each of these members listed below and personally solicited each of them to help solicit others for campaign contributions.

Frank Crossen  
David Witts  
George Watford  
Dr. Ralph Greenlee  
Don McMahan  
Bob Pickens

### CHRIS CROSSEN

The check was received June 30, 1977. Xerox copy of check enclosed. Although Ms. Crossen has the same last name as Frank Crossen, a member of the Committee of 200, the check was drawn on another bank other than the one received from Mr. Crossen. Further check through a phone call in November ascertained that Ms. Crossen is 19 years old, and her residence is Austin. Because of her age, her personal signature on a check drawn on her own account in a different city from Frank Crossen, we felt there was no reason to investigate further the legality of this contribution. Unless the FEC rules otherwise Friends of Bob Krueger is satisfied with the legality of this contribution.

### PAIGE G. PICKENS

Contribution received June 22, 1977. At the time the treasurer raised the question with the committee lawyer on legality, a telephone call was made to a member of the FEC staff. It was ascertained from the telephone call that minors could contribute legally. On November 10th the question was reopened with legal counsel. After discussions with Mr. Doug Patton a letter was sent to Miss Paige Pickens

P.O. Box 911 New Braunfels, Texas 78130 (512) 625-7347  
614 West 6th Austin, Texas 78701 (512) 478-1978

asking her the three key questions in the regulations. Enclosed is a copy of the letter dated November 17th. Paige and Anne Pickens' father via a telephone conversation answered questions one and three satisfactorily, but on question two the question of "exclusivity" arose. It seems the contributions came from accounts Bob Pickens has to co-sign. I felt that moved the accounts out of the minor's "exclusive control," so the contributions were refunded on November 22, 1977.

ANNE A. PICKENS

Same as above - see enclosed checks.

ELANE WITTS

Contribution received June 28, 1977. Ms. Witts is 21 years old. The check we received was made on a personalized bank account with her signature, signed on a different bank, on a different date than the contributions received from her father and mother. Because of the age and the personal signature and the different date, there was no provision of the regulations indicating that we should pursue this further. No follow-up letter was sent, but in November a phone call was made to the Witts family.

GERALDINE D. GREENLEE

RALPH G. GREENLEE, III

HELEN H. GREENLEE

On September 18th I received the three contributions from the three Greenlee children. Enclosed are the checks. On November 15th they were sent certified letters asking the questions as advised by Mr. Doug Patton. I did not hear from Dr. Greenlee until February 6th. Upon talking to Dr. Greenlee, the three children's legal guardian, the three checks were refunded. The reason being that although the children made the contributions knowingly and the contribution was not given as a result of a gift, they did not have "exclusive control of their funds" as the contributions came from trust funds that required his authority for action.

MARK MCMAHON

A check was received September 18th from Mark McMahon, written on his own account and signed personally by him on a different date on a different bank from his father or mother. At that time, I had no reason to question this contribution. After conversations with Doug Patton we felt there was no reason to investigate further. Mr. McMahon is 26 years old and a business executive with U.S. Steel. It appears that we made a bookkeeping error in describing his occupation as a student.

JOSEPH E. WATFORD

Received contribution August 29, 1977. A letter was received from George Watford stating that Joseph E. Watford was in the 8th grade. The contribution was received several weeks later than the contribution received from his parents, but on the same day his brother's and sister's checks came in. After my November 10th conversation with Doug Patton of the FEC a letter was sent to him on November 17, 1977. Upon receipt of the letter Joseph Watford had his lawyer, Dow Heard of Houston, call me and assure me of the legality of the contribution. I explained very carefully the questions of "exclusive control," "gift," and a "knowing contribution." I was told the money was earned by Joseph, and he determined how it was spent, that there might be some Christmas or birthday gifts co-mingled, but these were not made for the purpose of a campaign contribution and that Joseph was a strong supporter who had made a speech in civics class for Krueger; also, that it was after a

family discussion that he had made the decision to make his contribution. After having these facts related I concluded this was a legal contribution.

JENNY LYNN WATFORD

Received contribution August 29, 1977, same day as brother and sister. On November 17th I sent the enclosed letter. Dow Heard of Houston called in reply to the letter stating she was 20 years old, and therefore was not a minor; but for the record she decided to make the contribution after a family political discussion. The funds came from her own earnings that she had given her father for the express purpose of passing along to Friends of Bob Krueger.

RANDY W. TONKING

Received contribution August 29, 1977, same as brother and sister. On November 17th sent enclosed letter. Dow Heard of Houston called in reply to the letter stating Randy was 21 years old, a college student, and therefore not a minor; but for the record he had decided to make the contribution after a family political discussion. The funds came from his own earnings that he had passed along to his father for the express purpose of sending to Friends of Bob Krueger.

If you have any further questions, please do not hesitate to contact me.

Sincerely,



GARRY MAURO  
Campaign Manager & Legal Counsel

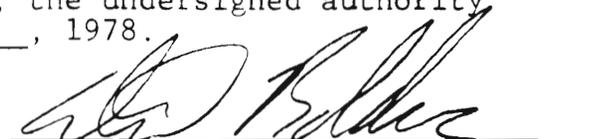
GM:ng

Enclosures (34)

I DULY SWEAR THAT THESE FACTS ARE TRUE AS STATED.

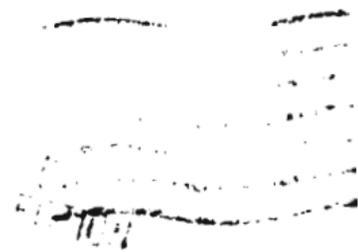


SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this the 15<sup>th</sup> day of March, 1978.



David Bolduc, Notary Public  
in and for Travis County, Texas

Garry Mauro  
Krueger of Texas  
614 West 6th  
Austin, Texas 78701



10  
6  
11:56

**CERTIFIED**  
No. 38137  
**MAIL**

Mr. William C. Gluaker  
General Counsel  
Federal Election Commission  
1325 F Street N.W.  
Washington, D.C. 20463

Attention:  
Susan Donaldson

**RETURN RECEIPT  
REQUESTED**



FEDERAL ELECTION COMMISSION

1325 K STREET, N.W.  
WASHINGTON, D.C. 20463

February 28, 1978

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS *mwe*  
SUBJECT: MUR 488 (77) - Interim Report dated 2-24-78  
Signed by General Counsel 2-24-78

The above-mentioned document was circulated to the Commissioners on a 24 hour no-objection basis at 12:30, February 27, 1978.

As of 12:30, this date, no objections have been received in the Office of Commission Secretary to the Interim Report.

February 24, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 488

Please have the attached Interim Report on MUR 488 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

78040051622

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Friends of Bob Krueger Committee; )  
Frank M. Crossen; R.H. and Jan Pickens; ) MUR 488  
David and Jean Witts; George F. and )  
Joan Watford; Dr. Ralph G. (Jr.) and )  
Melba Greenlee; Don E. McMahan )

Interim Report

It appeared that certain persons violated 2 U.S.C. §441f by making contributions to the Friends of Bob Krueger Committee in the name of their children; and that the Friends of Bob Krueger Committee violated 2 U.S.C. §441f by accepting contributions from individuals made in the name of their children.

The Commission has just received a response from the Friends of Bob Krueger Committee and four of the contributors. Further information is being requested from the Committee and the contributors, and a General Counsel's Report and recommendations will be presented to the Commission in about two weeks.

2/24/78  
Date

William C. Oldaker  
William C. Oldaker  
General Counsel

# KRUEGER OF TEXAS

MC 2799  
NEN

78 FEB 23 AM

**INDEPENDENT DEMOCRAT FOR U.S. SENATE**

February 17, 1978

1118488

Mr. William C. Oldaker  
General Counsel  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

Dear Mr. Oldaker,

In response to your letter of February 2, 1978, I hereby authorize Garry Mauro as legal counsel, as he is also campaign manager and has been involved in the financial setup since the beginning of our formation.

Sincerely,

*Arthur Wersterfer*  
ARTHUR WERSTERFER  
Treasurer

AW:jr

P.O. Box 911 New Braunfels, Texas 78130 (512) 625-7347  
614 West 6th Austin, Texas 78701 (512) 478-1978

614 West 6th.  
Austin, Texas 78701.



78 FEE 11:07

RETURN RECEIVED  
FEB 11 1978

Mr. William C. Oldaker  
General Counsel  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

REGISTERED  
NO. 1671

**Garry Mauro**  
Attorney-at-Law

314 W. 11th • Austin, Texas 78701 • (512) 477-6774

*FCC 2766*  
*NRW*

February 17, 1978

Re: #C00076968  
MUR 488

Mr. William C. Oldaker  
General Counsel  
Federal Election Commission  
1325 K Street N.W.  
Washington, D.C. 20463

Dear Mr. Oldaker,

The following information is supplied in response to your letter of February 2, 1978.

Friends of Bob Krueger set up a Committee of 200, which has 200 members pledged to solicit \$5,000 in contributions. All the contributions below were received as a result of solicitation by members of the Committee of 200. There have also been numerous follow-up letters urging these same people to solicit anyone who might be interested in the Bob Krueger campaign. Bob Krueger has met personally with each of these members listed below and personally solicited each of them to help solicit others for campaign contributions.

Frank Crossen  
David Witts  
George Watford  
Dr. Ralph Greenlee  
Don McMahon  
Bob Pickens

CHRIS CROSSEN

The check was received June 30, 1977. Xerox copy of check enclosed. Although Ms. Crossen has the same last name as Frank Crossen, a member of the Committee of 200, the check was drawn on another bank other than the one received from Mr. Crossen. Further check through a phone call in November ascertained that Ms. Crossen is 19 years old, and her residence is Austin. Because of her age, her personal signature on a check drawn on her own account in a different city from Frank Crossen, we felt there was no reason to investigate further the legality of this contribution. Unless the FEC rules otherwise Friends of Bob Krueger is satisfied with the legality of this contribution.

PAIGE G. PICKENS

Contribution received June 22, 1977. At the time the treasurer raised the question with the committee lawyer on legality, a telephone call was made to a member of the FEC staff. It was ascertained from the telephone call that minors could contribute legally. On November 10th the question was reopened with legal counsel. After discussions with Doug Patton a letter was sent to Miss Paige Pickens asking her the three key questions in the regulations. Enclosed is a copy of the letter

**Garry Mauro**  
Attorney-at-Law

314 W. 11th • Austin, Texas 78701 • (512) 477-6774

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dated November 17th. Paige and Anne Pickens' father via a telephone conversation answered questions one and three satisfactorily, but on question two the question of "exclusivity" arose. It seems the contributions came from accounts Bob Pickens has to co-sign. I felt that moved the accounts out of the minor's "exclusive control" so the contributions were refunded on November 22, 1977.

ANNE A. PICKENS

Same as above - see enclosed checks.

ELANE WITTS

Contribution received June 28, 1977. Ms. Witts is 21 years old. The check we received was made on a personalized bank account with her signature, signed on a different bank, on a different date than the contributions received from her father and mother. Because of the age and the personal signature and the different date, there was no provision of the regulations indicating that we should pursue this further. No follow-up letter was sent, but in November a phone call was made to the Witts family.

GERALDINE D. GREENLEE

RALPH G. GREENLEE, III

HELEN H. GREENLEE

On September 18th I received the three contributions from the three Greenlee children. Enclosed are the checks. On November 15th they were sent certified letters asking the questions as advised by Mr. Doug Patton. I did not hear from Dr. Greenlee until February 6th. Upon talking to Dr. Greenlee, the three children's legal guardian, the three checks were refunded. The reason being that although the children made the contributions knowingly and the contribution was not given as a result of a gift, they did not have "exclusive control of their funds" as the contributions came from trust funds that required his authority for action.

MARK MCMAHON

A check was received September 18th from Mark McMahon, written on his own account and signed personally by him on a different date on a different bank from his father or mother. At that time, I had no reason to question this contribution. After conversations with Doug Patton we felt there was no reason to investigate further. Mr. McMahon is 26 years old and a business executive with U.S. Steel. It appears that we made a bookkeeping error in describing his occupation as a student.

JOSEPH E. WATFORD

Received contribution August 29, 1977. A letter was received from George Watford stating that Joseph E. Watford was in the 8th grade. The contribution was received several weeks later than the contribution received from his parents, but on the same day his brother's and sister's checks came in. After my November 10th conversation with Doug Patton of the FEC a letter was sent to him on November 17, 1977. Upon receipt of the letter Joseph Watford had his lawyer, Dow Heard of Houston, call me and assure me of the legality of the contribution. I explained very

**Garry Mauro**

Attorney-at-Law

314 W. 11th • Austin, Texas 78701 • (512) 477-6774

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carefully the questions of "exclusive control," "gift," and a "knowing contribution." I was told the money was earned by Joseph, and he determined how it was spent, that there might be some Christmas or birthday gifts co-mingled, but these were not made for the purpose of a campaign contribution and that Joseph was a strong supporter who had made a speech in civics class for Krueger; also, that it was after a family discussion that he had made the decision to make his contribution. After having these facts related I concluded this was a legal contribution.

JENNY LYNN WATFORD

Received contribution August 29, 1977, same day as brother and sister. On November 17th I sent the enclosed letter. Dow Heard of Houston called in reply to letter stating she was 20 years old, and therefore was not a minor; but for the record she decided to make the contribution after a family political discussion. The funds came from her own earnings that she had given her father for the express purpose of passing along to Friends of Bob Krueger.

RANDY W. TONKING

Received contribution August 29, 1977, same as brother and sister. On November 17th sent enclosed letter. Dow Heard of Houston called in reply to the letter stating Randy was 21 years old, a college student, and therefore not a minor; but for the record he had decided to make the contribution after a family political discussion. The funds came from his own earnings that he had passed along to his father for the express purpose of sending to Friends of Bob Krueger.

If you have any further questions, please do not hesitate to contact me.

Sincerely,



GARRY MAURO  
Campaign Manager & Legal Counsel

GM:ng

Enclosures (34)

**Garry Mauro**  
Attorney-at-Law

314 W. 11th • Austin, Texas 78701 • (512) 477-6774

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ENCLOSURES:

1. Criss Crossen check
2. Frank Crossen check
3. Elane Witts check
4. David Witts check
5. Jean Witts check
6. Mark McMahon check
7. Don E. McMahon check
8. Mrs. D. E. McMahon check
9. Joseph Watford check
10. Jenny Lynn Watford check
11. Randy W. Tonking check
12. George Watford check
13. Jean Watford check
14. Paige Gardner Pickens refund
15. Anne Alison Pickens refund
16. Anne Alison Pickens check
17. Paige Gardner Pickens check
18. Ralph G. Greenlee III check
19. Geraldine Davis Greenlee check
20. Helen Hubbard Greenlee check
21. Ralph G. Greenlee refund
22. Geraldine Davis Greenlee refund
23. Helen Hubbard Greenlee refund
24. George Watford August 26, 1977 letter
25. Ralph Greenlee September 21 1977 letter
26. Friends of Bob Krueger letter to Greenlee, February 6, 1978
27. Friends of Bob Krueger letter to Anne Pickens, November 17, 1977
28. Friends of Bob Krueger letter to Paige Pickens, November 17, 1977
29. Friends of Bob Krueger letter to Randy W. Tonking, November 17, 1977
30. Friends of Bob Krueger letter to Joseph F. Watford, November 17, 1977
31. Friends of Bob Krueger letter to Jenny Lynn Watford, November 17, 1977
32. Friends of Bob Krueger letter to Ralph G. Greenlee III, Nov. 17, 1977
33. Friends of Bob Krueger letter to Geraldine Davis Greenlee, Nov. 17, 1977
34. Friends of Bob Krueger letter to Helen Hubbard Greenlee, Nov. 17, 1977



JUN 28 1977  
 ELIANE WITTS  
 6007 GLENDALE 361-1056  
 DALLAS, TEXAS 75230  
 31  
 6-15 1977 32-103  
 \$100.00  
 Friends of Bob Krueger  
 One Hundred Dollars  
 DOLLARS  
 Elane Wits  
 48 0085 31  
 0111001031

JUN 28 1977  
 DALLAS, TEXAS  
 DAVID WITTS  
 FRIENDS OF BOB KRUEGER  
 CASHIER'S CHECK  
 100.00  
 3111000011 00 2205 31  
 4

JUN 28 1977  
 DALLAS, TEXAS  
 JEAN WITTS  
 FRIENDS OF BOB KRUEGER  
 CASHIER'S CHECK  
 100.00  
 3111000011 00 2205 31  
 5

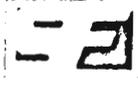
SEP 18 1977

MARKI MAHON  
5749 INDIAN CIRCLE  
HOUSTON, TEXAS 77057

172

09/15 19 77

PAID TO THE ORDER OF Friends of Bob Krueger, 1,000.00  
One thousand and no/100 → DOLLARS

 San Felipe National Bank  
BOX 42436  
HOUSTON, TEXAS 77042

campaign  
donation

⑆1130⑆0178⑆

Mark D. McMahon

30 1592 0⑆

SEP 18 1977

DON E. MAHON  
POST OFFICE BOX 22738  
HOUSTON, TEXAS 77027

No 548

AUGUST 26, 19 77

Pay

⑆1000⑆0000⑆

DOLLARS \$ 1,000.00

TO THE ORDER OF

FRIENDS OF BOB KRUEGER  
P. O. BOX 911  
NEW BRAUNFELS, TEXAS 78130

DON E. McMAHON



 NATIONAL BANK OF HOUSTON  
P.O. BOX 2137 HOUSTON, TEXAS 77001

⑆1130⑆0000⑆

50⑆549⑆5⑆

NOV 3 1977

MRS. D. E. McMAHON  
5749 INDIAN CIRCLE 789-8100  
HOUSTON, TEXAS 77057

3837

Nov 5, 19.77 25-104  
1130

PAY TO THE ORDER OF

Friends of Bob Krueger, 500.00  
Five Hundred and no/100 → DOLLARS

 FIRST CITY BANK  
OF HIGHLAND VILLAGE  
P.O. BOX 2225 HOUSTON, TEXAS 77027

MEMO

Mrs. D. E. McMahon

⑆1130⑆0104⑆

20⑆4533⑆8⑆

AUG 29 1977  
 GEORGE F. WATFORD  
 500 THE MAIN BLDG. 225-5413  
 HOUSTON, TEXAS 77002

110 (9)

August 26 19 77  $\frac{35-122}{1130}$

PAY TO THE ORDER OF Krueger of Texas \$ 1,000.00

One Thousand Dollars and No/100-----DOLLARS

 **Southern National Bank**  
 of Houston Main St McKinney P.O. Box 2529 Houston, Texas 77001

MEMO Joseph F. Watford contribution *George F. Watford*

⑆1130⑆0122⑆ 726 85⑆

AUG 29 1977  
 GEORGE F. WATFORD  
 500 THE MAIN BLDG. 225-5413  
 HOUSTON, TEXAS 77002

109 (10)

August 26 19 77  $\frac{35-122}{1130}$

PAY TO THE ORDER OF Krueger of Texas \$ 1,000.00

One Thousand Dollars and No/100-----DOLLARS

 **Southern National Bank**  
 of Houston Main St McKinney P.O. Box 2529 Houston, Texas 77001

MEMO Jenny Lynn Watford contribution *George F. Watford*

⑆1130⑆0122⑆ 726 85⑆

GEORGE F. WATFORD  
 500 THE MAIN BLDG. 225-5413  
 HOUSTON, TEXAS 77002

108 (11)

August 26 19 77  $\frac{35-122}{1130}$

PAY TO THE ORDER OF Krueger of Texas \$ 1,000.00

One Thousand Dollars and No/100-----DOLLARS

 **Southern National Bank**  
 of Houston Main St McKinney P.O. Box 2529 Houston, Texas 77001

MEMO Randy W. Tonking contribution *George F. Watford*

⑆1130⑆0122⑆ 726 85⑆

1977  
 GEORGE F. WATFORD  
 219 RENOIR 465-7515  
 HOUSTON, TEXAS 77079

1126 (12)

August 1 19 77  $\frac{35-120}{1130}$

PAY TO THE ORDER OF Friends of Bob Krueger \$ 1,000.00

One Thousand Dollars and No/100-----DOLLARS

 **MAIN BANK**  
 P.O. BOX 948 DOWNTOWN HOUSTON 77001

MEMO George Watford Contribution *George F. Watford*

⑆1130⑆0122⑆ 726 85⑆

14

874

FRIENDS OF BOB KRUEGER  
P. O. BOX 911 625-7347 OR 658-5361  
NEW BRAUNFELS, TEXAS 78130

*Richard* 100000

11-27-1977 88-678  
1149 \$1000<sup>00</sup>

PAY TO THE ORDER OF *Paige Gardner Pickens*

DOLLARS

 **New Braunfels**  
NATIONAL BANK  
P.O. Box 912 New Braunfels, Texas 78130

*Arthur W. Hester*  
*Trustee*

⑆1149⑆0678⑆ ⑈800 404 8⑈ ⑆0000100000⑆

15

873

FRIENDS OF BOB KRUEGER  
P. O. BOX 911 625-7347 OR 658-5361  
NEW BRAUNFELS, TEXAS 78130

*Richard* 100000

11-27-1977 88-678  
1149 \$1000<sup>00</sup>

PAY TO THE ORDER OF *Anne Alison Pickens*

DOLLARS

 **New Braunfels**  
NATIONAL BANK  
P.O. Box 912 New Braunfels, Texas 78130

*Arthur W. Hester*  
*Trustee*

⑆1149⑆0678⑆ ⑈800 404 8⑈ ⑆0000100000⑆

16

179

 **REPUBLIC**  
NATIONAL BANK  
OF DALLAS

DALLAS, TEXAS June 27, 1977

PAY TO THE ORDER OF - - - FRIENDS OF BOB KRUEGER - - - \$ 1,000.00

One Thousand and no/100 - - - - - DOLLARS

Contribution \$ 1,000.00 ANNE ALISON PICKENS, TRUST  
R. H. PICKENS, TRUSTEE

ANNE ALISON PICKENS, TRUST  
R. H. PICKENS, TRUSTEE



⑆1149⑆0678⑆ ⑈800 404 8⑈ ⑆0000100000⑆

PAIGE GARDNER PICKENS, TRUST  
R. H. PICKENS, TRUSTEE

REPUBLIC  
NATIONAL BANK  
OF DALLAS

327  
110  
17

179

DALLAS, TEXAS June 27, 1977

PAY TO THE ORDER OF - - - - FRIENDS OF BOB KRUEGER - - - - \$ 1,000.00

One Thousand and no/100 - - - - - DOLLAR



Contribution \$1,000.00

PAIGE GARDNER PICKENS, TRUST  
R. H. PICKENS, TRUSTEE

⑆ 1 1 1 0 0 0 6 2 ⑆ ⑆ 1 0 5 ⑆ 4 0 5 ⑆ 3 ⑆

SEP 18 1977

RALPH G. GREENLEE, II  
 RALPH G. GREENLEE, JR., CUSTODIAN  
 BOX 3122 1727  
 MIDLAND, TEXAS 79701

33<sup>18</sup>

September 15 1977  $\frac{88-389}{1163}$

PAY TO THE ORDER OF Krueger Campaign Committee \$1,000.00

One Thousand and No/100-----DOLLARS

 *The Midland National Bank*  
 MIDLAND, TEXAS

*Rena Cash*

⑆1163⑆0389⑆ ⑆368 016 21⑆

SEP 19 1977

Geraldine Davis Greenlee  
 P. O. Box 1727  
 Midland, Texas 79701

34

September 14 1977  $\frac{88-389}{1163}$

PAY TO THE ORDER OF Krueger Campaign Committee \$1,000.00

One Thousand and No/100-----DOLLARS

 *The Midland National Bank*  
 MIDLAND, TEXAS

*Rena Cash*

⑆1163⑆0389⑆ 368-016-9

SEP 18 1977

Helen Hubbard Greenlee  
 P. O. Box 1727  
 Midland, Texas 79701

20

35

September 14 1977  $\frac{88-389}{1163}$

PAY TO THE ORDER OF Krueger Campaign Committee \$1,000.00

One Thousand and No/100-----DOLLARS

 *The Midland National Bank*  
 MIDLAND, TEXAS

*Rena Cash*

⑆1163⑆0389⑆ 368-021-5

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT  
DATE 2-6-78 AMOUNT 1000.00

FRIENDS OF BOB KRUEGER Copy Non - Negotiable  
P. O. BOX 911 625-7347 OR 658-5361  
NEW BRAUNFELS, TEXAS 78130

(21) 1118

Refund - Student

PAY TO THE ORDER OF Ralph H. Guenther, III  
Copy Non - Negotiable

Feb 6 1978 89-678  
1149

\$ 1000.00  
DOLLARS

One thousand



New Braunfels NATIONAL BANK  
P.O. Box 813/New Braunfels, Texas 78130

Arthur Guenther  
Legal Clerk

⑆1⑆149⑆0678⑆ ⑈800 404 8⑈ ⑆3⑆0000⑆000000⑆

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT  
DATE 2-6-78 AMOUNT 1000.00

FRIENDS OF BOB KRUEGER Copy Non - Negotiable  
P. O. BOX 911 625-7347 OR 658-5361  
NEW BRAUNFELS, TEXAS 78130

(22) 1116

Refund - Student

PAY TO THE ORDER OF Geraldine Dawn Henderson  
Copy Non - Negotiable

Feb 6 1978 88-678  
1149

\$ 1000.00  
DOLLARS

One thousand



New Braunfels NATIONAL BANK  
P.O. Box 813/New Braunfels, Texas 78130

Arthur Henderson  
Legal Clerk

⑆1⑆149⑆0678⑆ ⑈800 404 8⑈ ⑆3⑆0000⑆000000⑆

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT  
DATE 2-6-78 AMOUNT 1000.00

FRIENDS OF BOB KRUEGER Copy Non - Negotiable  
P. O. BOX 911 625-7347 OR 658-5361  
NEW BRAUNFELS, TEXAS 78130

(23) 1117

Refund - Student

PAY TO THE ORDER OF Helga Hubbard Bredenk  
Copy Non - Negotiable

Feb 6 1978 89-678  
1149

\$ 1000.00  
DOLLARS

One thousand



New Braunfels NATIONAL BANK  
P.O. Box 813 New Braunfels, Texas 78130

Arthur Henderson  
Legal Clerk

Copy Non - Negotiable ⑆1⑆149⑆0678⑆ ⑈800 404 8⑈ ⑆3⑆0000⑆000000⑆

George F. Watford  
2200 Houston Natural Gas Building  
Houston, Texas 77002

August 26, 1977

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

Dear Bob:

Attached is the card that I have filled out as a member of the Committee of 200.

Mrs. Watford and I each mailed you a check for \$1,000.00 recently. Attached are 3 additional \$1,000.00 checks:

1. One is for Randy W. Tonking (Mrs. Watford's son and my step son and dependent) who is beginning his senior year at A&M University.
2. Another is for Jenny Lynn Watford (my daughter and Mrs. Watford's step daughter) who is beginning her junior year at the University of Houston.
3. The third is for Joseph F. Watford (our son) who is beginning the 8th grade here in Houston.

Good luck, & God bless



George F. Watford

GFW/rw

Enclosures

RALPH GREENLEE  
4441 BELFORT PLACE  
DALLAS, TEXAS 75205

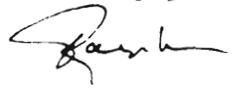
September 21, 1977

Mt. Garry Mauro  
Krueger Headquarters  
314 West 6th  
Austin, Texas 78701

Dear Garry,

Through a misunderstanding our Accountant in Midland did not forward the full \$5,000.00 to your office in contribution to Bob's campaign. Basically, we wanted each \$1,000.00 drawn from a separate account. He did not have a check from my Separate Account and thus delayed in making the donation. I am forwarding this to you along with a Committee of 200 card. This completes this aspect of the pledge my wife Melba and I made.

The Greenlee family supports Krueger's efforts and I look forward to raising other funds as I am able.

Sincerely yours,  


RGG:vb

cc: Mt. Ted Enloe

February 6, 1978

Maisie Clisbee  
P. O. Box 1727  
Midland, Texas 79701

Dear Ms. Clisbee,

Per Carry Mauro and Dr. Greenlee's conversation of February 6th, we are returning the enclosed checks.

Thank you.

Very truly yours,

Mrs. Hazel Hopkins  
Assistant to the Treasurer

Enclosure

MH:jr



PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER (Complete items 1-4) Add your address if the return to space on reverse	
1. The following service is requested (check one): <input type="checkbox"/> Show to whom and date delivered <input type="checkbox"/> Show to whom, date and address of delivery <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> Show to whom and date delivered <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> Show to whom, date and address of delivery (CONSULT POSTMASTER FOR USE)	
2. ARTICLE ADDRESSED TO:	
3. ARTICLE DESCRIPTION:	REGISTERED NO.   CERTIFIED NO.   INSURED NO.
(Always obtain signature of addressee or agent) I have received the article described above: SIGNATURE _____ Address _____ Authorized agent	
4. DATE OF DELIVERY	POSTMARK
5. ADDRESS (Complete only if requested)	
6. UNABLE TO DELIVER BECAUSE:	CLERK'S INITIALS

November 17, 1977

(27)

Ms. Anne Alison Pickens  
3926 Potomac  
Dallas, Texas 75205

Dear Anne:

Recently there has been some discussion about several contributions made to the Bob Krueger campaign. Your contribution was one of those questioned. The new Federal Election Commission rules and regulations clearly allow for minor children to make contributions to political candidates from their own funds.

On the face of your contribution, I feel there is no problem. But, in keeping with the spirit of the law, I think I should ask three key questions, most of which the answers are obvious.

- 1) Did you make the contribution yourself?
- 2) Did the money come out of your own funds?
- 3) Was the contribution made from the proceeds of a gift made for the express purpose of giving Bob Krueger a contribution?

If the decision to contribute was one that you did not make, or if the contribution was from funds other than your own checking account or savings account, or if the contribution was from the proceeds of a gift given for the purpose of making a contribution to Bob Krueger, then I need to refund to you the contribution we received.

If the contribution was from funds that are not controlled by you, then you could reissue a check to this campaign from your checking account.

I am sure this all seems rather confusing. so if you have any questions, please feel free to call me. I don't think we have any serious problems here, but we just need to clear the air.

Sincerely,

Garry Mauro  
Campaign Manager

GM:tmw

(28)

November 17, 1977

Ms. Paige Gardner Pickens  
3926 Potomac  
Dallas, Texas 75205

Dear Paige:

Recently there has been some discussion about several contributions made to the Bob Krueger campaign. Your contribution was one of those questioned. The new Federal Election Commission rules and regulations clearly allow for minor children to make contributions to political candidates from their own funds.

On the face of your contribution, I feel there is no problem. But, in keeping with the spirit of the law, I think I should ask three key questions, most of which the answers are obvious.

- 1) Did you make the contribution yourself?
- 2) Did the money come out of your own funds?
- 3) Was the contribution made from the proceeds of a gift made for the express purpose of giving Bob Krueger a contribution?

If the decision to contribute was one that you did not make, or if the contribution was from funds other than your own checking account or savings account, or if the contribution was from the proceeds of a gift given for the purpose of making a contribution to Bob Krueger, then I need to refund to you the contribution we received.

If the contribution was from funds that are not controlled by you, then you could reissue a check to this campaign from your checking account.

I am sure this all seems rather confusing, so if you have any questions, please feel free to call me. I don't think we have any serious problems here, but we just need to clear the air.

Sincerely,

Garry Mauro  
Campaign Manager

GM:tmw

November 17, 1977

(29)

Mr. Randy W. Tonking  
500 The Main Building  
Houston, Texas 77002

Dear Randy:

Recently there has been some discussion about several contributions made to the Bob Krueger campaign. Your contribution was one of those questioned. The new Federal Election Commission rules and regulations clearly allow for minor children to make contributions to political candidates from their own funds.

On the face of your contribution, I feel there is no problem. But, in keeping with the spirit of the law, I think I should ask three key questions, most of which the answers are obvious.

- 1) Did you make the contribution yourself?
- 2) Did the money come out of your own funds?
- 3) Was the contribution made from the proceeds of a gift made for the express purpose of giving Bob Krueger a contribution?

If the decision to contribute was one that you did not make, or if the contribution was from funds other than your own checking account or savings account, or if the contribution was from the proceeds of a gift given for the purpose of making a contribution to Bob Krueger, then I need to refund your contribution.

If the contribution was from funds that are not controlled by you, then you could reissue a check to this campaign from your checking account.

I am sure this all seems rather confusing, so if you have any questions, please feel free to call me. I don't think we have any serious problems here, but we just need to clear the air.

Sincerely,

Garry Mauro  
Campaign Manager

GM:taw

November 17, 1977

30

Mr. Joseph F. Watford  
500 The Main Building  
Houston, Texas 77002

Dear Joseph:

Recently there has been some discussion about several contributions made to the Bob Krueger campaign. Your contribution was one of those questioned. The new Federal Election Commission rules and regulations clearly allow for minor children to make contributions to political candidates from their own funds.

On the face of your contribution, I feel there is no problem. But, in keeping with the spirit of the law, I think I should ask three key questions, most of which the answers are obvious.

- 1) Did you make the contribution yourself?
- 2) Did the money come out of your own funds?
- 3) Was the contribution made from the proceeds of a gift made for the express purpose of giving Bob Krueger a contribution?

If the decision to contribute was one that you did not make, or if the contribution was from funds other than your own checking account or savings account, or if the contribution was from the proceeds of a gift given for the purpose of making a contribution to Bob Krueger, then I need to refund your contribution.

If the contribution was from funds that are not controlled by you, then you could reissue a check to this campaign from your checking account.

I am sure this all seems rather confusing, so if you have any questions, please feel free to call me. I don't think we have any serious problems here, but we just need to clear the air.

Sincerely,

Garry Mauro  
Campaign Manager

GM:tmv

November 17, 1977

(31)

Ms. Jenny Lynn Watford  
500 The Main Building  
Houston, Texas 77002

Dear Jenny:

Recently there has been some discussion about several contributions made to the Bob Krueger campaign. Your contribution was one of those questioned. The new Federal Election Commission rules and regulations clearly allow for minor children to make contributions to political candidates from their own funds.

On the face of your contribution, I feel there is no problem. But, in keeping with the spirit of the law, I think I ~~should~~ ask three key questions, most of which the answers are obvious.

- 1) Did you make the contribution yourself?
- 2) Did the money come out of your own funds?
- 3) Was the contribution made from the proceeds of a gift made for the express purpose of giving Bob Krueger a contribution?

If the decision to contribute was one that you did not make, or if the contribution was from funds other than your own checking account or savings account, or if the contribution was from the proceeds of a gift given for the purpose of making a contribution to Bob Krueger, then I need to refund your contribution.

If the contribution was from funds that are not controlled by you, then you could reissue a check to this campaign from your checking account.

I am sure this all seems rather confusing, so if you have any questions, please feel free to call me. I don't think we have any serious problems here, but we just need to clear the air.

Sincerely,

Garry Mauro  
Campaign Manager

GM:tmw

November 17, 1977

14 (32)  
Mr. Ralph G. Greenlee, III  
P. O. Box 1727  
Midland, Texas 79701

Dear Ralph:

Recently there has been some discussion about several contributions made to the Bob Krueger campaign. Your contribution was one of those questioned. The new Federal Election Commission rules and regulations clearly allow for minor children to make contributions to political candidates from their own funds.

On the face of your contribution, I feel there is no problem. But, in keeping with the spirit of the law, I think I should ask three key questions, most of which the answers are obvious.

- 1) Did you make the contribution yourself?
- 2) Did the money come out of your own funds?
- 3) Was the contribution made from the proceeds of a gift made for the express purpose of giving Bob Krueger a contribution?

If the decision to contribute was one that you did not make, or if the contribution was from funds other than your own checking account or savings account, or if the contribution was from the proceeds of a gift given for the purpose of making a contribution to Bob Krueger, then I need to refund to you the contribution we received.

If the contribution was from funds that are not controlled by you, then you could reissue a check to this campaign from your checking account.

I am sure this all seems rather confusing, so if you have any questions, please feel free to call me. I don't think we have any serious problems here, but we just need to clear the air.

Sincerely,

Garry Mauro  
Campaign Manager

GM:tmw

November 17, 1977

Ms. Geraldine Davis Greenlee  
P. O. Box 1727  
Midland, Texas 79701

33

11

Dear Geraldine:

Recently there has been some discussion about several contributions made to the Bob Krueger campaign. Your contribution was one of those questioned. The new Federal Election Commission rules and regulations clearly allow for minor children to make contributions to political candidates from their own funds.

On the face of your contribution, I feel there is no problem. But, in keeping with the spirit of the law, I think I should ask three key questions, most of which the answers are obvious.

- 1) Did you make the contribution yourself?
- 2) Did the money come out of your own funds?
- 3) Was the contribution made from the proceeds of a gift made for the express purpose of giving Bob Krueger a contribution?

If the decision to contribute was one that you did not make, or if the contribution was from funds other than your own checking account or savings account, or if the contribution was from the proceeds of a gift given for the purpose of making a contribution to Bob Krueger, then I need to refund to you the contribution we received.

If the contribution was from funds that are not controlled by you, then you could reissue a check to this campaign from your checking account.

I am sure this all seems rather confusing, so if you have any questions, please feel free to call me. I don't think we have any serious problems here but we just need to clear the air.

Sincerely,

Garry Mauro  
Campaign Manager

GM:tmw

November 17, 1977

Ms. Helen Hubbard Greenlee  
P. O. Box 1727  
Midland, Texas 79701

§

(34)

Dear Helen:

Recently there has been some discussion about several contributions made to the Bob Krueger campaign. Your contribution was one of those questioned. The new Federal Election Commission rules and regulations clearly allow for minor children to make contributions to political candidates from their own funds.

On the face of your contribution, I feel there is no problem. But, in keeping with the spirit of the law, I think I should ask three key questions, most of which the answers are obvious.

- 1) Did you make the contribution yourself?
- 2) Did the money come out of your own funds?
- 3) Was the contribution made from the proceeds of a gift made for the express purpose of giving Bob Krueger a contribution?

If the decision to contribute was one that you did not make, or if the contribution was from funds other than your own checking account or savings account, or if the contribution was from the proceeds of a gift given for the purpose of making a contribution to Bob Krueger, then I need to refund to you the contribution we received.

If the contribution was from funds that are not controlled by you, then you could reissue a check to this campaign from your checking account.

I am sure this all seems rather confusing, so if you have any questions, please feel free to call me. I don't think we have any serious problems here, but we just need to clear the air.

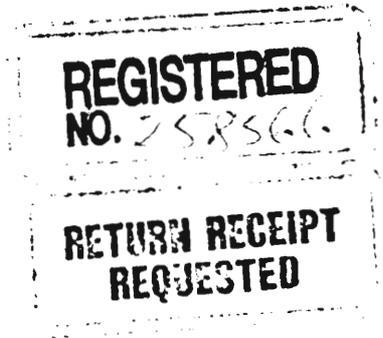
Sincerely,

Garry Mauro  
Campaign Manager

**★ KRUGER OF TEXAS**

**FOR U.S. SENATE**

P.O. Box 911, New Braunfels, Texas 78130



MR. WILLIAM C. OLDAKER, GENERAL COUNSEL  
FEDERAL ELECTION COMMISSION  
1525 K STREET N.W.  
WASHINGTON, D.C. 20463

MAC 2773  
MUR

FEDERAL ELECTION COMMISSION



FEDERAL ELECTION COMMISSION

February 15, 1978

78 FEB 22 PM 3:16

FRANK M. CROSSEN  
CHAIRMAN OF THE BOARD

Ms. Susan Donaldson  
Federal Election Commission  
1325 K St., N.W.  
Washington, D.C. 20463

Re: Your File MUR 488(77)

Dear Ms. Donaldson:

Your letter of February 2, 1978, was received during my absence from the City. I have just returned and will be sending you my response as soon as I obtain all the information requested.

Very truly yours,

FMC/sjw

13 FEB 20 11 3: 16

Ms. Susan Donaldson  
Federal Election Commission  
1325 K St., N.W.  
Washington, D. C. 20463

G MAURO ADA200687  
5126250143 PO BOX 911  
NEW BRAUNFELS TX 78130

western union

Mailgram®



4-019727E048 02/17/78 ICS IPMMTZZ CSP WSHB 3:07  
5126291531 MGM TDMT NEW BRAUNFELS TX 78130 02-17 1016A CST

*ACC 2748*

FEDERAL ELECTION COMMISSION  
ATTN RANDY JOHNSON  
1325 K ST NORTHWEST  
WASHINGTON DC 20463

PER OUR FEBRUARY 15 1978 CONVERSATION FRIENDS OF BOB KRUEGER REPLY ON  
MUR 488 MATTER WILL BE IN THE MAIL NO LATER THAN FEBRUARY 20 1978

GARY MAURO  
FRIENDS OF BOB KRUEGER  
PO BOX 911  
NEW BRAUNFELS TX

11:25 EST  
MGMCOMP MGM

4600 Republic National Bank Tower  
Dallas, Texas, 75201

13 FEB 22 PM 3:14

February 17, 1978

Ms. Susan Donaldson  
Federal Election Commission  
1325 K Street N.W.  
Washington, D. C., 20463

Re: MUR 488(77)

Dear Ms. Donaldson:

I am writing to answer the questions contained in the letter of February 2, 1978 which Mr. William C. Oldaker, General Counsel for the Commission, sent to me.

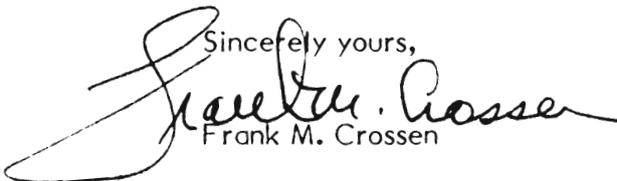
(1) By my check dated June 29, 1977, I contributed \$1,000 to "Friends of Bob Krueger" toward Mr. Krueger's campaign for the Democratic nomination for the office of United States Senator. A copy of the front and back of my cancelled check is enclosed. By her check of the same date, my daughter, Criss Crossen contributed \$1,000 to "Friends of Bob Krueger" for the same purpose. My daughter was in Dallas at that time, having recently returned from Austin, Texas where she had previously resided. On June 29, 1977, my daughter was 19 years of age. In Texas, a person who has attained the age of 18 is of legal age for all purposes.

(2) Mr. Bob Krueger solicited a contribution from me in June of 1977 (sometime prior to June 29) at an organization meeting for his campaign which took place in Kerrville, Texas. On or shortly prior to June 29, 1977, I suggested to my daughter that she also make a contribution to Mr. Krueger's campaign.

(3) Neither of the above contributions have been returned or refunded.

As I have indicated in my answers to the questions in Mr. Oldaker's letter, my adult daughter and I each made separate contributions to the Friends of Bob Krueger Committee. I did not make a contribution in the name of my daughter, and I was not then aware, and am not now aware, of any impropriety or illegality of her making a contribution to a political campaign upon my recommendation.

Sincerely yours,

  
Frank M. Crossen

/rb

JUN 30 1977



REPUBLIC NATIONAL BANK OF DALLAS



903

June 29, 1977

FRANK M. CROSSEN

4600 REPUBLIC NATIONAL BANK TOWER  
RI 8-7901 DALLAS, TEXAS 75201

PAY TO THE ORDER OF

Friends of Bob Krueger

\$ 1,000.00

One Thousand Dollars and No/100 ----- DOLLARS

THIS CHECK IS IN FULL SETTLEMENT OF THE DEBT HEREIN. ACCEPTANCE BY ENDORSEMENT CONSTITUTES RECEIPT IN FULL.

contribution	7	0	0	0	9	9	9	0

FRANK M. CROSSEN

*Frank M. Crossen*

⑆ 1110 0062⑆ ⑈086⑈406⑈4⑈

⑈0000 100000⑈



6 3 6

**FROM**

Frank M. Crossen

4600 Republic National Bank Tower

Dallas, Texas, 75201

**TO**

Ms. Susan Donaldson

Federal Election Commission

1325 K Street N.W.

Washington, D. C., 20463

100-278

73

5

COVERING INDEX

1. Two-page covering letter to Federal Election Committee re its Inquiry MUR 488(77), from Dow H. Heard, Jr. and Marion Sanford, Jr., attorneys, dated February 15, 1978.
2. Five-page letter to Federal Election Committee from George F. Watford, sworn and subscribed to by Mr. Watford, dated February 14, 1978.
3. Copy of one-page letter to Mr. Bob Krueger from George F. Watford, dated August 26, 1977. Attached thereto are copies of five checks: a check dated August 1, 1977 (Mr. Watford's contribution); a check dated August 1, 1977 (Mrs. Joan Watford's contribution); a check dated August 26, 1977 (Randy W. Tonking's contribution); a check dated August 26, 1977 (Jenny Lynn Watford's contribution); a check dated August 26, 1977 (Joseph F. Watford's contribution).
4. Front page lead news story in The San Antonio Sunday Express News, dated December 25, 1977, referred to in Mr. Watford's letter (#2 above), dated February 14, 1978.
5. Copy of two-page letter (with four-page attachment) to Secretary of the Senate of the United States from George F. Watford, dated February 15, 1978.

GEORGE F. WATFORD

219 RENOIR 465-7515  
HOUSTON, TEXAS 77079

1126

August 1 19 77 <sup>35-120</sup>/<sub>1130</sub>

PAY TO THE ORDER OF Friends of Bob Krueger \$ 1,000.00

One Thousand Dollars and No/100----- DOLLARS



George Watford Contribution

*George F. Watford*

⑆1130⑆0120⑆ ⑆ 924⑆381⑆ ⑆00001000000⑆

354  
HOUSTON  
354

POST OFFICE  
ORDINARY P.O.  
AUG 05 1977  
CITY OF AUSTIN  
AUSTIN, TEXAS  
76-2180

1977 08 01 9 4 0  
GEORGE F. WATFORD

1125

219 RENOIR 465-7515  
HOUSTON, TEXAS 77079

August 1 19 77  $\frac{35-120}{1130}$

PAY TO THE  
ORDER OF

Friends of Bob Krueger

\$ 1,000.00

One Thousand Dollars and No/100-----

DOLLARS



MAIN BANK



MEMO Joan Watford Contribution

*George F. Watford*

⑆ 1130 ⑈ 01201 ⑈ ⑈ 924 ⑈ 381 ⑈ ⑈ ⑈ 0000100000 ⑈

011 354

HOUSTON

004 05-9

83-195 83-2159  
PAYANY BANK, BANKER  
OR TRUST CO., P.E.O.  
113057  
HOUSTON, TEXAS  
00-0100



GEORGE F. WATFORD

109

500 THE MAIN BLDG. 225-5413

HOUSTON, TEXAS 77002

August 26

19 77

35-122  
1130

PAY TO THE  
ORDER OF

Krueger of Texas

\$ 1,000.00

One Thousand Dollars and No/100

DOLLARS



**Southern  
National  
Bank**

Main at McKinney  
P.O. Box 2629  
Houston, Texas  
77001

Jenny Lynn Watford contribution

*George F. Watford*

⑆ 1130 ⑆ 01221 ⑆ ⑆ 726 851 ⑆

⑆ 0000 ⑆ 000000 ⑆

PAID BY BANK  
CITY NATIONAL BANK  
AUSTIN, TEXAS

09-2150  
09-2150  
PAY ANY BANK BANKER  
CITY NATIONAL BANK  
AUSTIN, TEXAS  
AUG 30 1977  
CITY NATIONAL BANK  
AUSTIN, TEXAS  
09-2150

PAID BY BANK  
CITY NATIONAL BANK  
AUSTIN, TEXAS



100 2/18

LAW OFFICES OF  
**DOW H. HEARD**  
1300 FIRST CITY NATIONAL BANK BUILDING  
**HOUSTON, TEXAS 77002**  
TELEPHONE 713-651-1141

February 15, 1978

To: Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

Re: Federal Election Commission  
Inquiry MUR 488 (77)

Gentlemen:

In response to your letter directed to George F. and Joan Watford dated February 2, 1978, (received February 6, 1978) regarding a possible violation of 2 U. S. C. Sec. 441(f), we advise you that the Watfords are represented by counsel, namely Dow H. Heard, Jr., Law Offices of Dow H. Heard, Attorneys, 1300 First City National Bank Building, Houston, Texas, 77002, and Marion Sanford, Jr., Vinson & Elkins, Attorneys, 2100 First City National Bank Building, Houston, Texas 77002.

Attached is a notarized letter from George F. Watford which responds fully to the three questions you ask. We would only supplement that information by advising you that both George F. and Joan Watford are over 18, married and parents, and that no contribution has been refunded by the Krueger Campaign. Enclosed are cancelled checks, front and back, representing the contributions by the five members of the Watford family.

We have reviewed those regulations published by you in 11CFR which appear relevant, namely sections 110.1(i), 110.4(b), and 110.6, and conclude that the only regulation the observance of which has met with any seeming delay is that portion of Section 110.6 which requires the "intermediary or conduit", in this case George F. Watford, to report the original source and intended recipient of each contribution to, in this case, the Secretary of the Senate (Section 105.2). We point out that this latter regulation imposes no time limit for its observance by those in Mr. Watford's situation. It has now been observed. See the attached letter to the Secretary of the Senate. This report was not made at the time of the contributions due to the Watfords' unfamiliarity with your regulations. Messrs. Heard and Sanford have been

To: Federal Election Commission  
February 15, 1978  
Page 2

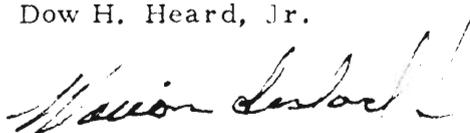
called into this matter only fairly recently. However, Dow Heard, from time to time, has been the lawyer for the five members of the Watford family.

The foregoing appears to dispose of the matter but if you have any further questions, please do not hesitate to call either of us, Dow Heard at 713/651-1141 or Marion Sanford, Jr. at 713/651-2510.

Very truly yours,



Dow H. Heard, Jr.



Marion Sanford, Jr.

DHH/mm

George F. Watford  
2200 Houston Natural Gas Building  
Houston, Texas 77002

August 26, 1977

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

Dear Bob:

Attached is the card that I have filled out as a member of the  
Committee of 200.

Mrs. Watford and I each mailed you a check for \$1,000.00 recently.  
Attached are 3 additional \$1,000.00 checks:

1. One is for Randy W. Tonking (Mrs. Watford's son and my  
step son and dependent) who is beginning his senior year  
at A&M University.
2. Another is for Jenny Lynn Watford (my daughter and Mrs.  
Watford's step daughter) who is beginning her junior  
year at the University of Houston.
3. The third is for Joseph F. Watford (our son) who is  
beginning the 8th grade here in Houston.

Good luck, & God bless



George F. Watford

GFW/rw

Enclosures

**SPUNK:**  
 Ray Kroc had it.  
 And that's why  
 You're eating at  
 McDonald's  
 — Page 1H



**MERRY CHRISTMAS**

**SPECIAL:**  
 It's uppers and comers time.  
 The Express-News picks its  
 politico of the year. —Page 16A

**SPECTACULAR:**  
 Hit girls of 1978. What  
 can you say? woo-woo!!  
 — in the **STAR**

**SPARTAN:**

Oakland .....	37
Baltimore .....	31
Denver .....	34
Pittsburgh .....	21

Details, Section 5

Final  
 Home  
 35c

THE SUNDAY  
**EXPRESS NEWS**

**FORECAST**  
 Partly cloudy,  
 colder. Low, low 30s.  
 High, upper 50s.  
 SATURDAY, DECEMBER 24, 1977

DEMBER 25, 1977

# Krueger getting dubious donations

By JACK ANDERSON

Rep. Bob Krueger has been on the receiving end of some questionable piggy-bank contributions from the offspring of oil-rich families.

The money has been deposited quietly in a political war chest, which he expects to use to unseat Sen. Don Tower.

Krueger has also made a brush appeal to oil and gas corporations for funds to underwrite his primary campaign.

He may have run afoul of federal election laws in both instances, and his campaign manager Garry Mauro is trying to make quick amends.

Federal Election Commission records indicate that Krueger's cam-

## Kiddie contributors

aign coffers have been tattered with at least \$10,000 in dubious, possibly illegal, contributions from the children of oil executives.

The law allows minors to contribute up to \$1,000, but only if the funds are controlled exclusively by the youngsters and not derived as a gift.

For instance, 13-year-old Joseph Watford tossed \$1,000 into the Krueger pot.

His oil executive father, George Watford of a Dallas firm called Prairie Producing, claimed his son raised the money by working and saving over the years and from gifts bestowed by grandparents.

Two other Watford children were good for an additional \$2,000.

And a college student asked about her \$1,000 Krueger gift confessed total ignorance of her largesse.

"Maybe Daddy did it for me," she speculated in confusion.

"Daddy" is Frank Crossen of Syntex Construction Co., another Dallas firm.

Crossen was unavailable for comment.

Campaign manager Mauro acknowledged he hadn't thought about the election law restrictions but hastily decided to refund any contributions by minors that might be illegal.

Krueger is also backtracking on a telegraphic appeal to oil and gas corporations for contributions that are prohibited.

He sent 7,000 Western Union Mailgrams to members of the Texas Independent Producers and Royalties Owners Association, reminding them he had been "fighting for deregulation" of gas prices.

### To corporations

Some of the wires went to corporations, which are forbidden by law from contributing.

"This is one of those classic screw-ups in a campaign that you have nightmares about," explained Mauro.

A Western Union spokesman disagreed vehemently.

"We followed the instructions given us," he said.

Krueger was reported vacationing in Great Britain and was unavailable for comment.

GEORGE F. WATFORD  
2200 Houston Natural Gas Building  
Houston, Texas 77002

February 15, 1978

Secretary of Senate  
Capitol Station  
Washington, D.C.

Re: Campaign Contributions

Dear Sir:

Pursuant to Federal Election Commission regulations published at 11 CFR §110.6, the following report is made to you.

Name of intermediary or conduit:

George F. Watford  
219 Renoir  
Houston, Texas 77079

Name of Candidate or Committee to whom  
contribution was made:

Friends of Bob Krueger Committee  
614 West 6th  
Austin, Texas 78701

Office which Mr. Krueger seeks:

U.S. Senator from Texas

Attached are the schedules for receipts and expenditures called for by the regulation. If you need any further information,

Secretary of Senate  
February 15, 1978  
Page 2

please contact me or one of my attorneys, Mr. Dow Heard, 1300  
First City National Bank Building, Houston, Texas 77002 (713/  
651-1141 or Mr. Marion Sanford, Jr., 2100 First City National Bank  
Building, Houston, Texas 77002 (713/651-2510).

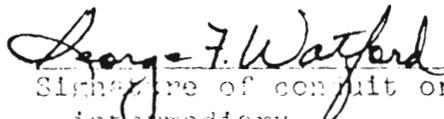
Very truly yours,

  
George F. Watford

Attachments

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

George F. Watford  
(typed name of conduit or  
intermediary)

  
Signature of conduit or  
intermediary

2-15-78  
Date

**Schedule A**

July 1976  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

**Itemized Receipts,  
Contributions, Ticket Purchases, Loans,  
Rebates and Transfers for line  
Numbers 15, 16, 17 and/or 18 of FEC Form 3**  
(see instructions on back)

Page \_\_\_\_\_ of \_\_\_\_\_ for \_\_\_\_\_

**LINE NUMBER** \_\_\_\_\_

Use separate lines for each numbered line.  
XXXXXX  
XXXXXX  
XXXXXX

Name of ~~Committee~~ ~~Committee~~ ~~in full~~ Intermediary or Conduit

George F. Watford

Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period		
Jenny L. Watford, 3620 Woodchase, Apt. 105, Houston, Texas 77402	8/26/77	\$1,000		
<table border="1"> <tr> <td>Principal place of business University of Houston 4800 Calhoun Houston, TX</td> <td>Occupation Student <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$1,000</td> </tr> </table>	Principal place of business University of Houston 4800 Calhoun Houston, TX	Occupation Student <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$1,000		
Principal place of business University of Houston 4800 Calhoun Houston, TX	Occupation Student <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$1,000			
Randy W. Tonking, 1601 Holleman, Apt. 1-P, College Station, Texas 77840	8/26/77	\$1,000		
<table border="1"> <tr> <td>Principal place of business Texas A &amp; M University College Station, TX</td> <td>Occupation Student <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$1,000</td> </tr> </table>	Principal place of business Texas A & M University College Station, TX	Occupation Student <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$1,000		
Principal place of business Texas A & M University College Station, TX	Occupation Student <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$1,000			
Joseph F. Watford, 219 Renoir, Houston, Texas 77079	8/26/77	\$1,000		
<table border="1"> <tr> <td>Principal place of business Spring Forrest Jr. High 14240 Memorial, Houston, TX</td> <td>Occupation Student <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$1,000</td> </tr> </table>	Principal place of business Spring Forrest Jr. High 14240 Memorial, Houston, TX	Occupation Student <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$1,000		
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Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$			
<table border="1"> <tr> <td>Principal place of business</td> <td>Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$</td> </tr> </table>	Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$		
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$			
<table border="1"> <tr> <td>Principal place of business</td> <td>Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$</td> </tr> </table>	Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$		
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$			
<b>Subtotal of receipts this period (XXXXXX)</b> ..... ▶		\$		
<b>Total this period (last page this line number only)</b> ..... ▶		\$ 3,000.00		

# Instructions for Preparing Schedule A, Form 3

## For Additional Information See Parts 100 Through 110 of Federal Election Commission Regulations

Use this schedule to itemize Receipts for lines 15, 16, 17 and/or 18 of the "Detailed Summary Schedule of Receipts and Expenditures," FEC Form 3, Page 2. Do not itemize transactions pertaining to more than one numbered line of the Detailed Summary Schedule on any one page. This schedule may be duplicated or the information may be itemized on computer printouts or any 8½" x 11" paper providing only the information required and in the same format.

This schedule is to be used to Itemize Only the Receipts as Specified Below for each Part. The "Total This Period" amount for each itemized line is to be carried forward to the corresponding line of the detailed summary schedule. When applicable, the total of all other receipts Not Required to be Itemized Under a Given Part is to be entered as a lump sum on the "Unitemized" subline of the appropriate part of the detailed summary schedule.

**Line 15(a). Itemized Contributions and Other Income.** — This is an itemized account of contribution and other income, giving the date, full name, mailing address, occupation, and principal place of business of each person who has made one or more contributions to or for the reporting committee or candidate during the reporting period in an amount in excess of \$100, or whose total contributions to date (aggregate) during the calendar year are in excess of \$100. Other income in the form of interest dividends, etc. in excess of \$100 during a reporting period will also be itemized. The actual amount of contribution(s) and other income received during this reporting period will be entered in the "Amount of Each Receipt This Period" column. **Candidates or committees which choose to itemize contributions not in excess of \$100 shall itemize these by attaching a separate schedule(s). Contributions aggregating \$100 or less shall not be reported on the same schedule with the required itemized contributions in excess of \$100.**

**Line 16(a). Itemized Loans and Loan Repayments Received.** — This is an itemized account giving the date, full name,

mailing address, occupation, and principal place of business of each lender and endorser of a loan(s), or a person making a loan repayment this period in excess of \$100 or whose total loans or loan repayments to date (aggregate) are in excess of \$100. The actual amount of each loan(s) or loan repayment(s) received during this period will be entered in the "Amount of Each Receipt This Period" column. Loans and loan repayments received from affiliated committees are considered "transfers" included in line 18.

**Line 17(a). Itemized Refunds and Rebates.** — This is an account of receipts in the form of refunds, returns and rebates. Give the date, full name, mailing address, occupation, and principal place of business of each person from whom one or more such receipts have been received in this reporting period in an amount in excess of \$100 and explanation of the receipt. The actual amount of each receipt(s) during this reporting period will be entered in the "Amount of Each Receipt This Period" column. Do not use the "Aggregate Year to Date" box. (Sec. 434(b)(7).)

**Line 18. Itemized Transfers in from Political Committees.** — This is an itemized account giving the date, full name and mailing address of each political committee or candidate from whom any transfer of funds has been received within this reporting period in any amount. A committee or candidate which receives a contribution(s) from another candidate's personal funds should report this receipt as a contribution on line 15 rather than a transfer on line 18. The actual amount of each transfer(s) during this reporting period will be entered in the "Amount of Each Receipt This Period" column. An "Aggregate Year to Date" amount must be entered for transfers from nonaffiliated committees.

Use separate pages for affiliated and nonaffiliated committees and report subtotals on summary schedule. (Sec. 434(b)(4).)

### LIMITATIONS ON CONTRIBUTIONS FROM POLITICAL COMMITTEES AND OTHER PERSONS AND EXEMPTION OF CERTAIN LEGAL AND ACCOUNTING FEES

Contributions received by candidates and their authorized committees are presumed to have been made for the next forthcoming election unless otherwise specified. Contributions to a candidate's campaign are limited to \$5,000 from qualified multi-candidate committees, and \$1,000 from all other persons for "any election" (2 U.S.C. 441(a)). In the event that a contribution is received before a primary election which exceeds the contribution limit applicable to the election, the excess over the limitation must be designated by the contributor as a contribution for a subsequent election (runoff or general election). This designation must be disclosed on each applicable itemized receipt, and all funds received for a subsequent election campaign must be reserved for use in the later election and not expended in the current election campaign.

Designations of contributions for subsequent elections and

the use of funds so designated are subject to audit by the Commission.

Legal and accounting services rendered to a political committee or candidate solely to ensure compliance with the Act or Chapter 95 and 96 of the Internal Revenue Code, and paid for by the regular employer of the individual rendering such service, do not constitute contributions subject to limitations. All such contributed services, however, must be reported as contributions in-kind and itemized on Schedules A and B if in excess of \$100. All such contributions should be labeled "Legal and accounting fees exempt from contribution limits." Legal and accounting services rendered to political committees or candidates which are not exempt, are contributions in-kind subject to the contribution limits.

**Schedule B**

July 1976  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

**Itemized Expenditures**

**Campaign Fundraising Loans and Transfers  
for Lines 20, 22, 23, and/or 24 of FEC Form 3**

Page \_\_\_\_\_ of \_\_\_\_\_ for \_\_\_\_\_

~~LINE NUMBER~~ \_\_\_\_\_

~~Use separate schedules to report  
multiple transfers~~

(see instructions on back)

Name of ~~Committee or Candidate~~ Intermediary or conduit  
George F. Watford

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
FRIENDS OF BOB KRUEGER COMMITTEE 614 West 6th Austin, Texas 78701	Campaign Contr. from Jenny L. Watford	8/26/77	\$1,000
FRIENDS OF BOB KRUEGER COMMITTEE 614 West 6th Austin, Texas 78701	Campaign Contr. from Randy W. Tonking	8/26/77	1,000
FRIENDS OF BOB KRUEGER COMMITTEE 614 West 6th Austin, Texas 78701	Campaign Contr. from Joseph F. Watford	8/26/77	1,000
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period

Subtotal of expenditures this page (optional) . . . . .	▶	\$
Total this period (last page this line number only) . . . . .	▶	\$ 3,000.00

# Instructions for Preparing Schedule B, Form 3

## For Additional Information See Parts 100 Through 110 of Federal Election Commission Regulations

Use this schedule to itemize Expenditures for Line 20, 22, 23, and/or 24 of the "Detailed Summary Schedule of Receipts and Expenditures" FEC Form 3. Do not itemize transactions pertaining to more than one numbered line of the Detailed Summary Schedule on any one page. This schedule may be duplicated or the information may be itemized on computer printouts or any 8½" x 11" paper providing only the information required and in the same format.

This schedule is to be used to Itemize Only the Expenditures as Specified Below for each Line. The "Total This Period" amount for each itemized line is to be carried forward to the corresponding line of the Detailed Summary Schedule. When applicable, the total of all other expenditures Not Required to be Itemized Under a Given Line is to be entered as a lump sum on the "Unitemized" sub line of the appropriate line of the Summary Report.

**Line 20(a). Itemized Operating Expenditures.** — This is an account of all expenditures not included in Lines 21, 22, 23, and 24 made during the reporting period and which aggregate in excess of \$100 to a single payee during the calendar year, itemized as to amount and date of expenditure and other information as indicated in column headings. This schedule includes expenditures for personal services, travel, rent, telephone, fundraising, legal and accounting expenditures (except for Presidential campaigns receiving Federal funds - see Line 23) and other normal operating expenses. (Section 434(b)(9) and (10).) If contributed legal and accounting services are exempt from the contribution limitations and are so noted on Schedule A, the corresponding expenditure must also be reported on Schedule B with same notation. If contributed legal and accounting services are not exempt from contribution limitations, the expenditures must be reported on both Schedule A and B as contributions in-kind.

**Line 22(a). Itemized Loans, Loan Repayments and Contribution Refunds.** — This is an account of loans, loan repayments, and contribution refunds made by the committee or a candidate during the reporting period and which aggregate in excess of \$100 to a single payee during the calendar year. Each entry shall contain the date, full name and mailing address of the

person or committee to whom the loan repayment, or contribution refund was made. List the amount of the loan, loan repayment, or contribution refund in the "Amount of Each Expenditure This Period" column. Loans or loan-repayments made to affiliated committees are considered "Transfers" included in line 24. (Sec. 434(b)(5).)

**Line 23(a). For Use Only by Presidential Campaigns Receiving Federal Funds: Exempt Fundraising, Legal and Accounting Expenditures.** — This is an account of fundraising expenditures and exempt legal and accounting expenditures made during the reporting period which aggregate in excess of \$100 to a single payee within a calendar year. Used only in Presidential campaigns receiving Federal funds. (Note: All other candidates and committees report such expenditures on Line 20.)

All fundraising costs of Presidential candidates and their authorized committees in campaigns in which Federal funds are, or will be, received are reported on Line 23 of the Detailed Summary Schedule except that any such expenditures in excess of 20% of a candidate's total expenditure limitation will be reported under Line 20 "Operating Expenditures."

Exempt legal and accounting services contributed to or paid for by Presidential candidates or their authorized committees shall be reported on Line 23. If such expenditures are in excess of \$100, they must be itemized on Schedule B and labeled "legal and accounting fees exempt from limitations." (Note: Non-exempt expenditures for legal and accounting fees shall be reported as Operating Expenditures on Line 20.) (See below for further explanation.)

**Line 24. Itemized Transfers out to Political Committee and Candidate.** — This is an itemized account giving the date, full name and mailing address of each political committee or candidate to whom any transfer of funds was made within this reporting period in any amount. List the amount of the transfer in the "Amount of Each Expenditure This Period" column.

Use separate pages for affiliated and nonaffiliated committees and report subtotals on the Detailed Summary Schedule. (Section 434(b)(4).)

### LIMITATIONS ON CONTRIBUTIONS TO CANDIDATES AND THEIR AUTHORIZED COMMITTEES AND EXEMPTIONS FOR CERTAIN LEGAL AND ACCOUNTING FEES

Contributions (transfers) to candidates and their authorized committees are presumed to have been made for the next forthcoming election unless otherwise specified. Contributions to a candidate's campaign are limited to \$5,000 from qualified multi-candidate committees, and \$1,000 from all other persons for "any election" (2 U.S.C. 441(g)). In the event that a contribution is made before a primary election which exceeds the contribution limit applicable to that election, the excess over the limitation must be designated by the contributor or contributing committee as a contribution for a subsequent election (runoff or general election). This designation must be disclosed on each applicable itemized transfer, and all funds contributed for a subsequent election campaign must be reserved for use in the later election and not expended in the current election campaign.

Designations of contributions for subsequent elections and the use of funds so designated are subject to audit by the Commission.

Legal and accounting services rendered to a political committee or candidate solely to ensure compliance with the Act or Chapter 95 and 96 of the Internal Revenue Code and paid for by the regular employer of the individual rendering such services do not constitute contributions and expenditures subject to limitations. All such contributed services, however, must be reported as contributions and expenditures in-kind and itemized on Schedules A and B if in excess of \$100. All such contributions should be labeled "Legal and Accounting Fees Exempt From Limitations." Legal and accounting services rendered to a political committee or candidate which are not exempt, are contributions in-kind, subject to the contribution limits.

15 FEB 17 11 15

FEDERAL

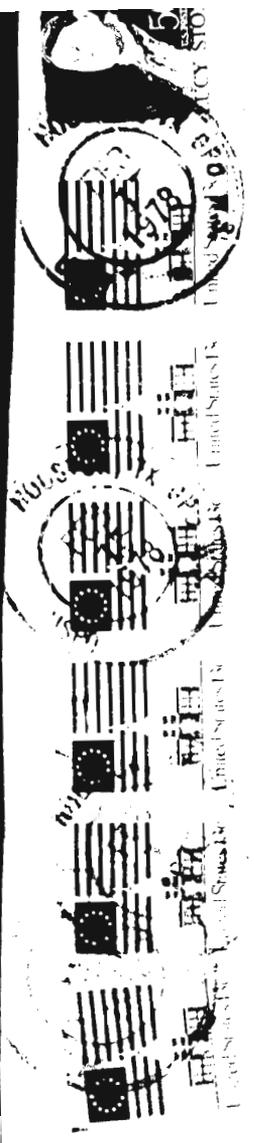
REGISTERE

36485

DOW H. HEARD

HOUSTON, TEXAS 77002

To Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463



2002689

R. H. Pickens  
800 Preston Bank Building  
Dallas, Texas 75225

Area Code 214  
369-7471

February 9 1978 12:37

Mr. William C. Oldaker  
Federal Election Commission  
1325 K Street N. W.  
Washington, D. C. 20463

RE: MUR 488 (77)

Dear Mr. Oldaker:

We received your certified letter dated February 2, 1978, on February 8, 1978.

In answer to your letter we offer the following information:

- 1) The following contributions were made to the "Friends of Bob Krueger" Committee on June 27, 1977:
  - (a) R. H. Pickens - \$1,000.00
  - (b) Jan Rymer Pickens (wife), age 35 - \$1,000.00
  - (c) Anne Alison Pickens Trust - R. H. Pickens, Trustee (our daughter, age 11) - \$1,000.00
  - (d) Paige Gardner Pickens Trust - R. H. Pickens, Trustee (our daughter, age 13) - \$1,000.00
  - (e) Ruth Gardner Pickens (mother of R. H. Pickens, age 68) \$900.00 (her contribution was made September 8, 1977)
  
- 2) To the best of my remembrance the only solicitation for Bob Krueger came from Mr. Ted Enloe, P. O. Box 5644, Dallas, Texas 75222.
  
- 3) The contributions of \$1,000.00 each from the Trusts noted in items 1 (c) and 1 (d) were refunded. Subsequent to the date of the contributions, it was brought to my attention by my accountant that these contributions might not be allowable under FEC regulations since I am the Trustee of both trusts. I then contacted Mr. Gary Mauro in Mr. Krueger's Austin, Texas, office and requested the contributions from the Trusts be refunded. The refunds were received on November 28, 1977, and deposited into the Trust accounts on November 30, 1977.

In compliance with your request, enclosed are copies of the above mentioned checks that deal directly with my immediate family.

If I may be of further assistance or provide additional information, please advise.

Sincerely,

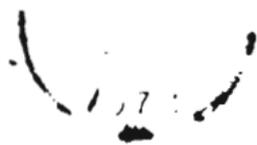
*R. H. Pickens*  
R. H. Pickens

*Jan Rymer Pickens*  
Jan Rymer Pickens

cc: Ms. Sue Donaldson

*R. H. Pickens*  
*800 Preston Bank Building*  
*Dallas, Texas 75225*

2:37



**CERTIFIED**  
No. 678416  
**MAIL**

Ms. Sue Donaldson  
Federal Election Commission  
1325 K Street N. W.  
Washington, D. C. 20463

ADD 2694

FEDERAL ELECTION COMMISSION

DAVID A. WITTS

ATTORNEY & COUNSELOR

5353 FIRST INTERNATIONAL BUILDING

DALLAS, TEXAS 75270  
78 FEB 14 PM 1:13  
(214) 741-7561

February 10, 1978

Mr. William C. Oldaker  
General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

Re: MUR 488(77)

Mr. Oldaker,

After reading your indictment by typewriter,

"specifically it appears that you may have violated  
2 U.S.C. §441f by making contributions in the name  
of your child,"

I can only presume that MUR stands for "Machinations Unrestricted."

I believe all the information you requested is a matter of public  
information, except our ages, which are:

- (a) myself - age 57
- (b) my daughter - age 21
- (c) my wife - (you'll have to extract that yourself  
since I'm under a non-disclosure order)

Your request for relevant factual material is hereby submitted:

1. My daughter commenced working when she was in the 8th  
Grade and has worked regularly ever since.

2. She has at least two checking accounts, several savings  
accounts, personal investments, personal earnings, and last year  
paid Federal income taxes of approximately \$15,000.

3. She has been brought up in the oil business, having  
been exposed to it all her life. She knows that government  
controls don't produce oil, people produce oil.

4. She was aware of Bob Krueger's fight to decontrol gas  
and she supports him, since it made no sense to her to pay the  
OPECs \$15 a barrel and Americans only \$5.00.

Mr. William C. Oldaker  
February 10, 1978

Page 2

5. She is fundamentally opposed to senseless government restrictions. Having traveled most of the world, she has seen for herself the differences between government controls and personal freedom. Standing on the border of Red China and looking at the barbed wire barricades, she asked me "if Communism is so great, why are the people trying to escape?"

6. Although still attending college, she is currently raising garden vegetables for food and sale. Only this weekend she told me she had contracted with a restaurant to supply their pickles and onions. (In this endeavor, she also knows that government controls don't produce food - only people produce food.)

7. As you have surmised, I am terribly proud of my daughter. I have encouraged her to work, to think and to produce.

I would hope that your letter, couched in its ominous bureaucratise and grounded on nothing more than "it appears that you may have violated. . ." would not encourage her to turn her back on our system, nor discourage her from being a productive American.

I think you'll find a lot of college students today are getting sick and tired of government playing Russian roulette with their lives and their future.

Very truly yours,

A handwritten signature in cursive script, appearing to read "James T. White".

DAW/ds

cc- Congressman Robert Krueger

DAVID A. WITTS

ATTORNEY & COUNSELOR

5355 FORT INTERNATIONAL BUILDING

DALLAS, TEXAS 75270

REC-11

NOV 11 1970

11:12

Mr. William C. Oldaker  
General Counsel  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

SCB 2697

**Donald E. McMahon**

February 8, 1978

Mr. William C. Oldaker  
General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR 488(77)

Dear Mr. Oldaker:

This acknowledges receipt of your certified mail letter of February 2, 1978 with respect to my contributions to the Friends of Bob Krueger Committee and requesting certain information in connection therewith.

Mr. Bob Krueger has been a friend of mine of long standing. Although I am a Republican, I feel that Bob has a lot to offer and would make a great U.S. Senator and for this reason my family has decided to support him. In support of his candidacy I have made a personal contribution of \$1,000.00. Likewise, my wife, Collette Marie McMahon, has made a donation of \$500.00. My son, Mark McMahon, who is age 26 and a Junior Executive with U.S. Steel Company has made a contribution of \$1,000.00. For your information, copies of the checks from each of us are enclosed herewith.

No one solicited us for contributions as they were made of our own free will and accord. None of the contributions made to the Friends of Bob Krueger Committee have been returned or refunded.

We do not feel that we have violated any provisions of the Federal Election Campaign Act of 1971, as amended, and if this is the case we would certainly like to be advised of any specific violations. If there is any

Mr. William C. Oldaker  
February 8, 1978  
Page 2

additional information that you may require, we will  
make a special effort to furnish it.

Very truly yours,

  
Don E. McMahon

DEM/rjm

Enclosures

SEP 18 1977

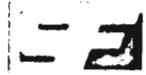
MARK McMAHON  
5749 INDIAN CIRCLE  
HOUSTON, TEXAS 77057

172

09/15 - 77

PAY TO THE ORDER OF

Friends of Bob Krueger 1,000.  
One thousand and no/100 →

 San Felipe National Bank  
BOX 42330  
HOUSTON, TEXAS 77042

campaign  
donation

⑆1130⑉0478⑆

Mark D. McMahon

30 1592 0⑈

SEP 18 1977

DON E. McMAHON  
POST OFFICE BOX 22738  
HOUSTON, TEXAS 77027

No 548

AUGUST 26, 1977

⑆1000⑉00⑆

DOLLARS \$ 1,000.00

PAY TO THE ORDER OF

TO THE ORDER OF

FRIENDS OF BOB KRUEGER  
P. O. BOX 911  
NEW BRAUNFELS, TEXAS 78130

DON E. McMAHON



 First City NATIONAL BANK OF HOUSTON  
P.O. BOX 4557, HOUSTON, TEXAS 77001

⑆1130⑉000⑆

50 5149 5⑈

MRS. D. E. McMAHON  
5749 INDIAN CIRCLE 789-8100  
HOUSTON, TEXAS 77057

3837

Nov 9, 1977 <sup>35-104</sup>/<sub>1130</sub>

PAID TO ORDER Friends of Bob Krausgen \$500.00  
Five Hundred and no/100 DOLLARS

FIRST CITY BANK  
OF HIGHLAND VILLAGE  
P.O. BOX 2125 HOUSTON, TEXAS 77027

Mrs. D. E. McMahon

⑆ 1130 0104 ⑆ 20 4533 8 ⑆ ⑆0000050000⑆

**Don E. McMahon**

P. O. BOX 22738  
HOUSTON, TEXAS 77027



70 FEB 1 1:01

Mr. William C. Oldaker  
General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

4002673

*R. H. Pickens*  
800 Preston Bank Building  
Dallas, Texas 75225

February 9, 1978

FEB 10 11 16  
Area Code 214  
369-7471

Mr. William C. Oldaker  
Federal Election Commission  
1325 K Street N. W.  
Washington, D. C. 20463

RE: MUR 488 (77)

Dear Mr. Oldaker:

We received your certified letter dated February 2, 1978, on February 8, 1978.

In answer to your letter we offer the following information:

- 1) The following contributions were made to the "Friends of Bob Krueger" Committee on June 27, 1977:
  - (a) R. H. Pickens - \$1,000.00
  - (b) Jan Rymer Pickens (wife), age 35 - \$1,000.00
  - (c) Anne Alison Pickens Trust - R. H. Pickens, Trustee (our daughter, age 11) - \$1,000.00
  - (d) Paige Gardner Pickens Trust - R. H. Pickens, Trustee (our daughter, age 13) - \$1,000.00
  - (e) Ruth Gardner Pickens (mother of R. H. Pickens, age 68) \$900.00 (her contribution was made September 8, 1977)
- 2) To the best of my remembrance the only solicitation for Bob Krueger came from Mr. Ted Enloe, P. O. Box 5644, Dallas, Texas 75222.
- 3) The contributions of \$1,000.00 each from the Trusts noted in items 1 (c) and 1 (d) were refunded. Subsequent to the date of the contributions, it was brought to my attention by my accountant that these contributions might not be allowable under FEC regulations since I am the Trustee of both trusts. I then contacted Mr. Gary Mauro in Mr. Krueger's Austin, Texas, office and requested the contributions from the Trusts be refunded. The refunds were received on November 28, 1977, and deposited into the Trust accounts on November 30, 1977.

In compliance with your request, enclosed are copies of the above mentioned checks that deal directly with my immediate family.

If I may be of further assistance or provide additional information, please advise.

Sincerely,

*R. H. Pickens*  
R. H. Pickens

*Jan Rymer Pickens*  
Jan Rymer Pickens

cc: Ms. Sue Donaldson

PAIGE GARDNER PICKENS, TRUST  
R. H. PICKENS, TRUSTEE

1977



# REPUBLIC NATIONAL BANK OF DALLAS

32-62  
1110

179

DALLAS, TEXAS

June 27,

19 77

CHEQUE NUMBER

PAY TO THE ORDER OF - - - FRIENDS OF BOB KRUEGER - - - \$ 1,000.00

One Thousand and no/100 - - - - - DOLLARS



Contribution 0 7 8 7,000.00 0 9 9 9 0 PAIGE GARDNER PICKENS, TRUST  
R. H. PICKENS, TRUSTEE

⑆1110⑆0062⑆ ⑆106⑆405⑆3⑆

⑆0000100000⑆

1 2 3 4 5 6 7 8 9 0

FOR DEPOSIT ONLY  
Friends of Bob Krueger

SENATORIAL

05  
 REPUBLIC NAT'L BANK  
 310 DALLAS, TEXAS  
 PAY ANY BANK  
 PAY ANY BANK-P.E.O.  
 GTRUSTED CO., P.E.O. 5592

0002

05-2180  
 JUL 0 1988  
 NATIONAL BANK  
 AUSTIN, TEXAS  
 05-2180

PAID  
REPUBLIC NAT'L BANK  
DALLAS, TEXAS

1110-0082

40550  
88-670

1 6 3 3



FOR DEPOSIT ONLY  
Friends of Bob Krueger

**SENATORIAL**

1110-0982  
1110-0982

JULY 77 035

CITY NATIONAL BANK  
AUSTIN, TEXAS

33-2130 33-2130

PAVANY BANK, BANKER,  
CITY NATIONAL BANK

JUL 6 1977

CITY NATIONAL BANK  
AUSTIN, TEXAS

33-2130 33-2130

1977-08  
1977-08

1977-08

1110-0982  
1110-0982

1110-0982





JUL 17 1954

28-212  
 FEDERAL RESERVE BANK  
 PAYABLE TO THE ORDER OF  
 TRUST CO. P. O.  
 NEW BRUNSWICK  
 JUL 17 1954  
 CITY NATIONAL BANK  
 ADRIAN, TEXAS  
 28-212

110-0002

FOR DEPOSIT ONLY  
Friends of Bob Knieger



SEMI-CENTRAL

PAY TO THE ORDER OF  
 New Brunswicks  
 National Bank  
 110-0002

REPUBLIC NATL BANK  
 PAID  
 JALLIS, TEXAS  
 110-0002

110-0002

JUN 29 1977  
ANNE ALISON PICKENS, TRUST  
R. H. PICKENS, TRUSTEE

**REPUBLIC NATIONAL BANK OF DALLAS**

32-62  
1110

179

DALLAS, TEXAS June 27, 1977 CHECK NUMBER

PAY TO THE ORDER OF --- FRIENDS OF BOB KRUEGER --- \$ 1,000.00

One Thousand and no/100 --- DOLLARS

Contribution 3 3 1,000.00 9 9 9 0 ANNE ALISON PICKENS, TRUST  
R. H. PICKENS, TRUSTEE

⑆ 1 1 1 0 ⑆ 0 0 6 2 ⑆ ⑆ 1 0 6 ⑆ 4 0 4 ⑆ 5 ⑆

⑆ 0 0 0 0 1 0 0 0 0 0 ⑆

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1110-0062  
REPUBLIC NATL BANK  
DALLAS, TEXAS  
PAID  
1110-0062

49502

1110-0062  
REPUBLIC NATL BANK  
DALLAS, TEXAS  
PAID  
1110-0062

33-2180  
REPUBLIC NATL BANK  
DALLAS, TEXAS  
PAY ANY BANK - P.E.C.  
OR TRUST CO. P.E.C.  
49502  
REPUBLIC NATL BANK  
DALLAS, TEXAS  
PAY ANY BANK - P.E.C.  
OR TRUST CO. P.E.C.  
33-2180

1110-0062

SENTINEL

FOR DEPOSIT ONLY  
Friends of Bob Krueger

FOR DEPOSIT ONLY  
Friends of Bob Krueger

300 000 1 5 0 0

R. H. Pickens  
800 Preston Bank Building  
Dallas, Texas 75225

55

**CERTIFIED**  
No. 678415  
**MAIL**

Mr. William C. Oldaker  
Federal Election Commission  
1325 K Street N. W.  
Washington, D. C. 20463

50

87

33

UNITED STATES  
AGENCY FOR  
INTERNATIONAL DEVELOPMENT  
IN PUBLIC EMPLOYMENT

111



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

*[Faint handwritten signature]*

MEMORANDUM TO: William C. Oldaker, General Counsel  
FROM: Douglas J. Patton *DJP*  
DATE: February 7, 1978  
RE: MUR 488

I would like at this time to recuse myself from participation in any matters or discussions concerning MUR 488. This should include the exclusion of all the files concerning this matter as well.

cc: Marjorie Emmons





FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

February 2, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Arthur Wersterfer  
Treasurer  
Friends of Bob Krueger  
Committee  
P. O. Box 911  
New Braunfels, Texas 78130

Re: MUR 488

Dear Mr. Westerfer:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, Friends of Bob Krueger, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended, ("the Act"). Specifically, as set forth on the attached page, it appears that the Friends of Bob Krueger Committee accepted contributions from certain persons made in the names of their children in violation of 2 U.S.C. §441f. We have numbered this matter MUR 488.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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. Additionally, please submit answers to the following questions:

(1) Describe the circumstances under which each contribution set forth on the attached page was solicited, including identification of each person who solicited such contributions and copies of any written materials involved in such solicitation.



(2) Describe any efforts undertaken by your committee to verify whether the contributions set forth on the attached page might in fact have been made by persons other than the named contributor.

(3) Has your committee returned or refunded any of the contributions set forth on the attached page? If so, please list each such returned contribution, state the date of return or refund and describe the circumstances surrounding its return.

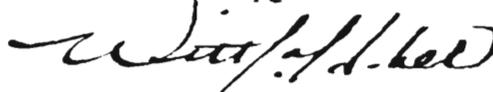
The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Ms. Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



William C. Oldaker  
General Counsel

Attachment

PS Form 3811, Apr. 1977  
RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3.  
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)
- Show to whom and date delivered
  - Show to whom, date, and address of delivery
  - RESTRICTED DELIVERY  
Show to whom and date delivered
  - RESTRICTED DELIVERY  
Show to whom, date, and address of delivery \$
- (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943108	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE \_\_\_\_\_ Address \_\_\_\_\_ Authorized agent \_\_\_\_\_

4. DATE OF DELIVERY

5. ADDRESS (Complete only if required)

6. UNABLE TO DELIVER BECAUSE:





## FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

February 2, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Frank M. Crossen  
4500 Republic National  
Bank Towers  
Dallas, TX 75201

Re: MUR 488(77)

Dear Mr. Crossen:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended, ("the Act"). Specifically, it appears that you may have violated 2 U.S.C. §441f by making contributions to the Friends of Bob Krueger Committee in the name of your child. We have numbered this matter MUR 488.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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. Additionally, please submit answers to the following questions:

(1) Did you and/or other members of your family contribute to the Friends of Bob Krueger Committee? If so, please identify and state the age of each family member who so contributed, and the amount of each such contribution.



(2) Identify each person who solicited contributions from you or your family on behalf of the Friends of Bob Krueger Committee and describe the circumstances of each such solicitation.

(3) Have any of the contributions that you or your family made to the Friends of Bob Krueger Committee been returned or refunded? If so, state the date each such contribution was returned, and describe the circumstances surrounding its return.

Additionally, we request that you provide the Commission with copies of any cancelled checks (front and back), contribution cards or statements, and any other documentation connected with such contributions to the Friends of Bob Krueger Committee.

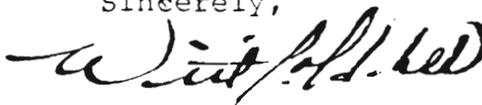
The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Ms. Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



William C. Oldaker  
General Counsel

MUR 488 Donaldson

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● **SENDER** Complete items 1 through 6. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one):

- Show to whom and date delivered
- Show to whom, date, and address of delivery
- RESTRICTED DELIVERY
- RESTRICTED DELIVERY

Show to whom and date delivered

Show to whom, date, and address of delivery

(CONSULT POSTMASTER FOR FEES)

---

2. **ARTICLE ADDRESSED TO:**

Mr. Frank M. Crasner  
 4600 Republic Nat'l Bank Bldg  
 Dallas, TX 75201

---

3. **ARTICLE DESCRIPTION:**

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943109	

(Always obtain signature of addressee or agent)

I have received the article described above:

SIGNATURE \_\_\_\_\_ Addressee \_\_\_\_\_ Authorized agent \_\_\_\_\_

---

4. **DATE OF DELIVERY**

FEB 6 1978

5. **ADDRESS** (Complete only if requested)

---

6. **UNABLE TO DELIVER BECAUSE:** \_\_\_\_\_ **CLERK'S INITIALS:** \_\_\_\_\_





FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

February 2, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

R. H. and Jan Pickens  
3926 Potomac  
Dallas, TX 75205

Re: MUR 488(77)

Dear Mr. and Mrs. Pickens:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended, ("the Act"). Specifically, it appears that you may have violated 2 U.S.C. §441f by making contributions to the Friends of Bob Krueger Committee in the names of your children. We have numbered this matter MUR 488.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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. Additionally, please submit answers to the following questions:

(1) Did you and/or other members of your family contribute to the Friends of Bob Krueger Committee? If so, please identify and state the age of each family member who so contributed, and the amount of each such contribution.



(2) Identify each person who solicited contributions from you or your family on behalf of the Friends of Bob Krueger Committee and describe the circumstances of each such solicitation.

(3) Have any of the contributions that you or your family made to the Friends of Bob Krueger Committee been returned or refunded? If so, state the date each such contribution was returned, and describe the circumstances surrounding its return.

Additionally, we request that you provide the Commission with copies of any cancelled checks (front and back), contribution cards or statements, and any other documentation connected with such contributions to the Friends of Bob Krueger Committee.

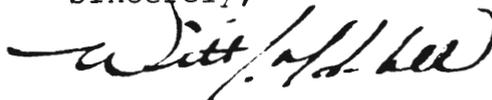
The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Ms. Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



William C. Oldaker  
General Counsel

PS Form 3811, Apr. 1977  
RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR488 Donaldson

SENDER Complete items 1 through 6  
Add your address in the "RETURN TO" space on reverse

1. The following service is requested (check one)  
 Show to whom and date delivered  
 Show to whom, date, and address of delivery  
 RESTRICTED DELIVERY  
Show to whom and date delivered  
 RESTRICTED DELIVERY  
Show to whom, date, and address of delivery \$  
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
R. H. and Jan Pickens  
3926 Potomac  
Dallas, TX 75205

3. ARTICLE DESCRIPTION:  
REGISTERED NO. CERTIFIED NO. INSURED NO.  
943107

(Always obtain signature of addressee or agent)

I have received the article described above.  
SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)



6. UNABLE TO DELIVER BECAUSE:  
CLERK'S INITIALS  
GRJK



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

February 2, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

David and Jean Witts  
5353 First International  
Building  
Dallas, TX 75270

Re: MUR 488(77)

Dear Mr. and Mrs. Witts:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended, ("the Act"). Specifically, it appears that you may have violated 2 U.S.C. §441f by making contributions to the Friends of Bob Krueger Committee in the name of your child. We have numbered this matter MUR 488.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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. Additionally, please submit answers to the following questions:

(1) Did you and/or other members of your family contribute to the Friends of Bob Krueger Committee? If so, please identify and state the age of each family member who so contributed, and the amount of each such contribution.



(2) Identify each person who solicited contributions from you or your family on behalf of the Friends of Bob Krueger Committee and describe the circumstances of each such solicitation.

(3) Have any of the contributions that you or your family made to the Friends of Bob Krueger Committee been returned or refunded? If so, state the date each such contribution was returned, and describe the circumstances surrounding its return.

Additionally, we request that you provide the Commission with copies of any cancelled checks (front and back), contribution cards or statements, and any other documentation connected with such contributions to the Friends of Bob Krueger Committee.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Ms. Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



William C. Oldaker  
General Counsel

MUR 488 Donaldson

PS Form 3811, Apr. 1977  
RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER (Complete items 1-5)  
Add your address in the RETURN TO space on reverse

1. The following service is requested (check one)  
 Show to whom and date delivered  
 Show to whom, date, and address of delivery  
 RESTRICTED DELIVERY  
 Show to whom and date delivered  
 RESTRICTED DELIVERY  
 Show to whom, date and address of delivery  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
 David and Jean Wilts  
 5353 First Int'l Bldg  
 Dallas, TX 75220

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
 94306

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE Addressed to Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

POSTMARK PLACE STA  
 FEB 7 1978



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

February 2, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

George F. and Joan Watford  
219 Renoir  
Houston, TX 77079

Re: MUR 488(77)

Dear Mr. and Mrs. Watford:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended, ("the Act"). Specifically, it appears that you may have violated 2 U.S.C. §441f by making contributions to the Friends of Bob Krueger Committee in the names of your children. We have numbered this matter MUR 488.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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. Additionally, please submit answers to the following questions:

(1) Did you and/or other members of your family contribute to the Friends of Bob Krueger Committee? If so, please identify and state the age of each family member who so contributed, and the amount of each such contribution.



(2) Identify each person who solicited contributions from you or your family on behalf of the Friends of Bob Krueger Committee and describe the circumstances of each such solicitation.

(3) Have any of the contributions that you or your family made to the Friends of Bob Krueger Committee been returned or refunded? If so, state the date each such contribution was returned, and describe the circumstances surrounding its return.

Additionally, we request that you provide the Commission with copies of any cancelled checks (front and back), contribution cards or statements, and any other documentation connected with such contributions to the Friends of Bob Krueger Committee.

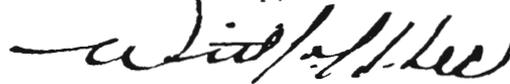
The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Ms. Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



William C. Oldaker  
General Counsel





FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

February 2, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Dr. Ralph G. (Jr.) and Melba D. Greenlee  
4441 Belfort Place  
Dallas, TX 75205

Re: MUR 488(77)

Dear Mr. and Mrs. Greenlee:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended, ("the Act"). Specifically, it appears that you may have violated 2 U.S.C. §441f by making contributions to the Friends of Bob Krueger Committee in the names of your children. We have numbered this matter MUR 488.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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. Additionally, please submit answers to the following questions:

(1) Did you and/or other members of your family contribute to the Friends of Bob Krueger Committee? If so, please identify and state the age of each family member who so contributed, and the amount of each such contribution.



(2) Identify each person who solicited contributions from you or your family on behalf of the Friends of Bob Krueger Committee and describe the circumstances of each such solicitation.

(3) Have any of the contributions that you or your family made to the Friends of Bob Krueger Committee been returned or refunded? If so, state the date each such contribution was returned, and describe the circumstances surrounding its return.

Additionally, we request that you provide the Commission with copies of any cancelled checks (front and back), contribution cards or statements, and any other documentation connected with such contributions to the Friends of Bob Krueger Committee.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

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If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



William C. Oldaker  
General Counsel

MUR 488 Donaldson

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

<input checked="" type="checkbox"/> <b>SENDER</b> Complete items 1 through 6. Add your address in the "RETURN TO" space on reverse.		
1. The following service is requested (check one)		
<input checked="" type="checkbox"/> Show to whom and date delivered <span style="float: right;">c</span>		
<input type="checkbox"/> Show to whom, date, and address of delivery <span style="float: right;">c</span>		
<input type="checkbox"/> <b>RESTRICTED DELIVERY</b>		
<input type="checkbox"/> Show to whom and date delivered <span style="float: right;">c</span>		
<input type="checkbox"/> <b>RESTRICTED DELIVERY</b>		
<input type="checkbox"/> Show to whom, date, and address of delivery <span style="float: right;">c</span>		
(CONSULT POSTMASTER FOR FEES)		
2. <b>ARTICLE ADDRESSED TO:</b> Dr. Ralph G. (Jr.) *Melba Granta 1441 Belfort Place Dallas, TX 75205		
3. <b>ARTICLE DESCRIPTION:</b>		
REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943103	
(Always obtain signature of addressee or agent)		
I have received the article described above.		
SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent		
<i>Melba Granta</i>		
4. <b>DATE OF DELIVERY</b>		<b>POSTMARK</b>
APR 1978 FED		
5. <b>ADDRESS</b> (Complete only if requested)		
6. <b>UNABLE TO DELIVER BECAUSE:</b>		<b>CLERK'S INITIALS</b>

0171000000



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

February 2, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Don E. McMahon  
5749 Indian Circle  
Houston, TX 77057

Re: MUR 488(77)

Dear Mr. McMahon:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended, ("the Act"). Specifically, it appears that you may have violated 2 U.S.C. §441f by making contributions to the Friends of Bob Krueger Committee in the name of your child. We have numbered this matter MUR 488.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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. Additionally, please submit answers to the following questions:

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(2) Identify each person who solicited contributions from you or your family on behalf of the Friends of Bob Krueger Committee and describe the circumstances of each such solicitation.

(3) Have any of the contributions that you or your family made to the Friends of Bob Krueger Committee been returned or refunded? If so, state the date each such contribution was returned, and describe the circumstances surrounding its return.

Additionally, we request that you provide the Commission with copies of any cancelled checks (front and back), contribution cards or statements, and any other documentation connected with such contributions to the Friends of Bob Krueger Committee.

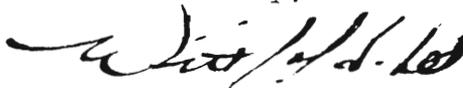
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If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



William C. Oldaker  
General Counsel

MR 488 Dora Idson

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).  
 Show to whom and date delivered ..... c  
 Show to whom, date, and address of delivery ..... c  
 RESTRICTED DELIVERY  
 Show to whom and date delivered ..... c  
 RESTRICTED DELIVERY  
 Show to whom, date, and address of delivery \$ .....  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
 Mr. Alex E. McMahon  
 5749 Ardian Circle  
 Houston, TX 77057

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
 943102

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE Addressee Authorized agent  
 [Signature]

DATE OF DELIVERY  
 2/16/78

5. ADDRESS (Complete only if requested)  
 HOUSTON TX 77057

6. UNABLE TO DELIVER BECAUSE:  
 CLERK'S INITIALS

5 1 2 1 1 1 0 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Friends of Bob Krueger Committee; ) MUR 488 (78)  
Frank M. Crossen; R.H. and )  
Jan Pickens; David and Jean Witts; )  
George F. and Joan Watford; )  
Dr. Ralph G. (Jr.) and )  
Melba Greenlee; Don E. McMahon )

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on January 27, 1978, the Commission adopted the recommendations of the General Counsel as follows:

1. Find reason to believe that the Friends of Bob Krueger Committee violated 2 U.S.C. §441f by knowingly receiving contributions made in the names of minor children.
2. Find reason to believe that Frank M. Crossen, R. H. and Jan Pickens, David and Jean Witts, George F. and Joan Watford, Dr. Ralph G. (Jr.) and Melba Greenlee, and Don E. McMahon violated 2 U.S.C. §441f by making contributions to the Friends of Bob Krueger Committee in the names of their children.
3. Send the draft letters attached to the General Counsel's report dated January 26, 1978.



Marjorie W. Emmons  
Secretary to the Commission



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

January 27, 1978

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS *mwe*  
SUBJECT: MUR 488 (78) - First General Counsel's Report

The above-mentioned document was circulated to the Commissioners on January 26, 1978 at 10:00 a.m.

No objections were received to the staff recommendation that Reason to Believe be found in this matter.

Let the record show that Commissioner Staebler reviewed MUR 488 (78) but that his Executive Assistant, Walter K. Moore, recused himself in this matter.

ATTACHMENT:  
Certification



January 25, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 488

Please have the attached 7 Day Report distributed  
to the Commission on a 24 hour no-objection basis.

Thank you.

1978040731719

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION \_\_\_\_\_

MUR NO. 488  
DATE COMPLAINT RECEIVED  
BY OGC \_\_\_\_\_  
STAFF  
MEMBER S, Donaldson

COMPLAINANT'S NAME: Referred from Staff Director's Office  
Friends of Bob Krueger Committee;  
RESPONDENT'S NAME: Frank M. Crossen; R.H. and Jan Pickens;  
David and Jean Witts; George F. and  
Joan Watford; Dr. Ralph G. (Jr.) and  
Melba Greenlee; Don E. McMahon  
RELEVANT STATUTE: 2 U.S.C. §441f; CFR §110.1(i)(2)  
INTERNAL REPORTS CHECKED: Friends of Bob Krueger Committee  
FEDERAL AGENCIES CHECKED: n/a

SUMMARY OF ALLEGATIONS

A review of the Friends of Bob Krueger (Senate) Committee reports revealed eleven \$1,000 contributions from individuals whose occupations were reported as "student." In each case, an individual with the same last name and/or address also contributed to the committee on or about the same date. In addition, a columnist in the attached Washington Post article alleged that the Krueger Committee accepted "dubious" contributions from the children of oil executives. This suggests that the \$1,000 contributions may have been made by parents in the names of minor children in violation of 2 U.S.C. §441f.

PRELIMINARY LEGAL ANALYSIS

2 U.S.C. §441f provides that no person shall make a contribution in the name of another person and no person shall knowingly accept a contribution made by one person in the name of another. The Commission's Regulations state that minor children may contribute in their own name if "the decision to contribute is made knowingly and voluntarily by the minor child; the funds contributed are owned or controlled exclusively by the child; and the contribution is not made from the proceeds of a gift, the purpose of which was to provide funds to be contributed." CFR §110.1(i)(2).

A review of the Friends of Bob Krueger Committee reports revealed the following contributions:

NAME AND ADDRESS	OCCUPATION	DATE OF CONT.	AMOUNT OF CONT.
Criss Crossen 503 Park Blvd. Austin, TX	Student	6-30-77	\$1,000
Frank M. Crossen 4600 Rep. Nat'l. Bank Tower Dallas, TX	Rancher	6-30-77	1,000

NAME AND ADDRESS	OCCUPATION	DATE OF CONT.	AMOUNT OF CONT.
Paige G. Pickens 3926 Potomac Dallas, TX	Student	6-29-77	\$1,000
Anne A. Pickens 3926 Potomac Dallas, TX	Student	6-29-77	1,000
R. H. Pickens 3926 Potomac Dallas, TX	Investor	6-29-77	1,000
Jan R. Pickens 3926 Potomac Dallas, TX	Housewife	6-29-77	1,000
-----			
Elane Witts 6007 Glendora Dallas, TX	Student	6-28-77	1,000
David Witts 5353 1st Int'l. Bldg. Dallas, TX	Attorney	6-28-77	1,000
Jean Witts 5353 1st Int'l. Bldg. Dallas, TX	Housewife	6-28-77	1,000
-----			
Joseph F. Watford 219 Renoir Houston, TX	Student	8-29-77	1,000
Jenny Lynn Watford 219 Renoir Houston, TX	Student	8-29-77	1,000
Randy N. Tonking 219 Renoir Houston, TX	Student	8-29-77	1,000

NAME AND ADDRESS	OCCUPATION	DATE OF CONT.	AMOUNT OF CONT.
George F. Watford 219 Renoir Houston, TX	President, Prairie Prod. Co.	8-29-77	\$1,000
Joan Watford 219 Renoir Houston, TX	Homemaker	8-3-77	1,000
-----			
Geraldine D. Greenlee P.O. Box 1727 Midland, TX	Student	9-18-77	1,000
Ralph G. Greenlee, III Box 1727 Midland, TX	Student	9-18-77	1,000
Helen H. Greenlee P.O. Box 1727 Midland, TX	Student	9-18-77	1,000
Melba Davis Greenlee 441 Belfort Place Dallas, TX	Housewife	9-18-77	1,000
Dr. Ralph G. Greenlee Jr. 4441 Belfort Place Dallas, TX	M.D.	9-27-77	1,000
-----			
Mark McMahon 5749 Indian Circle Houston, TX	Student	9-18-77	1,000
Don E. McMahon 5749 Indian Circle Houston, TX	President & Rancher	9-19-77	1,000
-----			

The pattern of students' contributions found in the Friends of Bob Krueger Committee reports strongly suggests that contributions may have been made in the names of minor children and accepted by the Krueger Committee in violation of 2 U.S.C. §441f.

RECOMMENDATION

1. Find reason to believe that the Friends of Bob Krueger Committee violated 2 U.S.C. §441f by knowingly receiving contributions made in the names of minor children. Send attached letter.

2. Find reason to believe that Frank M. Crossen, R. H. and Jan Pickens, David and Jean Witts, George F. and Joan Watford, Dr. Ralph G. (Jr.) and Melba Greenlee, and Don E. McMahon violated 2 U.S.C. §441f by making contributions to the Friends of Bob Krueger Committee in the names of their children. Send attached letters.

Jack Anderson and Les Whitten

WASH Post 12/29/77

## In Hot Pursuit of—Some Recipes

The threat of a congressional subpoena, used in the past to command the appearance of such diverse figures as crime overlord Frank Costello, Teamsters boss Jimmy Hoffa and banking tycoon J.P. Morgan, has now figured in a wild goose chase after a collection of exotic Korean recipes.

The threat came from the sanctuary of Leon Jaworski, the former Watergate prosecutor, who is now investigating the Korean payoff scandals for the House Committee on Standards of Official Conduct. His chief deputy, Peter White, came across a news snippet that Suzi Park Thomson had a book in the making.

She is the pettily attractive South Korean woman who used to hobnob with former Speaker Carl Albert and other Capitol Hill bigwigs. She has been cross-examined repeatedly behind closed doors by the Jaworski team. Not once during the hours of detailed questioning had she mentioned that she was writing a book.

The alert White hit the telephone and tracked down Suzi's literary agent, Bertha Klausner, in New York City. He demanded that Klausner supply the committee with the book material Suzi had sent her.

Klausner would not comment on her conversation with White. But both Suzi and her lawyer, Philip Hirschkop, quoted Klausner as telling them she had been threatened with a subpoena, which would compel her to turn over the 20-page book summary.

To save Jaworski's men the trouble of serving the subpoena, we are happy to supply them with the highlights of Suzi's manuscript:

The book will reveal Suzi's secret recipes for such Oriental delights as kim chee and Cheju Island pheasant. It will also include the ingredients for a bizarre dessert, which Suzi has named "the congressman."

The latter is a concoction of liquor, ice cream and chopped nuts, pumped up appropriately with air. Kim chee consists of cayenne-peppered cabbage. Cheju Island pheasant offers a chestnut sauce and stuffing.

Speaker Albert used to dote on Suzi's Korean-style spareribs. There will also be instructions on how to fix Peking goose. If Jaworski's investigators can wait until the book is in final form, they can also discover the secrets of shabu-shabu, a sort of Mongolian hot-pot.

But perhaps the most befitting dish will be a Korean-style meat mixture of Suzi's own creation. She calls it the "House leadership stew."

Footnote: Peter White gave us a polite "no comment."

**Kids for Krueger**—Rep. Robert Krueger (D-Tex.) has been on the receiving end of some astonishing piggy-bank contributions from the offspring of oil-rich families. The money has been deposited quietly in a political war chest, which he expects to use in an effort to unseat Sen. John Tower (R-Tex.).

Krueger has also made a brash appeal to oil and gas corporations for funds to underwrite his primary campaign. He may have run afoul of federal election laws in both instances, and his campaign manager, Gary Mauro, is trying to make quick amends.

Federal Election Commission re-

ords indicate that Krueger's campaign coffers have been fattened with at least \$10,000 in dubious, possibly illegal contributions from the children of oil executives. The law allows minors to contribute up to \$1,000 but only if the funds are controlled exclusively by the youngsters and not derived as a gift.

So we found 13-year-old Joseph Watford tossed \$1,000 into the Krueger pot. His father, George Watford, an oil executive with a Dallas firm called Prairie Producing, claimed his son raised the money by "working and saving over the years" and from gifts bestowed by grandparents. Two other Watford children were good for an additional \$2,000.

We asked a college student about her \$1,000 Krueger gift, and she confessed total ignorance of her largess. "Maybe Daddy did it for me," she speculated in confusion. "Daddy" is Frank Crossen of Syntex Construction, another Dallas firm. We were unable to get a comment from Crossen.

Campaign manager Mauro admitted to our reporter Geoff Lindsay he hadn't thought about the election law restrictions but hastily decided to refund any contributions by minors that might be illegal.

Krueger is also backtracking on a telegraphic appeal to oil and gas corporations for contributions which are flatly prohibited. He sent 7,000 Western Union mailgrams to members of the Texas Independent Petroleum Royalties Owners, reminding them he had been "fighting for deregulation" of gas prices. Some of the wires went to corporations, which are forbidden by law from contributing.

Memorandum

To: Bill Oldaker

From: Bill Loughrey **B.L.**

Re: Review of Indices for Kruegar Senate Committee

Date: January 3, 1977

Please note the attached index of the Kruegar Senate Committee, which was run and analyzed by Ernie Swiger. I am referring this to your attention for consideration as a MUR (see also MUR 199 for a similar pattern of contributions).

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MEMORANDUM

December 1, 1977

To: Bill Loughrey

From: Ernie Swiger ~~A~~

Subject: Review of Indices for Krueger Senate Committee

In the course of looking through the data available from the computer for the Friends of Bob Krueger (Senate) committee, I found several items that I think deserve some attention. These do not pertain so much to the data itself, but are compliance related questions.

First, the Krueger committee received much money over the summer, and there were numerous \$1000 donations from families in particular. This poses a question in my mind, as in several instances, members of the family, labelled "student" on the report gave \$1000, and these student contributions were greater than those given by the parents. It is Texas, and it is not inconceivable that these minors might well have their own accounts. However, does the Commission have a polite means of inquiring into such matters? The attached copies from the G index will make the point. It should be noted also that only in a few cases were even two of these names found on the same page of the report, despite being given on the same day.

Another interesting pattern that develops from the G index involves the Sanchez family in Laredo. Please note that several members of the family all contributed, but so did various members of the staff of the Sanchez-O'Brien Oil Co. and one member of the staff of the Sanchez (sic) Investment Co. In all cases these are senior staff people, and there probably is little that can be done to follow up at this time, but the information is worth noting at this time. Also, all these contributions were reported on September 15.

SELECTED LIST OF RECEIPTS & EXPENDITURES (G)  
SECTION I - INDIVIDUALS

CONTRIBUTOR/LENDER/TRANSFERER FILER	STREET ADDRESS	CITY	STATE ZIP	DATE	ELECTION	AMOUNT
NEWMAN, JOHN E. FRIENDS OF BOB KRUEGER 77SEN/004/2984 #023206 CONTRIBUTION	231 W. LYNWOOD AVE.	SAN ANTONIO	TX 78212	4JUL77	PRIMARY OCTOBER 10 QUARTERLY	1,000
		NEWMAN BROTHERS DRILLING COMPANY				
WORTHINGTON, ROBERT H. FRIENDS OF BOB KRUEGER 77SEN/004/3019 #024253 CONTRIBUTION	2206 COUNTRY CLUB DRIVE	MIDLAND	TX 79701	19SEP77	PRIMARY OCTOBER 10 QUARTERLY	500
		MESA PETROLEUM COMPANY				
Norman, Nathan C, D.R. 9/15/50 - 4/30/72 SPENGLER, JESSE H. FRIENDS OF BOB KRUEGER 77SEN/004/3026 #024557 CONTRIBUTION	400 E. MANDALAY	SAN ANTONIO	TX	30SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
		ATTORNEY				
PALMER, JOHN T. FRIENDS OF BOB KRUEGER 77SEN/004/3002 #023647 CONTRIBUTION	501 LLOYD LANE	SHREVEPORT	LA 71106	15AUG77	PRIMARY OCTOBER 10 QUARTERLY	500
		PETROLEUM GEOLOGIST				
PARKER, ERNEST CLYDE, JR. FRIENDS OF BOB KRUEGER 77SEN/004/3010 #023311 CONTRIBUTION	622 ELM	KERRVILLE	TX 78028	8SEP77	PRIMARY OCTOBER 10 QUARTERLY	500
		CHARLES SCHREINER CO.				
SPARTEN, J.R. FRIENDS OF BOB KRUEGER 77SEN/004/3001 #023637 CONTRIBUTION	P.O. BOX 458	MADISONVILLE	TX 77464	11AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
		CATTLE RANCHER				
PICKENS, ANNE A. FRIENDS OF BOB KRUEGER 77SEN/003/3285 #011924 CONTRIBUTION	3926 POTOMAC	DALLAS	TX 75205	29JUN77	PRIMARY JULY 10 QUARTERLY	1,000
		STUDENT				
PICKENS, JAN P. FRIENDS OF BOB KRUEGER 77SEN/003/3281 #011987 CONTRIBUTION	3926 POTOMAC	DALLAS	TX 75205	29JUN77	PRIMARY JULY 10 QUARTERLY	1,000
		HOUSEWIFE				
PICKENS, PAIGE G. FRIENDS OF BOB KRUEGER 77SEN/003/3280 #011976 CONTRIBUTION	3926 POTOMAC	DALLAS	TX 75205	29JUN77	PRIMARY JULY 10 QUARTERLY	1,000
		STUDENT				
PICKENS, R. H. FRIENDS OF BOB KRUEGER 77SEN/003/3284 #011920 CONTRIBUTION	3926 POTOMAC	DALLAS	TX 75205	29JUN77	PRIMARY JULY 10 QUARTERLY	1,000
PIERCE, SAMMY P. FRIENDS OF BOB KRUEGER 77SEN/004/3006 #023744 CONTRIBUTION	P.O. BOX 807	BELLVILLE	TX 77418	25AUG77	PRIMARY OCTOBER 10 QUARTERLY	500
		P & F CATTLE (RANCHER)				

+ Wm. L. \$900  
+ Ruth G. 9/22/77  
Pickens  
4/30/74

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CONTRIBUTOR/LENDER/TRANSFERER FILER	STREET ADDRESS	CITY	STATE ZIP	DATE	ELECTION	AMOUNT
✓ WARREN, J. N. FRIENDS OF BOB KRUEGER 77SEN/003/3273 #011784 CONTRIBUTION	6102 YARWELL	HOUSTON	TX 77035	8JUN77	PRIMARY JULY 10 QUARTERLY	1,000
✓ WATFORD, GEORGE F. FRIENDS OF BOB KRUEGER 77SEN/004/2999 #023620 CONTRIBUTION	219 RENOIR	HOUSTON	TX 77079	3AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WATFORD, JENNY LYNN FRIENDS OF BOB KRUEGER 77SEN/004/3008 #023781 CONTRIBUTION	219 RENOIR	HOUSTON <u>STUDENT</u>	TX 77079	29AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WATFORD, JOAN (GEORGE) FRIENDS OF BOB KRUEGER 77SEN/004/2999 #023621 CONTRIBUTION	219 RENOIR	HOUSTON HOMEMAKER	TX 77079	3AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WATFORD, JOSEPH F. FRIENDS OF BOB KRUEGER 77SEN/004/3008 #023779 CONTRIBUTION	219 RENOIR	HOUSTON <u>STUDENT</u>	TX 77079	29AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WAY, RALPH FRIENDS OF BOB KRUEGER 77SEN/004/3007 #023765 CONTRIBUTION	2100 NORTH L	MIDLAND	TX 79701	24AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WICHSSEL, ROBERT F. FRIENDS OF BOB KRUEGER 77SEN/004/3008 #023783 CONTRIBUTION	6106 LUPTON DR.	DALLAS	TX 75225	29AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WEIR, WARREN FRIENDS OF BOB KRUEGER 77SEN/004/3011 #023819 CONTRIBUTION	726 PATRICIA	SAN ANTONIO	TX 78216	12SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WESSELY, ARTHUR J. FRIENDS OF BOB KRUEGER 77SEN/004/3004 #023701 CONTRIBUTION	3425 BRYN MAWR	DALLAS	TX 75225	16AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WESSELY, DOROTHY R. FRIENDS OF BOB KRUEGER 77SEN/004/3006 #023744 CONTRIBUTION	3425 BRYN MAWR	DALLAS	TX 75225	22AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WHITE, PERRIN W. FRIENDS OF BOB KRUEGER 77SEN/004/2998 #023582 CONTRIBUTION	3345 DEL MONTE	HOUSTON	TX 77019	2AUG77	PRIMARY OCTOBER 10 QUARTERLY	500

*also see Foxberry p.20*

FEDERAL ELECTION COMMISSION

DATE 5DEC77

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CONTRIBUTOR/LENDER/TRANSFERER FILER	STREET ADDRESS	CITY	STATE ZIP	DATE	ELECTION	AMOUNT
✓ STIEREN, BARBARA E. FRIENDS OF BOB KRUEGER 77SEN/004/2996 #023322 CONTRIBUTION	7515 SHADYLANE	SAN ANTONIO HOUSEWIFE	TX 78209	1AUG77	PRIMARY OCTOBER 10 QUARTERLY	500
✓ STONE, EDWARD R. FRIENDS OF BOB KRUEGER 77SEN/004/3003 #023684 CONTRIBUTION	1426 STAGECOACH DR.	RICHARDSON W.O. BANKSTON LINCOLN-MERCURY	TX 75080	18AUG77	PRIMARY OCTOBER 10 QUARTERLY	500
✓ STOVALL, NORMAN D. JR. FRIENDS OF BOB KRUEGER 77SEN/003/3287 #011960 CONTRIBUTION	803 4TH ST.	GRAHAM	TX 76046	30JUN77	PRIMARY JULY 10 QUARTERLY	1,000
✓ STEET, SPENCER R. JR. FRIENDS OF BOB KRUEGER 77SEN/003/3283 #011909 CONTRIBUTION	1421 QUAIL RUN	GRAHAM	TX 76046	30JUN77	PRIMARY JULY 10 QUARTERLY	1,000
✓ STUMBERG, LOUIS H. FRIENDS OF BOB KRUEGER 77SEN/004/2990 #023270 CONTRIBUTION	832 EVENTIDE	SAN ANTONIO R.J. REYNOLDS FOODS	TX 78209	13JUL77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ TATHAM, THOMAS P. FRIENDS OF BOB KRUEGER 77SEN/004/2998 #023605 CONTRIBUTION	3940 IVERNESS	HOUSTON MID AMERICAN OIL COMPANY	TX	2AUG77	PRIMARY OCTOBER 10 QUARTERLY	500
✓ THOMAS, BARBARA R. FRIENDS OF BOB KRUEGER 77SEN/004/3024 #024519 CONTRIBUTION	4618 WATAUGA ROAD	DALLAS HOMEMAKER	TX 75209	23SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ THOMAS, MAX L. FRIENDS OF BOB KRUEGER 77SEN/004/3024 #024522 CONTRIBUTION	4618 WATAUGA ROAD	DALLAS SELF-EMPLOYED	TX 75209	23SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ TING, RANDY W. FRIENDS OF BOB KRUEGER 77SEN/004/3008 #023782 CONTRIBUTION	219 RENOIR	HOUSTON STUDENT	TX 77079	29AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ TRAEER, JIM FRIENDS OF BOB KRUEGER 77SEN/003/3273 #011791 CONTRIBUTION	BOX 47596	DALLAS L. D. HRINKMAN CO.	TX 75247	16JUN77	PRIMARY JULY 10 QUARTERLY	1,000
✓ TUCKER, WALTER F. FRIENDS OF BOB KRUEGER 77SEN/004/3000 #023628 CONTRIBUTION	2611 CIRCLE J.	SAN ANGELO TUCKER DRILLING COMPANY INC.	TX 76901	5AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000

*(see watford)*

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✓ GLASS, ROY F., DR. & MRS. FRIENDS OF BOB KRUEGER 77SEN/004/2990 #023271 CONTRIBUTION	2303 DOUGLAS DRIVE	SAN ANGELO	TX 76901	13JUL77	PRIMARY OCTOBER 10 QUARTERLY	1.000
		RETIRED				
✓ GREENLEEF, GERALDINE DAVIS FRIENDS OF BOB KRUEGER 77SEN/004/3015 #024115 CONTRIBUTION	P.O. BOX 1727	MIDLAND	TX 79701	18SEP77	PRIMARY OCTOBER 10 QUARTERLY	1.000
		STUDENT				
✓ GREENLEEF, HELEN HUBBARD FRIENDS OF BOB KRUEGER 77SEN/004/3019 #024266 CONTRIBUTION	P.O. BOX 1727	MIDLAND	TX 79701	18SEP77	PRIMARY OCTOBER 10 QUARTERLY	1.000
		STUDENT				
✓ GREENLEEF, MELBA DAVIS FRIENDS OF BOB KRUEGER 77SEN/004/3018 #024239 CONTRIBUTION	4441 BELFORT PLACE	DALLAS	TX 75205	18SEP77	PRIMARY OCTOBER 10 QUARTERLY	1.000
		HOUSEWIFE				
✓ GREENLEE, RALPH G., III FRIENDS OF BOB KRUEGER 77SEN/004/3015 #024122 CONTRIBUTION	P.O. BOX 1727	MIDLAND	TX 79701	18SEP77	PRIMARY OCTOBER 10 QUARTERLY	1.000
		STUDENT				
✓ GREENLEE, RALPH G., JR. DR. FRIENDS OF BOB KRUEGER 77SEN/004/3025 #024545 CONTRIBUTION	4441 BELFORT PLACE	DALLAS	TX 75205	27SEP77	PRIMARY OCTOBER 10 QUARTERLY	1.000
		MEDICAL DOCTOR				
✓ GUFFEY, ROY FRIENDS OF BOB KRUEGER 77SEN/004/2986 #023221 CONTRIBUTION	5433 DELOACHE	DALLAS	TX	6JUL77	PRIMARY OCTOBER 10 QUARTERLY	500
		GUFFY SCHLENSKER DRILLING CORP.				
✓ GUNN, CURTIS FRIENDS OF BOB KRUEGER 77SEN/003/3272 #011770 CONTRIBUTION	401 DEVINE ROAD	SAN ANTONIO	TX 78212	13MAY77	PRIMARY JULY 10 QUARTERLY	1.000
✓ GUNTER, KENNETH S. FRIENDS OF BOB KRUEGER 77SEN/004/3015 #024132 CONTRIBUTION	COUNTRY CLUB ROAD	SAN ANGELO	TX 76901	18SEP77	PRIMARY OCTOBER 10 QUARTERLY	1.000
		UA COLUMBIA CARLEVISION INC.				
✓ GUTIERREZ, JOSE ROBERTO FRIENDS OF BOB KRUEGER 77SEN/004/3021 #024285 CONTRIBUTION	107 PRIMROSE	LAREDO	TX 78040	15SEP77	PRIMARY OCTOBER 10 QUARTERLY	1.000
		PETROLEUM ENGINEER				
✓ HAAS, MARY FRANCES FRIENDS OF BOB KRUEGER 77SEN/004/3017 #024223 CONTRIBUTION	36 HEWITT	CORPUS CHRISTI	TX 78404	18SEP77	PRIMARY OCTOBER 10 QUARTERLY	1.000
		HOUSEWIFE				

*Sandy O'Brien Petro.*

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SECTION I - INDIVIDUALS

CONTRIBUTOR/LENDER/TRANSFERER FILE#	STREET ADDRESS	CITY	STATE ZIP	DATE ELECTION	AMOUNT
✓ RUTHERFORD, PAT JR. FRIENDS OF BOB KRUEGER 77SEN/003/3281 #011489 CONTRIBUTION	2550 TWO SHELL PLAZA	HOUSTON	TX 77002	20JUN77 PRIMARY JULY 10 QUARTERLY	1,000
✓ RUTHERFORD, PAT R. SR. FRIENDS OF BOB KRUEGER 77SEN/003/3284 #011918 CONTRIBUTION	3015 INWOOD	HOUSTON	TX 77019	20JUN77 PRIMARY JULY 10 QUARTERLY	1,000
<i>Sale from 5-7/13-1000...4/30/2</i> ✓ SANCHEZ, A.P., JR. FRIENDS OF BOB KRUEGER 77SEN/004/3021 #024278 CONTRIBUTION	1519 FREMONT	LAREDO SANCHEZ-O'BRIEN PETROLEUM CORP.	TX 78040	15SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ SANCHEZ, A.P., JR. MRS. FRIENDS OF BOB KRUEGER 77SEN/004/3016 #024194 CONTRIBUTION	802 STONE	LAREDO HOUSEWIFE	TX 78040	15SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ SANCHEZ, A.P., SR. FRIENDS OF BOB KRUEGER 77SEN/004/3016 #024210 CONTRIBUTION	2119 GUERRERO	LAREDO SANCHEZ-O'BRIEN PETROLEUM CORP.	TX 78040	15SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ SANCHEZ, GEORGE M. FRIENDS OF BOB KRUEGER 77SEN/004/3015 #024108 CONTRIBUTION	NO. 2 NORTHWOOD DRIVE	LAREDO SOUTH. DEVELOPMENT PROPERTIES INC.	TX 78041	15SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ SAROFIN, FAYEZ FRIENDS OF BOB KRUEGER 77SEN/004/3013 #024080 CONTRIBUTION	3970 INVERNESS	HOUSTON	TX 77019	14SEP77 PRIMARY OCTOBER 10 QUARTERLY	500
✓ SCHAEFER, JOHN M. FRIENDS OF BOB KRUEGER 77SEN/004/3026 #024562 CONTRIBUTION	167 COUNTRY LANE	SAN ANTONIO SCHAEFER HOMES	TX 78209	30SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ SCHAEFER, NANCY FRIENDS OF BOB KRUEGER 77SEN/004/3006 #023745 CONTRIBUTION	167 COUNTRY CLUB LANE	SAN ANTONIO HOUSEWIFE	TX 78209	30SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ SCHAEFER, SAM H. FRIENDS OF BOB KRUEGER 77SEN/004/3011 #023918 CONTRIBUTION	411 PATRICIA	SAN ANTONIO SCHAEFER HOMES	TX 78216	30SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ SCHAEFER, SAM H., MRS. FRIENDS OF BOB KRUEGER 77SEN/004/3026 #024578 CONTRIBUTION	411 PATRICIA	SAN ANTONIO HOMEMAKER	TX 78216	30SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000

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✓ ENDEPHY, CHARLIE FRIENDS OF ROB KRUEGER 77SEN/004/2985 #023214 CONTRIBUTION	P.O. BOX 425	GAINSVILLE	TX 76240	4JUL77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ EULICH, JOHN F. FRIENDS OF ROB KRUEGER 77SEN/004/2992 #023284 CONTRIBUTION	3704 LEXINGTON	DALLAS	TX 75205	21JUL77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ EULICH, VIRGINIA FRIENDS OF ROB KRUEGER 77SEN/004/2993 #023292 CONTRIBUTION	3704 LEXINGTON	DALLAS	TX 75205	21JUL77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ FETTL, LEVON FRIENDS OF ROB KRUEGER 77SEN/003/3282 #011905 CONTRIBUTION	7675 FALLMEADOW LANE	DALLAS	TX 75248	16JUN77	PRIMARY JULY 10 QUARTERLY	1,000
✓ FARNER, ROBERT D. FRIENDS OF ROB KRUEGER 77SEN/004/2990 #023275 CONTRIBUTION	457 OGDEN LANE	NEW BRAUNFELS	TX 78130	14JUL77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ FARRINGTON, RONNIE FRIENDS OF ROB KRUEGER 77SEN/004/3007 #023748 CONTRIBUTION	687 BENDING OAK DRIVE	BELLVILLE	TX 77418	24AUG77	PRIMARY OCTOBER 10 QUARTERLY	500
✓ FAULK, REYNOLDS FRIENDS OF ROB KRUEGER 77SEN/004/2985 #023213 CONTRIBUTION	121 SHAVANO DR.	SAN ANTONIO	TX 78231	4JUL77	PRIMARY OCTOBER 10 QUARTERLY	500
✓ FELD, MR. & MRS. ALAN FRIENDS OF ROB KRUEGER 77SEN/004/2983 #023351 CONTRIBUTION	4235 BORDEAUX	DALLAS	TX 75201	2JUL77	PRIMARY OCTOBER 10 QUARTERLY	1,000 AMENDMENT
✓ FITZGERALD, D.N., MR. AND MRS. FRIENDS OF ROB KRUEGER 77SEN/004/2986 #023216 CONTRIBUTION	3105 SEABOARD	MIDLAND	TX 79701	6JUL77	PRIMARY OCTOBER 10 QUARTERLY	500
✓ FOREE, R.L. (HOB) FRIENDS OF ROB KRUEGER 77SEN/004/2999 #023613 CONTRIBUTION	10140 GAYWOOD	DALLAS	TX 75202	4AUG77	PRIMARY OCTOBER 10 QUARTERLY	500
✓ FREEMAN, M.M. FRIENDS OF ROB KRUEGER 77SEN/004/3021 #024281 CONTRIBUTION	1920 HOUSTON ST.	LAREDO	TX 78040	15SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000

SANCHEZ-O'BRIEN PETROLEUM CORP.  
*see Sanchez*

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WHITTLE, RENE HAAS FRIENDS OF BOB KRUEGER 77SEN/004/3016 #024209 CONTRIBUTION	P.O. BOX 1064	CORPUS CHRISTI HOUSEWIFE	TX 78403	18SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
WHITTLE, WILLIAM A. FRIENDS OF BOB KRUEGER 77SEN/004/3016 #024203 CONTRIBUTION	P.O. BOX 2446	CORPUS CHRISTI KLEBERT, MOBLEY, ET AL (ATTORNEY)	TX 78403	18SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
WHITWORTH, CHARLES F. FRIENDS OF BOB KRUEGER 77SEN/004/3016 #024214 CONTRIBUTION	1920 PRINCE, APT. J	LAREDO SANCHEZ INVESTMENTS, INC.	TX 78040	15SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
WILLIAMS, CLAYTON W., JR. FRIENDS OF BOB KRUEGER 77SEN/004/3010 #023902 CONTRIBUTION	RT. 2 P.O. BOX 103	MIDLAND WILLIAMS CO.	TX 78701	6SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
WILLIAMS, J.D. FRIENDS OF BOB KRUEGER 77SEN/004/3025 #024551 CONTRIBUTION	1325 N. PEGRAM	ALEXANDRIA LAWYER	VA 22304	29SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
WILLIAMS, MODESTA FRIENDS OF BOB KRUEGER 77SEN/004/3010 #023908 CONTRIBUTION	RT. 2 P.O. BOX 103	MIDLAND HOMEMAKER	TX 79701	6SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
WILLIAMSON, J.C. FRIENDS OF BOB KRUEGER 77SEN/004/3004 #023726 CONTRIBUTION	2220 WESTERN	MIDLAND WILLIAMSON & WILLIAMSON (IND OIL)	TX 79701	17AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
WILLINSON, RALPH F. FRIENDS OF BOB KRUEGER 77SEN/004/3000 #023631 CONTRIBUTION	2413 METZ PL.	MIDLAND INDEPENDENT OIL PRODUCER	TX 79701	6AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
WILSON, WILLIAM W. FRIENDS OF BOB KRUEGER 77SEN/003/3280 #011471 CONTRIBUTION	200 PRIMROSE HILL	EULESS	TX 76039	28JUN77	PRIMARY JULY 10 QUARTERLY	1,000
WINSTEAD, S.G. FRIENDS OF BOB KRUEGER 77SEN/004/2985 #023212 CONTRIBUTION	4507 BORDEAUX	DALLAS JACKSON, WALKER, WINSTEAD, ET AL.	TX	4JUL77	PRIMARY OCTOBER 10 QUARTERLY	500
WITTS, DAVID FRIENDS OF BOB KRUEGER 77SEN/003/3285 #011925 CONTRIBUTION	5353 FIRST INTERNATIONAL BLDG.	DALLAS ATTORNEY	TX 75270	28JUN77	PRIMARY JULY 10 QUARTERLY	1,000

*see Sanchez*

Letter to be sent to Frank M. Crossen, R.H. and Jean Pickens, David and Jean Witts, George F. and Joan Watford, Dr. Ralph G. (jr.) and Melba Greenlee, and Don E. McMahon



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Re: MUR 488

Dear :

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended, ("the Act"). Specifically, it appears that you may have violated 2 U.S.C. §441f by making contributions to the Friends of Bob Krueger Committee in the name(s) of your child(ren). We have numbered this matter MUR 488.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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. Additionally, please submit answers to the following questions:

(1) Did you and/or other members of your family contribute to the Friends of Bob Krueger Committee? If so, please identify and state the age of each family member who so contributed, and the amount of each such contribution.

(2) Identify each person who solicited contributions from you or your family on behalf of the Friends of Bob Krueger Committee and describe the circumstances of each such solicitation.



(3) Have any of the contributions that you or your family made to the Friends of Bob Krueger Committee been returned or refunded? If so, state the date each such contribution was returned, and describe the circumstances surrounding its return.

Additionally, we request that you provide the Commission with copies of any cancelled checks (front and back), contribution cards or statements, and any other documentation connected with such contributions to the Friends of Bob Krueger Committee.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Ms. Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker  
General Counsel



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Arthur Wersterfer  
Treasurer  
Friends of Bob Krueger  
Committee  
P.O. Box 911  
New Braunfels, TX 78130

Re: MUR 488

Dear Mr. Westerfer:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, Friends of Bob Krueger, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended, ("the Act"). Specifically, as set forth on the attached page, it appears that the Friends of Bob Krueger Committee accepted contributions from certain persons made in the names of their children in violation of 2 U.S.C. §441f. We have numbered this matter MUR 488.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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. Additionally, please submit answers to the following questions:

(1) Describe the circumstances under which each contribution set forth on the attached page was solicited, including identification of each person who solicited such contributions and copies of any written materials involved in such solicitation.



(2) Describe any efforts undertaken by your committee to verify whether the contributions set forth on the attached page might in fact have been made by persons other than the named contributor.

(3) Has your committee returned or refunded any of the contributions set forth on the attached page? If so, please list each such returned contribution, state the date of return or refund and describe the circumstances surrounding its return.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Ms. Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker  
General Counsel

Attachment

NAME AND ADDRESS	DATE OF CONT.	AMOUNT OF CONT.
Criss Crossen 503 Park Blvd. Austin, TX	6-30-77	\$1,000
Paige G. Pickens 3926 Potomac Dallas, TX	6-29-77	1,000
Anne A. Pickens 3926 Potomac Dallas, TX	6-29-77	1,000
Elaine Witts 6007 Glendora Dallas, TX	6-28-77	1,000
Joseph E. Watford 219 Renoir Houston, TX	8-29-77	1,000
Jenny Lynn Watford 219 Renoir Houston, TX	8-29-77	1,000
Randy N. Tonking 219 Renoir Houston, TX	8-29-77	1,000
Geraldine D. Greenlee P.O. Box 1727 Midland, TX	9-18-77	1,000
Ralph G. Greenlee, III Box 1727 Midland, TX	9-18-77	1,000
Helen H. Greenlee P.O.Box 1727 Midland, TX	9-18-77	1,000
Mark McMahon 5749 Indian Circle Houston, TX	9-18-77	1,000

Memorandum

To: Bill Oldaker  
From: Bill Loughrey **B.L.**  
Re: Review of Indices for Kruegar Senate Committee  
Date: January 3, 1977

A-104 #1  
TO E gave MUR 483  
open MUR. (79)  
assign to  
S. Donaldson.

Please note the attached index of the Kruegar Senate Committee, which was run and analyzed by Ernie Swiger. I am referring this to your attention for consideration as a MUR (see also MUR 199 for a similar pattern of contributions).

0 1 2 3 4 5 6 7 8 9

MEMORANDUM

December 1, 1977

To: Bill Loughrey

From: Ernie Swiger 

Subject: Review of Indices for Krueger Senate Committee

In the course of looking through the data available from the computer for the Friends of Bob Krueger (Senate) committee, I found several items that I think deserve some attention. These do not pertain so much to the data itself, but are compliance related questions.

First, the Krueger committee received much money over the summer, and there were numerous \$1000 donations from families in particular. This poses a question in my mind, as in several instances, members of the family, labelled "student" on the report gave \$1000, and these student contributions were greater than those given by the parents. It is Texas, and it is not inconceivable that these minors might well have their own accounts. However, does the Commission have a polite means of inquiring into such matters? The attached copies from the G index will make the point. It should be noted also that only in a few cases were even two of these names found on the same page of the report, despite being given on the same day.

Another interesting pattern that develops from the G index involves the Sanchez family in Laredo. Please note that several members of the family all contributed, but so did various members of the staff of the Sanchez-O'Brien Oil Co. and one member of the staff of the Sanchez (sic) Investment Co. In all cases these are senior staff people, and there probably is little that can be done to follow up at this time, but the information is worth noting at this time. Also, all these contributions were reported on September 15.

SELECTED LIST OF RECEIPTS & EXPENDITURES (G)  
SECTION I - INDIVIDUALS

CONTRIBUTOR/LENDER/TRANSFERER FILE#	STREET ADDRESS	CITY	STATE ZIP	DATE	ELECTION	AMOUNT
✓ NEWMAN, JOHN F. FRIENDS OF BOB KRUEGER 77SEN/004/2984 #023206 CONTRIBUTION	231 W. LYNWOOD AVE.	SAN ANTONIO	TX 78212	4JUL77	PRIMARY OCTOBER 10 QUARTERLY	1,000
		NEWMAN BROTHERS DRILLING COMPANY				
✓ NORTHINGTON, ROBERT H. FRIENDS OF BOB KRUEGER 77SEN/004/3019 #024253 CONTRIBUTION	2206 COUNTRY CLUB DRIVE	MIDLAND	TX 79701	19SEP77	PRIMARY OCTOBER 10 QUARTERLY	500
		MESA PETROLEUM COMPANY				
✓ Norman, Nathan C, Dr. 9/13/500 - 4/30/77 OPPENHEIMER, JESSE M. FRIENDS OF BOB KRUEGER 77SEN/004/3026 #024357 CONTRIBUTION	400 E. MANDALAY	SAN ANTONIO	TX	30SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
		ATTORNEY				
✓ PALMER, JOHN T. FRIENDS OF BOB KRUEGER 77SEN/004/3002 #023347 CONTRIBUTION	501 LLOYD LANE	SHREVEPORT	LA 71106	15AUG77	PRIMARY OCTOBER 10 QUARTERLY	500
		PETROLEUM GEOLOGIST				
✓ PARKER, ERNEST CLYDE, JR. FRIENDS OF BOB KRUEGER 77SEN/004/3010 #023311 CONTRIBUTION	622 FLM	KERRVILLE	TX 78028	8SEP77	PRIMARY OCTOBER 10 QUARTERLY	500
		CHARLES SCHREINER CO.				
✓ PARTEN, J.R. FRIENDS OF BOB KRUEGER 77SEN/004/3001 #023637 CONTRIBUTION	P.O. BOX 458	MADISONVILLE	TX 77464	11AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
		CATTLE RANCHER				
✓ PICKENS, ANNE A. FRIENDS OF BOB KRUEGER 77SEN/003/3285 #011924 CONTRIBUTION	3926 POTOMAC	DALLAS	TX 75205	29JUN77	PRIMARY JULY 10 QUARTERLY	1,000
		STUDENT				
✓ PICKENS, JAN R. FRIENDS OF BOB KRUEGER 77SEN/003/3281 #011987 CONTRIBUTION	3926 POTOMAC	DALLAS	TX 75205	29JUN77	PRIMARY JULY 10 QUARTERLY	1,000
		HOUSEWIFE				
✓ PICKENS, PAIGE G. FRIENDS OF BOB KRUEGER 77SEN/003/3280 #011976 CONTRIBUTION	3926 POTOMAC	DALLAS	TX 75205	29JUN77	PRIMARY JULY 10 QUARTERLY	1,000
		STUDENT				
✓ PICKENS, P. H. FRIENDS OF BOB KRUEGER 77SEN/003/3284 #011920 CONTRIBUTION	3926 POTOMAC	DALLAS	TX 75205	29JUN77	PRIMARY JULY 10 QUARTERLY	1,000
✓ PIERCE, SAMMY P. FRIENDS OF BOB KRUEGER 77SEN/004/3006 #023746 CONTRIBUTION	P.O. BOX 807	BELLVILLE	TX 77418	25AUG77	PRIMARY OCTOBER 10 QUARTERLY	500
		P & F CATTLE (RANCHER)				

+ Wm. L. \$900  
+ Nath G. 9/22  
Pickens  
7/30/24

SELECTED LIST OF RECEIPTS & EXPENDITURES (G)  
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CONTRIBUTOR/LENDER/TRANSFERER FILER	STREET ADDRESS	CITY	STATE ZIP	DATE	ELECTION	AMOUNT
✓ WARREN, J. N. FRIENDS OF BOB KRUEGER 77SEN/003/3273 #011784 CONTRIBUTION	6102 YARWELL	HOUSTON	TX 77035	8JUN77	PRIMARY JULY 10 QUARTERLY	1,000
✓ WATFORD, GEORGE F. FRIENDS OF BOB KRUEGER 77SEN/004/2999 #023620 CONTRIBUTION	219 RENOIR	HOUSTON	TX 77079	3AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WATFORD, JENNY LYNN FRIENDS OF BOB KRUEGER 77SEN/004/3009 #023781 CONTRIBUTION	219 RENOIR	HOUSTON <u>STUDENT</u>	TX 77079	29AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WATFORD, JOAN (GEORGE) FRIENDS OF BOB KRUEGER 77SEN/004/2999 #023621 CONTRIBUTION	219 RENOIR	HOUSTON HOMEMAKER	TX 77079	3AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WATFORD, JOSEPH F. FRIENDS OF BOB KRUEGER 77SEN/004/3006 #023779 CONTRIBUTION	219 RENOIR	HOUSTON <u>STUDENT</u>	TX 77079	29AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WAY, RALPH FRIENDS OF BOB KRUEGER 77SEN/004/3007 #023765 CONTRIBUTION	2100 NORTH L	MIDLAND OIL & GAS PRODUCER	TX 79701	24AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WEICHEL, ROBERT F. FRIENDS OF BOB KRUEGER 77SEN/004/3008 #023783 CONTRIBUTION	6106 LUPTON DR.	DALLAS SCHNEIDER, BERNETS & HICKMAN	TX 75225	29AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WEIR, WARREN FRIENDS OF BOB KRUEGER 77SEN/004/3011 #023719 CONTRIBUTION	726 PATRICIA	SAN ANTONIO ATTORNEY	TX 78216	12SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WESSLEY, ARTHUR J. FRIENDS OF BOB KRUEGER 77SEN/004/3004 #023701 CONTRIBUTION	3425 BRYN MAWR	DALLAS INDEPENDENT OIL DEALER	TX 75225	16AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WESSLEY, DOROTHY R. FRIENDS OF BOB KRUEGER 77SEN/004/3006 #023744 CONTRIBUTION	3425 BRYN MAWR	DALLAS HOMEMAKER	TX 75225	22AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WHITE, PERRIN W. FRIENDS OF BOB KRUEGER 77SEN/004/2998 #023582 CONTRIBUTION	3345 DEL MONTE	HOUSTON WHITE & WHITE INC.	TX 77019	2AUG77	PRIMARY OCTOBER 10 QUARTERLY	500

also  
see  
Fonking  
p. 20

## FEDERAL ELECTION COMMISSION

DATE 5DEC77

SELECTED LIST OF RECEIPTS & EXPENDITURES (G)  
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CONTRIBUTOR/LENDER/TRANSFERER FILE#	STREET ADDRESS	CITY	STATE ZIP	DATE	ELECTION	AMOUNT
✓ STIEREN, BARBARA F. FRIENDS OF BOB KRUEGER 77SEN/004/2296 #023322 CONTRIBUTION	7515 SHADYLANE	SAN ANTONIO	TX 78209	1AUG77	PRIMARY OCTOBER 10 QUARTERLY	500
✓ STONE, EDWARD R. FRIENDS OF BOB KRUEGER 77SEN/004/3003 #023684 CONTRIBUTION	1426 STAGECOACH DR.	RICHARDSON	TX 75080	18AUG77	PRIMARY OCTOBER 10 QUARTERLY	500
✓ STOVALL, NORMAN D. JR. FRIENDS OF BOB KRUEGER 77SEN/003/3287 #011360 CONTRIBUTION	803 4TH ST.	GRAHAM	TX 76046	30JUN77	PRIMARY JULY 10 QUARTERLY	1,000
✓ STEET, SPENCER R. JR. FRIENDS OF BOB KRUEGER 77SEN/003/3283 #011309 CONTRIBUTION	1421 QUAIL RUN	GRAHAM	TX 76046	30JUN77	PRIMARY JULY 10 QUARTERLY	1,000
✓ STUMBERG, LOUIS H. FRIENDS OF BOB KRUEGER 77SEN/004/2990 #023270 CONTRIBUTION	832 EVENTIDE	SAN ANTONIO	TX 78209	13JUL77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ TATHAM, THOMAS P. FRIENDS OF BOB KRUEGER 77SEN/004/2998 #023605 CONTRIBUTION	3940 IVERNESS	HOUSTON	TX	2AUG77	PRIMARY OCTOBER 10 QUARTERLY	500
✓ THOMAS, BARBARA R. FRIENDS OF BOB KRUEGER 77SEN/004/3024 #024519 CONTRIBUTION	4618 WATAUGA ROAD	DALLAS	TX 75209	23SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ THOMAS, MAX L. FRIENDS OF BOB KRUEGER 77SEN/004/3024 #024522 CONTRIBUTION	4618 WATAUGA ROAD	DALLAS	TX 75209	23SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ TONKING, RANDY W. FRIENDS OF BOB KRUEGER 77SEN/004/3008 #023782 CONTRIBUTION	219 RENOIR <i>(see Watford)</i>	HOUSTON	TX 77079	29AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ TRAEK, JIM FRIENDS OF BOB KRUEGER 77SEN/003/3273 #011791 CONTRIBUTION	BOX 47596	DALLAS	TX 75247	16JUN77	PRIMARY JULY 10 QUARTERLY	1,000
✓ TUCKER, WALTER F. FRIENDS OF BOB KRUEGER 77SEN/004/3000 #023628 CONTRIBUTION	2611 CIRCLE J.	SAN ANGELO	TX 76901	5AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000

SELECTED LIST OF RECEIPTS & EXPENDITURES (G)  
SECTION I - INDIVIDUALS

CONTRIBUTOR/LENDER/TRANSFERER FILER	STREET ADDRESS	CITY	STATE ZIP	DATE ELECTION	AMOUNT
✓ GLASS, ROY F., DR. & MRS. FRIENDS OF BOB KRUEGER 77SEN/004/2990 #023271 CONTRIBUTION	2303 DOUGLAS DRIVE	SAN ANGELO RETIRED	TX 76901	13JUL77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ GREENLEF, GERALDINE DAVIS FRIENDS OF BOB KRUEGER 77SEN/004/3015 #024115 CONTRIBUTION	P.O. BOX 1727	MIDLAND STUDENT	TX 79701	18SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ GREENLEF, HELEN HUBBARD FRIENDS OF BOB KRUEGER 77SEN/004/3019 #024266 CONTRIBUTION	P.O. BOX 1727	MIDLAND STUDENT	TX 79701	18SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ GREENLEF, MELBA DAVIS FRIENDS OF BOB KRUEGER 77SEN/004/3018 #024239 CONTRIBUTION	4441 BELFORT PLACE	DALLAS HOUSEWIFE	TX 75205	18SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ GREENLEF, RALPH G., III FRIENDS OF BOB KRUEGER 77SEN/004/3015 #024122 CONTRIBUTION	P.O. BOX 1727	MIDLAND STUDENT	TX 79701	18SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ GREENLEF, RALPH G., JR. DR. FRIENDS OF BOB KRUEGER 77SEN/004/3025 #024545 CONTRIBUTION	4441 BELFORT PLACE	DALLAS MEDICAL DOCTOR	TX 75205	27SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ GUFFEY, ROY FRIENDS OF BOB KRUEGER 77SEN/004/2996 #023221 CONTRIBUTION	5433 DELOACHE	DALLAS GUFFY SCHLENSKER DRILLING CORP.	TX	6JUL77 PRIMARY OCTOBER 10 QUARTERLY	500
✓ GUNN, CURTIS FRIENDS OF BOB KRUEGER 77SEN/003/3272 #011770 CONTRIBUTION	401 DEVINE ROAD	SAN ANTONIO	TX 78212	13MAY77 PRIMARY JULY 10 QUARTERLY	1,000
✓ GUNTER, KENNETH S. FRIENDS OF BOB KRUEGER 77SEN/004/3015 #024132 CONTRIBUTION	COUNTRY CLUB ROAD	SAN ANGELO UA COLUMBIA CABLEVISION INC.	TX 76901	18SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ GUTIERREZ, JOSE ROBERTO FRIENDS OF BOB KRUEGER 77SEN/004/3021 #024285 CONTRIBUTION	107 PRIMROSE	LAREDO PETROLEUM ENGINEER	TX 78040	15SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ HAAS, MARY FRANCES FRIENDS OF BOB KRUEGER 77SEN/004/3017 #024223 CONTRIBUTION	36 HEWITT	CORPUS CHRISTI HOUSEWIFE	TX 78404	18SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000

*Sanchez*  
1,000 } *Sally*  
*Sandey*  
*O'Brien*  
*Petro*

FEDERAL ELECTION COMMISSION  
 SELECTED LIST OF RECEIPTS & EXPENDITURES (G)  
 SECTION I - INDIVIDUALS

DATE 5DEC77

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CONTRIBUTOR/LETTER/TRANSFER FILE#	STREET ADDRESS	CITY	STATE ZIP	DATE ELECTION	AMOUNT
✓ RUTHERFORD, PAT JR. FRIENDS OF BOB KRUEGER 77SEN/003/3281 #011889 CONTRIBUTION	2550 TWO SHELL PLAZA	HOUSTON	TX 77002	20JUN77 PRIMARY JULY 10 QUARTERLY	1,000
✓ RUTHERFORD, PAT H. SR. FRIENDS OF BOB KRUEGER 77SEN/003/3284 #011918 CONTRIBUTION	3015 INWOOD	HOUSTON	TX 77019	20JUN77 PRIMARY JULY 10 QUARTERLY	1,000
✓ <i>Sale from S - 9/13/77 - 4/3/82</i> SANCHEZ, A.R., JR. FRIENDS OF BOB KRUEGER 77SEN/004/3021 #024278 CONTRIBUTION	1519 FREMONT	LAREDO SANCHEZ-O'BRIEN PETROLEUM CORP.	TX 78040	15SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ SANCHEZ, A.R., JR. MRS. FRIENDS OF BOB KRUEGER 77SEN/004/3016 #024194 CONTRIBUTION	802 STONE	LAREDO HOUSEWIFE	TX 78040	15SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ SANCHEZ, A.R., SR. FRIENDS OF BOB KRUEGER 77SEN/004/3016 #024210 CONTRIBUTION	2119 GUERRERO	LAREDO SANCHEZ-O'BRIEN PETROLEUM CORP.	TX 78040	15SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ SANCHEZ, GEORGE M. FRIENDS OF BOB KRUEGER 77SEN/004/3015 #024108 CONTRIBUTION	NO. 2 NORTHWOOD DRIVE	LAREDO SOUTH. DEVELOPMENT PROPERTIES INC.	TX 78041	15SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ SAROFIN, FAYEZ FRIENDS OF BOB KRUEGER 77SEN/004/3013 #024080 CONTRIBUTION	3970 INVERNESS	HOUSTON	TX 77019	14SEP77 PRIMARY OCTOBER 10 QUARTERLY	500
✓ SCHAEFER, JOHN M. FRIENDS OF BOB KRUEGER 77SEN/004/3026 #024562 CONTRIBUTION	167 COUNTRY LANE	SAN ANTONIO SCHAEFER HOMES	TX 78209	30SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ SCHAEFER, NANCY FRIENDS OF BOB KRUEGER 77SEN/004/3006 #023745 CONTRIBUTION	167 COUNTRY CLUB LANE	SAN ANTONIO HOUSEWIFE	TX 78209	30SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ SCHAEFER, SAM H. FRIENDS OF BOB KRUEGER 77SEN/004/3011 #023319 CONTRIBUTION	411 PATRICIA	SAN ANTONIO SCHAEFER HOMES	TX 78216	30SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ SCHAEFER, SAM H., MRS. FRIENDS OF BOB KRUEGER 77SEN/004/3026 #024578 CONTRIBUTION	411 PATRICIA	SAN ANTONIO HOMEMAKER	TX 78216	30SEP77 PRIMARY OCTOBER 10 QUARTERLY	1,000

SELECTED LIST OF RECEIPTS & EXPENDITURES (G)  
SECTION I - INDIVIDUALS

CONTRIBUTOR/LENDER/TRANSFERER FILER	STREET ADDRESS	CITY	STATE ZIP	DATE	ELECTION	AMOUNT
✓ ENDEBRY, CHARLIE FRIENDS OF BOB KRUEGER 77SEN/004/2985 #023214 CONTRIBUTION	P.O. BOX 425	GAINSVILLE	TX 76240	4JUL77	PRIMARY	1,000
		GAINSVILLE HUTANE		OCTOBER 10	QUARTERLY	
✓ EULICH, JOHN F. FRIENDS OF BOB KRUEGER 77SEN/004/2992 #023284 CONTRIBUTION	3704 LEXINGTON	DALLAS	TX 75205	21JUL77	PRIMARY	1,000
		VANTAGE COMPANIES		OCTOBER 10	QUARTERLY	
✓ EULICH, VIRGINIA FRIENDS OF BOB KRUEGER 77SEN/004/2993 #023292 CONTRIBUTION	3704 LEXINGTON	DALLAS	TX 75205	21JUL77	PRIMARY	1,000
		HOUSEWIFE		OCTOBER 10	QUARTERLY	
✓ EZELL, LEVON FRIENDS OF BOB KRUEGER 77SEN/003/3282 #011905 CONTRIBUTION	7675 FALLMEADOW LANE	DALLAS	TX 75248	16JUN77	PRIMARY	1,000
		L. D. HRINKMAN CO.		JULY 10	QUARTERLY	
✓ FARMER, ROBERT D. FRIENDS OF BOB KRUEGER 77SEN/004/2990 #023275 CONTRIBUTION	457 OGDEN LANE	NEW BRAUNFELS	TX 78130	14JUL77	PRIMARY	1,000
		SIGMOR SERVICE STATIONS		OCTOBER 10	QUARTERLY	
✓ FARRINGTON, RONNIE FRIENDS OF BOB KRUEGER 77SEN/004/3007 #023748 CONTRIBUTION	687 BENDING OAK DRIVE	BELLVILLE	TX 77418	24AUG77	PRIMARY	500
		P & F CATTLE CO.		OCTOBER 10	QUARTERLY	
✓ FAULK, REYNOLDS FRIENDS OF BOB KRUEGER 77SEN/004/2985 #023213 CONTRIBUTION	121 SHAVANO DR.	SAN ANTONIO	TX 78231	4JUL77	PRIMARY	500
		REYNOLDS FAULK INVESTMENT CO.		OCTOBER 10	QUARTERLY	
✓ FELD, MR. & MRS. ALAN FRIENDS OF BOB KRUEGER 77SEN/004/2983 #023351 CONTRIBUTION	4235 BORDEAUX	DALLAS	TX 75201	2JUL77	PRIMARY	1,000
		AKIN, GUMP, HAUER & FELD (ATTORNEY)		OCTOBER 10	QUARTERLY	AMENDMENT
✓ FITZGERALD, D.N., MR. AND MRS. FRIENDS OF BOB KRUEGER 77SEN/004/2986 #023216 CONTRIBUTION	3105 SEABOARD	MIDLAND	TX 79701	6JUL77	PRIMARY	500
		SLOUGH EQUIPMENT CO.		OCTOBER 10	QUARTERLY	
✓ FOREE, R.L. (RON) FRIENDS OF BOB KRUEGER 77SEN/004/2999 #023613 CONTRIBUTION	10140 GAYWOOD	DALLAS	TX 75202	4AUG77	PRIMARY	500
		FOREE CO.		OCTOBER 10	QUARTERLY	
✓ FREEMAN, M.M. FRIENDS OF BOB KRUEGER 77SEN/004/3021 #024281 CONTRIBUTION	1920 HOUSTON ST.	LAREDO	TX 78040	15SEP77	PRIMARY	1,000
		SANCHEZ-O'BRIEN PETROLEUM CORP.		OCTOBER 10	QUARTERLY	

*see Sanchez*

SELECTED LIST OF RECEIPTS & EXPENDITURES (G)  
SECTION 1 - INDIVIDUALS

CONTRIBUTOR/LENDER/TRANSFERER FILER	STREET ADDRESS	CITY	STATE ZIP	DATE	ELECTION	AMOUNT
✓ WHITTLE, RENE HAAS FRIENDS OF BOB KRUEGER 77SEN/004/3016 #024209 CONTRIBUTION	P.O. BOX 1064	CORPUS CHRISTI HOUSEWIFE	TX 78403	18SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WHITTLE, WILLIAM A. FRIENDS OF BOB KRUEGER 77SEN/004/3016 #024203 CONTRIBUTION	P.O. BOX 2446	CORPUS CHRISTI KLEBERT, NOBLEY, ET AL (ATTORNEY)	TX 78403	18SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WHITWORTH, CHARLES E. FRIENDS OF BOB KRUEGER 77SEN/004/3016 #024214 CONTRIBUTION	1920 PRINCE, APT. J	LAREDO <i>see Sanchez</i> SANCHEZ INVESTMENTS, INC.	TX 78040	15SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WILLIAMS, CLAYTON W., JR. FRIENDS OF BOB KRUEGER 77SEN/004/3010 #023902 CONTRIBUTION	RT. 2 P.O. BOX 103	MIDLAND WILLIAMS CO.	TX 78701	6SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WILLIAMS, J.D. FRIENDS OF BOB KRUEGER 77SEN/004/3025 #024551 CONTRIBUTION	1325 N. PEGRAM	ALEXANDRIA LAWYER	VA 22304	29SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WILLIAMS, MODESTA FRIENDS OF BOB KRUEGER 77SEN/004/3010 #023908 CONTRIBUTION	RT. 2 P.O. BOX 103	MIDLAND HOMEMAKER	TX 79701	6SEP77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WILLIAMSON, J.C. FRIENDS OF BOB KRUEGER 77SEN/004/3004 #023726 CONTRIBUTION	2220 WESTERN	MIDLAND WILLIAMSON & WILLIAMSON (IND OIL)	TX 79701	17AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WILLINSON, RALPH E. FRIENDS OF BOB KRUEGER 77SEN/004/3000 #023531 CONTRIBUTION	2413 METZ PL.	MIDLAND INDEPENDENT OIL PRODUCER	TX 79701	6AUG77	PRIMARY OCTOBER 10 QUARTERLY	1,000
✓ WILSON, WILLIAM W. FRIENDS OF BOB KRUEGER 77SEN/003/3280 #011471 CONTRIBUTION	200 PRIMROSE HILL	EDLESS	TX 76039	28JUN77	PRIMARY JULY 10 QUARTERLY	1,000
✓ WINSTEAD, S.G. FRIENDS OF BOB KRUEGER 77SEN/004/2985 #023212 CONTRIBUTION	4507 BORDEAUS	DALLAS JACKSON, WALKER, WINSTEAD, ET AL.	TX	4JUL77	PRIMARY OCTOBER 10 QUARTERLY	500
✓ WITTS, DAVID FRIENDS OF BOB KRUEGER 77SEN/003/3285 #011925 CONTRIBUTION	5353 FIRST INTERNATIONAL BLDG.	DALLAS ATTORNEY	TX 75270	28JUN77	PRIMARY JULY 10 QUARTERLY	1,000

To: Bill  
 From: Ernie

Subject: My memo of 12/7/77

see the above mentioned memo.  
 For additional info.

Post  
 12/29/77

Jack Anderson and Les Whitten

In Hot Pursuit of—Some Recipes

The threat of a congressional subpoena, used in the past to command the appearance of such diverse figures as crime overlord Frank Costello, Teamsters boss Jimmy Hoffa and banking tycoon J.P. Morgan, has now figured in a wild goose chase after a collection of exotic Korean recipes.

The threat came from the sanctuary of Leon Jaworski, the former Watergate prosecutor, who is now investigating the Korean payoff scandals for the House Committee on Standards of Official Conduct. His chief deputy, Peter White, came across a news snippet that Suzi Park Thomson had a book in the making.

She is the petite attractive South Korean woman who used to hobnob with former Speaker Carl Albert and other Capitol Hill bigwigs. She has been cross-examined repeatedly behind closed doors by the Jaworski team. Not once during the hours of detailed questioning had she mentioned that she was writing a book.

The alert White hit the telephone and tracked down Suzi's literary agent, Bertha Klausner, in New York City. He demanded that Klausner supply the committee with the book material Suzi had sent her.

Klausner would not comment on her conversation with White. But both Suzi and her lawyer, Philip Hirschkop, quoted Klausner as telling them she had been threatened with a subpoena, which would compel her to turn over the 20-page book summary.

To save Jaworski's men the trouble of serving the subpoena, we are happy to supply them with the highlights of Suzi's manuscript:

The book will reveal Suzi's secret recipes for such Oriental delights as kim chee and Cheju Island pheasant. It will also include the ingredients for a bizarre dessert, which Suzi has named "the congressman."

The latter is a concoction of liquor, ice cream and chopped nuts, pumped up appropriately with air. Kim chee consists of cayenne-peppered cabbage. Cheju Island pheasant offers a chestnut sauce and stuffing.

Speaker Albert used to dote on Suzi's Korean-style spareribs. There will also be instructions on how to fix Peking goose. If Jaworski's investigators can wait until the book is in final form, they can also discover the secrets of shabu-shabu, a sort of Mongolian hot-pot.

But perhaps the most befitting dish will be a Korean-style meat mixture of Suzi's own creation. She calls it the "House leadership stew."

Footnote: Peter White gave us a polite "no comment."

Kids for Krueger—Rep. Robert Krueger (D-Tex.) has been on the receiving end of some astonishing piggy-bank contributions from the offspring of oil-rich families. The money has been deposited quietly in a political war chest, which he expects to use in a effort to unseat Sen. John Tower (R-Tex.).

Krueger has also made a brash appeal to oil and gas corporations for funds to underwrite his primary campaign. He may have run afoul of federal election laws in both instances, and his campaign manager, Gary Mauro, is trying to make quick amends.

Federal Election Commission re-

ords indicate that Krueger's campaign coffers have been fattened with at least \$10,000 in dubious, possibly illegal contributions from the children of oil executives. The law allows minors to contribute up to \$1,000 but only if the funds are controlled exclusively by the youngsters and not derived as a gift.

So we found 13-year-old Joseph Watford tossed \$1,000 into the Krueger pot. His father, George Watford, an oil executive with a Dallas firm called Prairie Producing, claimed his son raised the money by "working and saving over the years" and from gifts bestowed by grandparents. Two other Watford children were good for an additional \$2,000.

We asked a college student about her \$1,000 Krueger gift, and she confessed total ignorance of her largess. "Maybe Daddy did it for me," she speculated in confusion. "Daddy" is Frank Crossen of Syntex Construction, another Dallas firm. We were unable to get a comment from Crossen.

Campaign manager Mauro admitted to our reporter Geoff Lindsay he hadn't thought about the election law restrictions but hastily decided to refund any contributions by minors that might be illegal.

Krueger is also backtracking on a telegraphic appeal to oil and gas corporations for contributions which are flatly prohibited. He sent 7,000 Western Union mailgrams to members of the Texas Independent Petroleum Royalties Owners, reminding them he had been "fighting for deregulation" of gas prices. Some of the wires went to corporations, which are forbidden by law from contributing.

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- 34 Business
- 45 Luau food
- 46 Term in music
- 48 Traitor
- 53 Eastern queen
- 54 Prunes and
- 18 Furnish with other weapons
- 22 Periods
- 24 Dixie city
- 25 Actress Irene
- 26 Anima

Today's Crossword

by James Barrick

1	2	3	4	5	6	7	8	9	10	11	12
13	14	15	16								



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 488

