FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1104

Date Filmed 11/30/81 Camera No. --- 2

Cameraman SPC

FEDERAL ELECTION COMMISSION

materials in connection with conciliation attempts

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):

____	(1) Classified Information	____	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
✓	(3) Exempted by other statute 2 U.S.C. § 437g	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Carolyn Weeder

date Sept. 11, 87

FEC 9-21-77

8140302562

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 9, 1981

David Bolduc
Attorney at Law
1210 Nueces Street, Suite 100
Austin, Texas 78701

Re: MUR 1104
Texas Democratic Voter
Patricipation Project

8102025633

Dear Mr. Bolduc:

On September 3, 1981, the Commission accepted the conciliation agreement signed by Gary Mauro, treasurer of the Texas Democratic Voter Participation Project and the civil penalty in settlement of a violation of 2 U.S.C. § 434(b)(9) (presently 2 U.S.C. § 434(b)(6)(B)(v) and § 434(b)(4)(H)(iv)), and 2 U.S.C. § 441a(F) (11 C.F.R. § 102.5(a)(2)(i)), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files. Should you have any questions, contact Carolyn Weeder, the staff member assigned to this matter, at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

RECEIVED
81 AUG 20 P12: 11

BEFORE THE FEDERAL ELECTION COMMISSION

July 9, 1981

In the Matter of	)	
	)	MUR 1104
Texas Democratic Voter Participation Project	)	
	)	

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CONCILIATION AGREEMENT

The Federal Election Commission (hereinafter the "Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, initiated this matter and found reason to believe that Texas Democratic Voter Participation Project ("Respondent") violated 2 U.S.C. § 434(b)(9) (presently 2 U.S.C. § 434(b)(6)(B)(v) and § 434(b)(4)(H)(iv)) by failing to disclose the particulars for its voter registration and get-out-the-vote expenditures and to disclose whether its expenditures on behalf of Robert Krueger were state party expenditures made in accordance with § 44la(d) or were in-kind contributions, and violated § 44la(f), 11 C.F.R. § 102.5(a)(2)(i) by knowingly accepting contributions in excess of the contribution limitations set forth in § 44la(a) and depositing these contributions which were intended for the non-federal account into its federal account.

NOW, THEREFORE, the Commission and Respondent, having duly participated in informal methods of conciliation, do hereby agree as follows:

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81 AUG 20 P12:11

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this agreement has the effect of a conciliation agreement under 2 U.S.C. § 437g(a)(4)(A) (formerly 2 U.S.C. § 437g(a)(5)(A)).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent, Texas Democratic Voter Participation Project, was a state committee of the Democratic Party.

2. Respondent failed to adequately disclose the particulars for its expenditures.

3. Respondent deposited into its federal account contributions aggregating $15,000 from the John Hill Campaign Committee, an unregistered gubernatorial candidate committee in Texas, which were intended for deposit into Respondent's non-federal account. The date and amount of these contributions are as follows:

Date	Amount
07/11/78	$2,500
08/01/78	2,500
08/16/78	2,500
08/29/78	2,500
09/12/78	2,500
09/28/78	2,500

4. Respondent refunded $10,000 on November 28, 1979 and $5,000 on December 11, 1979 to the John Hill Campaign Committee.

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5. Respondent deposited into its federal account a contribution of $5,000 on September 20, 1978 from the Bill Hobby Campaign Committee, an unregistered public service fund for a statewide get-out-the-vote-drive in Texas, which was intended for deposit in Respondent's non-federal account.

6. Respondent deposited into its federal account a contribution of $5,000 on April 16, 1980 from Friends of Bob Armstrong, an unregistered "office-holder account" as defined under Article 14.01 of the Texas Election Code, which was intended for deposit in Respondent's non-federal account.

WHEREFORE, Respondent Agrees:

V. Respondent violated 2 U.S.C. § 434(b)(9) (presently 2 U.S.C. § 434(b)(6)(B)(v) and § 434(b)(4)(H)(iv)) by failing to disclose particulars for its voter registration and get-out-the-vote expenditures and failing to disclose whether its expenditures on behalf of Robert Krueger were state party expenditures made in accordance with 2 U.S.C. § 441a(d) or were in-kind contributions, and that:

1. "get-out-the-vote expense" and "voter registration expense" are improper particulars under which to report an expenditure and agrees to report specific purposes for such expenditures in the future;

2. all expenditures characterized as "Robert Krueger," "Krueger," or any similar characterization were § 441a(d) expenditures made on behalf of Robert Krueger, the Democratic

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nominee for the office of U.S. Senator, that all such expenditures should have been reported on Schedule F, and agrees to report such expenditures properly in the future;

3. receipts from and expenditures to other political committees should have been listed as transfers in and out rather than as contributions from individuals or operating expenditures and agrees to properly report the same in the future; and,

4. at least some of the reports in question did not properly identify the committee as the "Texas Democratic Voter Participation Project," and agrees to do so in the future.

VI. Respondent does not have to file amendments to its reports for the period July 1, 1978 to July 30, 1979.

VII. Respondent violated 2 U.S.C. § 441a(f), 11 C.F.R. § 102.5(a)(2)(i) by depositing into its federal account contributions from the John Hill Campaign Committee which exceeded contribution limitations and which were intended for deposit in Respondent's non-federal account.

VIII. Respondent violated 2 U.S.C. § 441a(f), 11 C.F.R. § 102.5(a)(2)(i) by depositing into its federal account a contribution of $5,000 from the Bill Hobby Campaign Committee which was intended for deposit in Respondent's non-federal account.

IX. Respondent violated 2 U.S.C. § 441a(f), 11 C.F.R. § 102.5a(2)(i) by depositing into its federal account a

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contribution of $5,000 from Friends of Bob Armstrong which was intended for deposit in Respondent's non-federal account.

X. Respondent will transfer $5,000 from its federal to its non-federal account for the $5,000 contribution received from the Bill Hobby Campaign Committee.

XI. Respondent will transfer $5,000 from its federal to its non-federal account for the $5,000 contribution received from Friends of Bob Armstrong.

XII. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of two thousand dollars ($2,000), pursuant to 2 U.S.C. § 437g(a)(6)(B).

XIII. Respondent shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

XIV. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

XV. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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XVI. It is agreed that Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

9 September 1981
Date

Charles N. Steele
General Counsel

Date

Texas Democratic Voter
Participation Project

BY: Garry Mauro

ITS: Treasurer

8104302569

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 9, 1981

John R. Castle, Jr.
Hughes and Hill
1200 American Bank Tower
Austin, Texas 78701

Re: MUR 1104
John Hill Campaign Committee

Dear Mr. Castle:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Carolyn Weeder, the staff member assigned to this matter, at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 9, 1981

Bob Armstrong
Commissioner
Texas General Land Office
P.O. Box 13144
Capital Station
Austin, Texas 78711

Re: MUR 1104
Friends of Bob Armstrong

Dear Mr. Armstrong:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Carolyn Weeder, the staff member assigned to this matter, at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 9, 1981

James E. Crowther
The Houston Post Company
Houston, Texas 77001

Re: MUR 1104
Bill Hobby Campaign Committee

Dear Mr. Crowther:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Carolyn Weeder, the staff member assigned to this matter, at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

8101302572

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David Bolduc
Attorney at Law
1210 Nueces Street, Suite 100
Austin, Texas 78701

Re: MUR 1104
Texas Democratic Voter
Patricipation Project

Dear Mr. Bolduc:

On September 3, 1981, the Commission accepted the conciliation agreement signed by Gary Mauro, treasurer of the Texas Democratic Voter Participation Project and the civil penalty in settlement of a violation of 2 U.S.C. § 434(b)(9) (presently 2 U.S.C. § 434(b)(6)(B)(v) and § 434(b)(4)(H)(iv)), and 2 U.S.C. § 441a(F) (11 C.F.R. § 102.5(a)(2)(i)), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files. Should you have any questions, contact Carolyn Weeder, the staff member assigned to this matter, at (202)523-4060.

Sincerely,

CNW

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

Bob Armstrong
Commissioner
Texas General Land Office
P.O. Box 13144
Capital Station
Austin, Texas 78711

Re: MUR 1104
Friends of Bob Armstrong

Dear Mr. Armstrong:

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Sincerely,

Charles N. Steele
General Counsel

8 1 0 3 0 2 5 7 4

James E. Crowther
The Houston Post Company
Houston, Texas 771001

Re: MUR 1104
Bill Hobby Campaign Committee

Dear Mr. Crowther:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Carolyn Weeder, the staff member assigned to this matter, at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1104
Texas Democratic Voter Participation Project	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 3, 1981, the Commission decided by a vote of 5-0 to take the following actions in MUR 1104:

1. Approve and send the letters, as submitted with the General Counsel's Memorandum to the Commission dated August 31, 1981.

2. CLOSE THE FILE.

Commissioners Harris, McGarry, Reiche, Thomson and Tiernan voted affirmatively in this matter; Commissioner Aikens did not cast a vote.

Attest:

9/3/81
Date

Jody A. Custer
for Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 8-31-81, 5:25
Circulated on 48 hour tally basis: 9-1-81, 11:00

8102302576

August 31, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MUR 1104

Please have the attached Memo to the Commission distributed to the Commission on a 48 hour tally basis. Thank you.

Attachment

cc: Weeder

8 1 0 3 2 0 0 5 7 7

Weeder

TEXAS DEMOCRATIC VOTER PARTICIPATION PROJECT

1210 NUECES, SUITE 100 (512) 477-1187

AUSTIN, TEXAS 78701

No 787

DATE 8/14/81

Attachment 3 (2 pages)

PAY One thousand dollar only $1000.00 XX

TO THE ORDER OF U. S. Treasurer

COUNTERSIGNATURE REQUIRED FOR $300 OR OVER

Garry Mauro

[illegible]

CITY NATIONAL BANK, AUSTIN, TEXAS

"000787" :111921800: "18501335"

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TEXAS DEMOCRATIC VOTER PARTICIPATION PROJECT

1210 NUECES, SUITE 100 (512) 477-1187

AUSTIN, TEXAS 78701

No 786

DATE June 11, 1981

PAY - - - - One Thousand and 00/100 - - - - - - - - - - - - - $1,000.00/100

TO THE ORDER OF Federal Election Commission

COUNTERSIGNATURE REQUIRED FOR $300 OR OVER

Barry Mauer

CITY NATIONAL BANK, AUSTIN, TEXAS

"000786" :114921800: "18501335"

DETACH AND RETAIN THIS STATEMENT

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW

IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

DATE	DESCRIPTION	AMOUNT
6-11-81	to Federal Election Commission For Civil Penalty under MUR 1104	$1,000.00

SL 2

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(10)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David Bolduc
Attorney at Law
1210 Nueces Street, Suite 100
Austin, Texas 78701

Re: MUR 1104
Texas Democrat Voter
Patricipation Project

Dear Mr. Bolduc:

On August , 1981, the Commission accepted the conciliation agreement signed by Gary Mauro, treasurer of the Texas Democratic Voter Participation Project and the civil penalty in settlement of a violation of 2 U.S.C. § 434(b)(9) (presently 2 U.S.C. § 434(b)(6)(B)(v) and § 434(b)(4)(H)(iv)), and 2 U.S.C. § 441a(F) (11 C.F.R. § 102.5(a)(2)(i)), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files. Should you have any questions, contact Carolyn Weeder, the staff member assigned to this matter, at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

BY:
Kenneth A. gross
Associate General Counsel

Enclosure
Conciliation Agreement

Attachment 3
(4 pages)

8104302580

(11)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

John R. Castle, Jr.
Hughes and Hill
1200 American Bank Tower
Austin, Texas 78701

Re: MUR 1104
John Hill Campaign Committee

Dear Mr. Castle:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Carolyn Weeder, the staff member assigned to this matter, at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

BY:
Kenneth A. Gross
Associate General Counsel

8104302581

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p. 2

(12)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bob Armstrong
Commissioner
Texas General Land Office
P.O. Box 13144
Capital Station
Austin, Texas 78711

Re: MUR 1104
Friends of Bob Armstrong

Dear Mr. Armstrong:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Carolyn Weeder, the staff member assigned to this matter, at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

BY:
Kenneth A. Gross
Associate General Counsel

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AH. 3
p. 3

(B)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

James E. Crowther
The Houston Post Company
Houston, Texas 771001

Re: MUR 1104
Bill Hobby Campaign Committee

Dear Mr. Crowther:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Carolyn Weeder, the staff member assigned to this matter, at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

BY:
Kenneth A. Gross
Associate General Counsel

8101302583

AA.3
p.1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 4, 1981

Bob Armstrong
Commissioner
Texas General Land Office
P.O. Box 13144
Capitol Station
Austin, Texas 78711

Re: MUR 1104

Dear Mr. Armstrong:

On July 28, 1981, the Commission found reason to believe that Friends of Bob Armstrong had violated 2 U.S.C. § 433 and § 434, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its files as it pertains to your committee. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The General Counsel's Factual and Legal analysis which formed a basis for the Commission's finding is attached for your information.

If you have any questions, please direct them to Carolyn Weeder, at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

8102584

Bob Armstrong
Commissioner
Texas General Land Office
P.O. Box 13144
Capitol Station
Austin, Texas 78711

Re: MUR 1104

Dear Mr. Armstrong:

On July 28, 1981, the Commission found reason to believe that Friends of Bob Armstrong had violated 2 U.S.C. § 433 and § 434, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its files as it pertains to your committee. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The General Counsel's Factual and Legal analysis which formed a basis for the Commission's finding is attached for your information.

If you have any questions, please direct them to Carolyn Wedder, at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE July 13, 1981

MUR NO. 1104
STAFF MEMBER(S) & TEL. NO.

RESPONDENT Friends of Bob Armstrong

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

The Reports Analysis Division forwarded information to the Office of General Counsel which indicated that Friends of Bob Armstrong violated 2 U.S.C. § 433 and § 434 by failing to register and report as a political committee.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 433 and § 434 require political committees which make expenditures in connection with federal elections in excess of $1,000 per calendar year to register and report with the Commission.

Reports filed by the Texas Democratic Voter Participation Project (the "Texas Committee") disclosed receipt of a $5,000 contribution from Friends of Bob Armstrong, an unregistered committee, on April 16, 1980. The Reports Analysis Division sent Friends of Bob Armstrong a request for additional information in regard to the contribution.

In response, Bob Armstrong submitted a letter explaining that Friends of Bob Armstrong was a state "office-holder account" as defined under Article 14.01 of the Texas Election Code. Mr. Armstrong further explained that the funds in this account are

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used to defray expenses not reimbursable by the State, including some political activities that he is expected to support as a state officeholder. Armstrong points out that the Texas Code prohibits money in this account to be contributed to any candidate for political office. Additionally, the Texas Code prohibits receipt of contributions from corporations and labor organizations in the office-holder account. Thus, Armstrong states that his contribution to the Texas Committee was intended to be used for state-wide voter participation drives in connection with state elections and that he was not aware that he was giving to a "federal committee". The Texas Committee has also confirmed this error.

Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Friends of Bob Armstrong violated 2 U.S.C. § 433 and § 434 but take no further action against Friends of Bob Armstrong.

Recommendation

Find reason to believe that Friends of Bob Armstrong violated 2 U.S.C. § 433 and § 434 but take no further action against Friends of Bob Armstrong.

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8-4-87

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:
David Baldwin

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 830240 | INSURED NO.

(Always obtain signature of addressee or agent)
I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
X

4. DATE OF DELIVERY 10 1987 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

1104 Weeden

PS Form 3811, Jan. 1979 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-000-000

AUSTIN TX AUG 7 AM 1987

B102 2589

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Texas Democratic Voter)
Participation Project)

MUR 1104

CERTIFICATION

I, Lena L. Stafford, Recording Secretary for the Federal Election Commission's Executive Session on July 28, 1981, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1104:

2. Find REASON TO BELIEVE that Friends of Bob Armstrong violated 2 U.S.C. §433 and §434 but take no further action against Friends of Bob Armstrong.

3. Approve and send the letter to Friends of Bob Armstrong (Attachment 4 to the General Counsel's July 8, 1981 report).

Commissioners Aikens, Harris, McGarry, Reiche, Thomson, and Tiernan voted affirmatively.

Attest:

7-29-81
Date

Lena L. Stafford
Recording Secretary

8102025809

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER

DATE: JULY 20, 1981

SUBJECT: OBJECTION - MUR 1104 General Counsel's Report dated July 8, 1981; Received in OCS 7-17-81, 9:57

The above-named document was circulated on a 48 hour vote basis at 2:00, July 17, 1981.

Commissioner Aikens submitted an objection at 2:16, July 20, 1981.

This matter will be placed on the Executive Session Agenda for Tuesday, July 28, 1981.

8104020259

July 17, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1104

Please have the attached General Counsel's Report distributed to the Commission on a 48 hour tally basis. Thank you.

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SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

July 8, 1981

81 JUL 17 A 9:57

In the Matter of	)	
	)	MUR 1104
Texas Democratic Voter Participation Project	)	
	)	

GENERAL COUNSEL'S REPORT

I. Background

This matter involves violations of the FECA, as amended, by the Texas Democratic Voter Participation Project (the "Texas Committee"). Specifically, on June 18, 1979, the Commission found reason to believe that the Texas Committee violated 2 U.S.C. § 434 by failing to properly report various expenditures and particulars of expenditures on the appropriate schedules. Additionally, the Commission, on June 24, 1980, found reason to believe that the Texas Committee violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from the John Hill Campaign Committee (the "Hill Committee"), an unregistered gubernatorial candidate committee.[1/]

RAD further discovered, however, that the Texas Committee accepted another contribution from the Bill Hobby Campaign Committee (the "Hobby Committee"), an unregistered "public service fund" for a statewide get-out-the-vote drive. Further investigation revealed that both the Hill Committee and the

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1/ The Texas Committee refunded this contribution on November 28, 1979 ($10,000) and December 11, 1979 ($5,000).

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Hobby Committee intended their contributions to be used in connection with state elections and thus, the Texas Committee violated 11 C.F.R. § 102.5(a)(2)(i) by depositing both contributions into its federal account.[2/]

II. Legal Analysis

A. Texas Democratic Voter Participation Project

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2/ The Commission found reason to believe that the Hill Committee and the Hobby Committee violated 2 U.S.C. § 433 and § 434 by making these contributions which triggered their registration and reporting requirements. The Commission, however, voted to take no further action in that both committees intended their contributions to be used only in connection with state election activities.

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B. Friends of Bob Armstrong

As previously noted, RAD discovered that the Texas Committee received a $5,000 contribution from Friends of Bob Armstrong on April 16, 1980. RAD sent an RFAI to Friends of Bob Armstrong regarding the contribution. In response, Bob Armstrong 3/ submitted a letter explaining that Friends of Bob Armstrong was a state "office-holder account" as defined under Article 14.01 of the Texas Election Code.

Mr. Armstrong further explained that the funds in this account are used to defray expenses not reimbursable by the State, including some political activities that he is expected to support as a state officeholder. Armstrong points out that

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3/ Bob Armstrong is a Commissioner of the Texas General Land Office.

the Texas Code prohibits money in this account to be contributed to any candidate for political office. Additionally, the Texas Code prohibits receipt of contributions from corporations and labor organizations in the office-holder account. Thus, Armstrong states that his contribution to the Texas Committee was intended to be used for state-wide voter participation drives in connection with state elections and that he was not aware that he was giving to a "federal committee".

Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Friends of Bob Armstrong violated 2 U.S.C. § 433 and § 434 but take no further action against Friends of Bob Armstrong.

III. Recommendations

2. Find reason to believe that Friends of Bob Armstrong violated 2 U.S.C. § 433 and § 434 but take no further action against Friends of Bob Armstrong.

3. Approve and send the attached letter to Friends of Bob Armstrong.

July 16, 1981
Date

Charles N. Steele
General Counsel

Attachments

3. Letter to Texas Committee
4. Letter and General Counsel's Legal and Factual Analysis to Friends of Bob Armstrong

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(9)

THE STATE OF TEXAS

COUNTY OF TRAVIS

AFFIDAVIT

BEFORE ME, the undersigned authority, appeared DAVID BOLDUC, who averred as follows:

"My name is David Bolduc. I am the legal counsel and past treasurer of the Texas Democratic Voter Participation Project. On or about August 13, 1980, I incorrectly informed Mr. Charles N. Steele that the Texas Democratic Voter Participation Project had accepted a $15,000.00 contribution from the Bill Hobby Campaign Committee. A review of the Project's reports reveals, however, that the Bill Hobby Campaign Committee in fact contributed only $5,000.00 to the Project."

A total of $15,000.00 was refunded for by the Texas Democratic Voter Participation Project to the John Hill Campaign Committee in two checks -- $10,000.00 on November 28, 1979 and $5,000.00 on December 11, 1979.

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DAVID BOLDUC

SUBSCRIBED AND SWORN TO BEFORE ME, this 11th day of June, 1981.

Notary Public, Travis County, Texas

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(15)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 13, 1981

Mr. Bob Armstrong
Commissioner
Texas General Land Office
P.O. Box 13144
Capitol Station
Austin, Texas 78711

RE: MUR 1104

Dear Mr. Armstrong:

On July , 1981, the Commission found reason to believe that Friends of Bob Armstrong had violated 2 U.S.C. § 433 and § 434, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), in connection with the above referenced-MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its files as it pertains to your committee. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The General Counsel's Factual and Legal analysis which formed a basis for the Commissions's finding is attached for your information.

If you have any questions, please direct them to Carolyn Weeder, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

Attachment 1
3 pages

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(16)

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE July 13, 1981

MUR NO. 1104
STAFF MEMBER(S) & TEL. NO.

RESPONDENT Friends of Bob Armstrong

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

The Reports Analysis Division forwarded information to the Office of General Counsel which indicated that Friends of Bob Armstrong violated 2 U.S.C. § 433 and § 434 by failing to register and report as a political committee.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 433 and § 434 require political committees which make expenditures in connection with federal elections in excess of $1,000 per calendar year to register and report with the Commission.

Reports filed by the Texas Democratic Voter Participation Project (the "Texas Committee") disclosed receipt of a $5,000 contribution from Friends of Bob Armstrong, an unregistered committee, on April 16, 1980. The Reports Analysis Division sent Friends of Bob Armstrong a request for additional information in regard to the contribution.

In response, Bob Armstrong submitted a letter explaining that Friends of Bob Armstrong was a state "office-holder account" as defined under Article 14.01 of the Texas Election Code. Mr. Armstrong further explained that the funds in this account are

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p. 2

(17)

used to defray expenses not reimbursable by the State, including some political activities that he is expected to support as a state officeholder. Armstrong points out that the Texas Code prohibits money in this account to be contributed to any candidate for political office. Additionally, the Texas Code prohibits receipt of contributions from corporations and labor organizations in the office-holder account. Thus, Armstrong states that his contribution to the Texas Committee was intended to be used for state-wide voter participation drives in connection with state elections and that he was not aware that he was giving to a "federal committee". The Texas Committee has also confirmed this error.

Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Friends of Bob Armstrong violated 2 U.S.C. § 433 and § 434 but take no further action against Friends of Bob Armstrong.

Recommendation

Find reason to believe that Friends of Bob Armstrong violated 2 U.S.C. § 433 and § 434 but take no further action against Friends of Bob Armstrong.

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REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE _____

ANALYST Mark Kleinman MK

TO: OFFICE OF GENERAL COUNSEL
ATTENTION: Caroline Weeder

TEAM CHIEF Roberta B. Werfel RBW

COMPLIANCE REVIEW RB

THROUGH: STAFF DIRECTOR

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12/10/79

**PURPOSE:

This update is being provided at your request.

The Reports Analysis Division sent an RFAI and a Second Notice to Friends of Bob Armstrong (FBA)(a state candidate's committee) advising them of the necessity of either registering and filing reports with the Commission, informing the recipient of the need to transfer its contribution to a non-federal account, or requesting a refund from the Texas Democratic Voter Participation Project (TDVPP)(See Attachments 1 & 2). FBA contacted the Commission twice by phone (see Attachments 3 & 5) and once in writing (see Attachment 4) indicating its willingness to resolve the matter. To date, however, FBA has not registered and filed reports with the Commission; or obtained a refund from TDVPP or provided documentation to that effect. Additionally, TDVPP has not reported the transfer of the contribution to a non-federal account.

OUTCOME: (if applicable)

Friends of Bob Armstrong is being referred to the Office of General Counsel.

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 6, 1981

Friends of Bob Armstrong
P.O. Box 13144
Austin, TX 78711

Dear Treasurer :

This letter is prompted by the Commission's interest in assisting committees which may be subject to the registration and reporting requirements of the Federal Election Campaign Act (the Act) but are not registered with the Commission.

The Act defines a "political committee" to include any committee, club, association, or other group of persons which receives contributions aggregating in excess of $1,000 during a calendar year or which makes expenditures aggregating in excess of $1,000 during a calendar year (for the purpose of influencing any election for Federal office). 2 U.S.C. 431(4).

A review of the receipts reported by the Texas Democratic Voter Participation Project Committee and the Travis County Democratic Executive Committee indicate that your organization may have made expenditures in excess of $1,000 during the calendar year 80 to influence Federal elections. The term "expenditures" includes contributions to Federal candidates and committees supporting Federal candidates. 2 U.S.C. 431(9). This activity may qualify you as a "political committee" subject to the registration, reporting and other requirements of the Act. A copy of the receipt schedule(s) which list your contribution(s) is enclosed for your review.

If the contributions in question were specifically designated by you to be used for State and local elections only, please inform the Commission. Please identify the source of funds used and provide copies of any memoranda or letters which designated these contributions.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which will clarify this matter.

If you are a "political committee" but you do not wish to be considered one, you must obtain refund(s) from the candidate(s) or the political committee(s) to which you have made a contribution. As an alternative, the recipient candidate(s) or political committee(s) may transfer all or part of the contributions to accounts which are not used

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to influence Federal elections. These refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed $1,000 during a calendar year.

If your organization has made contributions or expenditures from an account containing receipts from corporations or labor organizations, you must either obtain a full refund, or request the recipient candidate(s) or political committee(s) to transfer the full amount(s) to an account which is not used to influence Federal elections. Contributions or expenditures from corporate or labor organization sources are prohibited by 2 U.S.C. 441b.

If your committee does not obtain the recommended refunds or insure that the required transfers are made, you must submit a Statement of Organization on FEC Form 1 (2 U.S.C. 433) and file disclosure reports on FEC Form 3X (2 U.S.C. 434). We have enclosed relevant informational materials and forms.

Please notify the Commission within fifteen (15) days from the date on this letter of your decision on this matter. If you have any questions, please contact me on our toll free number, (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Mark Kleinman

Mark Kleinman
Reports Analyst
Reports Analysis Division

Enclosures

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SCHEDULE A — ITEMIZED RECEIPTS

Page 5 of 6 for Line Number 11

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

Name of Committee (In Full): TRAVIS COUNTY DEMOCRATIC EXECUTIVE COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt This Period
Campaign Committee To Elect Dylon Adams P.O. Box 6246 Austin, Texas 78762		2/4/80	200.00
Receipt For: ☐ Primary ☐ General ☒ Other (specify): County Convention			
B. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date $ 50.00	Date (month, day, year)	Amount of Each Receipt This Period
Friends of Bob Armstrong P.O. Box 13144 Austin, Texas 78711		2/6/80	50.00
Receipt For: ☐ Primary ☐ General ☒ Other (specify): County Convention			
C. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date $ 200.00	Date (month, day, year)	Amount of Each Receipt This Period
Communications Workers of America COPE - PCC 1925 K Street, N.W. Washington, D.C. 20006		2/6/80	200.00
Receipt For: ☐ Primary ☐ General ☒ Other (specify): County Convention			
D. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date $ 50.00	Date (month, day, year)	Amount of Each Receipt This Period
FINANPAC 2520 Austin Nat. Bank Tower Austin, Texas 78701		2/6/80	50.00
Receipt For: ☐ Primary ☐ General ☒ Other (specify): County Convention			
E. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date $ 200.00	Date (month, day, year)	Amount of Each Receipt This Period
United Transportation Union Educational Committee 1011 Congress, Suite 508 Austin, Texas 78701		2/21/80	200.00
Receipt For: ☐ Primary ☐ General ☒ Other (specify): County Convention			
F. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date $ 200.00	Date (month, day, year)	Amount of Each Receipt This Period
Bob Perkins Re-Election Committee P.O. Box 12984 Austin, Texas 78711		2/27/80	200.00
Receipt For: ☐ Primary ☐ General ☒ Other (specify): County Convention			
G. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date $	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
SUBTOTAL of Receipts This Page (optional)			900.00
TOTAL This Period (last page this line number only)			3350.00

HEDULE A **ITEMIZED RECEIPTS**

Page 1 of 1 for
LINE NUMBERS
Also attached for this category of the Detailed Summary Page)

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

e of Committee (in Full)
Texas Democratic Voter Participation Project

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Senator Lloyd Bentsen Re-Election Comm. P. O. Box 61202 Houston, Texas 77206	N/A	6/10/80	$5,000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date-$ 5,000.00		
X Friends of Bob Armstrong P. O. Box 13144 Austin, Texas 78711	N/A	6/16/80	$5,000.00
Receipt For ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date-$		
F/D Political Involvement Committee 2900 Entex Bldg. Houston, Texas 77002	N/A	6/13/80	$2,000.00
Receipt For ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date-$		
Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date-$		
Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date-$		
Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date-$		
Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date-$		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			12,000.00

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 29, 1981

Treasurer
Friends of Bob Armstrong
P.O. Box 13144
Austin, TX 78711

Dear Treasurer:

This is to inform you that as of this date, the Commission has not received your response to our letter dated May 6, 1981. Our letter notified you that a review of reports filed with the Commission indicates that your organization may have made expenditures which qualify it as a political committee. Enclosed is a copy of our original letter.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate legal action to ensure compliance with the Act.

If you should have any questions related to this matter, please contact Mark Kleinman on our toll-free number (800)424-9530 or our local number (202)523-4048.

Sincerely,

John D. Gibson

John D. Gibson
Acting Asst. Staff Director
Reports Analysis Division

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TELECON TO THE FILE: FRIENDS OF BOB ARMSTRONG

FROM : MARK KLEINMAN

DATE : 6-9-81

SUBJECT : Possible registration

Bob Armstrong called and stated that he was not aware that he was giving to a Federal committee. He elaborated by saying that under Texas state law, he could not give to any candidate from his account (Friends of Bob Armstrong).

I advised him that contributions to a political committee other than a candidate committee could nevertheless trigger a registration requirement, if the committee got involved in Federal elections.

He will respond accordingly. (Note: he stated that there would be no corporate or labor funds in the account as it is prohibited under state law.)

Bob Armstrong
(512) 475-4681

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BOB ARMSTRONG
Commissioner

Texas General Land Office
P.O. Box 13144
Capitol Station
Austin, Texas 78711

June 10, 1981

Mr. Mark Kleinman
Reports Analyst
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Kleinman:

This letter is in response to your written inquiry of May 6 and in response to our telephone conversation of June 9 concerning whether or not "Friends of Bob Armstrong" constitutes a "political committee" subject to registration and reporting requirements under the Federal Election Campaign Laws.

"Friends of Bob Armstrong" is an office-holder account as defined under Article 14.01 of the Texas Election Code. As a state-wide elected official, I use the funds in this account to defray expenses not reimbursable by the State, including some political activities of my party that I am expected to support. All contributions and expenditures to this office-holder account over $50.00 must be reported to the Texas Secretary of State. I have enclosed a copy of my financial statement filed with the Secretary of State for the year 1980. Contributions by corporations and labor organizations are prohibited by the Texas Election Code Article 14.06(242). In addition, money in this account may not be contributed to any candidate for political office.

It was my understanding that the Voter Participation Project to which I contributed was aimed at registering voters regardless of party affiliation (voters do not register by political party in Texas), and any voter registered would be free to vote for any candidate on the ballot.

I doubt seriously that the Federal Election Campaign Act of 1979 was intended to include office-holder accounts such as this one, but if you have further questions I will be glad to discuss it with you.

Sincerely,

Bob Armstrong

Bob Armstrong

Enclosure

OFFICE HOLDER

PART I

George W. Strake, Jr., Secretary of State
Capitol Station
Austin, Texas 78711

OFFICEHOLDER'S SWORN STATEMENT OF CONTRIBUTIONS & EXPENDITURES

(Chapter 14, Vernon's Texas Election Code)

For the Period January 1, 1980, through December 31, 1980

Friends of Bob Armstrong

Name of Officeholder	Office Held
Robert L. Armstrong	Commissioner, Texas General Land Office
Address	
P.O. Box 13144, Austin, Texas 78711	

Check One:

- [x] January 15th Aanual Statement — Periods Covered: (from last statement filed through December 31st)
- [ ] 15th Day after Designation of Campaign Treasurer Statement * — Periods Covered: (from last statement filed through the day before the date of designation of campaign treasurer)

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* The filing of designation of a successor campaign treasurer does not trigger the requirement to file this sworn statement. After this designation, in addition to the annual statement, all contributions and expenditures must be reported at the same time as required of candidates for that election. No designation of campaign treasurer shall be required in order for an officeholder to accept contributions or make expenditures to assist the officeholder in the performance of duties or activities in connection with the office which are nonreimbursable by the state or political subdivision.

INSTRUCTIONAL NOTE:
Loans are not reportable as officeholder contributions, even though these forms indicate their reportability for candidates and political committees.

Attach Part II

Complete pages 1 and 2

Answer page 2 on reverse side

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George W. Strake, Jr., Secretary of State
Capitol Station
Austin, Texas 78711

CONTRIBUTIONS

PART II
SECTION A

INSTRUCTIONS List all contributions aggregating more than $50 from any one person (or group) during this reporting period. *General purpose political committees filing on a monthly basis must list all contributions aggregating more than $10 from any one person (or group) during this reporting period.* Give the market value of all gifts of property or services and the rental value of the use of property. If the gift of property is classified as unique so that the market value cannot be ascertained, give the estimated reasonable value. If the exact value of the services or use of property cannot be ascertained, show the estimated market value. If more space is needed, use the back of this page or simply reproduce form.

Date	Contributor or Creditor (List full given and last names)	Address (Give complete street or P.O. Box number, city or town)	Money or equivalent (1)	Loans of Money (2)	Gifts of or use of property or services (3)	
					Amount	Description
2-15	Vaughn O. Stewart	P.O. Box 120, Lake Jackson, Texas 77566	$ 250.00	$	$	
2-16	Mrs. J. W. Hershey	#1 Longbow Lane, Houston, Texas 77024	100.00			
		TOTAL	$ 350.00		$	

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George W. Strake, Jr., Secretary of State
Capitol Station
Austin, Texas 78711

PART II
SECTION B

EXPENDITURES

INSTRUCTIONS List all expenditures aggregating more than $50 to any one person (or group) during this reporting period. *General purpose political committees filing on a monthly basis must list all expenditures aggregating more than $10 to any one person (or group) during this reporting period.* If more space is needed, use the back side of this page, or reproduce this form.

Total amount of payments made for previously reported bills (no itemization required; do not carry this total forward) $_____ (Optional)

Date	Payee or Creditor (List full given and last names)	Address (Give complete street or P.O. Box number, city and town)	Cash payments and unpaid bills (except loans) not previously reported (1)	Repayments of loans of money (2)	Purpose (be specific)
			$	$	
1-3-80	Safeway	12th Street at I.H. 35, Austin	58.06		Coffee Supplies
1-30	Texas Coalition of Black Democrats	P.O. Box 15126, Ft. Worth, Tx.76119	60.00		Ad in convention program
2-4	Travis County Democratic Party	1711 Rio Grande, Austin, Tx. 78701	50.00		Contribution
3-5	Texas AFL-CIO	1106 Lavaca, Austin, Tx. 78701	200.00		Contribution
3-11	Houston Post	4747 Sw Frwy, Houston	50.00		Ad for the Houston Stock Show 4-H Salute
3-20	Bob Armstrong	P.O. Box 13144, Austin 78711	70.72		Reimbursement for travel expense
4-2	Safeway	12th Street at I.H. 35, Austin	56.47		Coffee Supplies
4-2	Texas Young Democrats	P.O. Box 12345, Austin, 78711	60.00		Advertisement
4-16	Tx. Democratic Party	215 Stokes Bldg, Austin 78701	5,000.00		1980 Voter Participation Project
5-12	Billy Goldberg	10th Fl., Guaranty Natl. Bank Bldg. Houston, Tx.	67.20		Reimbursement for hotel expense
5-30	Lou Hill	2106 Allred Dr., Austin, 78748	25.00		Contract Services
6-30	Lou Hill	" "	25.00		" "
6-30	Safeway	12th Street at I.H. 35, Austin	56.34		Coffee Supplies
7-15	University of Texas - Joe C. Thompson Conference Center	2600 Red River St., Austin, Tx.	230.56		Reception honoring Secretary of Interior, Cecil Andrus
7-23	Tx. Women's Political Caucus	815 Brazos, Suite 304 Austin 78701	80.00		½ page ad for convention
8-1	Lou Hill	2106 Allred Dr., Austin, 78748	25.00		Contract Services
8-15	New York Hilton Hotel	New York, N.Y.	914.29		Democratic National Convention Expenses
8-19	R.L. Armstrong	P.O. Box 13144, Austin 78711	80.50		Reimbursement for Natl. Convention Expenses
8-29	Lou Hill	2106 Allred Drive, Austin 78748	25.00		Contract Services
9-9	Travis Co. Democratic Party	P.O. Box 13262, Austin, 78711	100.00		1980 kick-off tickets
9-26	University Yount Democrats	University of Tx.-Austin	50.00		Get out the vote effort
9-29	Lou Hill	2106 Allred Dr, Austin 78748	25.00		Contract Services
8-29	Texas Democratic Party	215 Stokes Bldg, Austin 78701	1,193.37		Reception at New York Hilton
		TOTAL	$ 8,502.51	$	

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George W. Strake, Jr., Secretary of State
Capitol Station
Austin, Texas 78711

EXPENDITURES

PART II
SECTION B

INSTRUCTIONS List all expenditures aggregating more than $50 to any one person (or group) during this reporting period. *General purpose political committees filing on a monthly basis must list all expenditures aggregating more than $10 to any one person (or group) during this reporting period.* If more space is needed, use the back side of this page, or reproduce this form.

Total amount of payments made for previously reported bills (no itemization required; do not carry this total forward) $_____ (Optional)

Date	Payee or Creditor (Last full given and last names)	Address (Give complete street or P.O. Box number, city and town)	Cash payments and unpaid bills (except loans) not previously reported (1)	Repayments of loans of money (2)	Purpose (Be specific)
			$	$	
10-9	Stuart Long Memorial Scholarship Fund	P.O. Box 2342, Austin 78767	125.00		Gridiron Ad
11-3	Lou Hill	2106 Allred Drive, Austin 78748	25.00		Contract Services
12-1	Lou Hill	" "	25.00		Contract Services
12-1	Tx. Democratic Party	215 Stokes Bldg, Austin 78701	1,000.00		Contribution
12-30	Lou Hill	2106 Allred Dr, Austin 78748	25.00		Contract Services
		TOTAL	$ 1,200.00	$	

Jack W. Strake, Jr., Secretary of State
Capitol Station
Austin, Texas 78711

TOTALS

CANDIDATES, OFFICEHOLDERS, and POLITICAL COMMITTEES

PART II. SECTION C

NOTE: Candidates, officeholders, specific purpose political committees and general purpose political committees not filing on a monthly basis shall report ALL CONTRIBUTIONS AND EXPENDITURES (even those aggregating $50 and less) from or to any one person or group) during the reporting period as indicated.

FROM CONTRIBUTIONS OF	MORE THAN $50	$50 AND LESS
MONEY OR ITS EQUIVALENT		
(1) Total from Column 1, Part II, Section A	$ 350.00	
(2) $50 and less (a previously unreported figure)		$ 50.00
GIFTS OF OR USE OF PROPERTY OR SERVICES		
(3) Total from Column 3, Part II, Section A	$ -0-	
(4) Values of $50 and less (a previously unreported figure)		$ -0-
(5) TOTAL OF CONTRIBUTIONS OF MORE THAN $50 (other than loans of money)	$ 350.00	
(6) TOTAL OF CONTRIBUTIONS OF $50 AND LESS (other than loans of money)		$ 50.00
LOANS OF MONEY		
(7) Total from Column 2, Part II, Section A	$ -0-	
(8) Total loans of $50 and less (a previously unreported figure)		$ -0-
(9) TOTAL CONTRIBUTIONS OF MORE THAN $50 [Add figure (5) to figure (7)]	$ 350.00	
(10) TOTAL CONTRIBUTIONS OF $50 AND LESS [Add figure (6) to figure (8)]		$ 50.00
TOTAL CONTRIBUTIONS FOR THIS REPORTING PERIOD: (Add totals from both columns to obtain this figure)	$ 400.00	
TOTAL CONTRIBUTIONS FROM PREVIOUS REPORTS (Optional)	$	
TOTAL CONTRIBUTIONS TO DATE (Optional)	$	

FROM EXPENDITURES OF	MORE THAN $50	$50 AND LESS
CASH PAYMENTS AND UNPAID BILLS (except loans) NOT PREVIOUSLY REPORTED		
(11) Total from Column 1, Part II, Section B	$ 9,702.51	
(12) $50 and less (a previously unreported figure)		$ 645.23
GIFTS OF OR USE OF PROPERTY OR SERVICES		
(13) Total from line 3 above	$ -0-	
(14) Total from line 4 above		$ -0-
(15) TOTAL OF EXPENDITURES OF MORE THAN $50 (other than repayment of loans of money)	$ 9,702.51	
(16) TOTAL OF EXPENDITURES OF $50 AND LESS (other than repayment of loans of money)		$ 645.23
REPAYMENTS OF LOANS (OF MONEY)		
(17) Total from Column 2, part II, Section B	$ -0-	
(18) Total repayments of $50 and less (a previously unreported figure)		$ -0-
(19) TOTAL EXPENDITURES OF MORE THAN $50 [Add figure (15) and figure (17)]	$ 9,702.51	
(20) TOTAL EXPENDITURES OF $50 AND LESS [Add figure (16) and figure (18)]		$ 645.23
TOTAL EXPENDITURES FOR THIS REPORTING PERIOD: (Add totals from both columns to obtain this figure)	$ 10,347.74	
TOTAL EXPENDITURES FROM PREVIOUS REPORTS (Optional)	$	
TOTAL EXPENDITURES TO DATE (Optional)	$	

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AFFIDAVIT

STATE OF TEXAS
COUNTY OF TRAVIS

Before me, the undersigned authority, on this day personally appeared Robert L Armstrong who being by me here and now duly sworn, upon oath says: I do solemnly swear that the foregoing statement, filed herewith, is in all things true and correct, and fully shows all information required to be reported by me pursuant to the Political Funds Reporting and Disclosure Act of 1975.

Robert L Armstrong
Signature of Affiant

NOTE: TREASURER OF CANDIDATE IS NOT AUTHORIZED TO SIGN FOR CANDIDATE OR OFFICE HOLDER.

Subscribed and sworn to before me by the said Robert L. Armstrong, this 14th day of January, 19 81, to certify which, witness my hand and seal of office

Linda K Zaiser
Signature of officer administering oath

Title of officer administering oath

See Reverse Side for Election Filing Deadlines

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 6, 1981

Friends of Bob Armstrong
P.O. Box 13144
Austin, TX 78711

Dear Treasurer :

This letter is prompted by the Commission's interest in assisting committees which may be subject to the registration and reporting requirements of the Federal Election Campaign Act (the Act) but are not registered with the Commission.

The Act defines a "political committee" to include any committee, club, association, or other group of persons which receives contributions aggregating in excess of $1,000 during a calendar year or which makes expenditures aggregating in excess of $1,000 during a calendar year (for the purpose of influencing any election for Federal office). 2 U.S.C. 431(4).

A review of the receipts reported by the Texas Democratic Voter Participation Project Committee and the Travis County Democratic Executive Committee indicate that your organization may have made expenditures in excess of $1,000 during the calendar year 80 to influence Federal elections. The term "expenditures" includes contributions to Federal candidates and committees supporting Federal candidates. 2 U.S.C. 431(9). This activity may qualify you as a "political committee" subject to the registration, reporting and other requirements of the Act. A copy of the receipt schedule(s) which list your contribution(s) is enclosed for your review.

If the contributions in question were specifically designated by you to be used for State and local elections only, please inform the Commission. Please identify the source of funds used and provide copies of any memoranda or letters which designated these contributions.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which will clarify this matter.

If you are a "political committee" but you do not wish to be considered one, you must obtain refund(s) from the candidate(s) or the political committee(s) to which you have made a contribution. As an alternative, the recipient candidate(s) or political committee(s) may transfer all or part of the contributions to accounts which are not used

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to influence Federal elections. These refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed $1,000 during a calendar year.

If your organization has made contributions or expenditures from an account containing receipts from corporations or labor organizations, you must either obtain a full refund, or request the recipient candidate(s) or political committee(s) to transfer the full amount(s) to an account which is not used to influence Federal elections. Contributions or expenditures from corporate or labor organization sources are prohibited by 2 U.S.C. 441b.

If your committee does not obtain the recommended refunds or insure that the required transfers are made, you must submit a Statement of Organization on FEC Form 1 (2 U.S.C. 433) and file disclosure reports on FEC Form 3X (2 U.S.C. 434). We have enclosed relevant informational materials and forms.

Please notify the Commission within fifteen (15) days from the date on this letter of your decision on this matter. If you have any questions, please contact me on our toll free number, (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Mark Kleinman

Mark Kleinman
Reports Analyst
Reports Analysis Division

Enclosures

8104102615

TELECON TO THE FILE: FRIENDS OF BOB ARMSTRONG

FROM : MARK KLEINMAN

DATE : 6-12-81

SUBJECT : Possible registration --- call from attorney

Dave Bolduc called saying that he was an attorney for Bob Armstrong. He again reiterated what Bob Armstrong had stated, namely that Bob Armstrong never intended the funds to go into a Federal committee.

Mr. Bolduc stated that there was some confusion because the Texas Democratic Voter Participation Project never mentioned at a meeting with Bob Armstrong that the funds would go into a Federal committee (although Texas Democratic Voter Participation Project knew they were a Federal committee).

He stated that Bob Armstrong definitely did not want to register. He asked if it would be alright to simply transfer to their state account, the amount equal to what Friends of Bob Armstrong gave to the Texas Democratic Voter Participation Project.

I advised him that this would be acceptable.

Dave Bolduc
(512) 477-1187

8102026145

8102302617

6/25/81

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:
James E. Coulter

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	Eh43Eh	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

Coulter

4. DATE OF DELIVERY
JUL 6 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

HOUSTON TX

P.S. Form 3811, Feb. 1974 RETURN RECEIPT, REGISTERED AND CERTIFIED MAIL

☆GPO : 1979-289-488

1104 weeder

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 25, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James E. Crowther
The Houston Post Company
Houston, Texas 77001

Re: MUR 1104
Bill Hobby Campaign Committee

Dear Mr. Crowther:

On April 30, 1981, the Commission found reason to believe that your committee had violated 2 U.S.C. § 433 and § 434 in connection with the above referenced matter. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file with respect to your committee's involvement in this matter.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please direct them to Carolyn Weeder, at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

8104302618

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James E. Growther
The Houston Post Company
Houston, Texas 77001

Re: MUR 1104
Bill Hobby Campaign Committee

Dear Mr. Crowther:

On April 30, 1981, the Commission found reason to believe that your committee had violated 2 U.S.C. § 433 and § 434 in connection with the above referenced matter. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file with respect to your committee's involvement in this matter.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please direct them to Carolyn Weeder, at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

CW/dm 06/18/81

8102026 19

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1104
Bill Hobby Campaign Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 23, 1981, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1104:

1. Take no further action against the Bill Hobby Campaign Committee regarding a violation of 2 U.S.C. § 433 and § 434.

2. Approve and send the letter to the Bill Hobby Campaign Committee (Attachment 1 to the General Counsel's June 18, 1981 report).

3. Close the file with respect to the Bill Hobby Campaign Committee.

Commissioners Aikens, Harris, McGarry, Reiche, Thomson and Tiernan voted affirmatively in this matter.

Attest:

6/24/81
Date

Marjorie W. Emmons
Secretary of the Commission

Report signed: 6-19-81
Received in Office of the Commission Secretary: 6-19-81, 1:03
Circulated on 48 hour vote basis: 6-22-81, 11:00

8104302620

June 19, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MUR 1104

Please have the attached General Counsel's Report distributed to the Commission on a 48 hour tally basis. Thank you.

Attachment

cc: Weeder

8102022621

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

June 18, 1981 81 JUN 19 P1:03

In the Matter of)
) MUR 1104
Bill Hobby Campaign Committee)

GENERAL COUNSEL'S REPORT

I. Background

On April 30, 1981, the Commission found reason to believe that the Bill Hobby Campaign Committee[1/] (the "Hobby Committee") violated 2 U.S.C. § 433 and § 434 by failing to register and report as a political committee. The Commission based its determination on the fact that reports filed by two registered committees, the Texas Democratic Voter Participation Project or "Texas Committee" and the Harris County Democratic Voter Project or "Harris Committee", revealed receipts of contributions of $5,000 and $2,500, respectively, from the Hobby Committee in 1978.

8104302622

II. Legal Analysis

In response to the Commission's findings, the Hobby Committee submitted an affidavit of Mr. H. Lee Godfrey, treasurer of the Hobby Committee in 1978, which states that the Hobby Committee made the contributions to the Texas

---

1/ The Committee is a "public service fund" for a statewide get-out-the-vote drive which is not registered with the Commission. Additionally, Bill Hobby was the Democratic nominee for Lieutenant Governor in Texas.

Committee and the Harris Committee with the intent that such funds be used only in Texas elections (Attachment 2). The affidavit further states that the Hobby Committee was unaware that the Texas Committee and the Harris Committee deposited the contributions in accounts not limited to the support of state candidates until receiving notification from the Commission.

Communications with the two recipient committees by Commission staff also confirm that these committees erred in reporting the Hobby contributions in their federal accounts.

8102026623

The Office of General Counsel, therefore, recommends that the Commission take no further action regarding a violation of 2 U.S.C. § 433 and § 434 by the Hobby Committee.

III. Recommendations

1. Take no further action against the Bill Hobby Campaign Committee regarding a violation of 2 U.S.C. § 433 and § 434.

2. Approve and send the attached letter to the Bill Hobby Campaign Committee.

3. Close the file with respect to the Bill Hobby Campaign Committee.

19 June 1987
Date

Charles N. Steele
General Counsel

Attachments

1. Letter to Respondent
2. Respondent's Submission

8104030624

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James E. Crowther
The Houston Post Company
Houston, Texas 77001

Re: MUR 1104
Bill Hobby Campaign Committee

Dear Mr. Crowther:

On April 30, 1981, the Commission found reason to believe that your committee had violated 2 U.S.C. § 433 and § 434 in connection with the above referenced matter. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file with respect to your committee's involvement in this matter.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please direct them to Carolyn Weeder, at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

Attachment 1

8104302625

MCC#4792

THE HOUSTON POST COMPANY

ESTABLISHED 1888
HOUSTON, TEXAS
77001

May 26, 1981

JAMES E. CROWTHER
EXECUTIVE VICE PRESIDENT
AND GENERAL COUNSEL

81 JUN 1 P1:20

Re: MUR No. 1104

Federal Election Committee
Office of General Counsel
Washington, D. C. 20463

Attention: Ms. Carolyn Weeder

Dear Ms. Weeder:

In response to your letter directed to the Bill Hobby Campaign Committee dated May 5, 1981, received on May 12, 1981, I am enclosing an affidavit of the campaign's treasurer setting forth the facts surrounding the contributions called into question.

If you need further information, please do not hesitate to write or call.

Yours truly,

James E. Crowther

JEC/ah
Enclosures

8 1 0 1 0 0 2 2 6

Attachment 2
(3 pages)

8 1 0 4 0 3 0 2 6 2

STATE OF TEXAS §

COUNTY OF HARRIS §

BEFORE ME, a notary public in and for Harris County, Texas, on this day personally appeared H. Lee Godfrey, who being by me duly sworn on his oath deposes and says:

"My name is H. Lee Godfrey. I was during the 1978 campaign the treasurer of the Bill Hobby Campaign Committee, which was the principal campaign committee for Texas Lieutenant Governor Bill Hobby's re-election campaign to the State office of Lieutenant Governor. During the 1978 General Election that committee made contributions of $5,000.00 to the Texas Democratic Voter Participation Project ("Texas Committee"), and $2,500.00 to the Harris County Democratic Voter Project ("Harris Committee"). The funds came from contributions made to support Bill Hobby, a candidate for Texas rather than federal office, and were made to encourage Democratic voter participation in Texas rather than federal elections.

The Bill Hobby Committee has been advised by the Federal Election Commission that these funds were deposited by each of the other two named committees in accounts that were not limited to the support of State candidates. As the funds were contributed to the Bill Hobby committee, and by it to the other two committees, with the intent that such funds be used only in Texas elections, we have instructed both the Texas Committee and the Harris Committee to correct their records to properly reflect the source and disposition of the funds.

Further affidavit sayeth not."

H. Lee Godfrey

AH-2
p.2

8 ●0 4 0 3 0 2 6 2 8●

FILED
81 JUN 1 PM 1:30

Subscribed and sworn to before me the undersigned authority on this the 28th day of May, 1981, to certify which witness my hand and seal of office.

Jane L. Cote

Notary Public in and for
Harris County, Texas

JANE L. COTÉ
July 31, 1981

8 1 0 4 0 3 0 2 6 2 9

6/12/81

PS Form 3811, Jan. 1979

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:
John R. Castle, Jr.

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. | INSURED NO.
4 C E 2 5 h

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY 6-15-81 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

11 of 11 weeder

☆GPO : 1979-288-848

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 12, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John R. Castle, Jr.
HUGHES & HILL
1200 American Bank Tower
Austin, Texas 78701

Re: MUR 1104
John Hill Campaign Committee

Dear Mr. Castle:

On July 16, 1979 and June 24, 1980, the Commission found reason to believe that your client had violated 2 U.S.C. § 433, § 434, and § 441a(a)(1)(C) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file with respect to your client's involvement in this matter.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please direct them to Carolyn Weeder, at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8104302630

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John R. Castle, Jr.
HUGHES & HILL
1200 American Bank Tower
Austin, Texas 78701

Re: MUR 1104
John Hill Campaign Committee

Dear Mr. Castle:

On July 16, 1979 and June 24, 1980, the Commission found reason to believe that your client had violated 2 U.S.C. § 433, § 434, and § 441a(a)(1)(C) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file with respect to your client's involvement in this matter.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please direct them to Carolyn Reeder, at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
John Hill Campaign Committee)

MUR 1104

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on June 9, 1981, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1104:

1. Take no further action against the John Hill Campaign Committee regarding a violation of 2 U.S.C. §433 and §434.

2. Take no further action against the John Hill Campaign Committee regarding a violation of 2 U.S.C. §441a(a)(1)(C).

3. Approve and send the letter to Mr. John R. Castle, Jr., counsel for the John Hill Campaign Committee, as submitted with the General Counsel's May 19, 1981 report and amended in the meeting of June 9, 1981.

4. Close the file with respect to the John Hill Campaign Committee's involvement in this matter.

Attest:

6/10/81
Date

Marjorie W. Emmons
Secretary of the Commission

8104302632

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER

DATE: JUNE 8, 1981

SUBJECT: OBJECTION - MUR 1104 General Counsel's Report dated May 19, 1981; Received in OCS, 6-3-81, 3:42

The above-named document was circulated on a 48 hour vote basis at 11:00, June 4, 1981.

Commissioner Aikens submitted an objection at 11:33, June 8, 1981.

This matter will be placed on the Executive Session Agenda for Tuesday, June 9, 1981.

8104030633

June 3, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MUR 1104

Please have the attached General Counsel's Report distributed to the Commission on a 48 hour tally basis. Thank you.

Attachment

cc: Weeder

8103026334

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

May 19, 1981 81 JUN 3 P3:42

In the Matter of)
) MUR 1104
John Hill Campaign Committee)

GENERAL COUNSEL'S REPORT

I. Background

On July 16, 1979, the Commission, through RAD, found reason to believe that the John Hill Campaign Committee (the "Hill Committee"), a gubernatorial candidate committee in Texas in 1978, violated 2 U.S.C. § 433 and § 434 by failing to register and report as a political committee. The Commission based its determination on the fact that reports filed by four registered committees (the Texas Democratic Voter Participation Project or "Texas Committee"; the Bexar County Democratic Victory Fund; the Harris County Democratic Voter Project; and the Dallas County Democratic Progressive Voters League) disclosed receipts of contributions from the Hill Committee which exceeded $1,000 in a calendar year.

On June 24, 1980, the Commission also found reason to believe that the Hill Committee violated 2 U.S.C. § 441a(a)(1)(C) after reports filed by the Texas Committee disclosed contributions aggregating $15,000 from the Hill Committee in July, August, and September of 1978.

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II. Legal Analysis

A. 2 U.S.C. § 433 and § 434

In response to the Commission's findings, counsel for the Hill Committee submitted an affidavit of Mr. Lowell Leberman, treasurer of the Hill Committee, which states that the contributions made by the Hill Committee were specifically intended for the state and local accounts of the Texas Committee, the Bexar County Democratic Victory Fund, the Harris County Democratic Voter Project and the Dallas County Demcoratic Progressive Voters League (Attachment 2). The affidavit further explains that the Hill Committee was unaware of the error made by the recipient committees until receiving a notice from the Commission. Mr. Lebermann states that the deposit of the contributions into the federal accounts of the recipient committees was not consistent with the intentions or understanding of the Hill Committee. Mr. Lebermann asserts that the deposits should have been made and credited to the state and local accounts, consistent with the objectives of the Hill Committee's campaign for the governorship of Texas.

Communications with the recipient committees by Commission staff also confirm that they erred in depositing and reporting in their federal accounts the Hill contributions which were intended for state/local accounts.

Additionally, there is no indication of other expenditures or contributions made by the Hill Committee in connection with

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federal elections. Therefore, absent the contributions at issue, the Hill Committee is not subject to the registration and reporting requirments of 2 U.S.C. § 433 and § 434.

The Office of General Counsel therefore recommends that the Commission take no further action regarding violation of 2 U.S.C. § 433 and § 434 by the Hill Committee.

B. 2 U.S.C. § 441a(a)(1)(C)

Since the Texas Committee erroneously deposited the Hill contributions in its federal account, the Texas Committee reported receipts of five contributions aggregating $15,000 from the Hill Committee in July, August, and September, 1978. The Commission therefore found reason to believe that the Hill Committee violated 2 U.S.C. § 441a(a)(1)(C). The Texas Committee, however, subsequently admitted responsibility for its mistake of depositing the Hill contribution in its federal account. The Texas Committee therefore returned the contributions to the Hill Committee in November 28, 1979 ($10,000) and December 11, 1979 ($5,000) in an effort to correct its mistake.

In view of the facts that the Hill Committee's contributions were not intended to be deposited into the Texas Committee's federal account and that the contributions have been refunded, the Office of General Counsel recommends that the Commission take no further action regarding a violation of 2 U.S.C. § 441a (a)(1)(C) by the Hill Committee.

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III. General Counsel's Recommendations

1. Take no further action against the John Hill Campaign Committee regarding a violation of 2 U.S.C. § 433 and § 434.

2. Take no further action against the John Hill Campaign Committee regarding a violation of 2 U.S.C. § 441a(a)(1)(C).

3. Approve and send the attached letter to Mr. John R. Castle, Jr., counsel for the John Hill Campaign Committee.

4. Close the file with respect to the John Hill Campaign Committee's involvement in this matter.

3 June 1984
Date

Charles N. Steele
General Counsel

Attachments
1. Letter to Respondent's Counsel
2. Respondent's Submission

8104030263 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John R. Castle, Jr.
HUGHES & HILL
1200 American Bank Tower
Austin, Texas 78701

Re: MUR 1104
John Hill Campaign Committee

Dear Mr. Castle:

On July 16, 1979 and June 24, 1980, the Commission found reason to believe that your client had violated 2 U.S.C. § 433, § 434, and § 441a(a)(1)(C) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file with respect to your client's involvement in this matter. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Carolyn Weeder, at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

Attachment 1
(1 page)

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100283 -4608

Weeder

HUGHES & HILL
1200 AMERICAN BANK TOWER
AUSTIN, TEXAS 78701

(512) 474-6050

DALLAS OFFICE
1000 MERCANTILE DALLAS BUILDING
DALLAS, TEXAS 75201
(214) 651-0477

May 1, 1981

Ms. Carolyn Weeder
Office of the General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR 1104
John Hill Campaign Committee

Dear Carolyn:

As I indicated to you over the telephone this week, the contributions in question by the John Hill Campaign Committee to the three local committees in Texas, were made for the purpose of being deposited in the state and local accounts of those committees, but evidently were inadvertently deposited to their federal accounts. I am enclosing an affidavit from Lowell Lebermann, Treasurer of the John Hill Campaign Committee which supports that conclusion.

Each of the various local committees are willing to correct their records to reflect that the contributions should have been deposited to the state and local accounts, but, unfortunately, none of the three local committees has any funds that can be transferred to the state and local account. However, it does not seem to be fair that John Hill be penalized as a result of an error made by the local committees.

I trust that this is the information that you require. If we can provide further information in our efforts to resolve this issue, please do not hesitate to give me a call.

Very truly yours,

John R. Castle, Jr.

JRC:mkh
Enclosures

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31 MAY 4 AM 11:24

Attachment 2
(3 pages)

HUGHES & HILL
1200 AMERICAN BANK TOWER
AUSTIN, TEXAS 78701

(512) 474-6050

DALLAS OFFICE
1000 MERCANTILE DALLAS BUILDING
DALLAS, TEXAS 75201
(214) 651-0477

April 30, 1981

Ms. Carolyn Weeder
Office of the General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR 1104
John Hill Campaign Committee

Dear Ms. Weeder:

This will confirm that John R. Castle, Jr. of Hughes & Hill is authorized to represent the John Hill Campaign Committee in connection with any matters before the Federal Election Commission.

Jim Bushala, formerly with our firm, is now in Corpus Christi and is no longer directly involved. Of course, Mr. Bushala is available for consultation and support.

Very truly yours,

John L. Hill

JLH:mkh

81030026411

81 MAY 4 AM 8:24

AH. 2
p. 2

AFFIDAVIT

STATE OF TEXAS

COUNTY OF TRAVIS

The undersigned, Lowell Lebermann, of Travis County, Texas, does hereby affirm and certify as follows:

1. I was the Treasurer of the John Hill Campaign Committee (1978) and I have personal knowledge of the facts set forth herein.

2. The John Hill Campaign Committee (1978) was for the campaign of John Hill for Governor of the State of Texas in 1978. During the course of that campaign, the following contributions were made to the indicated projects or funds:

   (a) Bexar County Democratic Victory Fund - $525.70

   (b) Dallas County Democratic Progressive Voter League - $2,100.00

   (c) Harris County Democratic Voter Project - $2,198.00

3. Our contributions were for the obvious purpose to enhance the election of John Hill to the state office of Governor and to support the indicated committees in their efforts locally. It was our intention and understanding that all such contributions would be deposited in the state and local account of each such committee.

4. It has recently come to my attention, as a result of a notice from the Federal Election Commission, that the above-referenced committees may have in fact deposited the funds contributed by the John Hill Campaign Committee (1978) to their federal accounts and if in fact that was done, that was not consistent with our intentions or understandings and the deposits should have been made and credited to the state and local accounts, consistent with the objectives of the campaign for the governorship of the State of Texas being conducted by the John Hill Campaign Committee.

5. For your further information, there are currently no funds remaining in the John Hill Campaign Committee.

WITNESS MY HAND THIS 1st DAY OF MAY, 1981.

LOWELL LEBERMANN

THE STATE OF TEXAS
COUNTY OF TRAVIS

Before me, the undersigned, a Notary Public in and for said County and State, on this day personally appeared Lowell Lebermann and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this the 1st day of May, 1981.

Louise Miller
Notary Public in and for Travis County
LOUISE MILLER

My Commission Expires:

12/31/84

81 MAY 4 AM 11:24

THE STATE OF TEXAS

COUNTY OF TRAVIS

AFFIDAVIT

BEFORE ME, the undersigned authority, appeared DAVID BOLDUC, who averred as follows:

"My name is David Bolduc. I am the legal counsel and past treasurer of the Texas Democratic Voter Participation Project. On or about August 13, 1980, I incorrectly informed Mr. Charles N. Steele that the Texas Democratic Voter Participation Project had accepted a $15,000.00 contribution from the Bill Hobby Campaign Committee. A review of the Project's reports reveals, however, that the Bill Hobby Campaign Committee in fact contributed only $5,000.00 to the Project."

A total of $15,000.00 was refunded for by the Texas Democratic Voter Participation Project to the John Hill Campaign Committee in two checks -- $10,000.00 on November 28, 1979 and $5,000.00 on December 11, 1979.

8103026433

DAVID BOLDUC

SUBSCRIBED AND SWORN TO BEFORE ME, this 11th day of June, 1981.

Notary Public, Travis County, Texas

100683
MCC#4792

THE HOUSTON POST COMPANY

ESTABLISHED 1888
HOUSTON, TEXAS
77001

May 26, 1981

JAMES E. CROWTHER
EXECUTIVE VICE PRESIDENT
AND GENERAL COUNSEL

81030264

Re: MUR No. 1104

Federal Election Committee
Office of General Counsel
Washington, D. C. 20463

Attention: Ms. Carolyn Weeder

Dear Ms. Weeder:

In response to your letter directed to the Bill Hobby Campaign Committee dated May 5, 1981, received on May 12, 1981, I am enclosing an affidavit of the campaign's treasurer setting forth the facts surrounding the contributions called into question.

If you need further information, please do not hesitate to write or call.

Yours truly,

James E. Crowther

JEC/ah
Enclosures

81 JUN 1 AM 11:20

10403026

GCC#4792

81 JUN 1 P1:30

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL

STATE OF TEXAS X

COUNTY OF HARRIS X

BEFORE ME, a notary public in and for Harris County, Texas, on this day personally appeared H. Lee Godfrey, who being by me duly sworn on his oath deposes and says:

"My name is H. Lee Godfrey. I was during the 1978 campaign the treasurer of the Bill Hobby Campaign Committee, which was the principal campaign committee for Texas Lieutenant Governor Bill Hobby's re-election campaign to the State office of Lieutenant Governor. During the 1978 General Election that committee made contributions of $5,000.00 to the Texas Democratic Voter Participation Project ("Texas Committee"), and $2,500.00 to the Harris County Democratic Voter Project ("Harris Committee"). The funds came from contributions made to support Bill Hobby, a candidate for Texas rather than federal office, and were made to encourage Democratic voter participation in Texas rather than federal elections.

The Bill Hobby Committee has been advised by the Federal Election Commission that these funds were deposited by each of the other two named committees in accounts that were not limited to the support of State candidates. As the funds were contributed to the Bill Hobby committee, and by it to the other two committees, with the intent that such funds be used only in Texas elections, we have instructed both the Texas Committee and the Harris Committee to correct their records to properly reflect the source and disposition of the funds.

Further affidavit sayeth not."

H. Lee Godfrey

81 JUN 1 PM 1:30

Subscribed and sworn to before me the undersigned authority on this the 28th day of May, 1981, to certify which witness my hand and seal of office.

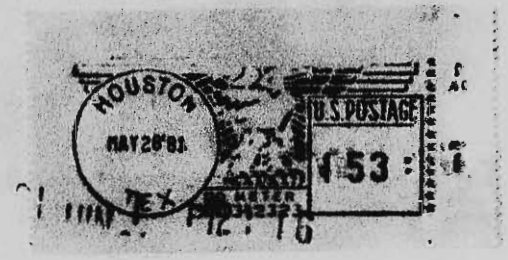
Jane L. Coté

Notary Public in and for
Harris County, Texas

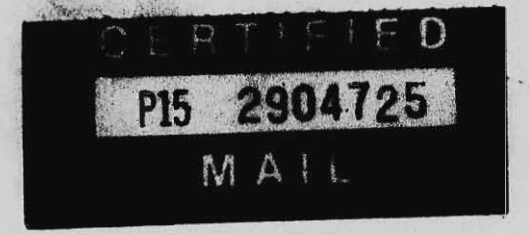
JANE L. COTÉ
July 31, 1981

The Houston Post
4747 SOUTHWEST FREEWAY
HOUSTON, TEXAS 77001

81010302047



Federal Election Committee
Office of General Counsel
Washington, D. C. 20463



ROUTING SLIP FOR RTB LETTERS

TO: Chairman/Vice Chairman

FROM: Elissa T. Garr
OGC Enforcement Docket

DATE: 5-4-81

MUR # 1104

Date RTB Found 4-30-81

Date Cert. Rec'd in OGC 5-4-81

Staff Assigned Weeder

STAFF CHECK:

✓ Accuracy

✓ Enclosures

✓ Certification

Date Rec'd in OGC From Chairman/Vice Chairman

5-5-81

8104030264 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 5, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James Crowther
Bill Hobby Campaign Committee
P.O. Box 567
Austin, Texas 78767

Re: MUR 1104

Dear Mr. Crowther:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found evidence that the Bill Hobby Campaign Committee has violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A summary of the possible violations is enclosed.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

8104302649

If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter at (202)523-4529. For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

JOHN WARREN McGARRY
Chairman

Enclosures
1. Summary of Possible Violations
2. Procedures

If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter at (202)523-4529. For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

JOHN WARREN McGARRY
Chairman

Enclosures
1. Summary of Possible Violations
2. Procedures

8104030265O

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James Crowther
Bill Hobby Campaign Committee
P.O. Box 567
Austin, Texas 78767

Re: MUR 1104

Dear Mr. Crowther:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found evidence that the Bill Hobby Campaign Committee has violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A summary of the possible violations is enclosed.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

8102026511

If you have any questions, pelase contact Carolyn Weeder, the staff member assigned to this matter at (202)523-4529. For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
1. Summary of Possible Violations
2. Procedures

8104030265 2

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE: May 5, 1981

MUR NO. 1104
STAFF MEMBER & TEL. NO.
Carolyn Weeder
(202)523-4529

RESPONDENT: BIll Hobby Campaign Committee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

8104030265 3

SUMMARY OF ALLEGATIONS

The Reports Analysis Division referred to the Office of General Counsel the matter in which the Bill Hobby Campaign Committee may have violated 2 U.S.C. § 433 and § 434 by making contributions in connection with federal elections in excess of $1,000 without registering and reporting with the Commission.

FACTUAL BASIS AND LEGAL ANALYSIS

Reports filed by the Texas Democratic Voter Participation Project ("Texas Committee") and the Harris County Democratic Voter Project ("Harris Committee") revealed receipts of contributions of $5,000 and $2,500, respectively, from the Bill Hobby Campaign Committee,1/ a public service fund for a statewide get-out-the-vote drive which is not registered with the Commission.

In that the recipient committees used the contributions in connection with federal elections, the contributions made by the Hobby Committee triggered its registration and reporting obligations pursuant to 2 U.S.C. § 433 and § 434.

In view of these circumstances, the Office of General Counsel recommends that the Commission find reason to believe that the Bill Hobby Campaign Committee violated 2 U.S.C. § 433 and § 434.

RECOMMENDATION

Based on the foregoing analysis, the Office of General Counsel recommends that the Commission find reason to believe that the Bill Hobby Committee violated 2 U.S.C. § 433 and § 434.

1/ Bill Hobby was the Democratic nominee for Lieutenant Govenor in Texas.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Bill Hobby Campaign Committee)

MUR 1104

CERTIFICATION

I, Lena L. Stafford, Recording Secretary for the Federal Election Commission's Executive Session on April 30, 1981, do hereby certify that the Commission decided in a vote of 6-0 to take the following actions in the above-titled matter:

1. FIND REASON TO BELIEVE that the Bill Hobby Campaign Committee violated 2 U.S.C. § 433 and § 434.

2. Approve and send the letter and notification attached to the General Counsel's Report dated April 16, 1981, to the Bill Hobby Campaign Committee.

Commissioners Aikens, Harris, McGarry, Reiche, Thomson, and Tiernan voted affirmatively.

Attest:

5-4-81
Date

Lena L. Stafford
Recording Secretary

8102026547

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER

DATE: APRIL 21, 1981

SUBJECT: OBJECTION - MUR 1104 General Counsel's Report, dated April 16, 1981; Received in OCS, 4-17-81, 3:40

The above-named document was circulated on a 48 hour vote basis at 11:00, April 20, 1981.

Commissioner Aikens submitted an objection at 1:56, April 21, 1981.

This matter will be placed on the Executive Session Agenda for Tuesday, April 28, 1981.

8104030265

April 17, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1104

Pleasehave the attached General Counsel's Report distributed to the Commission on a 48 hour tally basis. Thank you.

8104030265

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
81 APR 17 P3:40

April 16, 1981

In the Matter of)
)
Bill Hobby Campaign Committee) MUR 1104

GENERAL COUNSEL'S REPORT

I. Background

In connection with ongoing MUR 1104, the Reports Analysis Division referred to the Office of General Counsel the matter in which the Bill Hobby Campaign Committee may have violated 2 U.S.C. § 433 and § 434 by making contributions for federal election activities in excess of $1,000 without registering and reporting with the Commission.

II. Legal Analysis

Reports filed by the Texas Democratic Voter Participation Project ("Texas Committee") and the Harris County Democratic Voter Project ("Harris Committee") revealed receipts of contributions of $5,000 and $2,500, respectively, from the Bill Hobby Campaign Committee,1/ a public service fund for a statewide get-out-the-vote drive which is not registered with the Commission.

Conversations by RAD with the Hobby Committee revealed that the Hobby Committee intended the contributions to be deposited in each committee's state and local account. Both recipient committees, however, erred in depositing the contribution in their account for federal elections.

In that the recipient committees subsequently used the contributions in connection with federal elections, the contributions made by the Hobby Committee triggered its registration and reporting obligations pursuant to 2 U.S.C. § 433 and § 434.

The Office of General Counsel therefore recommends that the Commission find reason to believe that the Bill Hobby Campaign Committee violated 2 U.S.C. § 433 and § 434. Accordingly, the Office of General Counsel also recommends that the Commission

---

1/ Bill Hobby was the Democratic nominee for Lieutenant Govenor in Texas.

8104030267

approve and send the attached letter and notification to the Bill Hobby Campaign Committee.

III. Recommendations

1. Find reason to believe that the Bill Hobby Campaign Committee violated 2 U.S.C. § 433 and § 434.

2. Approve and send the attached letter and notification to the Bill Hobby Campaign Committee.

Attachments

Letter and General Counsel's Factual and Legal Analysis to the Bill Hobby Campaign Committee

17 April 1984
Date

Charles N. Steele
General Counsel

8104030269

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James Crowther
Bill Hobby Campaign Committee
P.O. Box 567
Austin, Texas 78767

Re: MUR 1104

Dear Mr. Crowther:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found evidence that the Bill Hobby Campaign Committee has violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A summary of the possible violations is enclosed.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

8104302659

If you have any questions, pelase contact Carolyn Weeder, the staff member assigned to this matter at (202)523-4529. For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,



Enclosures
1. Summary of Possible Violations
2. Procedures

8104030265O

100[illegible] [illegible] 4608

HUGHES & HILL
1200 AMERICAN BANK TOWER
AUSTIN, TEXAS 78701

(512) 474-6050

DALLAS OFFICE
1000 MERCANTILE DALLAS BUILDING
DALLAS, TEXAS 75201
(214) 651-0477

May 1, 1981

Ms. Carolyn Weeder
Office of the General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR 1104
John Hill Campaign Committee

Dear Carolyn:

As I indicated to you over the telephone this week, the contributions in question by the John Hill Campaign Committee to the three local committees in Texas, were made for the purpose of being deposited in the state and local accounts of those committees, but evidently were inadvertently deposited to their federal accounts. I am enclosing an affidavit from Lowell Lebermann, Treasurer of the John Hill Campaign Committee which supports that conclusion.

Each of the various local committees are willing to correct their records to reflect that the contributions should have been deposited to the state and local accounts, but, unfortunately, none of the three local committees has any funds that can be transferred to the state and local account. However, it does not seem to be fair that John Hill be penalized as a result of an error made by the local committees.

I trust that this is the information that you require. If we can provide further information in our efforts to resolve this issue, please do not hesitate to give me a call.

Very truly yours,

John R. Castle, Jr.

JRC:mkh
Enclosures

81 MAY 4 AM 11:24

8 1 0 3 0 3 6 4 1

HUGHES & HILL
1200 AMERICAN BANK TOWER
AUSTIN, TEXAS 78701

(512) 474-6050

DALLAS OFFICE
1000 MERCANTILE DALLAS BUILDING
DALLAS, TEXAS 75201
(214) 651-0477

April 30, 1981

Ms. Carolyn Weeder
Office of the General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR 1104
John Hill Campaign Committee

Dear Ms. Weeder:

This will confirm that John R. Castle, Jr. of Hughes & Hill is authorized to represent the John Hill Campaign Committee in connection with any matters before the Federal Election Commission.

Jim Bushala, formerly with our firm, is now in Corpus Christi and is no longer directly involved. Of course, Mr. Bushala is available for consultation and support.

Very truly yours,

John L. Hill

JLH:mkh

81 MAY 4 AM 9:24

8 0 4 0 3 0 2 6 5

AFFIDAVIT

STATE OF TEXAS

COUNTY OF TRAVIS

The undersigned, Lowell Lebermann, of Travis County, Texas, does hereby affirm and certify as follows:

1. I was the Treasurer of the John Hill Campaign Committee (1978) and I have personal knowledge of the facts set forth herein.

2. The John Hill Campaign Committee (1978) was for the campaign of John Hill for Governor of the State of Texas in 1978. During the course of that campaign, the following contributions were made to the indicated projects or funds:

   (a) Bexar County Democratic Victory Fund - $525.70

   (b) Dallas County Democratic Progressive Voter League - $2,100.00

   (c) Harris County Democratic Voter Project - $2,198.00

3. Our contributions were for the obvious purpose to enhance the election of John Hill to the state office of Governor and to support the indicated committees in their efforts locally. It was our intention and understanding that all such contributions would be deposited in the state and local account of each such committee.

4. It has recently come to my attention, as a result of a notice from the Federal Election Commission, that the above-referenced committees may have in fact deposited the funds contributed by the John Hill Campaign Committee (1978) to their federal accounts and if in fact that was done, that was not consistent with our intentions or understandings and the deposits should have been made and credited to the state and local accounts, consistent with the objectives of the campaign for the governorship of the State of Texas being conducted by the John Hill Campaign Committee.

5. For your further information, there are currently no funds remaining in the John Hill Campaign Committee.

WITNESS MY HAND THIS 1st DAY OF MAY, 1981.

LOWELL LEBERMANN

THE STATE OF TEXAS
COUNTY OF TRAVIS

Before me, the undersigned, a Notary Public in and for said County and State, on this day personally appeared Lowell Lebermann and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

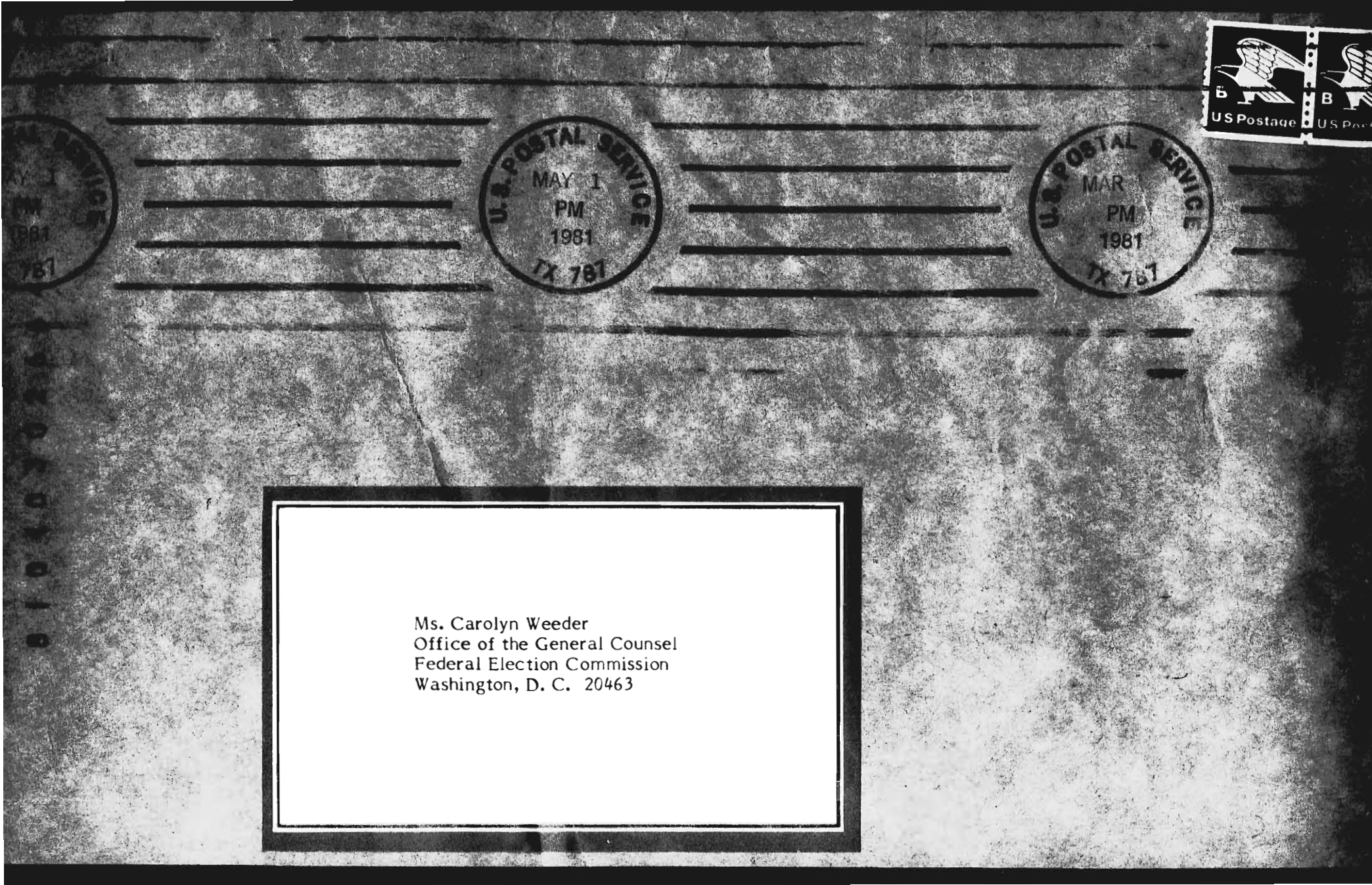
Given under my hand and seal of office this the 1st day of May, 1981.

Louise Miller
Notary Public in and for Travis County
LOUISE MILLER

My Commission Expires:

12/31/84

81 MAY 4 All: 24


U.S. POSTAL SERVICE
MAY 1
PM
1981
TX 761
U.S. POSTAL SERVICE
MAR
PM
1981
TX 761
US Postage
Ms. Carolyn Weeder
Office of the General Counsel
Federal Election Commission
Washington, D. C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

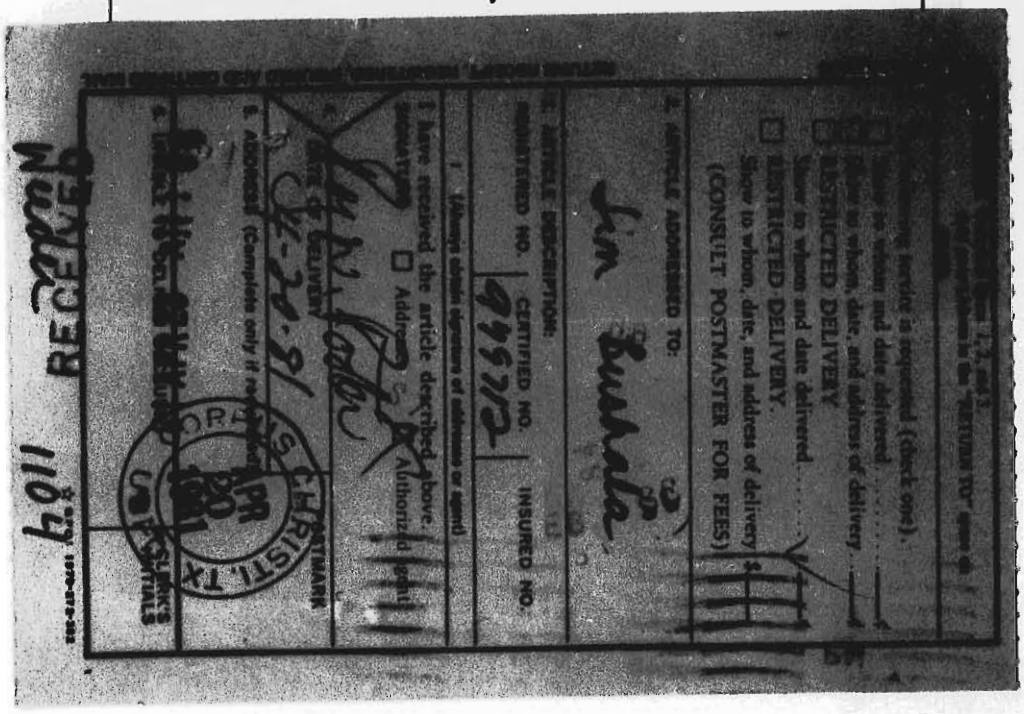
TO: Samande & MUR 1104 DATE: April 16, 81

FROM: C. Weeden

- ☐ APPROVAL
- ☐ AS REQUESTED
- ☐ CONCURRENCE
- ☐ CORRECTION
- ☐ FILING
- ☐ FULL REPORT
- ☐ HANDLE DIRECT
- ☐ ANSWER OR ACKNOWLEDGE ON OR BEFORE _____
- ☐ PREPARE REPLY FOR THE SIGNATURE OF _____
- ☐ IMMEDIATE ACTION
- ☐ INITIALS
- ☐ NECESSARY ACTION
- ☐ NOTE AND RETURN
- ☐ PER OUR CONVERSATION
- ☐ PER TELEPHONE CONVERSATION
- ☐ RECOMMENDATION
- ☐ SEE ME
- ☐ SIGNATURE
- ☐ YOUR COMMENT
- ☐ YOUR INFORMATION
- ☐

REMARKS:

Please resend the letter addressed to Jim Bushala with the correct address. An envelope and a certified receipt card with the correct address is attached.



81040302665

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use $300

10302666

RETURNED TO SENDER

POSTAGE AND FEES PAID

James Bushala, Jr.
P.O. Box 7156
Corpus Christy, Texas 78408

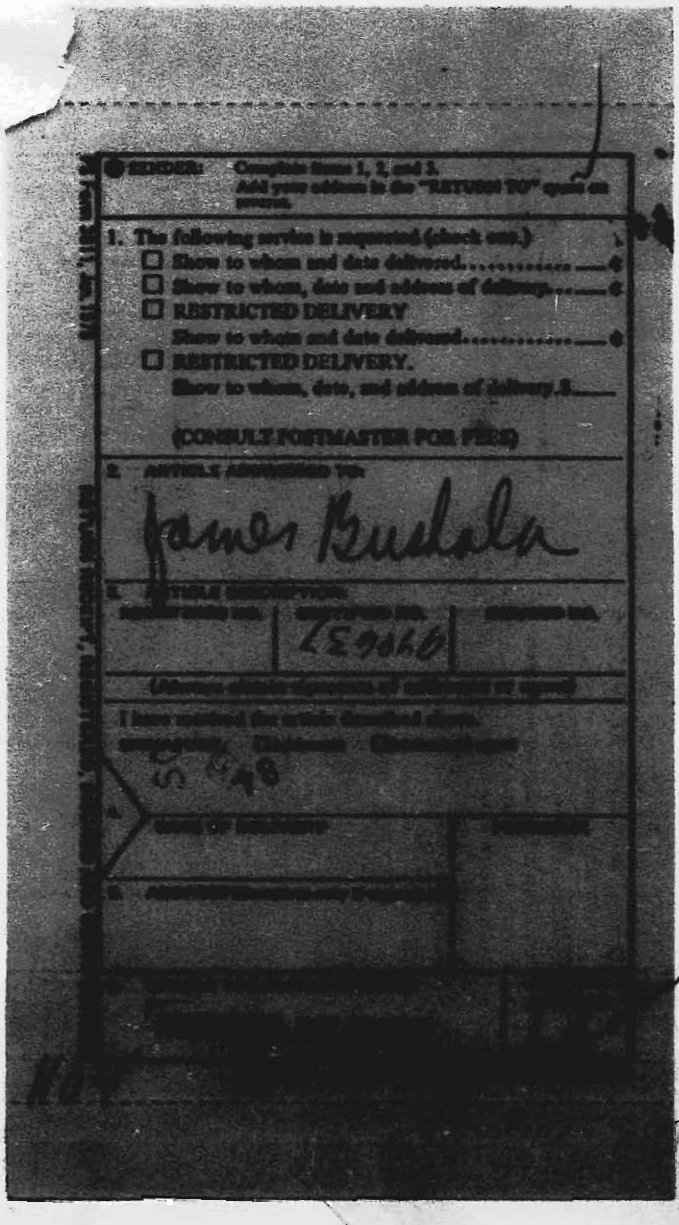
CERTIFIED

RETURN TO WRITER

ATTEMPTED, NOT KNOWN

949637

8 1 [illegible] 6 6 7



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 FEE)

2. ARTICLE ADDRESSED TO:
James Budala

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. | INSURED NO.
Z 590 660

(Always obtain signature of addressee or agent)
I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY | POSTMARK

5. ADDRESSEE'S ADDRESS (ONLY IF REQUESTED)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 2, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James Bushala, Jr.
P.O. Box 7156
Corpus Christy, Texas 78408

Re: MUR 1104
John Hill Campaign Committee

Dear Mr. Bushala:

This letter is to confirm our telephone conversation of March 25, 1981 regarding the John Hill Campaign Committee (the "Committee"). Specifically, during the conversation, you indicated that you are preparing to make refunds on behalf of the Committee for three contributions made by the Committee in 1978 which remain outstanding.

You further stated that the refunds are to take place in the near future and that you will submit verification of the refunds.

In that the Office of General Counsel is waiting for this verification, your expediency in submitting these documents is requested.

If you have any questions, please contact Carolyn Weeder at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

8104302668

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James Bushala, Jr.
P.O. Box 7156
Corpus Christy, Texas 78408

Re: MUR 1104
John Hill Campaign Committee

Dear Mr. Bushala:

This letter is to confirm our telephone conversation of March 25, 1981 regarding the John Hill Campaign Committee (the "Committee"). Specifically, during the conversation, you indicated that you are preparing to make refunds on behalf of the Committee for three contributions made by the Committee in 1978 which remain outstanding.

You further stated that the refunds are to take place in the near future and that you will submit verification of the refunds.

In that the Office of General Counsel is waiting for this verification, your expediency in submitting these documents is requested.

If you have any questions, please contact Carolyn Weeder at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

CW/dm 03/31/81

8102002659

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER MWE

DATE: MARCH 17, 1981

SUBJECT: MUR 1104 - Interim Investigative Report #1 dated 3-13-81; Received in OCS 3-13-81, 2:11

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 11:00, March 16, 1981.

There were no objections to the Interim Investigative Report at the time of the deadline.

8102030267 0

March 13, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1104

Please have the attached Interim Invest Report distributed to the Commission. Thank you.

8102022671

BEFORE THE FEDERAL ELECTION COMMISSION

March 13, 1981

81 MAR 13 P2:11

In the Matter of	)	
	)	
Texas Democratic Voter Participation Project	)	MUR 1104
John Hill Campaign Committee	)	
Bill Hobby Campaign Committee	)	

INTERIM INVESTIGATIVE REPORT # 1

This matter involves possible violations of the FECA, as amended by the Texas Democratic Voter Participation Project (the "Texas Committee"), the John Hill Campaign Committee ("Hill Committee"), and the Bill Hobby Campaign Committee ("Hobby Committee").

8104030267 2

8104030267 3

John Hill Campaign Committee

On July 16, 1979, RAD notified the Hill Committee that the Commission found reason to believe that it violated 2 U.S.C. § 433 and § 434 by failing to register and report as a political

committee after the reports filed with the Commission disclosed that the Hill Committee made contributions to four political committees: the Harris County Democratic Voter Project, the Texas County Democratic Victory Fund, the Dallas County Democratic Progressive Voter League, and the Texas Committee. In that the contribution to the Texas Committee exceeded lawful limitations, the Commission, on June 24, 1980, also found reason to believe that the Hill Committee violated 2 U.S.C. § 441a(a)(1)(C).

In response to the findings, the Hill Committee, a committee for the gubernatorial seat in Texas, explains that it intended the contributions to each of these four committees to be used in connection with state and local elections and for the get-out-the-vote drive within the state of Texas. However, the recipient committees, all of which are registered with the Commission, erred in depositing the contribution in its account designated for federal election activities. Thus, the Hill Committee contends that it was placed in violation of the Act due to error on the part of the recipient committees.

However, the Hill Committee states that it is in the process of rectifying its violations. For example, the Hill Committee obtained a refund for the entire contribution from the Texas Committee. Additionally, the Hill Committee has requested that the other committees either refund the money or transfer the amount of the contribution to its state/local account.

The Office of General Counsel will prepare a further report with regard to the Hill Committee upon submission of additionally requested information.

8104302674

Bill Hobby Campaign Committee

The Bill Hobby Campaign Committee[1/] is a public service fund for a statewide get-out-the-vote drive. As stated previously, the Texas Committee initially relayed that it received a contribution of $15,000 from the Bill Hobby Committee. However, the facts subsequently revealed that the contribution was in fact for $5,000. As was the situation with the Hill Committee, the Hobby Committee intended the contribution for the Texas Committee's state and local account. However, the Texas Committee erred in depositing the contribution in its account for federal election activities.

In a telephone conversation on March 10, 1981, the treasurer of the Texas Committee stated that he is prepared to make a refund to the Hobby Committee for the entire contribution and accordingly will submit documentation verifying the refund. The Office of General Counsel will therefore prepare a further report with respect to the Hobby Committee upon receipt of the submission.

3/13/81
Date

Charles N. Steele by KCH
Charles N. Steele
General Counsel

1/ Bill Hobby was the Democratic nominee for Lieutenant Govenor in Texas.

8104030275

FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY

DATE: OCOTBER 7, 1980

SUBJECT: MUR 1104 - Memorandum to the Commission dated 10-2-80; Received in OCS 10-2-80, 2:51

The above-named document was circulated on a 48 hour vote basis at 2:00, October 3, 1980.

Commissioners Aikens and Friedersdorf submitted objections to MUR 1104.

This matter will be placed on the Executive Session Agenda for Wednesday, October 15, 1980.

8104302675

October 2, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1104

Please have the attached Memo distributed to the Commission on a 48 hour tally basis. Thank you.

8102302677

90 993

HUGHES & HILL
1200 AMERICAN BANK TOWER
AUSTIN, TEXAS 78701

(512) 474-6050

DALLAS OFFICE
1000 MERCANTILE DALLAS BUILDING
DALLAS, TEXAS 75201
(214) 651-0477

RECEIVED
FEC
80 SEP 2 P3:44

August 11, 1980

80 SEP 2 P5:35

Ms. Michele D. Brown
Staff Member
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

Re: MUR 1104

Dear Ms. Brown:

I am in receipt of the Commission's letter dated July 31, 1980 and signed by Max L. Friedersdorf, Chairman of the FEC reference the John Hill Campaign Committee.

Please allow me this opportunity to respond to each of the alleged contributions in question made by the John Hill Campaign Committee during the 1978 Texas Gubernatorial Race in which the Federal Election Commission makes allegations regarding possible violations of Federal Reporting laws relating to four specific contributions.

1. Texas Democratic Voter Participation Project (Texas DVPP). A $15,000 contribution from the Hill Committee was made to the Texas DVPP Federal Account.

Comment: It is my understanding from talking with David Greevy of the Federal Election Commission that an appropriate transfer has been made from the Texas DVPP Federal Account to the Texas DVPP State Account, and thus this allegation by the FEC appears to be moot.

2. Bexar County Democratic Victory Fund (Bexar CDVF). A $525.70 contribution was made to the Bexar CDVF Federal Account.

Comment: This contribution apparently remains outstanding. Since Federal Election law permits a committee to spend up to $1,000 without becoming a federal committee, we hereby designate this contribution as a portion of the $1,000 threshold exemption. That leaves us with a $474.30 amount to be allocated to a third contribution from the Hill Campaign (see below).

3. Dallas County Democratic Progressive Voter League (Dallas CDPVL). Two contributions were made to the Dallas CDPVL Federal Account, one for $1,000 and another for $1,100 for a total of $2,100.

Comment: It is my understanding, and you can confirm this with David Greevy of your staff, that to date, an $850.00 transfer has been made to the Dallas CDPVL

8104902679

State Account leaving an amount of $1,250 outstanding. We would therefore designate the remaining $427.30 of our $1,000 threshold exemption to be applied to the Dallas CDPVL account leaving $775.70 which still remains to be transferred to the Dallas CDPVL State Account to get it in compliance.

4. Harris County Democratic Voter Project (Harris CDPV). Two contributions were made to the Harris CDVP Federal Account from the Hill Committee, one for $2,000 and another for $198.00.

Comment: The $2,198 total contribution by the Hill Campaign to the Harris CDVP Federal Account remain outstanding.

Ms. Brown, in summary, based on the above figures and our understanding of the status of each of the accounts with respect to already completed transfers of funds into proper accounts, as well as the utilization of our $1,000 threshold exemption, it is our position that the John Hill Campaign Committee, according to your interpretation of the Federal Election Commission regulations, has made a total of $2,973.70 worth of contributions which need to be accounted for, i.e., $2,198 to the Harris CDVP State Account and $775.70 which must be transferred to the Dallas CDPVL State Account.

OUR EVALUATION

In earlier conversations with David Greevy of your staff, he confirmed that the reason that the Federal Election Commission records reflected that the John Hill Campaign Committee was a Federal Committee with attendant reporting requirements was that during the 1978 General Election Gubernatorial Race, the Committee had sent funds to the four aforementioned committees. Each of the four committees are registered with the Federal Election Commission and each reported the contributions to you. Each committee also has a state and local account into which the Hill Committee funds should have been deposited.

While it was our intention and belief that the funds transferred from the Hill Committee were to be used in the furtherance of the Hill Campaign effort, a state election, it is your interpretation that the get-out-the-vote efforts made by these committees were contributed to both state and federal candidates in a general statewide effort.

In talking with David Greevy, he advised that the Federal Election Commission records would no longer reflect the Hill Committee as a federal committee if the four Texas committees in question transferred from their federal account to their state and local accounts, the amounts they received from the Hill Committee, reflecting that transaction in their next report, and sending you a letter verifying the reasons for the transaction.

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As was set forth earlier, the Texas DVPP has already made the appropriate transfer from the Texas DVPP Federal Account to its State Account, thus making moot the allegations regarding the $15,000 contribution by the Hill Campaign to the Texas DVPP. The Bexar CDVF $525.70 contribution, should be designated as a portion of the $1,000 threshold exemption, thus eliminating it from contention and leaving a balance of $474.30 to be applied to the Dallas CDPVL Account, leaving $775.70 which must be transferred to the Dallas CDPVL State Account. Finally, the Harris CDVP should transfer the full $2,198 to its state account.

For the purpose of settling this matter, my client is prepared to send the Dallas CDPVL Committee a check in the amount of $775.70 and ask that the Committee transfer those monies to its state account. That should close out the Dallas CDPVL matter. We will likewise send Harris CDVP a check in the amount of $2,198 and request that it transfer these monies to its state account. That should close out the Harris CDVP matter.

Please review this submission and consult with David Greevy, since he should have first-hand knowledge of most of these matters. If you are in accord with our proposal for settlement, kindly advise me by telephone or letter and we will submit the respective checks to the Dallas CDPVL and the Harris CDVP.

Trusting that you find this submission in order and looking forward to bringing this matter to a conclusion in the near future, I remain

Sincerely,

Jim Bushala, Jr.

JBJr:mkh

cc: Mr. Max L. Friedersdorf
Chairman, Federal Election Commission
Washington, D. C. 20463

Mr. David Greevy
Staff Member
Federal Election Commission
Washington, D. C. 20463

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Chairman, Federal Election Commission
Washington, D. C. 20463

Mr. David Greevy
Staff Member
Federal Election Commission
Washington, D. C. 20463

bcc: Mr. P. John Kuhl, Jr.
Attorney at Law
Vinson & Elkins
First City National Bank Building
Houston, Texas 77002

8102620381

HUGHES & HILL
1200 AMERICAN BANK TOWER
AUSTIN, TEXAS 78701

8102026

Ms. Michele D. Brown
Staff Member
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

HUGHES & HILL
1200 AMERICAN BANK TOWER
AUSTIN, TEXAS 78701

(512) 474-6050

DALLAS OFFICE
1000 MERCANTILE DALLAS BUILDING
DALLAS, TEXAS 75201
(214) 651-0477

August 11, 1980

Ms. Michele D. Brown
Staff Member
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

80 SEP 2 P5:38
RECEIVED
FEDERAL ELECTION COMMISSION

Re: MUR 1104

Dear Ms. Brown:

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Jim Bushala, Jr.

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cc: Mr. Max L. Friedersdorf
Chairman, Federal Election Commission
Washington, D. C. 20463

Mr. David Greevy
Staff Member
Federal Election Commission
Washington, D. C. 20463

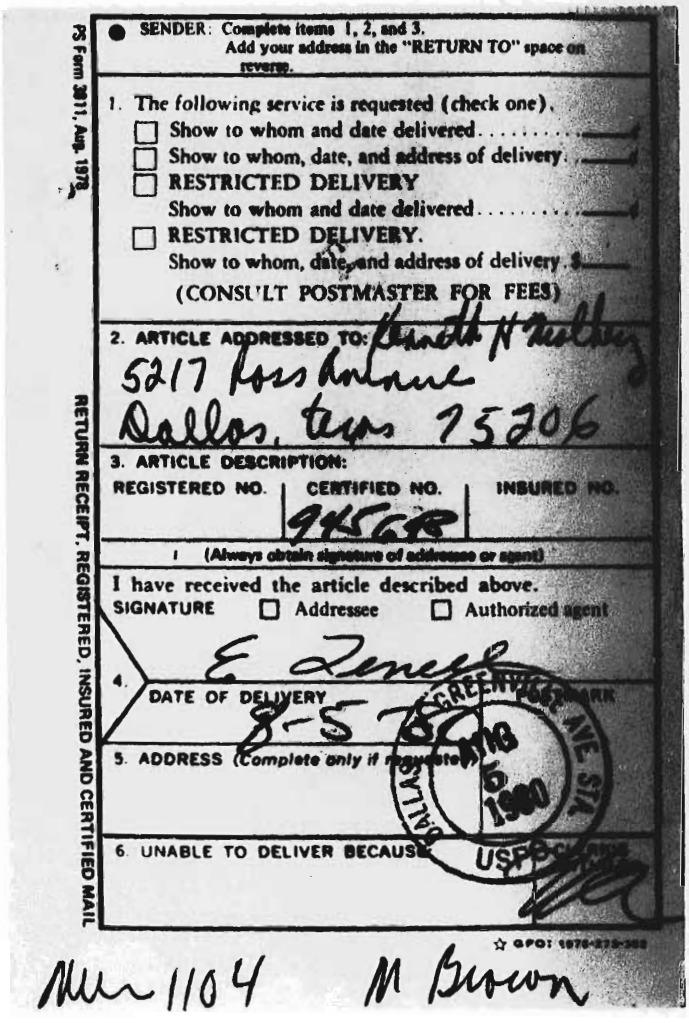
8 1 0 4 0 3 0 2 6 8 5

HUGHES & HILL
1200 AMERICAN BANK-TOWER
AUSTIN, TEXAS 78701

RECEIVED
80 SEP 2 P3:44

Mr. David Greevy
Staff Member
Federal Election Commission
Washington, D. C. 20463

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PS Form 3811, Aug. 1978

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: Kenneth P Nolan
5217 Ross Avenue
Dallas, Texas 75206

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	945 68	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
E Jones

4. DATE OF DELIVERY 8-5-80

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

DALLAS GREENVILLE POST OFFICE AVE. STA. MAY 5 1980 USPS

☆ GPO: 1978-273-369

Allen 1104 M Brown

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 31, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kenneth H. Molberg
Campaign Victory '78 (Non-Federal)
318 Merchants State Bank Building
5217 Ross Avenue
Dallas, Texas 75206

Re: MUR 1104

Dear Mr. Molberg:

The Commission has received a 12 Day Pre-Primary Report from Dallas County Democratic Progressive Voters League which is dated April 23, 1980, and which indicates that that committee transferred from its federal account to its state and local account the funds it received from Campaign Victory '78 (Non-Federal). Based on this, the Commission determined on June 24, 1980 to take no further action with regard to the violations of 2 U.S.C. § 433 and § 434 and the possible violation of § 441a(a)(1)(c) by the making of an excessive contribution to Dallas County Democratic Progressive Voters League.

Section 441a(a)(4) and section 110.3(c) of the regulations allow unlimited transfers between and among national, state, district, or local committees, including any subordinate committees, of the same political party. This would apply if Dallas County Democratic Progressive Voters League had registered with the Commission as a party committee. For purposes of the limitations on contributions to candidates and political committees, "[A]ll contributions made by the political committees established, financed, maintained, or controlled by a state party committee and by subordinate state party committees shall be presumed to be made by one political committee." 11 C.F.R. 110.3(b)(2)(ii).

If you have any questions, please contact Michele D. Brown, the staff member assigned to this matter, at (202)523-4175.

Sincerely,

Charles N. Steele
General Counsel

8104302638

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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318 Merchants State Bank Building
5217 Ross Avenue
Dallas, Texas 75206

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Sincerely,

Charles N. Steele
General Counsel

mb 7/31/80

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8 1 0 1 3 0 2 6 9 0

PS Form 3811, Aug. 1978

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: Jesse W Jones
6139 Monticello
Dallas, Texas 75231

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	945299	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

Jesse Jones

4. DATE OF DELIVERY 4-8-80

POSTMARK: U.S. POSTAGE PAID 1980 DALLAS, TX HIGHLAND

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO: 1978-272-395

Mer 11 0 4 M. Brown

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 31, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Jesse W. Jones
Dallas County Democratic
Progressive Voters League
6139 Moonglow
Dallas, Texas 75241

Re: MUR 1104

Dear Dr. Jones:

The Commission has received the 12 Day Pre-Primary Report which is dated April 23, 1980 and which indicates that your committee transferred from its federal account to its state and local account the funds it received from the non-federal account of Campaign Victory '78. Based on this, the Commission determined on June 24, 1980, to take no further action with regard to Dallas County Democratic Progressive Voters League's possible violation of 2 U.S.C. § 441a(f) by the acceptance of an excessive contribution from Campaign Victory '78.

The Commission reminds you that if your committee is a state, district or local committee of the Democratic party structure of the state of Texas, this should be included on your Statement of Organization. If this is the case, your committee is allowed to make unlimited transfers to other political committees which are national, state, district, or local committees, including any subordinate committees, of the Democratic party. See 2 U.S.C. § 441a(a)(4) and 11 C.F.R. § 110.3(c). Also, for purposes of the limitations on contributions to candidates and political committees, "[A]ll contributions made by the political committees established, financed, maintained, or controlled by a state party committee and by subordinate state party committees shall be presumed to be made by one political committee". 11 C.F.R. § 110.3(b) (2)(ii).

If you have any questions, please contact Michele D. Brown, the staff member assigned to this matter, at (202)523-4175.

Sincerely,

Charles N. Steele
General Counsel

8104302691

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Jesse W. Jones
Dallas County Democratic
Progressive Voters League
6139 Moonglow
Dallas, Texas 75241

Re: MUR 1104

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Sincerely,

Charles N. Steele
General Counsel

7/31/80

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 31, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David Bolduc
Texas Democratic Voter
Participation Project
1210 Nueces Street
Suite 100
Austin, Texas 78701

Re: MUR 1104

Dear Mr. Bolduc:

The Federal Election Commission notified you in a letter dated September 14, 1979, that there was reason to believe that your committee violated 2 U.S.C. § 434. The Commission understands that you are presently preparing disclosure report amendments with regard to the Commission's September 14, 1979 reason to believe finding and which will include specific purposes for each get-out-the-vote and voter registration expenditure and which will specify which expenditures were § 441a(d) expenditures made on behalf of Robert Krueger. We request that you submit the amendments to the Commission within ten days of your receipt of this letter.

The Commission also determined, on June 24, 1980, that there is reason to believe that your committee has violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from the John Hill Campaign Committee. A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

We acknowledge receipt of your written response which was dated November 13, 1979. In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and

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proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe, if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Michele D. Brown, the staff member assigned to this matter, at (202)523-4175.

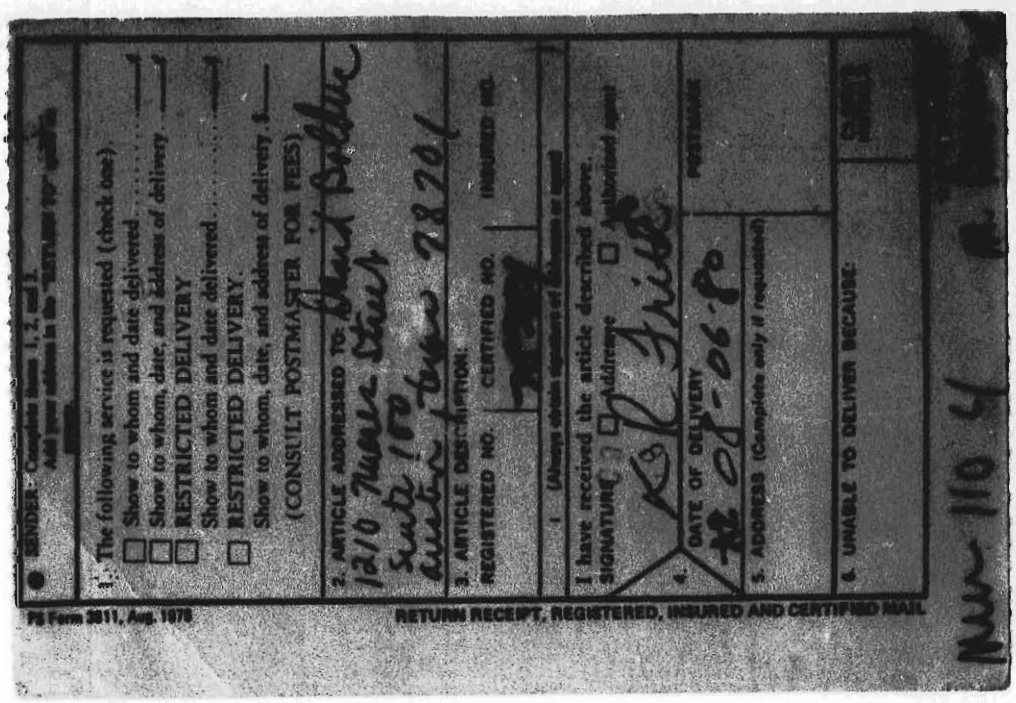
Sincerely,

Max L. Friedersdorf

Max L. Friedersdorf
Chairman

Enclosures

1. Notification of Reason to Believe Finding
2. Procedures



8104030269 1

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE: July 31, 1980

MUR # 1104
STAFF MEMBER & TEL. NO.
Michele Brown (202)523-4175

RESPONDENT: Texas Democratic Voter Participation Project

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

The Commission alleged that the Texas Democratic Voter Participation Project (the "Texas Committee") 1) failed to disclose, as required by 2 U.S.C. § 434, the particulars for its voter registration and get-out-the-vote expenditures and failed to disclose, also as required by § 434, whether its expenditures made on behalf of Robert Krueger were expenditures in accordance with 2 U.S.C. § 441a(d) or were in-kind contributions; 2) received contributions from the John Hill Campaign Committee and Rex Cauble, an individual, each in excess of the contribution limitations set forth in 2 U.S.C. § 441a(a)(1)(C), in violation of 2 U.S.C. § 441a(f), and; 3) failed to disclose the purpose of a $1,000 expenditure.

FACTUAL BASIS AND LEGAL ANALYSIS

The Reports Analysis Division sent to the Texas Committee on June 18, 1979, a request for additional information about the voter registration, get-out-the-vote, and Robert Krueger expenditures. With regard to the excessive contribution from the John Hill Campaign Committee, the Reports Analysis Division sent a letter to the Texas Committee on July 19, 1979. After the Commission failed to receive a response to the June 18th request, the Commission determined on September 14, 1979, that there was reason to believe that the Texas Committee had violated 2 U.S.C. § 434.

The Texas Committee received a contribution of $15,000 from the John Hill Campaign Committee. 2 U.S.C. § 441a(a)(1)(C) allows a committee to contribute only $5,000 to any other political committee in any calendar year. The Texas Committee's acceptance of this excessive contribution constitutes a violation of 2 U.S.C. § 441a(f) which states that a political committee shall not knowingly accept any contribution in violation of the provisions of section 441a.

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With regard to the possible excessive contribution from Mr. Cauble, the Texas Committee has submitted a letter stating that the contribution was incorrectly reported. The contribution should have been reported as two contributions: one from Mr. Cauble and one from Mrs. Cauble. The Commission has determined to take no further action on this particular matter because of the explanation given by the Texas Committee.

Based on the foregoing analysis, the Federal Election Commission has found:

1. reason to believe the Texas Committee has violated 2 U.S.C. § 434;

2. reason to believe the Texas Committee has violated 2 U.S.C. § 441a(f).

8104030269 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 31, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jim Bushala, Jr.
Hughes and Hill
1200 American Bank Tower
Austin, Texas 78701

Re: MUR 1104

Dear Mr. Bushala:

The Federal Election Commission notified your client, John Hill Campaign Committee, in a letter dated July 16, 1979, that there was reason to believe the Committee may have violated 2 U.S.C. § 433 and § 434 for failure to register and file reports with the Commission. The Commission requests that your client file a Statement of Organization and disclosure reports for the period in which the transfers were made to the Texas Democratic Voter Participation Project, the Bexar County Democratic Victory Fund, the Democratic Voter Project and the Dallas County Democratic Progressive Voters League.

The Commission also determined on June 24, 1980, that there is reason to believe that your client has violated 2 U.S.C. § 441a(a)(1)(C) by contributing $15,000 to the Texas Democratic Voter Participation Project. A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your client, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe, if you so desire.

8104302627

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Michele D. Brown, the staff member assigned to this matter, at (202)523-4175.

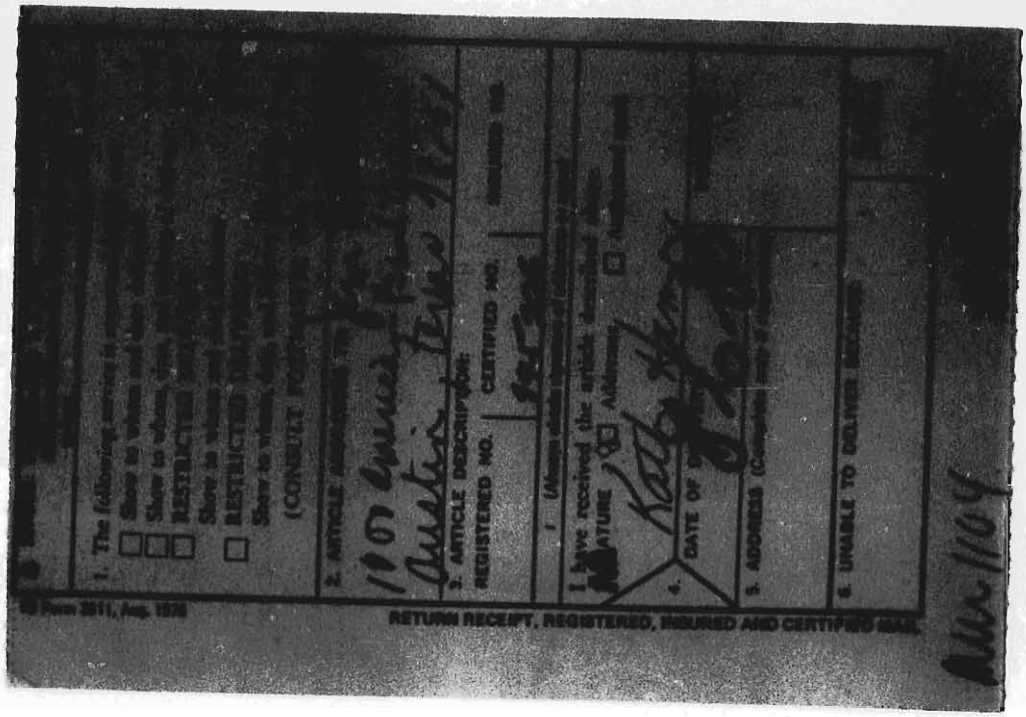
Sincerely,

Max L. Friedersdorf

Max L. Friedersdorf
Chairman

Enclosures

1. Notification of Reason to Believe Finding
2. Procedures



8104030269 8

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE: July 31, 1980

MUR # 1104
STAFF MEMBER & TEL. NO.
Michele Brown (202)523-4175

RESPONDENT: John Hill Campaign Committee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

It is alleged that the John Hill Campaign Committee might be a political committee as defined by 2 U.S.C. § 431(d) of the Federal Election Campaign Act because it transferred $15,000 to the federal account of the Texas Democratic Voter Participation Project, $525.70 to the federal account of the Bexar County Democratic Victory Fund, $2,198 to the federal account of the Democratic Voter Project and $2,100 to the federal account of the Dallas County Democratic Progressive Voters League. It is further alleged that the contribution to the Texas Democratic Voter Participation Project was in an amount exceeding the limit on contributions set forth in 2 U.S.C. § 441a(a)(1)(C).

8 1 0 3 0 2 6 9 9

FACTUAL BASIS AND LEGAL ANALYSIS

Section 431(d) defines a political committee as:

> "any committee, club, association, or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding $1,000."

Because the contributions made by the John Hill Campaign Committee were deposited into the federal accounts of the Texas Democratic Voter Participation Project, the Bexar County Democratic Victory Fund, the Democratic Voter Project and the Dallas County Democratic Progressive Voters League, the John Hill Campaign Committee would be considered a political committee and would, therefore, have to file a Statement of Organization and disclosure reports as required by 2 U.S.C. §§ 433 and 434. The committee did not comply with these requirements, therefore, the Commission, on July 16, 1979, found reason to believe that the John Hill Campaign Committee violated 2 U.S.C. §§ 433 and 434.

Section 441a(a)(1)(C) limits contributions from a committee to any other political committee to $5,000. The $15,000 contribution exceeds this limit and would thus constitute a violation of 2 U.S.C. § 441a(a)(1)(C).

Based on the foregoing analysis, the Federal Election Commission has found:

1. reason to believe the John Hill Campaign Committee violated 2 U.S.C. §§ 433 and 434, and;

2. reason to believe the John Hill Campaign Committee violated 2 U.S.C. § 441a(a)(1)(C).

8104030270 0

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Texas Democratic Voter Participation)
Project)
John Hill Campaign Committee) MUR 1104
Campaign Victory '78 (Non-Federal))
Dallas County Democratic Progressive)
Voters League)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission's executive session on July 29, 1980, do hereby certify that the Commission agreed by unanimous consent to approve and authorize the sending of the letters attached to the General Counsel's July 18, 1980 report on MUR 1104 to the Texas Democratic Voter Participation Project, the John Hill Campaign Committee, Campaign Victory '78 (Non-Federal), and the Dallas County Democratic Progressive Voters League, subject to amendment of this last letter as agreed upon in the meeting of July 29, 1980.

Attest:

7-30-80
Date

Marjorie W. Emmons
Secretary to the Commission

8104030270 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY mc

DATE: JULY 22, 1980

SUBJECT: OBJECTION - MUR 1104 - Memorandum to the Commission dated 7-18-80 with proposed letter; Received in OCS 7-18-80, 10:32

The above-named document was circulated on a no-objection basis at 2:00, July 18, 1980.

Commissioner Aikens submitted an objection at 11:37, July 22, 1980, thereby placing MUR 1104 on the Executive Session Agenda for Tuesday, July 29, 1980.

A copy of the Commissioners' vote sheet is attached attached showing her comment.

ATTACHMENT:
Copy of Vote Sheet

8104030270 2

July 18, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1104

Please have the attached Memo distributed to the Commission on a 24 hour no-objection basis. Thank you.

8 1 0 1 0 3 0 2 7 0 3

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

80 JUL 18 A10: 32

July 18, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: MUR 1104

Pursuant to the discussion and findings of the Commission meeting on Tuesday, June 24, 1980, the attached letters to the Texas Democratic Voter Participation Project, the John Hill Campaign Committee, Campaign Victory '78 (Non-Federal), and the Dallas County Democratic Progressive Voters League have been prepared and are being circulated to the Commission for approval. Also attached is the latest RAD referral which was mentioned during the Commission's discussion of this matter.

Recommendation

Approve and authorize the sending of the attached letters to the Texas Democratic Voter Participation Project, the John Hill Campaign Committee, Campaign Victory '78 (Non-Federal), and the Dallas County Democratic Progressive Voters League.

Attachments

1. RAD Referral
2. Letter to the Texas Democratic Voter Participation Project
3. Letter to John Hill Campaign Committee
4. Letter to Campaign Victory '78 (Non-Federal)
5. Letter to Dallas County Democratic Progressive Voters League

8104027004

REPORTS ANALYSIS REFERRAL UPDATE

M. Brown

*ORIGIN: RAD

DATE June 11, 1980

ANALYST DU Greevy Aug 6/9

TO: Office of General Counsel

ATTENTION:

TEAM CHIEF Bobby Werfel

THROUGH: STAFF DIRECTOR A.L. for S.O.P.

COMPLIANCE REVIEW EG/PS

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104 (79)

DATE OF ORIGINAL REFERRAL 12/10/79

John Hill Campaign Committee

**PURPOSE: Information

One of the recipient committees of the Hill contributions made a transfer to its segregated State and local account. The transfer was specifically listed as being comprised of funds received from Hill, and the amount was $850.

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

Attachment 1 (6 Pages)

8104302705

1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

REPORT OF RECEIPTS AND EXPENDITURES FOR A CANDIDATE OR COMMITTEE SUPPORTING CANDIDATE(S) FOR NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED
'80 APR 23 AM 11:52

Note: *Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.*

1 Dallas County Democratic Progressive Voters League
Name of Candidate or Committee (in full)

2 I.D. No. C00091777
Candidate/Committee

6139 Moonglow Drive
Address (number and street)

3 N/A
Office Sought, State/District (if applicable)

Dallas, Texas 75241
City, State and ZIP Code

☐ Check if address is different than previously reported.

Year of Election _____

4 Type of Report (check appropriate boxes)

☒ April 10 Quarterly Report
☐ July 10 Quarterly Report
☐ October 10 Quarterly Report
☐ January 31 Annual Report
☐ Monthly Report _____ (month)

☐ Tenth day report preceding _____ election (primary, general or convention) on _____ (date) in the State of _____
☐ Thirtieth day report following _____ election (primary, general or convention) on _____ (date) in the State of _____

☐ Termination Report
☐ Amendment for: _____ (which report)

This is a report for ☐ Primary Election ☐ General Election ☐ Primary and General ☐ Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES

(Figures may be rounded to nearest dollar.)

5 Covering Period 1-1-80 Through 4-7-80

	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19		$ 35.17
7 Cash on hand at beginning of reporting period	$ 35.17	
8 Total receipts (from line 19)	$ 1500.00	$ 1500.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	$ 1535.17	$ 1535.17
9 Total expenditures (from line 25)	$ 1314.00	$ 1314.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	$ 221.17	$ 221.17
11 Value of contributed items on hand to be liquidated (Attach itemized list) $ N/A		
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	$ -0-	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	$ -0-	

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

4-10-80
(Date)

Jesse W. Jones
(Typed Name of Treasurer or Candidate)

Jesse W. Jones
(Signature of Treasurer or Candidate)

Note: *Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441j (see reverse side of form).*

For further information, Contact: Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463 or call 800/424-9530

Approved by GAO B-187620 (R0506) Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

v. 1978
ral Election Commission
325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 4 of 4 for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Coalition of Black Democrats Ft. Worth Tx. 2411	Political Ad Expenditure for: ☐ Primary ☐ General ☒ Other	2/14	60.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
J. W. Lockridge Scholarship Fund Dallas Tx. 24U	Candidate Promotion Expenditure for: ☐ Primary ☐ General ☐ Other	2/29	44.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
TWL State/Local Account 6139 Moonglow Drive Dallas Tx. 75241 24U	Excess Contributions FROM JOHN HILL CAMPAIGN Expenditure for: ☐ Primary ☐ General ☒ Other		850.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		

SUBTOTAL of expenditures this page (optional)	$954.00
TOTAL this period (last page this line number only)	$1314.00

15044

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

M. Broux

DATE June 11, 1980

ANALYST DU Greevy 6/9

TO: Office of General Counsel
ATTENTION:

TEAM CHIEF Bobby Werfel

COMPLIANCE REVIEW

THROUGH: STAFF DIRECTOR B.L. for D.A.R.

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104 (79)

DATE OF ORIGINAL REFERRAL 12/10/79

Campaign '78 (Non-Federal)

**PURPOSE: Information

The recipient committee of the Campaign '78 contribution made a transfer to its segregated State and local account. The transfer was specifically listed as being comprised of funds received from Campaign '78, and the amount was $9,540.48.

OUTCOME: (if applicable)

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*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

RECEIVED

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

80 MAY -5 PM 2:36

(Summary Page)

1. Name of Committee (in Full)
Dallas County Democratic Progressive Voters League

Address (Number and Street)
6139 Moonglow Drive

City, State and ZIP Code
Dallas, Texas 75241

☐ Check if address is different than previously reported.

2. FEC Identification Number
C00091777

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

12/10/79
Rpt'd 4-21-80

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ ~~Monthly Report for~~ _____
- ☒ Twelfth day report preceding Primary (Type of Election) election on May 3 in the State of Texas
- ☐ Thirtieth day report following the General Election on _____ in the State of _____
- ☐ Termination Report

(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period 4/8/80 Through 4/22/80		
6. (a) Cash on Hand January 1, 1980		$ 35.17
(b) Cash on Hand at Beginning of Reporting Period	$ 221.17	
(c) Total Receipts (from Line 18)	$ 13,225.00	$ 14,725.00
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	$ 13,446.00	$ 14,760.17
7. Total Disbursements (from Line 28)	$ 11,410.93	$ 12,724.93
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	$ 2,035.07	$ 2,025.24
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ -0-	

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

Jesse W. Jones
Type or Print Name of Treasurer

Jesse W. Jones
SIGNATURE OF TREASURER

4/23/80
Date

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. S437g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X 3/80

8100315537927

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for
LINE NUMBER 19
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (In Full)

Democratic Progressive Voters League

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Progressive Voters League State/Local Account 2654 Anderson Dallas, Texas 75215	Transfer: Excess cont.(Cam. Victry '78) Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	4/17/80	9,540.48
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			9,540.48
TOTAL This Period (last page this line number only)			9,540.48

8100310553027913011

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David Bolduc
Texas Democratic Voter
Participation Project
1210 Nueces Street
Suite 100
Austin, Texas 78701

Re: MUR 1104

Dear Mr. Bolduc:

The Federal Election Commission notified you in a letter dated September 14, 1979, that there was reason to believe that your committee violated 2 U.S.C. § 434. The Commission understands that you are presently preparing disclosure report amendments with regard to the Commission's September 14, 1979 reason to believe finding and which will include specific purposes for each get-out-the-vote and voter registration expenditure and which will specify which expenditures were § 441a(d) expenditures made on behalf of Robert Krueger. We request that you submit the amendments to the Commission within ten days of your receipt of this letter.

The Commission also determined, on June 24, 1980, that there is reason to believe that your committee has violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from the John Hill Campaign Committee. A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

We acknowledge receipt of your written response which was dated November 13, 1979. In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and

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Attachment 2 (4 Pages)

proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe, if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Michele D. Brown, the staff member assigned to this matter, at (202)523-4175.

Sincerely,

Enclosures

1. Notification of Reason to Believe Finding
2. Procedures

8104030271?

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE:

MUR # 1104
STAFF MEMBER & TEL. NO.
Michele Brown (202)523-4175

RESPONDENT: Texas Democratic Voter Participation Project

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

The Commission alleged that the Texas Democratic Voter Participation Project (the "Texas Committee") 1) failed to disclose, as required by 2 U.S.C. § 434, the particulars for its voter registration and get-out-the-vote expenditures and failed to disclose, also as required by § 434, whether its expenditures made on behalf of Robert Krueger were expenditures in accordance with 2 U.S.C. § 441a(d) or were in-kind contributions; 2) received contributions from the John Hill Campaign Committee and Rex Cauble, an individual, each in excess of the contribution limitations set forth in 2 U.S.C. § 441a(a)(1)(C), in violation of 2 U.S.C. § 441a(f), and; 3) failed to disclose the purpose of a $1,000 expenditure.

FACTUAL BASIS AND LEGAL ANALYSIS

The Reports Analysis Division sent to the Texas Committee on June 18, 1979, a request for additional information about the voter registration, get-out-the-vote, and Robert Krueger expenditures. With regard to the excessive contribution from the John Hill Campaign Committee, the Reports Analysis Division sent a letter to the Texas Committee on July 19, 1979. After the Commission failed to receive a response to the June 18th request, the Commission determined on September 14, 1979, that there was reason to believe that the Texas Committee had violated 2 U.S.C. § 434.

The Texas Committee received a contribution of $15,000 from the John Hill Campaign Committee. 2 U.S.C. § 441a(a)(1)(C) allows a committee to contribute only $5,000 to any other political committee in any calendar year. The Texas Committee's acceptance of this excessive contribution constitutes a violation of 2 U.S.C. § 441a(f) which states that a political committee shall not knowingly accept any contribution in violation of the provisions of section 441a.

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With regard to the possible excessive contribution from Mr. Cauble, the Texas Committee has submitted a letter stating that the contribution was incorrectly reported. The contribution should have been reported as two contributions: one from Mr. Cauble and one from Mrs. Cauble. The Commission has determined to take no further action on this particular matter because of the explanation given by the Texas Committee.

Based on the foregoing analysis, the Federal Election Commission has found:

1. reason to believe the Texas Committee has violated 2 U.S.C. § 434;

2. reason to believe the Texas Committee has violated 2 U.S.C. § 441a(f).

8104302714

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jim Bushala, Jr.
Hughes and Hill
1200 American Bank Tower
Austin, Texas 78701

Re: MUR 1104

Dear Mr. Bushala:

The Federal Election Commission notified your client, John Hill Campaign Committee, in a letter dated July 16, 1979, that there was reason to believe the Committee may have violated 2 U.S.C. § 433 and § 434 for failure to register and file reports with the Commission. The Commission requests that your client file a Statement of Organization and disclosure reports for the period in which the transfers were made to the Texas Democratic Voter Participation Project, the Bexar County Democratic Victory Fund, the Democratic Voter Project and the Dallas County Democratic Progressive Voters League.

The Commission also determined on June 24, 1980, that there is reason to believe that your client has violated 2 U.S.C. § 441a(a)(1)(C) by contributing $15,000 to the Texas Democratic Voter Participation Project. A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your client, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe, if you so desire.

Attachment 3 (4 Pages)

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Michele D. Brown, the staff member assigned to this matter, at (202)523-4175.

Sincerely,

Enclosures

1. Notification of Reason to Believe Finding
2. Procedures

8104030276

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE:

MUR # 1104
STAFF MEMBER & TEL. NO.
Michele Brown (202)523-4175

RESPONDENT: John Hill Campaign Committee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

It is alleged that the John Hill Campaign Committee might be a political committee as defined by 2 U.S.C. § 431(d) of the Federal Election Campaign Act because it transferred $15,000 to the federal account of the Texas Democratic Voter Participation Project, $525.70 to the federal account of the Bexar County Democratic Victory Fund, $2,198 to the federal account of the Democratic Voter Project and $2,100 to the federal account of the Dallas County Democratic Progressive Voters League. It is further alleged that the contribution to the Texas Democratic Voter Participation Project was in an amount exceeding the limit on contributions set forth in 2 U.S.C. § 441a(a)(1)(C).

8104302717

FACTUAL BASIS AND LEGAL ANALYSIS

Section 431(d) defines a political committee as:

> "any committee, club, association, or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding $1,000."

Because the contributions made by the John Hill Campaign Committee were deposited into the federal accounts of the Texas Democratic Voter Participation Project, the Bexar County Democratic Victory Fund, the Democratic Voter Project and the Dallas County Democratic Progressive Voters League, the John Hill Campaign Committee would be considered a political committee and would, therefore, have to file a Statement of Organization and disclosure reports as required by 2 U.S.C. §§ 433 and 434. The committee did not comply with these requirements, therefore, the Commission, on July 16, 1979, found reason to believe that the John Hill Campaign Committee violated 2 U.S.C. §§ 433 and 434.

Section 441a(a)(1)(C) limits contributions from a committee to any other political committee to $5,000. The $15,000 contribution exceeds this limit and would thus constitute a violation of 2 U.S.C. § 441a(a)(1)(C).

Based on the foregoing analysis, the Federal Election Commission has found:

1. reason to believe the John Hill Campaign Committee violated 2 U.S.C. §§ 433 and 434, and;

2. reason to believe the John Hill Campaign Committee violated 2 U.S.C. § 441a(a)(1)(C).

8104030271 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kenneth H. Molberg
Campaign Victory '78 (Non-Federal)
318 Merchants State Bank Building
5217 Ross Avenue
Dallas, Texas 75206

Re: MUR 1104

8102702719

Dear Mr. Molberg:

The Commission has received a 12 Day Pre-Primary Report from Dallas County Democratic Progressive Voters League which is dated April 23, 1980, and which indicates that that committee transferred from its federal account to its state and local account the funds it received from Campaign Victory '78 (Non-Federal). Based on this, the Commission determined on June 24, 1980 to take no further action with regard to the violations of 2 U.S.C. § 433 and § 434 and the possible violation of § 441a(a)(1)(c) by the making of an excessive contribution to Dallas County Democratic Progressive Voters League.

Section 441a(a)(4) and section 110.3(c) of the regulations allow unlimited transfers between and among national, state, district, or local committees, including any subordinate committees, of the same political party. This would apply if Dallas County Democratic Progressive Voters League had registered with the Commission as a party committee. For purposes of the limitations on contributions to candidates and political committees, "[A]ll contributions made by the political committees established, financed, maintained, or controlled by a state party committee and by subordinate state party committees shall be presumed to be made by one political committee." 11 C.F.R. 110.3(b)(2)(ii).

If you have any questions, please contact Michele D. Brown, the staff member assigned to this matter, at (202)523-4175.

Sincerely,

Charles N. Steele
General Counsel

Attachment 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Jesse W. Jones
Dallas County Democratic
Progressive Voters League
6139 Moonglow
Dallas, Texas 75241

Re: MUR 1104

Dear Dr. Jones:

The Commission has received the 12 Day Pre-Primary Report which is dated April 23, 1980 and which indicates that your committee transferred from its federal account to its state and local account the funds it received from the non-federal account of Campaign Victory '78. Based on this, the Commission determined on June 24, 1980, to take no further action with regard to Dallas County Democratic Progressive Voters League's possible violation of 2 U.S.C. § 441a(f) by the acceptance of an excessive contribution from Campaign Victory '78.

The Commission reminds you that if your committee is a state, district or local committee of the Democratic party, this should be included on your Statement of Organization. If this is the case, your committee is allowed to make unlimited transfers to other political committees which are national, state, district, or local committees, including any subordinate committees, also of the Democratic party. See 2 U.S.C. § 441a(a)(4) and 11 C.F.R. § 110.3(c). Also, for purposes of the limitations on contributions to candidates and political committees, "[A]ll contributions made by the political committees established, financed, maintained, or controlled by a state party committee and by subordinate state party committees shall be presumed to be made by one political committee". 11 C.F.R. § 110.3(b)(2)(ii).

If you have any questions, please contact Michele D. Brown, the staff member assigned to this matter at (202)523-4175.

Sincerely,

Charles N. Steele
General Counsel

8104302720

Attachment 5

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Texas Democratic Voter	)	
Identification Project	)	MUR 1104
John Hill Campaign Committee	)	
Campaign Victory '78	)	
Dallas County Democratic	)	
Progressive Voters League	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission's executive session on June 24, 1980, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 1104:

1. Find reason to believe the Texas Democratic Voter Participation Project violated 2 U.S.C. §44la(f) by knowingly accepting an excessive contribution from the John Hill Campaign Committee.

2. Find reason to believe the John Hill Campaign Committee violated 2 U.S.C. §44la(a)(1)(C) by making an excessive contribution to the Texas Democratic Voter Participation Project.

3. Take no further action against Campaign Victory '78 (non-Federal) with regard to the violations of 2 U.S.C. §433, §434, and §44la(a)(1)(C) because the excessive contribution made to the Dallas County Democratic Progressive Voters League was transferred from its federal account into its non-federal account.

4. Take no further action against Dallas County Democratic Progressive Voters League with regard to the violation of 2 U.S.C. §44la(f) by knowingly accepting an excessive contribution from Campaign Victory '78 (non-Federal) because the Dallas County Democratic Progressive Voters League transferred the contribution from its federal account into its non-federal account.

Continued

8104302721

5. Circulate for Commission approval letters to Texas Democratic Voter Participation Project, John Hill Campaign Committee, Campaign Victory '78 (non-Federal) and Dallas County Democratic Progressive Voters League.

Commissioners Aikens, Friedersdorf, Harris, McGarry, and Reiche voted affirmatively for the decision; Commissioner Tiernan was not present at the time of the vote.

Attest:

6/28/80
Date

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

8104022722

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE mwe

FROM: MARJORIE W. EMMONS/MARGARET CHANEY mc

DATE: JUNE 19, 1980
OBJECTION -

SUBJECT: MUR 1104 - First General Counsel's Report dated 6-16-80; Received in OCS 6-16-80, 12:13

The above-named document was circulated on a 48 hour vote basis at 4:00, June 16, 1980.

Commissioner Aikens submitted an objection at 4:21, June 18, 1980.

This matter will be placed on the Executive Session Agenda for Tuesday, June 24, 1980.

8104302723

June 16, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1104

Please have the attached First GC Report distributed to the Commission on a 48 hour tally basis. Thank you.

8104030274

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

80 JUN 16 P12: 18

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION JUN 16 1980

MUR NO. 1104
STAFF MEMBER(S)
Michele Brown

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Texas Democratic Voter Identification Project
John Hill Campaign Committee
Campaign Victory '78
Dallas County Democratic Progressive Voters League

RELEVANT STATUTE: 2 U.S.C. §§ 433, 434, 441a(a)(1)(C), 441a(f)

INTERNAL REPORTS CHECKED: Bexar County Democratic Victory Fund

FEDERAL AGENCIES CHECKED: None

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BACKGROUND

On December 10, 1979, the Reports Analysis Division referred to the Office of General Counsel the Texas Democratic Voter Participation Project, the John Hill Campaign Committee, and Campaign Victory '78 (Non-Federal). The referral has been updated on December 21, 1979, January 10, 1980, January 23, 1980, February 7, 1980, March 28, 1980, and May 30, 1980.

It is alleged that the Texas Democratic Voter Participation Project failed to adequately disclose the particulars for expenditures made by the Committee, and that it accepted an excessive contribution from the John Hill Campaign Committee and an excessive contribution from an individual, Rex Cauble. The Commission found reason to believe on September 14, 1979, that the Committee violated 2 U.S.C. § 434.

With regard to the John Hill Campaign Committee, it is alleged that the Committee is a political committee because it made contributions to the Texas Democratic Voter Participation Project, Bexar County Democratic Victory Fund, Democratic Voter Project and Dallas County Democratic Progressive Voters League. These committees disclosed these transfers on their reports filed with the Commission. Because the John Hill Campaign Committee expenditures were made in connection with federal elections, the John Hill Campaign Committee should have filed a Statement of Organization and disclosure reports with the Commission.

The John Hill Campaign Committee's transfer to the Texas Democratic Voter Participation Project was in the amount of $15,000 which is a violation of the contribution limitations set forth in 2 U.S.C. § 441a. On July 16, 1979, the Commission found reason to believe the John Hill Campaign Committee violated 2 U.S.C. §§ 433 and 434.

Campaign Victory '78 (Non-Federal) was referred because it made contributions to the Dallas County Democratic Progressive Voters League's federal account, but it failed to file a Statement of Organization and required reports with the Commission. The Commission found reason to believe on July 16, 1979, that Campaign Victory '78 (Non-Federal) violated 2 U.S.C. §§ 433 and 434.

The Office of General Counsel has prepared a chart showing the relationships between the various committees. This chart is included as Attachment 1.

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FACTUAL AND LEGAL ANALYSIS

A. Texas Democratic Voter Participation Project (the "Texas Committee")

The Reports Analysis Division sent a request for additional information on June 18, 1979, to the Texas Committee stating that the descriptions "Voter Registration Expenses" and "Get-Out-The-Vote-Program", were insufficient to meet statutory requirements for disclosure. RAD also requested that the Texas Committee clarify whether expenditures made on behalf of Mr. Robert Krueger were expenditures by a State committee of a political party, in accordance with 2 U.S.C. § 441a(d) or in-kind contributions.

On July 19, 1979, RAD sent to the Texas Committee a letter which stated that it appeared that the Texas Committee had received a contribution in excess of the $5,000 limitation applicable to contributions from political committees. The contribution in question was a $15,000 contribution from the John Hill Campaign Committee.

Because the Texas Committee made no response to the Commission's request for additional information dated June 18, 1979, the Commission sent a letter to the Texas Committee on September 14, 1979, stating that there was reason to believe that the Texas Committee was in violation of 2 U.S.C. § 434. A finding was not made with respect to the excessive contribution because Reports Analysis had some difficulty in locating the treasurer in its attempt to send him the July 19, 1979 letter.

On October 11, 1979, Mr. David Bolduc contacted the Reports Analysis Division by telephone informing the Commission that he was the new treasurer of the Texas Committee. RAD mailed to Mr. Bolduc on October 17, 1979, copies of the requests for additional information and the July 19, 1979 letter concerning the excessive contribution.

Mr. Bolduc called the Reports Analyst on October 23, 1979, to discuss the problems of the Texas Committee. With regard to the excessive contribution from the John Hill Campaign Committee, Mr. Bolduc stated that candidates in the state had agreed to get individuals to make contributions to the Texas Committee for voter registration and get-out-the-vote drives. Each candidate was to arrange for $15,000 in contributions from individuals. Because the John Hill Campaign Committee was not able to get the $15,000 in contributions, it transferred $15,000 directly to the Committee.

Mr. Bolduc said that he realized that this contribution was in excess of the limitations and, therefore, he would arrange to have the Texas Committee refund $10,000 back to the John Hill Campaign Committee. The money was not transferred at that point because the Texas Committee had only $800 at the time. The analyst told Mr. Bolduc that the Commission had contacted the John Hill Campaign Committee not only because of the excessive contribution, but also because the John Hill Campaign Committee had not registered with the Commission or filed reports. Mr. Bolduc then decided that the entire $15,000 should be refunded and that he would show a debt of $15,000 owed to the John Hill Campaign Committee on the next report of the Texas Committee.

With regard to the voter registration and get-out-the-vote expenditures, Mr. Bolduc said he would contact the entities to which expenditures had been made in order to find out the purposes for the expenditures. According to Mr. Bolduc, Texas Democratic Voter Participation Project is the registered State central committee. Thus, the expenditures made on behalf of Mr. Krueger were § 441a(d) expenditures. On Novemer 12, 1979, and November 13, 1979, Mr. Bolduc sent letters to the Commission reiterating what he had stated on the telephone.

RAD, on December 21, 1979, sent to the Office of General Counsel an update to RAD's referral which included more examples of expenditures to Mr. Krueger, get-out-the-vote expenditures, a $10,000 contribution from an individual, and an $1,000 expenditure the purpose of which was not included on the report.

RAD sent another update to the Office of General Counsel on January 10, 1980. This included a copy of a letter sent to the Texas Committee regarding the $10,000 contribution and the Texas Committee's response. The response stated that instead of it being one $10,000 contribution from Mr. Rex Cauble, the contribution should have been reported as a $5,000 contribution from Mr. Cauble and a $5,000 contribution from Mrs. Cauble.

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In a January 23, 1980 update, RAD sent to the Office of General Counsel a copy of Mr. Bolduc's letter of January 14, 1980. Mr. Bolduc in his letter explained the Krueger expenditures and the $1,000 expenditure were § 441a(d) expenditures. He also stated that he was in the process of amending the Texas Committee's reports accordingly.

The Texas Committee refunded $10,000 to the John Hill Campaign Committee on November 28, 1979 and $5,000 December 11, 1979. RAD, on February 7, 1980, sent to the Office of General Counsel, a copy of the page from the report filed by the Texas Committee showing the refunds.

The Office of General Counsel recognizes that Mr. Bolduc is presently preparing report amendments which include specific purposes for each get-out-the-vote and voter registration expenditure and which will specify which expenditures are § 441a(d) expenditures on behalf of Bob Krueger. With respect to the John Hill Campaign Committee's excessive contribution to the Texas Committee, the Office of General Counsel recommends that the Commission find reason to believe that the Texas Committee violated 2 U.S.C. § 441a(f) by knowingly accepting the $15,000 contribution. We recommend that the attached letter to Mr. Bolduc be sent to notify him of the new reason to believe finding and to request that he provide the amendments to the Texas Committee's reports within ten days of his receipt of the letter.

B. John Hill Campaign Committee

The Commission sent a letter to the John Hill Campaign Committee stating that the Committee might be a political committee as defined by the Act because it transferred $15,000 to the federal account of the Texas Democratic Voter Participation Project, $525.70 to the federal account of the Bexar County Democratic Victory Fund, $2,198 to the federal account of the Democratic Voter Project, and $2,100 to the federal account of Dallas County Democratic Progressive Voters League. Because these expenditures were made for the purpose of influencing a federal election, the John Hill Campaign Committee should have filed a Statement of Organization and disclosure reports with the Commission. The letter suggested that, if the John Hill Campaign Committee did not want to be considered a political committee, it should contact the committees to which contributions were made and request that they either refund the monies or transfer the monies to a non-federal account.

The John Hill Campaign Committee had two offices, one in Dallas and one in Austin, but there was only one bank account. The surface violation letter was sent to the Dallas office on May 18, 1979, and another surface violation letter was sent to

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the Dallas office on July 19, 1979. Because the Dallas office did not respond to the surface violation letter, the Commission, on July 16, 1979, found reason to believe that the John Hill Campaign Committee violated 2 U.S.C. §§ 433 and 434.

On July 31, 1979, Jim Bushala, Legal Counsel to the John Hill Campaign Committee, called the Reports Analyst. The analyst explained four alternatives for rectifying the situation: 1) the John Hill Campaign Committee could request that the committees to which transfers had been made establish a separate non-federal account and transfer the excessive amount to it; 2) the John Hill Campaign Committee could register with the Commission and file reports for the periods in which the transfers took place; 3) the John Hill Campaign Committee could request a refund of the amount over $1,000 from the recipient committees, or; 4) the John Hill Campaign Committee could request an Advisory Opinion from the Commission.

On August 13, 1979, Mr. Bushala sent a letter to the Commission indicating that he had written to the four recipient committees requesting that they open "state and local accounts" and transfer money into them from their federal account.

1. Texas Democratic Voter Participation Project

As discussed in section A above, the Texas Democratic Voter Participation Project refunded $10,000 to the John Hill Campaign Committee on November 28, 1979, and $5,000 on December 11, 1979.

The Office of General Counsel recommends that the Commission find reason to believe that the John Hill Campaign Committee violated 2 U.S.C. § 441a(a)(1)(C) by contributing $15,000 to the Texas Democratic Voter Participation Project.

2. Bexar County Democratic Victory Fund

The Bexar County Democratic Victory Fund responded to Mr. Bushala stating that there were no funds available to be transferred. The Bexar County Democratic Victory Fund terminated its reporting requirements with the Commission on January 30, 1979.

3. Democratic Voter Project

Marion Sanford of the Democratic Voter Project called the analyst on August 21, 1979. He said that Democratic Voter Project would be willing to transfer funds from their federal

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account into their non-federal account but could not do so because the bank account had been closed and there was no money that could be transferred. The analyst told Mr. Sanford to send a letter to Mr. Bushala, counsel for the John Hill Campaign Committee, informing him of this.

4. Dallas County Democratic Progressive Voters League

The Dallas County Democratic Progressive Voters League did not have the funds in its federal account to transfer into its non-federal account. Jesse Jones, of the Dallas County Democratic Progressive Voters League, contacted the bank to try to arrange a loan inorder to make the transfer, however, the bank was not familiar with this type of transaction and the loan was not approved. Dr. Jones then requested an Advisory Opinion from the Commission to assist him in this matter. Dr. Jones' request for an Advisory Opinion was denied.

The analyst informed Mr. Bushala that, because it appeared that the committees would not be able to transfer funds from their federal accounts to their non-federal accounts, it looked as though the John Hill Campaign Committee would have to register and file reports with the Commission.

Mr. Marion Sanford, representing the John Hill Campaign Committee, called the analyst on May 23, 1980, to say that some of the payments by the John Hill Campaign Committee to the Bexar County Democratic Victory Fund, the Democratic Voter Project, and the Dallas County Democratic Progressive Voters League may have been expenditures for services rather than contributions.

The Office of General Counsel recommends that the attached letter be sent informing the John Hill Campaign Committee that the Commission has found reason to believe that the Committee has violated 2 U.S.C. §§ 441a(a)(1)(C) by making an excessive contribution to the Texas Democratic Voter Participation Project and requesting that the John Hill Campaign Committee file a Statement of Organization and disclosure reports with the Commission.

C. Campaign Victory '78 (Non-Federal)

In reviewing the reports filed by the Dallas County Democratic Progressive Voters League, the analyst noticed transfers-in from Campaign Victory '78. According to the analyst the reports filed by Campaign Victory '78 (Federal) do not show any transfers to the Dallas County Democratic Progressive Voters League. The reports showed that Campaign Victory '78 (Federal) had little money or activity. Because of this, the analyst determined that Campaign Victory '78 had another account from which the transfers were made and which was not reported to the Commission.

On May 18, 1979, the Commission sent a letter to Campaign Victory '78 (Non-Federal) stating that the committee might be a political committee as defined by the Act because it transferred $10,300 to the federal account of the Dallas County

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Democratic Progressive Voters League. Because Campaign Victory '78 (Non-Federal) had made expenditures for the purpose of influencing a federal election, Campaign Victory '78 (Non-Federal) should have filed a Statement of Organization and disclosure reports with the Commission. The letter suggested that, if the committee did not want to be considered a political committee, the committee should contact the candidates, committees, or both, to which contributions were made and request that they either refund the monies or transfer the monies to a non-federal account.

Because the committee did not respond to the letter, the Commission found reason to believe that a violation of 2 U.S.C. §§ 433 and 434 had occurred. The reason to believe letter was returned to the Commission because of an insufficient address. It was re-mailed on August 1, 1979.

Ken Molberg, the treasurer of Campaign Victory '78 called the analyst on August 3, 1979 regarding the letter of May 18, 1979. He confirmed that Campaign Victory '78 had two separate accounts and that the transfers to Dallas County Democratic Progressive Voters League had come from the non-Federal account. Mr. Molberg stated that when the transfers were made, the transfers were supposed to have been placed in the non-Federal account of the League. He said that he would contact the League and request that it transfer the $10,000 to its non-Federal account.

On August 8, 1979, Mr. Molberg sent a letter to the analyst stating that he would try to rectify the situation. He said further that the funds transferred to the League "were not primarily used for the purpose of influencing federal elections". He also stated that, "by way of information, the Victory '78 Committee was a committee designed to support Democratic Party candidates whose jurisdictions overlapped Dallas County. Four of these were federal races -- one senatorial and three congressional -- while in excess of 80 were state and local -- the two most prominent races being those for governor and county judge. Previous information was provided you with respect to our 'support-the-party' effort."

Mr. Molberg sent another letter to the Commission enclosing a copy of a letter he sent to Jesse Jones, President of the Dallas County Democratic Progressive Voters League, confirming a telephone conversation between the two in which Dr. Jones told Mr. Molberg that $9,540.48 was incorrectly reported on Dallas County Democratic Progressive Voters League's federal reports and that that amount would be transferred to the League's non-Federal account, leaving a $759.52 contribution to the Federal account.

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Because Dallas County Democratic Progressive Voters League did not have the funds in its federal account to transfer into its non-Federal account, Dr. Jones contacted the bank to arrange a loan in order to carry out the transfer, however, the bank was not familiar with this type of transaction and it was not approved. Dr. Jones then decided to request an Advisory Opinion from the Commission regarding Dallas County Democratic Progressive Voters League's inability to refund monies to Campaign Victory '78 and the John Hill Campaign Committee, both of which had made contributions to the Federal account, to rectify their §§ 433 and 434 violations. Dr. Jones' request was denied by the Commission.

The analyst called Mr. Molberg on September 18, 1979, to tell him that the transfer from the Federal account to the non-Federal account of Dallas County Democratic Progressive Voters League had not been made. Mr. Molberg was surprised to hear this because he thought it had been done. The analyst told him that he could either file a Statement of Organization and the required reports or request an Advisory Opinion. Mr. Molberg said he would request an Advisory Opinion.

The analyst contacted Mr. Molberg on October 2, 1979, to find out if Mr. Molberg had written his Advisory Opinion Request and to tell him that the Commission had a new policy regarding AO requests and, therefore, would probably not consider Mr. Molberg's request. The analyst told Mr. Molberg that unless a refund was made or the recipient committee transferred the funds to a state and local account, the committee would have to register with the Commission and file reports. Mr. Molberg said he could do that but he reiterated that the funds had been intended to have been used for non-Federal purposes. He did not know that Dallas County Democratic Progressive Voters League would deposit the funds into its Federal account.

On October 29, 1979, Mr. Molberg sent a letter to the Commission explaining that only $759.52 was transferrd from the Federal account of Campaign Victory '78 to the Dallas County Democratic Progressive Voters League while the remaining $9,540.48 was transferred from the non-Federal account of the Campaign Victory '78. The copies of checks enclosed with the letter corroborate this (see Attachment 8). The Dallas County Democratic Progressive Voters League, however, deposited the total $10,500 in its Federal account.

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Mr. Molberg ends his letter thus:

> "This treasurer [Campaign Victory '78] has utilized his best efforts to comply with the Act. As far as I know, those efforts have been successful.* In view of the circumstances, I would request that the Commission seek its remedy through the Progressive Voter's League, inasmuch as this is where the problem occurred. It would appear that the League should probably amend its filing to reflect the actual circumstances surrounding these monies."

Because the Dallas County Democratic Progressive Voters League deposited into its Federal account $9,540.48 from Campaign Victory '78, it appears that Campiagn Victory '78 (non-Federal) made an excessive contribution to Dallas County Democratic Progressive Voters League. The Office of General Counsel recommends that the Commission find reason to believe that Campaign Victory '78 (non-Federal) violated 2 U.S.C. § 44la(a)(1)(C) by making an excessive contribution to Dallas County Democratic Progressive Voters League and that Dallas County Democratic Progressive Voters League violated 2 U.S.C. § 44la(f) by knowingly accepting the contribution. The Office of General Counsel recommends sending a) to Campaign Victory '78, the attached letter and interrogatories regarding RAD's previous reason to believe finding and this reason to believe finding, and; b) to the Dallas County Democratic Progressive Voters League the attached letter and interrogatories inquiring into the contributions the Dallas County Democratic Progressive Voters League received from Campaign Victory '78.

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RECOMMENDATIONS

A. Texas Democratic Voter Participation Project

1. Find reason to believe the Texas Democratic Voter Participation Project violated 2 U.S.C. § 44la(f) by knowingly accepting an excessive contribution from the John Hill Campaign Committee.

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*/ Dallas County Democratic Progressive Voters League told Campaign Victory '78 that the funds had been transferred from its Federal account to the non-Federal account, however, the FEC analyst informed Campaign Victory '78 that this had not been done.

2. Approve and authorize the sending of the attached letter notifying the committee of the 2 U.S.C. § 441a(f) reason to believe finding and requesting that the committee file the amendments to its reports within ten days.

B. John Hill Campaign Committee

1. Find reason to believe the John Hill Campaign Committee violated 2 U.S.C. § 441a(a)(1)(C) by making an excessive contribution to the Texas Democratic Voter Participation Project.

2. Approve and authorize the sending of the attached letter notifying the committee of the 2 U.S.C. § 441a(a)(1)(C) reason to believe finding and requesting that the committee file a Statement of Organization and disclosure reports with the Commission.

C. Campaign Victory '78 (Non-Federal)

1. Find reason to believe that Campaign Victory '78 (non-Federal) violated 2 U.S.C. § 441a(a)(1)(C) by making an excessive contribution to the Dallas County Democratic Progressive Voters League.

2. Approve and authorize the sending of the attached letter notifying the committee of the 2 U.S.C. § 441a(a)(1)(C) reason to believe finding and requesting information regarding RAD's 2 U.S.C. §§ 433 and 434 reason to believe finding.

D. Dallas County Democratic Progressive Voters League

1. Find reason to believe that Dallas County Democratic Progressive Voters League violated 2 U.S.C. § 441a(f) by knowingly accepting an excessive contribution from Campaign Victory '78 (non-Federal).

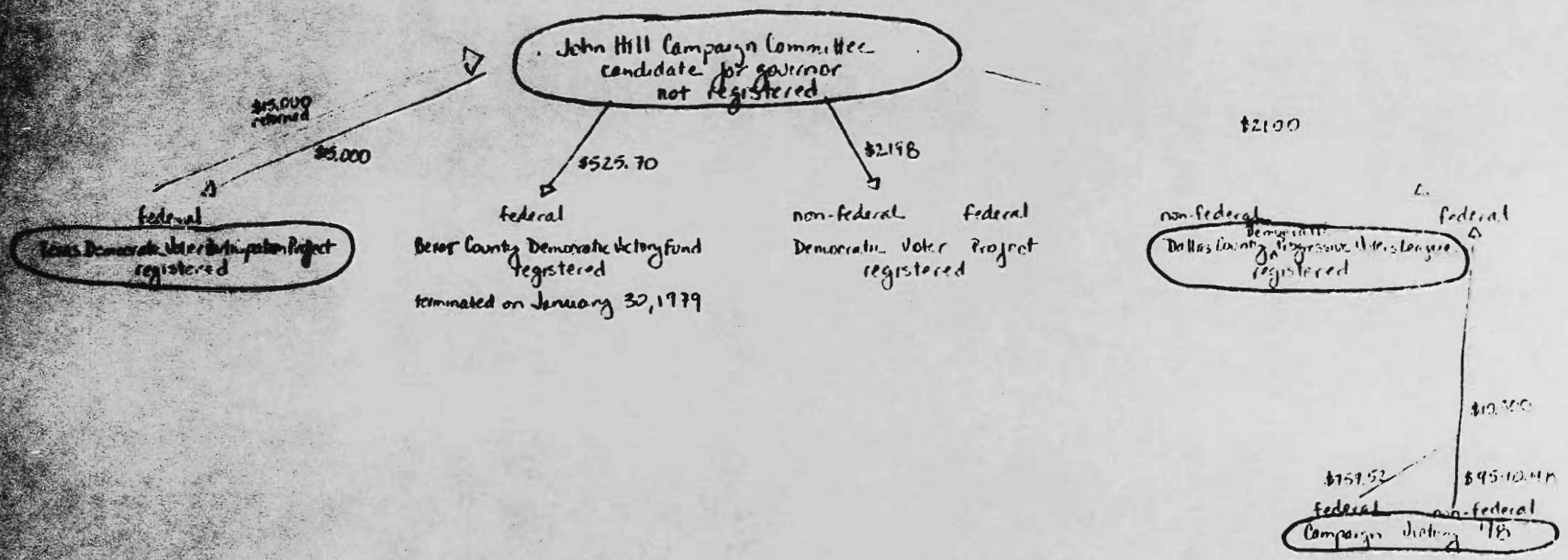
2. Approve and authorize the sending of the attached letter.

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Attachments:

1. Chart
2. December 10, 1979 Referral
3. December 21, 1979 Referral
4. January 10, 1980 Referral
5. January 23, 1980 Referral
6. February 7, 1980 Referral
7. March 28, 1980 Referral
8. May 30, 1980 Referral
9. Copies of Campaign Victory '78 checks
10. Letter and Notification of Reason to Believe Finding to the Texas Democratic Voter Participation Project
11. Letter and Notification Reason to Believe Finding to the John Hill Campaign Committee
12. Letter, Notification of Reason to Believe Finding, and Interrogatories to Campaign Victory '78 (Non-Federal)
13. Letter, Notification of Reason to Believe Finding, and Interrogatories to the Dallas County Democratic Progressive Voters League

8104302735



Attachment 1

respondent committees are circled

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D-549

rec'd 12/12/79
5:45 PM

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DECEMBER 10, 1979

MEMORANDUM

MUR1104

TO : CHARLES N. STEELE, GENERAL COUNSEL

THROUGH: ORLANDO B. POTTER OBP

FROM : THOMAS J. HASELHORST TJH

RE : REFERRALS OF TEXAS DEMOCRATIC VOTER PARTICIPATION PROJECT, CAMPAIGN VICTORY '78 (NON-FEDERAL), AND JOHN HILL CAMPAIGN COMMITTEE

Attached is a referral for Texas Democratic Voter Participation Project and related referrals for two unregistered committees who transferred funds which were put into the registered committee's federal account. The three committees are being referred together in order that they may be reviewed together by the Office of General Counsel.

8104302737

Attachment 2 (105 pages)

D 519
RAD 9/14-29-79

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12-10-79 ANALYST Dug Greevy

TO: Office of General Counsel TEAM CHIEF Bobby Werfel/Rolf

THROUGH: STAFF DIRECTOR [signature] COMPLIANCE REVIEW [signature]

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [signature]

CANDIDATE/COMMITTEE: Texas Democratic Voter Participation Project
TREASURER: David Bolduc (FEC has been informed by phone)
ADDRESS: 1210 Nueces, Suite 100
Austin, TX 78701

AFFILIATE(S):

ALLEGATION(S):	CITE:	ATTACHMENT(S)
Inadequate Disclosure	2 U.S.C. 434	2
Receipt of Excessive Contribution	2 U.S.C. 441a	4

DATE INITIATED: 6/18/79

MANNER IN WHICH REVIEW WAS INITIATED:
☒ Normal Review ☐ Other: ATTACHMENT
☐ Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 7/1/78 TO 12/31/78

TOTAL RECEIPTS $ 91,410 TOTAL EXPENDITURES $ 91,329

CASH ON HAND $ 79.00(12/31/78) DEBTS $ 0

HISTORY:

RESULTS OF REVIEW: *ATTACHMENT*
Request for Additional Information, Oct. 10, 10 Day Pre-Election, 30 Day Post-Election Reports, 6/18/79 2
3RQ2/79-52, 9/14/79 (for no response) 3
3SV1/79-76, Oct. 10, 7/19/79 4

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: *ATTACHMENT*
Telecon: Greevy with TX Demo. Party secretary, 9/14/79 5
Telecon: Greevy with Bolduc, 10/11/79 6
Telecon: Greevy with Bolduc, 10/23/79 7

REASON(S) FOR REFERRAL: *ATTACHMENT*
Response to 3RQ2/79-52, 11/12/79, inadequate 11
Response to 3SV1/79-76, 11/19/79, question of adequacy 12
Note: The recipient committee's cash on hand as of 9/30/79 was $864.

OTHER PENDING ACTIONS INITIATED BY RAD: *ATTACHMENT*
None

OTHER RELEVANT INFORMATION:
Memo to the File: Greevy, 8/1/79 8
Memo to the File: Greevy, 10/17/79 9
Substantive portions of committee's reports for which information was requested in FEC letter of 6/18/79 10
Referral for contributing committee (John Hill Campaign Committee) is submitted with this referral

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:
None

RAD Form 1
REVISED Oct. 1979

8104302739

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 31OCT79
PAGE 1

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COMMITTEE / DOCUMENT	RECEIPTS PRIMARY	RECEIPTS GENERAL	EXPENDITURES PRIMARY	EXPENDITURES GENERAL	COVERAGE DATES		# OF PAGES	MICROFILM LOCATION
TEXAS DEMOCRATIC VOTER PARTICIPATION PROJECT								ID# C00099267
1978 STATEMENT OF ORGANIZATION					10JUL78		4	78FEC/078/4360
STATEMENT OF ORGANIZATION- AMENDMENT					12OCT78		6	78FEC/089/0082
OCTOBER 10 QUARTERLY	37,650		35,700		1JUL78	-30SEP78	14	78FEC/089/0088
REQUEST FOR ADDITIONAL INFORMATION					1JUL78	-30SEP78	2	79FEC/129/0192
REQUEST FOR ADDITIONAL INFORMATION					1JUL78	-30SEP78	2	79FEC/133/1027
10 DAY PRE-GENERAL		21,620		19,631	10OCT78	-23OCT78	7	78FEC/093/1674
REQUEST FOR ADDITIONAL INFORMATION						23OCT78	2	79FEC/129/0194
30 DAY POST-GENERAL		32,140		29,258	24OCT78	-27NOV78	13	79FEC/116/5418
REQUEST FOR ADDITIONAL INFORMATION					24OCT78	-27NOV78	2	79FEC/129/0196
YEAR END REPORT		0		6,740		31DEC78	5	79FEC/121/2653
TOTAL	37,650	53,760	35,700	55,629			57	TOTAL PAGES

All reports reviewed

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ITEMIZED EXPENDITURES

...erating, Transfers Out, Contributions In-Kind
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page 2 of 2 for
Line Number 20A

(Use Separate Schedules for each numbered line)

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Name of Candidate or Committee in Full

Texas Democratic Vote Participation Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Mr. Wizard 2 1/2 W. Mt. King. Austin, Texas 78701	Office furniture rental Expenditure for: ☐ Primary ☑ General ☐ Other	8-14-78	35.00
Nueces Co. Dem. Hdq. 720 Buffalo Corpus Christi, Tx.	Office rent C.C. - Aug " " " - Sept voter registration ex. Oct. Expenditure for: ☐ Primary ☑ General ☐ Other	8-17-78 9-6-78 9-27-78	325.00 325.00 300.00
Frank Perea P.O. Box 242 Pecos, Tx. 79772	Travel expense " " / gas / mileage reimbursement Expenditure for: ☐ Primary ☑ General ☐ Other	8-17-78 9-6-78	200.00 400.00
Lowell Starling 1911 W. Harmony Tyler, Texas 75702	Travel reimbursement Contract labor Expenditure for: ☐ Primary ☑ General ☐ Other	8-21-78 9-6-78	200.00 300.00
Kerrville Bus Co. P.O. Box 6154 Austin, Tx. 78702	Travel expenses (bus rental) Expenditure for: ☐ Primary ☑ General ☐ Other	8-23-78	185.60
Blanche Darley 2008 Atlanta El Paso, Tx. 79902	Travel expense Contract labor Expenditure for: ☐ Primary ☑ General ☐ Other	8-24-78 8-24-78	200.00 200.00
Petty Cash - miscellaneous (office rese)	Gas / mileage postage, travel office supplies Expenditure for: ☐ Primary ☑ General ☐ Other	8-28-78 9-12-78 9-21-78 9-28-78	100.00 100.00 100.00 100.00
Grace Garcia 2139 W. Kings Hwy. San Antonio, Tx.	Salary (contract labor) travell ex person mileage reimbursement contract labor ; travel ex. Expenditure for: ☐ Primary ☑ General ☐ Other	8-26-78 8-28-78 8-28-78 8-28-78 9-6-78	450.00 100.00 15.95 14.95 450.00 ; 100
SUBTOTAL of expenditures this page (optional)			$ 4442.50
TOTAL this period (last page this line number only)			$

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ITEMIZED EXPENDITURES
...erating, Transfers Out, Contributions In-Kind
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Texas Democratic Votee Participation Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure / Expenditure for	Date (month, day, year)	Amount of each expenditure this period
Brady Fisher Rt 2 Box 14 Paris, Tx. 75460	contract labor travel ex. Expenditure for: ☐ Primary ☑ General ☐ Other	9-6-78 9-6-78	300.00 200.00
Mingo Chapa 1203 Metro Tower 1220 Broadway Lubbock, Tx. 79401	travel expense Expenditure for: ☐ Primary ☑ General ☐ Other		
Larry Jackson 1406 Willow Creek #102 Austin, Texas 78741	Particulars of Expenditure: contract labor reimburse on refreshments mileage Igas reimbursment contract labor & mileage reim Expenditure for: ☐ Primary ☑ General ☐ Other	9-6-78 9-15-78 9-19-78 9-26-78	300.00 107.00 140.96 (300.00) 93.00
Joan Hinojosa 2829 Iris McAllen, Texas 78501	travel expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-7-78	300.00
Rosa Olivo 3202 Ave. O. Rosenberg, Tx. 77471	travel expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-7-78	100.00
Charlene Hooker 704 Citizen Tower Waco, Tex. 76701	travel reimbursmet Expenditure for: ☐ Primary ☑ General ☐ Other	9-12-78	23.00
Raymond Campbell 1102 Sapphire Longview, Tx. 75602	traveling expense " " Expenditure for: ☐ Primary ☑ General ☐ Other	9-12-78 9-20-78	35.00 15.00
E. Ornles 100 Alamo St. Hearne, Tx.	BBQ for Hearne tour voter registration expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-15-78 9-26-78	510.00 15.00
SUBTOTAL of expenditures this page (optional)			$ 2608.96
TOTAL this period (last page this line number only)			$

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ITEMIZED EXPENDITURES

...erating, Transfers Out, Contributions (In-Kind)
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page ... of ... Pages
Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Texas Democratic Voter Participation Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Greyhound Lines Congress Ave. Austin, Tx. 78701	Tour thru Central Texas Expenditure for: ☐ Primary ☑ General ☐ Other	9-15-78	450.08
24 Nueces Co. Voter Reg. Project P.O. Box 5445 Corpus Christi, Tx.	Voter registration expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-18-78	1,000.00
Duke Fox 511 N. Ave. Pittsburg, Tx. 75686	travel & expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-18-78	30.00
C.L. Belton 422 Victory Pittsburg, Tx. 75686	traveling expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-18-78	30.00
Mike Williams 4610 Bowie Midland, Tx. 79701	300 - salary / contract 200 - travel expenses Expenditure for: ☐ Primary ☑ General ☐ Other	9-19-78	500.00
J.C. Calvert 912 W. French San Antonio, Tx. 78212	traveling expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-19-78	200.00
Linda Lewis McGowan 2503 New York Dr. #157 Austin, Tx. 78702	travel expense/gas/mileage reim. contract labor Expenditure for: ☐ Primary ☑ General ☐ Other	9-14-78 9-28-78	107.52 300.00
M.L. Hughes 302 Park Ln. Austin, Tx. 78704	travel/mileage mileage reimbursement Expenditure for: ☐ Primary ☑ General ☐ Other	9-19-78 9-26-78	84.30 34.50
SUBTOTAL of expenditures this page (optional)			$2736.40
TOTAL this period (last page this line number only)			$

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ITEMIZED EXPENDITURES

...erating, Transfers Out, Contributions In-Kind
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page 3 of 7 for
Line Number 22A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Texas Democratic Voter Participation Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
William Glenn 207 W. Mulberry Kaufman, Tx.	voter registration expense Expenditure for: ☐ Primary ☑ General ☐ Other	9/22/78	150.00
KTAE RADIO Taylor, Tx.	Radio spots / media V.R. Expenditure for: ☐ Primary ☑ General ☐ Other	9-21-78	88.00
Gilden Creek Baptist Ch. Rt. # 2 Box - 3-D Manor, Tx.	Voter registration expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-22-78	25.00
Alice Taylor Rt. # 2 Box 3-D Manor, Tx.	travel expense (V.R. ") Expenditure for: ☐ Primary ☑ General ☐ Other	9-22-78	3.00
Jerdie Baker Rt. # 2 Box 3-D Manor, Tx.	travel expenses (V.R. ") Expenditure for: ☐ Primary ☑ General ☐ Other	9-22-78	6.25
Grace Garcia 2139 Knigp Hwy. San Antonio, Tx.	gas / bridge rent. Contract labor travel expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-19-78 9-26-78 9-26-78	104.60 450.00 100.00
Voter Registration Comm. Court Place Bldg. Suite 701 Lubbock, Tx. 79401	voter registration expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-26-78	500.00
Southwestern Bell Tele. Co. P.O. Box 2901 Austin, Tx. 78767	telephone - Sept main Austin office Expenditure for: ☐ Primary ☑ General ☐ Other	9-28-78	28.40
SUBTOTAL of expenditures this page (optional)			$ 1645.25
TOTAL this period (last page this line number only)			$

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ITEMIZED EXPENDITURES

(O...ting, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Texas Democratic Vote Participation Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
James Pace / Cameron Co. Democratic Party 1325 Willow ... 7477 Brownsville, Tx. 78520	gas/mileage reimb. vote registration expens Expenditure for: ☐ Primary ☑ General ☐ Other	9-12-78	250.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Cameron Co. Democratic Party 1325 Willow ... 7111 Brownsville, Tx. 78520	Vote registration expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-26-78	1,500.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Quik Print 101 Saturation Life Bldg. Austin, Tx. 78701	Printing of campaign brochures letters &c. Expenditure for: ☐ Primary ☑ General ☐ Other	9-12-78 9-26-78	80.28 10.45
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Rosie Centeno 1810 San Bernardo Laredo, Tx. 78040	travel ex/mileage reim. vote registration expens Expenditure for: ☐ Primary ☑ General ☐ Other	9-12-78 9-26-78	250.00 450.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Democratic Victory Fund 214 Dwyer Suite 205 San Antonio, Tx. 78204	voter registration expens - Bexar Co. Expenditure for: ☐ Primary ☑ General ☐ Other	9-26-78	200.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Mt. Caramel Lodge 1704 E. 12th St. Austin, Tx.	E. Austin office rent 9-25 thru 11-7-78 Expenditure for: ☐ Primary ☑ General ☐ Other	9-26-78	200.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Arlington Democratic Club Greg Hall 900 Linda V. Sta #5 Arlington, Tx. 76013	voter registration expenses - Arlington Expenditure for: ☐ Primary ☑ General ☐ Other	9-26-78	100.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Relly Cary Campaign 1804 Bunche Ft. Worth, Tx. 76112	voter registration expenses Ft. Worth Tarrant Co. Expenditure for: ☐ Primary ☑ General ☐ Other	9-27-78	100.00

SUBTOTAL of expenditures this page (optional)	$ 3140.73
TOTAL this period (last page this line number only)	$

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ITEMIZED EXPENDITURES
...rating, Transfers Out, Contributions In-Kind
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Texas Democratic Voter Part. Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure / Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
Mrs. Ann Byers 1029 E. Marion Ft. Worth, Tx. 76104	Voter registration expense - Ft. Worth Tarrant Co. ☐ Primary ☑ General ☐ Other	9-27-78	100.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure / Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
LULAC Council #312 c/o Jacinto Ortega-President Box 426 Pearsall, Tx. 78061	Voter registration expenses Frio Co. ☐ Primary ☑ General ☐ Other	9-28-78	15.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure / Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
Texas State Bank 900 Congress Austin, Tx. 78701	bank service charge ☐ Primary ☑ General ☐ Other	9-5-78	1.55
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure / Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
	☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure / Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
	☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure / Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
	☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure / Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
	☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure / Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
	☐ Primary ☐ General ☐ Other		

SUBTOTAL of expenditures this page (optional)	$ 116.55
TOTAL this period (last page this line number only)	$ 33,200.3

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SCHEDULE B
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 1 of 2 for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Texas Democratic Voter Registration Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Nueces Co. Demo. Party 722 Buffalo Corpus Christi, Tx. 78401	Office rent (Krueger) C000 76191 Expenditure for: ☐ Primary ☑ General ☐ Other	10-16-78	487.50
Marc Campos 2005 Willow Creek #1054 Austin, Tx.	Signs Program Expenditure for: ☐ Primary ☑ General ☐ Other	10-16-78	200.00
Larry Jackson 3100 Rexford Austin, Tx.	Reimbursement for travel Expenditure for: ☐ Primary ☑ General ☐ Other	10-17-78	59.31
Houston PASO 3303 Parkwood Houston, Tx. 77021	Get-Out-the-Vote Program Expenditure for: ☐ Primary ☑ General ☐ Other	10-17-78	2,000.00
San Antonio Voters Action League 307 Dillon Walk, Bldg. #32 San Antonio, Tx. 78208 C/O J.C. Calvert	Get out the vote Program Expenditure for: ☐ Primary ☑ General ☐ Other	10-17-78	1,700.00
American Printers Exchange 6618 N. Lamar Austin, Tx.	Printing for Election Day/Pamphlets Expenditure for: ☐ Primary ☑ General ☐ Other	10-18-78	350.00
Campaign Victory '78 Turtle Creek Village Suite 514 Dallas, Tx. 75219	Dallas Co. GOTV C000 101972 Expenditure for: ☐ Primary ☑ General ☐ Other	10-18-78	1,250.00
Ace Lumber Co. P.O. Box 892 Austin, Tx. 78767	yard stakes for political signs Expenditure for: ☐ Primary ☑ General ☐ Other	10-18-78	192.78
SUBTOTAL of expenditures this page (optional)			$ 6,339.59
TOTAL this period (last page this line number only)			$

FORM B
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...ary, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 2 of 3 for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Texas Democratic Voter ~~Participation~~ Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure / Expenditure for	Date (month, day, year)	Amount of each expenditure this period
Southwestern Bell P.O. Box 2967076967 Austin, Tx. 78777	Krueger / Austin 7/1 telephone bill Expenditure for: ☐ Primary ☑ General ☐ Other	10-18-78	1,771.33
La Quinta Royale 401 north Water Corpus Christi, Tx.	hotel expenses for Morale Tour Expenditure for: ☐ Primary ☑ General ☐ Other	10-18-78	1,677.99
Vic Gonzales P.O.Box 215 Stockdale, Tx. 78601	contract labor Expenditure for: ☐ Primary ☑ General ☐ Other	10-18-78	400.00
Kwick Kopy 2407-B S. Congress Ave. Austin, Tx	printing for E-DAY Expenditure for: ☐ Primary ☑ General ☐ Other	10-23-78	873.38
Oscar Gomez P.O. Box 215 Stockdale, Tx. 7860	Contract labor Expenditure for: ☐ Primary ☑ General ☐ Other	10-23-78	500.00
Southwestern Bell P.O. Box 2901 Austin Tx. 78777	Krueger / Austin off-[illegible] wats bill Expenditure for: ☐ Primary ☑ General ☐ Other	10-23-78	4,769.74
Barbara Klein 722 Buffalo Corpus Christi, Tx.	Contract labor Expenditure for: ☐ Primary ☑ General ☐ Other	10-23-78	550.00
Joe Gonzales 722 Buffalo Corpus Christi, Tx.	Contract labor Expenditure for: ☐ Primary ☑ General ☐ Other	10-23-78	500.00
SUBTOTAL of expenditures this page (optional)			$ 11,242.44
TOTAL this period (last page this line number only)			$

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ITEMIZED EXPENDITURES
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Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page ___ of ___ for
Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Texas Democratic Voter Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
U.S. Post Office Houston, Tx.	Mailing of Dem. Krueger Brochure Postage Expenditure for: ☐ Primary ☑ General ☐ Other	10-25-78	750.00
David Butts 3112 Dancy Austin, Tx. 78722	Aug. contract labor Expenditure for: ☐ Primary ☑ General ☐ Other	10-24-78	500.00
Democratic Party 215 Stokes Bldg. Austin, Tx. 78701	postage / shipping Expenditure for: ☐ Primary ☑ General ☐ Other	10-24-78	20.00
Campaign Victory 178 1 Turtle Creek Village suite 514 Dallas, Tx. 75219	Dallas Co. - GOTV C10101972 Expenditure for: ☐ Primary ☑ General ☐ Other	10-24-78	1,000.00
PCA 2017 Cedar Springs Dallas, Tx. 75201	Dallas Co. Phoning Expenditure for: ☐ Primary ☑ General ☐ Other	10-24-78	1,000.00
Val Mendoza 1601 W. Westheimer Austin, Tx. 78703	Car. Caravan salary Expenditure for: ☐ Primary ☑ General ☐ Other	10-24-78	1,000.00
Joe Gonzales AUSTIN, TX.	TRAVEL EXPENSE Expenditure for: ☐ Primary ☑ General ☐ Other	10-24-78	250.00
Ace Lumber Co. Inc. 408 Comal Austin, Tx.	Stakes for yard signs Expenditure for: ☐ Primary ☑ General ☐ Other	10-26-78	102.90
SUBTOTAL of expenditures this page (optional)			$ 4,622.90
TOTAL this period (last page this line number only)			$

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ITEMIZED EXPENDITURES
(Operating, Transfers Out, Contributions In[illegible], Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 2 of 5 for Line Number 22A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Texas Democratic Voter Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
G.S.D. & M. 150 E. Riverside Dr. Austin, Tx.	Media fee KT & Dem. Party, E-Day Expenditure for: ☐ Primary ☑ General ☐ Other	10-26-78	5,000.00
Full Name, Mailing Address and ZIP Code (Gerry Sigrow) PARMER Marketing 805 LAMAR Ft. Worth, Tx. 76102	Particulars of Expenditure Phoning in Ft. Worth/Tarrant Co. Expenditure for: ☐ Primary ☑ General ☐ Other	10-26-78	3,000.00
Full Name, Mailing Address and ZIP Code Alan Schoenbaum 614 E. 6th St. Austin, Tx. 78701	Particulars of Expenditure GOTV expenses Expenditure for: ☐ Primary ☑ General ☐ Other	10-28-78	100.00
Full Name, Mailing Address and ZIP Code G.S.D. & M. 150 E. Riverside Dr. Austin, Tx.	Particulars of Expenditure media fee KT & E-Day Expenditure for: ☐ Primary ☑ General ☐ Other	10-30-78	3,000.00
Full Name, Mailing Address and ZIP Code Frank Candelaria 2720 Montana El Paso, Tx. 79903	Particulars of Expenditure Salary Expenditure for: ☐ Primary ☑ General ☐ Other	10-30-78	500.00
Full Name, Mailing Address and ZIP Code Daily Sentinel Box 68 Nacogdoches, Tx. 75961	Particulars of Expenditure Newspaper ad Expenditure for: ☐ Primary ☑ General ☐ Other	11-1-78	288.96
Full Name, Mailing Address and ZIP Code PASO 3303 Parkwood Houston, Tx. 77023	Particulars of Expenditure GOTV Harris Co. Mexican-Am. Expenditure for: ☐ Primary ☑ General ☐ Other	11-2-78	2,000.00
Full Name, Mailing Address and ZIP Code Campaign Victory '78 14 Turtle Creek Village Suite 514 Dallas, Tx. 75219	Particulars of Expenditure GOTV Dallas Co. Expenditure for: ☐ Primary ☑ General ☐ Other	11-3-78	1,750.00

SUBTOTAL of expenditures this page (optional)	$ 15,638.96
TOTAL this period (last page this line number only)	$

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ITEMIZED EXPENDITURE
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Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page ___ of ___ for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Texas Democratic Vote Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Munguia Printers 2201 Buena Vista San Antonio, Tx.	Printing door-hangers Expenditure for: ☐ Primary ☑ General ☐ Other	11-3-78	2,000.00
Arnold Gonzales P.O. Box 2990 Austin, Tx. 78711	GOTV in Nueces Co. Expenditure for: ☐ Primary ☑ General ☐ Other	11-3-78	200.00
Larry Jackson 3100 Rexford Austin, Tx.	Travel expenses - 200.00 Travel reimbursement 150.00 Expenditure for: ☐ Primary ☑ General ☐ Other	11-3-78	350.00
Farmer Mkt. 905 Lamar Ft. Worth, Tx. 76102	Phone Bank Ft. Worth Expenditure for: ☐ Primary ☑ General ☐ Other	11-3-78	1,000.00
Lowell Starling 1911 W. Harmony Tyler, Tx. 75702	Salary - 300.00 Travel ex - 200.00 Expenditure for: ☐ Primary ☑ General ☐ Other	11-4-78	500.00
Harris Co. Dem. Vote Project 2016 Main Suite 102 Houston, Tx. 77002	GOTV in Harris Co. Expenditure for: ☐ Primary ☑ General ☐ Other	11-4-78	500.00
Grace Garcia 2139 Kings Hwy. San Antonio, Tx.	Salary - 450.00 Travel - 100.00 Travel reimbursement 142.36 Expenditure for: ☐ Primary ☑ General ☐ Other	11-10-78	692.36
Larry Jackson 3100 Rexford Austin, Tx.	Salary - 300.00 Travel reimbursement 66.58 Expenditure for: ☐ Primary ☑ General ☐ Other	11-10-78	366.58
SUBTOTAL of expenditures this page (optional)			$ 5,608.94
TOTAL this period (last page this line number only)			$

82470913042

ITEMIZED EXPENDITURES

...rating, Transfers Out, Contributions In-... Loans, Loan Repayments and Refunds Made
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

...mission ... 20463

Line Number 20 A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

DEMOCRATIC VOTER PROJECT

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
ML Hughes 302 Park Ln. Austin, Tx. 78701	Salary 400.00 travel expenses - 200.00 travel reimb - 88.00 Expenditure for: ☐ Primary ☑ General ☐ Other	11-13-78	688.00
J.C. Pouland 302 Park Ln. Austin, Tx. 78701	travel reimbursement Expenditure for: ☐ Primary ☑ General ☐ Other	11-13-78	80.42
David Butts 3112 Dancy Austin, Tx. 78722	Particulars of Expenditure Salary - 1,050.00 Travel for Sept. & Oct 400.00 Expenditure for: ☐ Primary ☑ General ☐ Other	11-14-78	1,450.00
Linda McGowen 2503 New York Dr. #157 Austin, Tx. 78702	Particulars of Expenditure [redacted] Salary - 300.00 travel expenses - 100.00 Expenditure for: ☐ Primary ☑ General ☐ Other	11-14-78	400.00
Hastings North off 7701 N. Lamar Blvd. Austin, Tx.	Particulars of Expenditure Answering Service Fee Expenditure for: ☐ Primary ☑ General ☐ Other	11-17-78	32.41
Joyce Peters 214 Dawson San Antonio, Tx. 78205	Particulars of Expenditure For Dem. Buttons Expenditure for: ☐ Primary ☑ General ☐ Other	11-17-78	300.00
Petty Cash	Particulars of Expenditure Office expenditures Expenditure for: ☐ Primary ☑ General ☐ Other	10-2[illegible]-78	100.00
City Bank P.O. Box 1727 Austin, Tx. 78767	Particulars of Expenditure Service charge Expenditure for: ☐ Primary ☑ General ☐ Other	10-31-78	2.25
SUBTOTAL of expenditures this page (optional)			$ 3,053.08
TOTAL this period (last page this line number only)			$

ission
20463

ITEMIZED EXPENDITURES
Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

DEMOCRATIC VOTER PROJECT

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Galveston Daily News Box 628 Galveston, Tx 77553	advertising Expenditure for: ☐ Primary ☑ General ☐ Other	10-28-78	334.40
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period

SUBTOTAL of expenditures this page (optional)	$ 334.40
TOTAL this period (last page this line number only)	$29,258.2[illegible]

8 17 03 31 01 26 75 54 24 4

2

FEDERAL ELECTION COMMISSION

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

June 18, 1979

John C. Pouland
Texas Democratic Voter Participation Project
601 International Life Building
Austin, Texas 78701

Dear Mr. Pouland:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the October 10 Quarterly, 10 Day Pre-General, & 30 Day Post-General Reports of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact David Greevy in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)357-0023.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

8104027553

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

1-16

Texas Democratic Voter Participation Project DATE: June 18, 1979

I.D. NO.: C00099267

REQUEST FOR ADDITIONAL INFORMATION FOR THE October 10 Quarterly REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 7/1/78 THROUGH 9/30/78, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Detailed Summary (Page 2) Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Schedule Totals: ___ disagree with Detailed Summary (Page 2) or ___ omitted

___ Date(s): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Full Name(s)/Mailing Address(es): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Occupation/Principal Place(s) of Business: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Election Designation: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Aggregate Year-to-Date Totals: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

X Nature or Purpose of Expenditure: ___ omitted or X inadequate for Schedule(s) B Line(s) 20

___ Nature or Purpose of Receipt: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Inadequate Description of: ___ proceeds ___ dates ___ events ___ location of Schedule

___ Signature: ___ omitted ___ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

___ Other: The committee has reported several expenditures the purposes of which are listed as "Voter Registration Expenses." Please be advised that these descriptions are not sufficient to meet the statutory requirements. Please amend your report to clarify the nature of these expenditures. > $1,000

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 357-0023 Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEC Form 12
(Revised November 1978)

TO: Texas Democratic Vot[illegible]articipation Project DATE June 18, 1979

I.D. NO.: C00099267

REQUEST FOR ADDITIONAL INFORMATION FOR THE 10 Day Pre-General REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD ? THROUGH ?, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

X Coverage Dates: X omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___omitted or ___incorrect

___ Detailed Summary (Page 2) Line(s):___ Column(s):___ Totals:___ ___omitted or ___incorrect

___ Schedule Totals: ___disagree with Detailed Summary (Page 2) or ___omitted

___ Date(s): ___omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Full Name(s)/Mailing Address(es): ___omitted or ___ inadequate for Schedule(s)___ Line(s)___

___ Occupation/Principal Place(s) of Business: ___omitted or ___inadequate for Schedule(s)___ Line(s)___

___ Election Designation: ___omitted or ___inadequate for Schedule(s)___ Line(s)___

X Aggregate Year-to-Date Totals: X omitted or ___ inadequate for Schedule(s) A Line(s) 14

X Nature or Purpose of Expenditure: ___ omitted or X inadequate for Schedule(s) B Line(s) 20

___ Nature or Purpose of Receipt: ___omitted or ___inadequate for Schedule(s)___ Line(s)___

___ Inadequate Description of: ___ proceeds ___dates ___events ___location of Schedule

___ Signature: ___ omitted ___ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

___ Other: Please See Page Two

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 357-0023 Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEC Form 12
(Revised November 1978)

Texas Democratic Voter Participation Project
10 Day Pre-General Election

The committee has reported several expenditures the purposes of which are listed as "Get-Out-The-Vote Program" and "GOTV." Please be advised that these descriptions are not sufficient to meet the statutory requirements. Please amend your report to clarify the nature of these expenditures.

The committee has reported several expenditures the purposes of which are listed as, "Office Rent(Krueger)", "Krueger/Austin office telephone bill", and "Krueger/Austin office watts bill." Please state whether these expenditures constitute in-kind contributions made to a candidate for Federal office or expenditures made in accordance with 2 U.S.C. 441a(d) made on behalf of a candidate for Federal office. If so, please provide the name of the candidate, his/her address, and the office sought. In addition, the amount of support provided through the expenditures should be provided.

7903129015
8104030275

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

F16

TO: Texas Democratic Voter Participation Project

DATE: June 18, 1979

I.D. NO.: C00099267

REQUEST FOR ADDITIONAL INFORMATION FOR THE 30 Day Post-General REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 10/24/78 THROUGH 11/27/78, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Detailed Summary (Page 2) Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Schedule Totals: ___ disagree with Detailed Summary (Page 2) or ___ omitted

___ Date(s): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Full Name(s)/Mailing Address(es): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Occupation/Principal Place(s) of Business: ___ omitted or X inadequate for Schedule(s) A Line(s) 14

___ Election Designation: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

X Aggregate Year-to-Date Totals: X omitted or ___ inadequate for Schedule(s) A Line(s) 14

X Nature or Purpose of Expenditure: ___ omitted or X inadequate for Schedule(s) B Line(s) 20

___ Nature or Purpose of Receipt: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Inadequate Description of: ___ proceeds ___ dates ___ events ___ location of Schedule

___ Signature: ___ omitted ___ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

___ Other: Please See Page Two

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 357-0023 Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEC Form 12
(Revised November 1978)

Texas Democratic Voter Participation Project
30 Day Post-General Election

Please note the name of the committee as registered. The committee is not registered as "Democratic Voter Project."

The committee has reported several expenditures the purposes of which are listed as "GOTV." Please be advised that these descriptions are not sufficient to meet the statutory requirements. Please amend your report to clarify the nature of these expenditures.

The committee has reported an expenditure the purpose of which is listed as "Krueger Brochure Poster." Please state whether this expenditure constitutes an in-kind contribution made to a candidate for Federal office or an expenditure made in accordance with 2 U.S.C. 441a(d) made on behalf of a candidate for Federal office. If so, please provide the name of the candidate, his/her address, and the office sought. In addition, the amount of support provided through the expenditure should be provided.

The committee has reported several expenditures all or some of which may constitute in-kind contributions made to candidate(s) for Federal office(s). Please state whether these expenditures do constitute in-kind contributions made to candidate(s) for Federal office(s). If they do, please provide the name(s) of the candidate(s) supported, the address(es), and the office(s) sought. In addition, the amount of support provided for each expenditure made should be provided.

Please be advised that Section 100.11 of the FEC Regulations defines "occupation" to be "principal job title or position and whether or not self-employed." Section 100.12 of those regulations defines "principal place of business" to be "full name under which the business is conducted and the city in which the person is employed or conducts business. Please amend your report providing this information for your itemized contributors.

8 1 9 0 4 0 3 0 1 3 2 9 0 2 7 1 9 8 7

In reply please refer to: [illegible]

4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 19, 1979

John C. Pouland, Treasurer
Texas Democratic Voter
Participation Project
601 International Life Bldg.
Austin, Texas 78701

Dear Mr. Pouland:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, (the Act) as amended. During the review of the October 10 Quarterly Report of Receipts and Expenditures, we noticed an entry indicating that you may have received a contribution which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

The Act prohibits political committees from making contributions to any other political committee in any calendar year which, in the aggregate, exceed $5,000.

If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

Alternatively, if you find that you have received a contribution in excess of the limits set forth in the Act, the Commission recommends that you notify the donor and refund the amount in excess of $5,000. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures.

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions, please do not hesitate to contact David Greevy, (800) 424-9530, our Reports Analyst assigned to you. Our local number is (202)357-0023.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Enclosure
Certified Mail
Return Receipt Requested

8104030279

...ation Commission
...reet, N.W.
...on, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 1 of 2 for
Line Number 14A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

TEXAS DEMOCRATIC VOTER PARTICIPATION PROJECT

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
JOHN HILL CAMP. COMM.	1035 BROWN BLDG. Austin, Tx. 78701 Occupation: DEM. NOMINEE For Tex. Gov. ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	7-11-78 8-1-78 8-16-78 8-29-78 9-12-78	2,500.00 2,500.00 2,500.00 2,500.00 2,500.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
Royce E. Wisenbaker	14th Floor Peoples Bank Bldg. Tyler, Texas 75701 Occupation: BANKER at Peoples Bank ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 5000	8-24-78	5,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
J. R. PARTEN	1638 BANK of Southwest Bldg. Houston, Tx. 77002 Occupation: Oil Business ☑ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 5000	8-31-78	5,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
B. J. McCombs	1025 San Pedro San Antonio, Tx. 78212 Occupation: Car Dealer ☑ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 1,000	9-6-78	1,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
Committee for Good Government 12532	8000 E. Jefferson Ave. Detroit, Michigan 48214 Occupation: United Auto Workers Political Action Comm. ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 1,000	9-12-78	1,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
JOHN HILL CAMP. COMM.	1035 BROWN BLDG. Austin, Tx. 78701 Occupation: Dem. Nom. for Tex. Gov. ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 15,000	9-28-78	2,500.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
Frank Pool	P.O. Box 1940 San Angelo, Tx. 76902 Occupation: Oil Business ☑ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 1,000	9-19-78	1,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
SUBTOTAL of receipts this page (optional)			$ 28,000
TOTAL this period (last page this line number only)			$

8

Memo to the File

Greevy
8/1/79
3SV1/79-76

The above was returned to FEC on 7/31/79. I am mailing it certified to Pouland at P.O. Box 1672, Austin, TX, 78767.

TX 02 012415N1 07/24/79

RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

POSTAGE AND FEES PAID

U.S.MAIL

COMMISSION
0463

RETURNED TO SENDER
Not Deliverable as Addressed
UNABLE TO FORWARD

TEX*01 POU 01 TEX 01 TEX 02 POU 0 TEX 01 012612N1 07/2

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RETURN TO SEI
NOT DELIVERABLE AS AI
UNABLE TO FOI

John C. Pouland, Treasurer
Texas Democratic Voter
Participation Project
601 International Life Bldg.
Austin, Texas 78701

CERTIFIED
7/31/79

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:
Pouland
TX Demo Voter Partic. P

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. | INSURED NO.
[illegible]

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY | POSTMARK

5. ADDRESS (Complete only if requested)

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

☆GPO 1977-O-249-595

3SV1/79-76

0 1 8

Rule Red Copy 3501/79-76

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)

RR SEP 24 2:56

2. ARTICLE ADDRESSED TO:
TX Dems Voter Part Proj

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943892	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. Susan Boswell

DATE OF DELIVERY 9-17-79

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆GPO: 1977—O—240-865

9/14

8104030276 2

3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 14, 1979

John C. Pouland, Treasurer
Texas Democratic Voter Participation Project
601 International Life Building
Austin, Texas 78701

Dear Mr. Pouland:

On June 18, 1979, you were notified that the October 10 Quarterly, 10 Day Pre-General and 30 Day Post-General Reports of Receipts and Expenditures filed by your committee omitted certain required information.

As of this date, however, we have received no response from you. Your failure to amend your report gives the Commission reason to believe that you are in violation of 2 U.S.C. 434.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact David Greevy, our Reports Analyst assigned to you on our toll free number (800)424-4930. Our local number is (202)523-4048.

Sincerely,

John W. McGarry

Commissioner

8104302763

5

Telecon:

Greevy with Secretary of TX Democratic Party
Re: Texas Democratic Voter Participation Project
3SV1/79-76
9/14/79
512-478-8746

There has been a problem in getting the above letter to the committee. I called today to ascertain to what address the letter can be sent.

The secretary stated that the committee operated out of the office, and that the address was 215 Stokes Building
Austin, TX 78701

She stated that Fred Williams was the executive director, and that the letter should be sent to him. She indicated that the party leadership has changed somewhat, and that she did not know the address of John C. Pouland.

The letter(copy) will be sent to the address above, today certified.

Other addresses for Pouland:

John C. Pouland
Texas Democratic Voter Participation
Project
613 Brown Building
Austin, TX 78701

John C. Pouland
Texas Democratic Voter Participation
Project
P.O. Box 1672
Austin, TX 78767

John C. Pouland
Texas Democratic Voter Participation
Project
601 International Life Building
Austin, TX 78701

8104302764

6

Telecon:

Greevy with David Bolduc
Texas Democratic Voter Participation Project
10/11/79
512/477-1187
C00099267

DB called this day. He stated that he is the new treasurer of the committee, and that the former treasurer had stated that we had sent some letters to the committee.

DB asked what these were about.

I knew that the problems were extensive, so I told him that I would review the file, and call him back.

He was in court when I returned the call.

81040302765

9

Memo to the File:

Re: Texas Democratic Voter Participation Project

Greevy
10/17/79

I attempted to phone Bolduc on Friday, 10/12, and on Monday, Tuesday, and Wednesday of this week. He has been in court each time that I called.

I've left messages for him, but I've not heard from him.

I got his address from the secretary and I shall send copies of the following to him, certified.

1. 3SV1/79-76
2. RFAI's for 10G, 30G, and Q3

In addition, I will give Compliance copies of the RFAI's so that they can track them. They were sent out 7/19/79. I do not know why there was no follow up.

Dup RFAI Cpys: 3SV1/79-76 + RQ's

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: Bolduc, TX Democratic Voter Participation Project

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943[illegible]	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
L Frith

4. DATE OF DELIVERY: OCT 22 1979 — POSTMARK

5. ADDRESS (Complete only if requested)

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

☆GPO: 1977 – 0 – 249-595

10/17

S 9 7 P 30 M '79 U RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

Address

1210 Nueces
Suite 100
Austin, TX
78701

Telecon:

Greevy with David Bolduc
Texas Democratic Voter Participation Project
3SV1/79-76 & other Requests
10/23/79
512-477-1187

Bolduc called this day. We talked about the following:

3SV1/79-76

He said the previous treasurer (Pouland) really made a mess of this. He said that various candidates throughout the State made an agreement whereby they would get individuals to contribute to the TDVPP. The funds would be used for GOTV and for voter registration. The agreement (made informally) was for each participant to arrange a total of $15,000 in contributions to the TDVPP.

John Hill was not able to arrange for these contributions for the "expense sharing deal." Because of this, he made the $15,000 transfer to the TDVPP.

I stated that the transfer was definitely in excess of the limits. Bolduc said that he knew it was, and he did not understand why it was accepted.

He said that he would transfer the $10,000 excess to Hill, but his committee has only about $800 on hand. I then informed him of Hill's problem regarding the possible 433 & 434 violation. He said the transfer should then be $15,000.

He asked if he should send a letter acknowledging the problem, and showing a debt to Hill for $15,000 on their next report. I said that he could certainly do that, but that compliance would not be met until the required refund is made.

We continued our discussion by talking about Texas Democratic Party-Federal. This portion of the discussion may affect the means by which TDVPP could get the funds to refund Hill.

Texas Democratic Party-Federal

Bolduc briefly related what the committee does. (I am familiar with the situation because I review the committee's reports).

In essence, TDP-F receives funds from Dollars for Democrats. That is the fundraising arm for the Association of State Democratic Chairpersons. Once the funds are received, they are immediately transferred to the State and local account of the Texas Democratic Party.

Bolduc asked whether the TDP-F is required to remain registered and reporting with the Commission. I stated that this would not be required by virtue of the fact that it receives funds from Dollars for Democrats. Furthermore, if the funds are just going into the non-Federal account of the organization, we would not

8 1 0 1 0 3 0 2 7 6 7

Telecon:

continued
Bolduc
10/23/79

require the TDP-F to remain reporting to us. He stated that he thought the committee should terminate with the FEC, because the funds do just go into the non-Federal account of the organization.

I then suggested that the following may be possible in order to get the funds for the TDVPP to refund to Hill:

> Dollars for Democrats has been rather successful for the Texas Democratic Party. Instead of putting the transfers from D for D into the TDP-F account, they could be put into the TDVPP account. Once enough funds are received to make the refund to Hill, the TDVPP could make the refund to Hill.

Regarding this, Bolduc asked whether Hill could then contribute the funds to the non-Federal account of the organization. I stated that that would be up to Hill, as our concern at this point is just that the refunds should be made.

I emphasized that in all instances, any transfers from unregistered entities to the TDVPP must be permissible under FECA and that the contributing entity would trigger a reporting responsibility were the transfer to exceed $1,000 during a calnedar year. I mentioned this because he asked about making transfers from the non-Federal account to the Federal account.

Requests for Additional Information

Bolduc stated that he received the copies sent to him. He said that with respect to GOTV and voter registration, he would get back in touch with the payees and get records on how the funds were expended-

He stated that the committee did not make in-kind contributions to Krueger, but that he was under the impression that they made coordinated expenditures on Krueger's behalf. I stated that we have not been so informed.

He said that that was the case, because he and Krueger worked together on what the party would do for the Krueger campaign under 441a(d). I said that I would send him Schedules F and that he should provide the information as necessary.

He said that the TDVPP is the registered State central committee, and therefore they were in charge of the 441a(d) activity. I asked if any subordinate committees had been authorized by the committee to make such expenditures. He said that he thought not, but that he would get in contact with me for further instruction if he found that not to be the case.

Misc.

I told him to submit a 1 amend showing that he is the treasurer of the committee.

8104030276 8

DAVID BOLDUC
ATTORNEY AT LAW
1210 NUECES ST., SUITE 100
AUSTIN, TEXAS 78701
(512) 477-1187

RECEIVED
FEDERAL ELECTION
COMMISSION
'79 NOV 15 PM 12:00

11

November 12, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: Texas Democratic Voter Participation Project
ID No: C00099267
In response to: Your letter of June 18, 1979

Dear Sir:

Your letter of June 18, 1979 raises questions concerning "voter registration," "Get-Out-The-Vote," and "GOTV," expenditures, expenditures for "Krueger," and information regarding contributions.

In reviewing this matter, it appears that the past treasurer of the committee has made a number of reporting errors. I propose to clear up this matter by doing the following:

1. Reviewing the "GOTV" and other expenditures to attempt to be more specific, and amending the reports in question. This may not be feasible, however, as my past experience has been that voter registration and GOTV expenditures are done on a contract basis; ie, the payment of a fixed sum to work a specific amount of time on either voter registration or get-out-the-vote activities. Transportation and other expenses are provided by the worker involved. Futhermore, a number of these expenditures appear to be transfers out to state and/or local committees for the same service.

2. Reviewing all the "Krueger" expenditures and amending the reports in question. As far as I know, these are expenditures under 2 U.S.C. § 441a(d), that were not listed on Schedule F.

3. Reviewing and amending reports where inadequate information was provided.

I apologize for the delay the committee's change in treasurers has caused in dealing with this, and I would appreciate knowing whether our action meets with your approval.

Yours truly,

DAVID BOLDUC

DB:mkm

81040302769

DAVID BOLDUC
ATTORNEY AT LAW
1210 NUECES ST., SUITE 100
AUSTIN, TEXAS 78701
(512) 477-1187

79 NOV 19 A 8:48

November 13, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: Texas Democratic Voter Participation Project
ID No: C00099267
In Response to: 35V1/79-76

Dear Sir:

In reviewing the letter referred to above, it appears that contributions to this committee were accepted by its past treasurer from the John Hill Campaign Committee in the amount of $15,000.00.

I can see no exception that would allow receipt of funds in this amount, so the entire amount will be refunded as soon as funds to do so are available. In the meantime, this amount will be listed by this committee as a debt to the John Hill Campaign Committee.

I apologize for the delay that our change in treasurers has caused in dealing with this matter, and I would appreciate knowing whether our action meets with your approval.

Yours truly,

DAVID BOLDUC

DB:mkm

8103027703

81040302771

MUR 549
RAD 94-212R

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/6/79 ANALYST Doug Greevy

TO: Office of General Counsel TEAM CHIEF Bobby Harfel

THROUGH: STAFF DIRECTOR OAP COMPLIANCE REVIEW PS/ER

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: John Hill Campaign Committee(Hill's Campaign)

TREASURER: James Bushala, Jr., Legal Counsel

ADDRESS: Hughes and Hill
1200 American Bank Tower
Austin, TX 78701

AFFILIATE(S):

ALLEGATION(S):	CITE:	ATTACHMENT(S)
Unregistered Political Committee	2 U.S.C. 433 & 434	1
Excessive Contribution Made	2 U.S.C. 441a	1

Note: Contributing committee was not informed in letter of the excessive contribution.

DATE INITIATED: 5/1/79

MANNER IN WHICH REVIEW WAS INITIATED: ATTACHMENT
☒ Normal review ☐ Other:
☐ Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, ~~see attachment~~

PERIOD COVERED FROM _____ TO _____

TOTAL RECEIPTS $ _____ TOTAL EXPENDITURES $ _____

CASH ON HAND $ _____ DEBTS $ _____

HISTORY:

RESULTS OF REVIEW: ATTACHMENT
3SV1/79-40, dated 5/18/79 2
3SV2/79-40, dated 7/16/79(for no response) 3
3SV2/79-40 returned 7/23/79, remailed 7/24/79 4
3SV1/79-74, dated 7/19/79 5
Certified Receipt Cards 6, 7

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
Telecon: Greevy with Bushala, 7/31/79 7
Telecon: Stolaruk with Bushala, 8/9/79 8
Telecon: Greevy with Bushala, 9/24/79 12

REASON(S) FOR REFERRAL: ATTACHMENT
Response of 8/13/79 9
1. Status of State candidate committee transfers to political committees unclear.
2. Indication that at least two recipient committees cannot refund Hill funds received. 10, 11

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT
None

OTHER RELEVANT INFORMATION
3SV2/79-40 & 3SV1/79-74 combined 8
Telecon: Greevy with Sanford(member of recipient committee), 8/21/79 10
PREVIOUS ~~REFERRALS FROM RAD~~
Telecon: Greevy with Jones(member of recipient committee), 9/7/79 11
Request for Advisory Opinion submitted by one of the recipient committees 13
NO PREVIOUS OGC/AUDIT REFERRALS FROM RAD continued on next page

CONTINUATION: Other Relevant Information

General Counsel response to Request for Advisory Opinion 14
Telecon: Greevy with Bolduc (Recipient Committee),10/11/79 15
Memo to the File: Greevy, 10/17/79 16
Telecon: Greevy with Bolduc (Recipient Committee),10/23/79 17

Referral for Recipient Committee (Texas Democratic Voter Participation Project) is submitted with this referral

Response received from Texas Democratic Voter Participation Project, 11/19/79 18

Note: This committee's cash on hand as of 9/30/79 was $864.

81040302772

ITEMIZED RECEIPTS

Contributions, Transfers, Contribution Refund, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Dallas County Democratic Progressive Voters League

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
Campaign Victory '78 Dallas, Texas Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business: C00101675 Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $ 5,300.00		300.00
Full Name, Mailing Address and ZIP Code Hill's Campaign Cedar Springs Dallas, Texas Receipt for: ☐ Primary ☒ General ☐ Other	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $	11/2/78	1,100.00
Full Name, Mailing Address and ZIP Code Kruger for Senator Dallas, Texas Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business: C00170647 Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $	11/7/78	400.00
Full Name, Mailing Address and ZIP Code Progressive Voters League 6139 Moonglow Dr. Dallas, Texas Receipts for: ☐ Primary ☒ General ☐ Other	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $	12/1/78	20.00
Full Name, Mailing Address and ZIP Code Campaign Victory '78 Receipt for: ☐ Primary ☒ General ☐ Other	Principal Place of Business: C00101675 Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $ 10,300	10/25/78	5,000.00
Full Name, Mailing Address and ZIP Code Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $		
Full Name, Mailing Address and ZIP Code Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $		
SUBTOTAL of receipts this page (optional)			$ 6,820.00
TOTAL this period (last page this line number only)			$ 6,820.00

SCHEDULE A
REVISED
January, 1978
Federal Election Commission
325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 4 of 6

Line Number 15b

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Dallas County Democratic Progressive Voters League

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each this Period
Mattox In 78 Committee P. O. Box 50071 Dallas, Texas 75250	Occupation	3-31-78	$ 500.0
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date ... $ 500.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each this Period
John Cutright Business Account 315 Westgate Blvd. Austin, Texas 78701	Occupation	3-31-78	$ 500.0
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date ... $ 500.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each this Period
Judge Geo. Martinez Campaign Fund-6733 Keswick Circle Dallas, Texas 75232	Occupation	3-30-78	$ 250.0
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date ... $ 250.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each this Period
Ron Chapman For Judge Campaign Fund 10509 Mapleridge Dallas, Texas 75238	Occupation	3-30-78	$ 100.00
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date ... $ 100.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each this Period
Phil L. Adams Campaign Fund 905 Grinnell Richardson, Texas 75081	Occupation	3-28-78	$ 250.00
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date ... $ 250.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each this Period
Judge Berlaind L. Brashear Campaign Fund 1412 Main Street, No.900 Dallas, Texas 75202	Occupation	4-1-78	$ 250.00
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date ... $ 250.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each this Period
John Hill Campaign Fund 2528 Tanglewood Trail Austin, Texas 78703	Occupation	3-28-78	$1,000.00
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date ... $ 1,000.00		

SUBTOTAL of receipts this page (optional)

8104033274

Election Commission
Street, N.W.
ton, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page ___ of ___ Pages
Line Number 14A
(Use Separate Schedules for each category of the Detailed Summary Page)

Name of Candidate or Committee in Full
TEXAS DEMOCRATIC VOTER PARTICIPATION PROJECT

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
JOHN HILL CAMP. COMM.	1035 BROWN BLDG. Austin, Tx. 78701 DEM. NOMINEE For Tex. Gov. ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	7-11-78 8-1-78 8-16-78 8-29-78 9-12-78	2,500.00 2,500.00 2,500.00 2,500.00 2,500.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code Royce E. Wisenbaker	Principal Place of Business 14th Floor Peoples Bank Bldg. Tyler, Texas 75701 Occupation BANKER at Peoples Bank ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 5000	Date (month, day, year) 8-24-78	Amount of each Receipt this Period 5,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code J. R. PARTEN	Principal Place of Business 1638 BANK of Southwest Bldg. Houston, Tx. 77002 Occupation Oil Business ☑ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 5000	Date (month, day, year) 8-31-78	Amount of each Receipt this Period 5,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code B. J. McCombs	Principal Place of Business 1025 San Pedro San Antonio, Tx. 78212 Occupation Car Dealer ☑ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 1,000	Date (month, day, year) 9-6-78	Amount of each Receipt this Period 1,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code Committee for Good Government	Principal Place of Business 8000 E. Jefferson Ave. Detroit, Michigan 48214 Occupation United Auto Workers Political Action Comm. ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 1,000	Date (month, day, year) 9-12-78	Amount of each Receipt this Period 1,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code JOHN HILL CAMP. COMM.	Principal Place of Business 1035 BROWN BLDG. Austin, Tx. 78701 Occupation Dem. Nom. for Tex. Gov. ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 15,000	Date (month, day, year) 9-28-78	Amount of each Receipt this Period 2,500.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code Frank Pool	Principal Place of Business P.O. Box 1940 San Angelo, Tx. 76902 Occupation Oil Business ☑ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 1,000	Date (month, day, year) 9-19-78	Amount of each Receipt this Period 1,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
SUBTOTAL of receipts this page (optional) . . .			$ 28,000.00
TOTAL this period (last page this line number only) . . .			$

SCHEDULE A
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and or 18a of FEC FORM 3

Page 1 of 1
Line Number 15b

Name of Candidate or Committee as Filed
Democratic Voter Project

Full Name, Mailing Address and ZIP Code	Purpose of Receipt or Business	Date Received	Amount of each Receipt this Period
Harris County Democratic Voter Registration Comte. 4741 Kingfisher Houston, Texas 77035 Receipt for: ☐ Primary ☐ General ☐ Other	Final report filed ☐ Check if Aggregate Year-to-Date Amount Aggregate Year-to-Date Amount $ 96.14	8-1-78	96.14
Harris County Democratic Get-Out-The-Vote Comte. 4741 Kingfisher, Houston TX 77045 Receipt for: ☐ Primary ☐ General ☐ Other	Final report filed ☐ Check if Aggregate Year-to-Date Amount Aggregate Year-to-Date Amount $ 81.00	8-1-78	81.00
John Hill Campaign 2016 Main Houston, Texas 77002 Receipt for: ☐ Primary ☒ General ☐ Other	2016 Main Houston, Texas 77002 ☐ Check if Aggregate Year-to-Date Amount Aggregate Year-to-Date Amount $ 2198.00	8-1-78 8-1-78	198.00 2000.00
Mark White for Attorney General Comte. 6101 Southwest Fwy. Houston, Texas 77057 Receipt for: ☐ Primary ☒ General ☐ Other	6101 Southwest Fwy. Houston, Texas 77057 ☐ Check if Aggregate Year-to-Date Amount Aggregate Year-to-Date Amount $ 200.00	8-1-78	200.00
Gammage for Congress Committee '78 8328 Gulf Fwy. Houston, Texas 77017 Receipt for: ☐ Primary ☒ General ☐ Other	8328 Gulf Fwy. Houston, Texas 77017 Campaign Committee ☐ Check if Aggregate Year-to-Date Amount Aggregate Year-to-Date Amount $ 1000.00	8-1-78 8-1-78	291.00 291.00
Joe Pentony Campaign Comte. 1219 Milam Houston, Texas 77002 Receipt for: ☐ Primary ☒ General ☐ Other	1219 Milam Houston, Texas 77002 Campaign Committee ☐ Check if Aggregate Year-to-Date Amount Aggregate Year-to-Date Amount $ 571.00	8-1-78	71.00
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Aggregate Year-to-Date Amount Aggregate Year-to-Date Amount $		

SUBTOTAL of receipts this page (optional)	$ 4546.41
TOTAL this line number (or this column, if applicable)	$ 4546.41

81040302776

SCHEDULE A
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page ____ of ____ for

Line Number ____

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Bexar County Democratic Victory Fund

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Aggregate Year To Date	Date (month, day, year)	Amount of each Receipt this Period
Dr. Louis T. Bogy 4402 Vance Jackson Road. San Antonio, TX Receipt for: ☐ Primary ☑ General ☐ Other	146 Park North Med. Prof. Building Podiatrist ☐ Check if Contributor is self-employed Aggregate Year To Date ▶	-3-78	$200.00
Dr. W.R. Elizondo 2219 Cincinnati Ave. San Antonio, TX 78228 Receipt for ☐ Primary ☒ General ☐ Other	Principal Place of Business Optometrist ☐ Check if Contributor is self-employed Aggregate Year To Date $	10-24-78	$140.00
Robert D. Green Campaign Fund c/o Bexar County Clerks Office, Bexar County Courthouse, San Antonio, TX Receipt for ☐ Primary ☒ General ☐ Other	Principal Place of Business Bexar County Courthouse Occupation Co Clerk ☐ Check if Contributor is self-employed Aggregate Year To Date $	10-6-78	$100.00
Mr. Herbert D. Kelleher 711 Navarro, Suite 620 San Antonio, TX 78205 Receipt for ☐ Primary ☒ General ☐ Other	Principal Place of Business Suite 620, 711 Navarro San Antonio, TX Occupation Attorney ☐ Check if Contributor is self-employed Aggregate Year To Date $	10-8-78	$250.00
John Hill Campaign Committee 201 Brown Bldg. Austin, TX 78701 Receipt for ☐ Primary ☒ General ☐ Other	Principal Place of Business Austin, Texas Occupation Candidate for Governor ☐ Check if Contributor is self-employed Aggregate Year To Date $	10-26-78	$525.70
Maury Holden , Col. 9406 E. Valleyview Ln San Antonio, TX Receipt for ☐ Primary ☒ General ☐ Other	Principal Place of Business Occupation Banker ☐ Check if Contributor is self-employed Aggregate Year To Date $	10-3-78	$100.00
Gerald C. Henckel 3438 Northmoor San Antonio, TX 78230 Receipt for ☐ Primary ☒ General ☐ Other	Principal Place of Business City Hall 506 Dolorosa San Antonio, TX Occupation City of San Antonio ☐ Check if Contributor is self-employed Aggregate Year To Date $	10-13-78	$100.00
SUBTOTAL of receipts this page (optional)			
TOTAL this period (last page this line number only) ▶			

8103022777

In reply please refer to:

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 18, 1979

Treasurer
Hill's Campaign
Cedar Springs
Dallas, Texas 75201

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by the Dallas County Democratic Progressive Voters League indicates that your organization may have made contributions which total in excess of $1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of $1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed $1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

8 1 0 4 0 0 2 7 8

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact David Greevy, in our Reports Analysis Division at (800) 424-9530. Our local number is (202) 357-0023.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipts Requested

8104030279

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution Refund, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Line Number 15c

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Dallas County Democratic Progressive Voters League

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
Campaign Victory '78 Dallas, Texas	Principal Place of Business: Coalition Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $ 5,300.00		300.00
Receipt for: ☐ Primary ☐ General ☐ Other			
Hill's Campaign Cedar Springs Dallas, Texas	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $	11/2/78	1,100.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Kruger for Senator Dallas, Texas	Principal Place of Business: Committee Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $	11/7/78	400.00
Receipt for: ☐ Primary ☐ General ☐ Other			
Progressive Voters League 6139 Moonglow Dr. Dallas, Texas	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $	12/1/78	20.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Campaign Victory '78	Principal Place of Business: C00101972 Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $ 10,300	10/25/78	5,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: ☐ Primary ☐ General ☐ Other			
SUBTOTAL of receipts this page (optional)			$ 6,820.00
TOTAL this period (last page this line number only)			$ 6,820.00

In reply please refer to: 38V2/79-40

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1979

Treasurer
Hill's Campaign
Cedar Springs
Dallas, TX 75201

Dear Treasurer:

On May 18, 1979, you were notified that you may have made contributions to a political committee which raised problems under 2 U.S.C. 433 and 434.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 433 and 434.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter and demonstrate why no action should be taken against you. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact David Greevy, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202) 357-0023.

Sincerely,

Robert O. Tiernan

Commissioner

Certified Mail:
Return Receipt Requested

8104302781

In reply please refer to: [illegible]

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 19, 1979

Treasurer
John Hill Campaign Committee
201 Brown Building
Austin, Texas 78703

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by Dallas County Democratic Progressive Voters League, Texas Democratic Voter Participation Project, Democratic Voter Project, and Bexar County Democratic Victory Fund indicates that your organization may have made contributions which total in excess of $1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of $1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you agree that your organization has made contributions or expenditures which qualify you as a political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed $1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact David Greevy, in our Reports Analysis Division at (800)424-9530. Our local number is (202)357-0023.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipt Requested

8104302783

SCHEDULE A
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 4 of 6

Line Number 15b

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Dallas County Democratic Progressive Voters League

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each this Period
Mattox In 78 Committee P. O. Box 50071 Dallas, Texas 75250	Occupation	3-31-78	$ 500.0
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 500.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each this Period
John Cutright Business Account 315 Westgate Blvd. Austin, Texas 78701	Occupation	3-31-78	$ 500.0
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 500.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each this Period
Judge Geo. Martinez Campaign Fund-6733 Keswick Circle Dallas, Texas 75232	Occupation	3-30-78	$ 250.0
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 250.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each this Period
Ron Chapman For Judge Campaign Fund 10509 Mapleridge Dallas, Texas 75238	Occupation	3-30-78	$ 100.00
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 100.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each this Period
Phil L. Adams Campaign Fund 905 Grinnell Richardson, Texas 75081	Occupation	3-28-78	$ 250.00
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 250.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each this Period
Judge Berlaind L. Brashear Campaign Fund 1412 Main Street, No.900 Dallas, Texas 75202	Occupation	4-1-78	$ 250.00
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 250.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each this Period
John Hill Campaign Fund 2528 Tanglewood Trail Austin, Texas 78703	Occupation	3-28-78	$1,000.00
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $1,000.00		

SUBTOTAL of receipts this page (optional)

Election Commission
Street, N.W.
ton, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 1 of 2 for
Line Number 14A

(Use Separate Schedule for each numbered line)

Name of Candidate or Committee in Full
TEXAS DEMOCRATIC VOTER PARTICIPATION PROJECT

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
JOHN HILL CAMP. COMM.	1035 BROWN BLDG. Austin, Tx. 7870[illegible]	7-11-78	2,500.00
	Occupation: DEM. NOMINEE FOR Tex. Gov.	8-1-78	2,500.00
Receipt for: ☐ Primary ☑ General ☐ Other	☐ Check if Contributor is self-employed	8-16-78	2,500.00
	Aggregate Year-To-Date . . . $	8-29-78	2,500.00
		9-12-78	2,500.00
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Royce E. Wisenbaker	14th Floor Peoples Bank Bldg. Tyler, Texas 75701	8-24-78	5,000.00
	Occupation: BANKER at Peoples Bank		
Receipt for: ☐ Primary ☑ General ☐ Other	☑ Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . $ 5000		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
J. R. PARTEN	1638 BANK of Southwest Bldg. Houston, Tx. 77002	8-31-78	5,000.00
	Occupation: Oil Business		
Receipt for: ☐ Primary ☑ General ☐ Other	☑ Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . $ 5000		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
B. J. McCombs	1025 San Pedro San Antonio, Tx. 78212	9-6-78	1,000.00
	Occupation: Car Dealer		
Receipt for: ☐ Primary ☑ General ☐ Other	☑ Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . $ 1,000		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Committee for Good Government	8000 E. Jefferson Ave. Detroit, Michigan 4824[illegible]	9-12-78	1,000.00
	Occupation: United Auto Workers Political Action Comm.		
Receipt for: ☐ Primary ☑ General ☐ Other	☐ Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . $ 1,000		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
JOHN HILL CAMP. COMM.	1035 BROWN BLDG. Austin, Tx. 78701	9-28-78	2,500.00
	Occupation: Dem. Nom. for Tex. Gov.		
Receipt for: ☐ Primary ☑ General ☐ Other	☐ Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . $ 15,000		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Frank Pool	P.O. Box 1940 San Angelo, Tx. 76902	9-19-78	1,000.00
	Occupation: Oil Business		
Receipt for: ☐ Primary ☑ General ☐ Other	☑ Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . $ 1,000		
SUBTOTAL of receipts this page (optional) . . .			$ 28,000.00
TOTAL this period (last page this line number only) . . .			$

FEC 0940 1 3 0 8 9 2 7 8 0 4 0 3 0 8 9 2 7

SCHEDULE A
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and or 18a of FEC FORM 3

Page 1 of 1
Line Number 15b

Name of Candidate or Committee in Full
Democratic Voter Project

Full Name, Mailing Address and ZIP Code		Date	Amount
Harris County Democratic Voter Registration Comte. 4741 Kingfisher Houston, Texas 77035 Receipt for: ☐ Primary ☒ General ☐ Other	Final report filed	9-1-78	34.14
Harris County Democratic Get-Out-The-Vote Comte. 4741 Kingfisher, Houston TX 77045 Receipt for: ☐ Primary ☒ General ☐ Other	Final report filed	9-1-78	41.07
John Hill Campaign 2016 Main Houston, Texas 77002 Receipt for: ☐ Primary ☒ General ☐ Other	2016 Main Houston, Texas 77002	9-1-78 9-1-78	198.10 2000.00
Mark White for Attorney General Comte. 6101 Southwest Fwy. Houston, Texas 77057 Receipt for: ☐ Primary ☒ General ☐ Other	6101 Southwest Fwy. Houston, Texas 77057	9-1-78	241.93
Gammage for Congress Committee '78 8328 Gulf Frwy. Houston, Texas 77017 Receipt for: ☐ Primary ☒ General ☐ Other	8328 Gulf Frwy. Houston, Texas 77017	9-13-78 9-13-78	201.00 201.00
Joe Pentony Campaign Comte. 3219 Milam Houston, Texas 77002 Receipt for: ☐ Primary ☐ General ☐ Other	3219 Milam Houston, Texas 77002	9-1-78	71.00

SCHEDULE A
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page ____ of ____ for

Line Number ____

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Bexar County Democratic Victory Fund

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
Dr. Louis T. Bogy 4402 Vance Jackson Road. San Antonio, TX Receipt for: ☐ Primary ☑ General ☐ Other	146 Park North Med. Prof. Building Podiatrist ☐	-3-78	$200.00
Dr. W.R. Elizondo 2219 Cincinnati Ave. San Antonio, TX 78228 Receipt for ☐ Primary ☒ General ☐ Other	Optometrist ☐	10-24-78	$140.00
Robert D. Green Campaign Fund c/o Bexar County Clerks Office, Bexar County Courthouse, San Antonio, TX Receipt for ☐ Primary ☒ General ☐ Other	Bexar County Courthouse Co Clerk ☐	10-6-78	$100.00
Mr. Herbert D. Kelleher 711 Navarro, Suite 620 San Antonio, TX 78205 Receipt for ☐ Primary ☒ General ☐ Other	Suite 620, 711 Navarro San Antonio, TX Attorney ☐	10-8-78	$250.00
John Hill Campaign Committee 201 Brown Bldg. Austin, TX 78701 Receipt for ☐ Primary ☒ General ☐ Other	Austin, Texas Candidate for Governor ☐	10-26-78	$525.70
Maury Holden , Col. 9406 E. Valleyview Ln San Antonio, TX Receipt for ☐ Primary ☒ General ☐ Other	Banker ☐	10-3-78	$100.00
Gerald C. Henckel 3438 Northmoor San Antonio, TX 78230 Receipt for ☐ Primary ☒ General ☐ Other	City Hall 506 Dolorosa San Antonio, TX City of San Antonio ☐	10-13-78	$100.00
SUBTOTAL of receipts this page (optional)			
TOTAL this period (last page this line number only)			

10 0 2 0 1 8 7 8

Telecon:

Groovy with Jesse Jones
Dallas County Democratic Progressive Voters League
7/24/79
214-372-8152

Called Jones on two matters:

1. Hill's Campaign--3SV2/79-40

The above letter was sent on 7/16/79, and was returned to the Commission on 7/23/79.

He stated that the committee has disbanded, but that the treasurer could be reached at: Dallas County Democratic Headquarters
Attention: Susan Buck
1 Turtle Creek
Dallas, TX

The letter will be sent certified to that address today. Copy of SV1 will also be sent.

2. Campaign Advisors--3SV1/78-105

He stated that the committee's secretary had verified that the refund made to Campaign Advisors was $162. He thought a letter had been sent on this, but I told him it had not been received.

I told him that we were under the impression that the entity was a committee. He stated that this was not the case, that in fact it is a business. He stated that funds are received by the agency, which in turn provides these funds to local committees to disburse for mailings, etc.

I asked him to send a letter to this effect. He said that it would be in the mail shortly.

Note: While this does verify the nature of the business, as stated by Amps in the letter received 11/9/78, this may be a question for OGC.

Will talk to Peggy about this.

8104027978

35V1/79-74

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:
John Hill Camp Conte

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	94372	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Marie Lee McKnight

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

POSTMARK AUSTIN, TX JUL 26 1979

7/19

☆GPO 1977—0—249-595

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

35V1/79-74

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:
John Hill Camp Conte

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	94372	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Sandra A Terry

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

POSTMARK S. STATION AUSTIN, TX MAY 24 1979

5/18

☆GPO: 1977—0—249-595

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

6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use $300

Not in Directory

Insufficient address

Treasurer
Hill's Campaign
Cedar Springs
Dallas, TX 75201

RETURNED TO SENDER

Insufficient address

3502/79-40

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:
Hill's Campaign
TX

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY | POSTMARK

5. ADDRESS (Complete only if requested)

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

☆GPO: 1977—0—249-595

7/16

Copy 3502 + 3502/79-40

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: Perry Section TX
Hill's Campaign TX

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Susan C. Bush

4. DATE OF DELIVERY 7-31-79 | POSTMARK

5. ADDRESS (Complete only if requested)

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

☆GPO: 1977—0—249-595

7/24

0 0 2 0 0 0 1 8

Telecon:

Greevy with Jim Bushala
John Hill Campaign Committee 3SV1/79-74
Hill's Campaign 3SV1/79-40
7/31/79
512-474-6050

JB called yesterday. I returned the call today.

Susan Buck gave him the information sent to her for 3SV1/79-40. I told him why the letter was sent, what the options are, and stated as well that a request for an AO could be submitted.

We then discussed the John Hill Campaign Committee. He stated that the two organizations are one and the same, but that separate offices were established in Dallas and Austin. He indicated that there was one account for the organization.

With this information, I went over with him all the transfers included in both SV's.

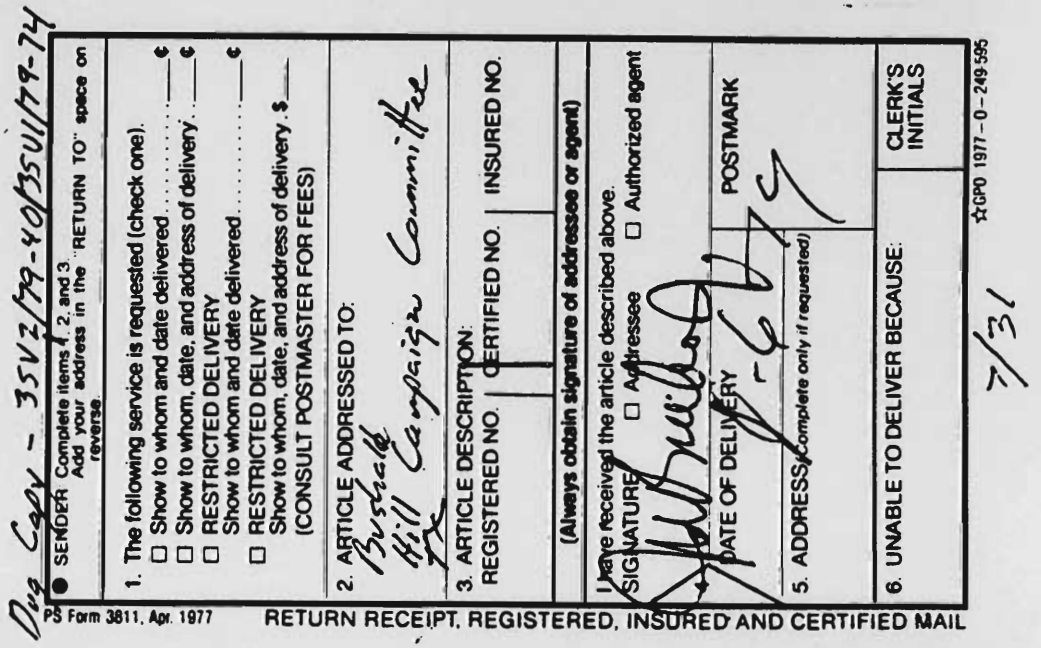
I further mentioned the possibility of 441a problems with respect to the transfers to Texas Democratic Voter Participation Project.

He asked for copies of all materials sent out on this matter. Same was sent today, certified.

He asked that he, as counsel for the Hill Campaign, be apprised of all matters involving that campaign. I told him that I would arrange for all future information and requests to be directed to him at:

Jim Bushala
Hughes and Hill
1200 American Bank Tower
Austin, TX 78701

I shall integrate these two matters and suspend matter until 8/31/79



8104030279 1

TELECON

DATE: 8/9/79

TIME: 2:00

COMMITTEE: John Hill for Governor Campaign Committee

PERSON SPOKEN TO: Jim Bushala, Legal Advisor (512)474-6050

FEC'R: Lisa Stolaruk

SUBJECT: M letter

Mr. Bushala called for Dug yesterday, but Dug was out of the office, and is also absent today. I reviewed the SV and decided to call Mr. Bushala back today to see if I could be of any assistance.

Mr. Bushala said that Dug had given him various alternatives to rectify the situation, and before pursuing any of them, he wanted to have each alternative explained once more. I gave him 4 alternatives:

1) Have the re cipient committees establish a separate, non-federal account, and transfer the excessive amount. (I emphasized the fact that the Campaign Committee contributed to 4 federal committees, and thus its total contributions could not exceed $1,000. We figured that each recipient committee would conceivably be able to retain $250.)

2) Register the Campaign Committee and file reports during the period(s) in which the transfers took place.

3) Seek a refund of the total amount over $1,000 from the recipient committees

4) Request an Advisory Opinion.

Mr. Bushala favored option #1 over all others. I gave him the names of the treasurers of the recipient committees and their addresses. He asked the best way of alerting the FEC of the result, if all committees agreed to establish a separate fund. I said that he should first of all write a letter to the FEC stating that he is working on the matter. If all committees agree to the option, I said that they should each write a letter stating that they have opened a separate account. Then , the transfers-out should appear on their next report. I told Mr. Bushala that the only committee that might pose a problem is Bexar County, which appears on our B index as terminated. He suggested that perhaps the committee could re-open an account, amend their federal report, and then terminate again. But, he said that he would have to ask the committee first if this option was amenable to them in any case.

I stressed the fact that I was not the analyst that normally handles Texas, and that any further communications (orally or otherwise) should be addressed to Dug. I also said that if anything I told him was incorrect, that Dug would call him back Monday.

8104302792

HUGHES & HILL
1200 AMERICAN BANK TOWER
AUSTIN, TEXAS 78701
(512) 474-6050

RECEIVED
FEDERAL ELECTION
COMMISSION

'79 AUG 16 AM 11:17

DALLAS OFFICE
1000 MERCANTILE DALLAS BUILDING
DALLAS, TEXAS 75201
(214) 651-0477

August 13, 1979

Mr. David Greevy
Reports Analyst
Federal Election Commission
Washington, D. C. 20463

Re: 3SV2/79-40
3SV1/79-74

Dear Mr. Greevy:

With regard to your inquiries relating to the John Hill for Governor Committee contributions to four registered federal committees here in Texas during the 1978 gubernatorial campaign, please be advised of the following:

1. Earlier this week, I had the pleasure of visiting with your assistant, Ms. Lisa Stolaruk. We reviewed each of the four federally registered committee reports.

2. I have prepared and mailed letters to the designated treasurers of the four committees, explaining the situation in which we find ourselves and requesting that they open "State and Local Accounts" and make the bookkeepping transfer of the designated amounts of money from their federal account.

The individuals to whom I have writtten and the committees of which they served as treasurer are as follows:

1. Dr. Jesse W. Jones
Dallas County Progressive Voters League

2. Mr. John C. Pouland
Texas Democratic Voter Participation Project

3. Ms. Barbara Stanley
Democratic Voter Project

4. Mr. Joseph Krier
Bexar County Democratic Victory Fund

8104302793

I have asked that each of them review my letter and then give me a call so that we might discuss the matter on the telephone and agree on what needs to be done with each of the respective committees. As soon as I hear from them, I will of course be back in touch with you. I have asked that they give these matters priority attention.

Thank you for the cooperation that you have exhibited thus far as we attempt to hopefully bring to a close the John Hill for Governor Campaign of 1978. I apologize for our not having filed the necessary papers at an earlier date, but please be assured that whatever was not done, was not the result of malicious intent, but purely an oversight.

Sincerely,

Jim Bushala, Jr.

JBJr:mkh

cc: Ms. Lisa Stolaruk
Assistant Reports Analyst
Federal Election Commission
Washington, D. C. 20463

81049302794

Telecon:

Groevy with Marion Sanford
8/21/79
Harris County Democratic Voter Project
Re: Hill/Hobby Campaign Committees

MS called this day. He has been contacted by both Hill and Hobby regarding the letters they received from us. Regarding Hobby, it appeared that he may be handling the situation.

MS stated:

Harris Project(HP) established segregated accounts about 9/15/78.

After the segregation of accounts, all funds from State candidates were placed into the non-Federal account. Those funds remaining in the Federal account at the time of segregation were not transferred to the newly established non-Federal account.

HP reports to FEC disclosed only the activity of the Federal account.

The function of HP(which is described by MS as a "party-type committee", not a "party committee formally") was to provide GOTV services for all candidates.

To this end, the committee expended about $14,000 from the Federal account and $35,000 from the non-Federal account.

In essence, HP is a vendor type committee, providing services to candidates who pay for those services. This status is a bit muddied however because the committee did receive some individual contributions.

HP closed its Federal account recently and submitted its termination report.

HP would have been willing to transfer funds received from Hill/Hobby to its non-Federal account, but the bank accounts have been closed and HP has, of course, no money at this time.

He asked what he should do with respect to Hill. I stated that a letter outlining the above should be sent to Jim Bushola, and that he should send copy to FEC. At that point, I would get in touch with Hill.

He asked if the situation with Hobby was analagous. I stated that I thought so, and that the same should be done in that situation.

He stated that Hobby had also contributed to the Texas Democratic Voter Participatio Project . He said that he believed this committee had only one account, but that he was not sure about this.

His phone: 713-651-2510

8104302795

10

Telecon:

Greevy with Jesse Jones
Dallas County Democratic Progressive Voters League
9/7/79
214-372-8152

Talked this day with Jones.

We received a letter from Campaign Victory '78-Non-Federal, in which it was stated that the DCDPVL would transfer the funds necessary to bring the CV'78NF's contributions under $1,000.

I checked the DCDPVL reports and determined that they did not have enough funds. It was for this reason that I called.

Jones stated that they did in fact have little monies available to transfer, and that he had been in contact with a bank to determine if they could borrow the funds necessary. He said that the bank indicated that they were not familiar with this sort of transaction, i.e. one account borrowing funds to place into another account. As a result of this response, Jones stated that he was going to get in contact with us.

He asked me what should be done. I stated that I really didn't know, but that it may be of some help to request an AO from the Commission. He stated that he would do this, as this was a problem for both the CV'78NF and for the John Hill Campaign.

On another matter--The committee has not yet responded to the YE RFAI regarding cash on hand discrepancy. He said that a response would be in the mail shortly.

8104030279 6

Telecon:

Greevy with Jim Bushala
John Hill Campaign Committee
9/24/79

I called JB today.

I asked what the status of the matter was. He stated that he sent four letters out requesting the recipient committees to transfer the funds to segregated State and local accounts.

The letter to Jones (Dallas County Progressive Voters League) has not been responded to.

The letter to Pouland (Texas Democratic Voter Participation Project) was returned. Contact still not made.

The letter to Stanley (Democratic Voter Project) has been responded to. The response stated that funds are not available to transfer.

The letter to Krier (Bexar County Democratic Victory Fund) has been responded to. The response stated that funds are not available to transfer.

I told him that the committee may be required to register and report, in light of the difficulty regarding the inability of the committees to transfer the funds.

I briefly described to him the requirements of the law regarding filing of Form 1 and Form 3. I also directed him to the Act and the Regulations.

He stated that all contributions made by the Hill committee were made with the intention of those funds being used to further the Hill campaign.

I asked him to send a letter describing the current status of the matter and explaining the purposes of the contributions.

8104302797

PVL

FILED
September 20, 1979
COMMISSION

'79 SEP 20 PM 1:20

Democratic Progressive Voters League

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

Dear Mr. Oldeker:

This letter is written to request an advisory opinion on behalf of the Progressive Voters League (PVL). While the PVL does not appear to be in violation of any rules or regulations of the FEC, two state committees have inadverently made contributions to PVL in excess of those allowed by the guidelines of the FEC. The two committees have been advised that the problem could most readily be solved by having PVL transfer the funds in excess of the allowable to an account for state and local candidates. This simple solution is complicated by the fact that funds have all been expended from both PVL accounts. I am therefore appealing to you for advise as to what steps are open to the Progressive Voters League which will minimize the difficulties of the two contributors and at the same time assure fair and accurate reporting of all funds.

Cordially yours,

Jesse W. Jones

cc Mr. David Greevy

6139 Moonglow • Dallas, Texas 75241 • (214) 376-1660

Telecon:

Greevy with David Bolduc
Texas Democratic Voter Participation Project
10/11/79
512/477-1187
C00099267

DB called this day. He stated that he is the new treasurer of the committee, and that the former treasurer had stated that we had sent some letters to the committee.

DB asked what these were about.

I knew that the problems were extensive, so I told him that I would review the file, and call him back.

He was in court when I returned the call.

Address

1210 Nueces
Suite 100
Austin, TX
78701

81049302799

Forwarded to WCo 10/15/79

OCT 15 1979

Jesse W. Jones
6139 Moonglow
Dallas, Texas 75241

Dear Mr. Jones:

This refers to your letter of September 17, 1979, requesting an advisory opinion concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act").

You have requested an opinion regarding past activity of the Progressive Voters League ("PVL") in receiving transfers in excess of $1,000 from state committees which are not registered with the Commission as "political committees". You suggest that PVL may be willing to transfer an amount equal to the amount received from the unregistered committees, from its Federal to its nonfederal account. However, at this time no funds are available in PVL accounts.

Under the Act and regulations, advisory opinion requests must present an issue concerning application of the Act to a specific factual situation that involves the requesting person. 2 U.S.C. §437f. The cited section enables the requestor to act and rely upon the opinion "in good faith" without being "subject to any sanction provided by" the Act. 2 U.S.C. §437f(b); see also 11 CFR 112.1, 112.5. This "good faith" reliance protection means that persons requesting an opinion must establish some potential jeopardy of committing a violation themselves in order to satisfy the standing requirement.

The situation presented in your request raises an issue regarding application of the Act's registration and reporting requirements to the unregistered state committees that transferred funds to your committee. Although you may be interested in how those unregistered committees can avoid coming within the Act, you do not set forth any facts establishing a basis for us to conclude that your committee may be in violation of the Act as a direct result of the failure of the state committees to register as political committees.

Thus you cannot properly obtain an advisory opinion concerning application of the Act or Commission regulations to your committee in the factual situation as presented.

I regret that the advisory opinion procedure is not available to respond to your request. The Commission or its staff may be in future contact with the unregistered state committees, or with your committee, to deal with these matters pursuant to the Commission's compliance procedures. See 2 U.S.C. §437g.

Sincerely yours,

William C. Oldaker
General Counsel

bcc: Tom Haselhorst

NBLitchfield:bwl:10/12/79

Memo to the File:

Re: Texas Democratic Voter Participation Project

Greevy
10/17/79

I attempted to phone Bolduc on Friday, 10/12, and on Monday, Tuesday, and Wednesday of this week. He has been in court each time that I called.

I've left messages for him, but I've not heard from him.

I got his address from the secretary and I shall send copies of the following to him, certified.

1. 3SV1/79-76
2. RFAI's for 10G, 30G, and Q3

In addition, I will give Compliance copies of the RFAI's so that they can track them. They were sent out 7/19/79. I do not know why there was no follow up.

9104030280 2

Page 1 of 2

COO 9926

Telecon:

Greevy with David Bolduc
Texas Democratic Voter Participation Project
3SV1/79-76 & other Requests
10/23/79
512-477-1187

Bolduc called this day. We talked about the following:

3SV1/79-76

He said the previous treasurer (Pouland) really made a mess of this. He said that various candidates throughout the State made an agreement whereby they would get individuals to contribute to the TDVPP. The funds would be used for GOTV and for voter registration. The agreement (made informally) was for each participant to arrange a total of $15,000 in contributions to the TDVPP.

John Hill was not able to arrange for these contributions for the "expense sharing deal." Because of this, he made the $15,000 transfer to the TDVPP.

I stated that the transfer was definitely in excess of the limits. Bolduc said that he knew it was, and he did not understand why it was accepted.

He said that he would transfer the $10,000 excess to Hill, but his committee has only about $800 on hand. I then informed him of Hill's problem regarding the possible 433 & 434 violation. He said the transfer should then be $15,000.

He asked if he should send a letter acknowledging the problem, and showing a debt to Hill for $15,000 on their next report. I said that he could certainly do that, but that compliance would not be met until the required refund is made.

We continued our discussion by talking about Texas Democratic Party-Federal. This portion of the discussion may affect the means by which TDVPP could get the funds to refund Hill.

Texas Democratic Party-Federal

Bolduc briefly related what the committee does. (I am familiar with the situation because I review the committee's reports)

In essence, TDP-F receives funds from Dollars for Democrats. That is the fundraising arm for the Association of State Democratic Chairpersons. Once the funds are received, they are immediately transferred to the State and local account of the Texas Democratic Party.

Bolduc asked whether the TDP-F is required to remain registered and reporting with the Commission. I stated that this would not be required by virtue of the fact that it receives funds from Dollars for Democrats. Furthermore, if the funds are just going into the non-Federal account of the organization, we would not

8104302803

require the TDP-F to remain reporting to us. He stated that he thought the committee should terminate with the FEC, because the funds do just go into the non-Federal account of the organization.

I then suggested that the following may be possible in order to get the funds for the TDVPP to refund to Hill:

> Dollars for Democrats has been rather successful for the Texas Democratic Party. Instead of putting the transfers from D for D into the TDP-F account, they could be put into the TDVPP account. Once enough funds are received to make the refund to Hill, the TDVPP could make the refund to Hill.

Regarding this, Bolduc asked whether Hill could then contribute the funds to the non-Federal account of the organization. I stated that that would be up to Hill, as our concern at this point is just that the refunds should be made.

I emphasized that in all instances, any transfers from unregistered entities to the TDVPP must be permissible under FECA and that the contributing entity would trigger a reporting responsibility were the transfer to exceed $1,000 during a calendar year. I mentioned this because he asked about making transfers from the non-Federal account to the Federal account.

Requests for Additional Information

Bolduc stated that he received the copies sent to him. He said that with respect to GOTV and voter registration, he would get back in touch with the payees and get records on how the funds were expended-

He stated that the committee did not make in-kind contributions to Krueger, but that he was under the impression that they made coordinated expenditures on Krueger's behalf. I stated that we have not been so informed.

He said that that was the case, because he and Krueger worked together on what the party would do for the Krueger campaign under 441a(d). I said that I would send him Schedules F and that he should provide the information as necessary.

He said that the TDVPP is the registered State central committee, and therefore they were in charge of the 441a(d) activity. I asked if any subordinate committees had been authorized by the committee to make such expenditures. He said that he thought not, but that he would get in contact with me for further instruction if he found that not to be the case.

Misc.

I told him to submit a 1 amend showing that he is the treasurer of the committee

8104030280 4

DAVID BOLDUC
ATTORNEY AT LAW
1210 NUECES ST., SUITE 100
AUSTIN, TEXAS 78701
(512) 477-1187

79 NOV 19 A8:48

November 13, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: Texas Democratic Voter Participation Project
ID No: C00099267
In Response to: 35V1/79-76

Dear Sir:

In reviewing the letter referred to above, it appears that contributions to this committee were accepted by its past treasurer from the John Hill Campaign Committee in the amount of $15,000.00.

I can see no exception that would allow receipt of funds in this amount, so the entire amount will be refunded as soon as funds to do so are available. In the meantime, this amount will be listed by this committee as a debt to the John Hill Campaign Committee.

I apologize for the delay that our change in treasurers has caused in dealing with this matter, and I would appreciate knowing whether our action meets with your approval.

Yours truly,

DAVID BOLDUC

DB:mkm

8104030280 /9031113437

RAD 549 12-MAR 78

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12-10-79 ANALYST Dug Greevy

TO: Office of General Counsel TEAM CHIEF Bobby Wenfel

THROUGH: STAFF DIRECTOR WRP COMPLIANCE REVIEW CB/95

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: Campaign Victory '78 (Non-Federal) (non-registered)

TREASURER: Kenneth H. Molberg

ADDRESS: 318 Merchants State Bank Building
5217 Ross Avenue
Dallas, TX 75206

AFFILIATE(S) Campaign Victory '78 (registered-C00101972)

ALLEGATION(S)	CITE:	ATTACHMENT(S)
Unregistered Political Committee	2 U.S.C. 433 & 434	1

DATE INITIATED: 5/1/79

MANNER IN WHICH REVIEW WAS INITIATED: ATTACHMENT
☒ Normal review ☐ Other:
☐ Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM _____ TO _____

TOTAL RECEIPTS $ _____ TOTAL EXPENDITURES $ _____

CASH ON HAND $ _____ DEBTS $ _____

HISTORY:

RESULTS OF REVIEW: ATTACHMENT
3SV1/79-29, 5/18/79 2
3SV2/79-29, 7/16/79 3
Note: 3SV2/79-29 returned to FEC on 7/31/79, remailed 8/1/79

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
Telecon: Greevy with Molberg, 8/3/79 4
Telecon: Greevy with Jones (Recipient committee treasurer), 9/7/79 5
Telecon: Greevy with Molberg, 9/18/79 10
Telecon: Greevy with Molberg, 10/2/79 11

REASON(S) FOR REFERRAL: ATTACHMENT
Molberg letter of 8/8/79 6
Molberg letter of 8/27/79 7
Molberg letter of 10/29/79 10
Question of adequacy of response

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT
NONE

OTHER RELEVANT INFORMATION:
Campaign Victory '78 (federal account) reports transfers out reflecting the checks attached to Molberg response of 10/29/79. 12
PREVIOUS OGC/AUDIT REFERRALS FROM RAD:
Request for Advisory Opinion from recipient committee, 9/30/79 8
General Counsel's response to Request for Advisory Opinion, 10/15/79 9
NO PREVIOUS OGC/AUDIT REFERRALS FROM RAD

RAD Form

81040302806

Commission
N.W.
C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 1 of 1 for Line Number 15a

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Progressive Voters League

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receip this Period
Minority Search, Inc 777 R. L. Thornton Fwy. Dallas, Texas	Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 499.50	10/17/78	499.50
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receip this Period
Campaign Victory '78 5217 Ross Avenue Dallas, Texas	Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 5000.00	10/20/78	5,000.00
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receip this Period
	Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $		
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receip this Period
	Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $		
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receip this Period
	Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $		
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receip this Period
	Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $		
Receipt for: ☐ Primary ☐ General ☐ Other			
SUBTOTAL of receipts this page (optional)			$ 5,499.50
TOTAL this period (last page this line number only)			$ 5,499.50

8130128087

(Contributions, Transfers, Contribution In Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Dallas County Democratic Progressive Voters League

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Rec this Period
Campaign Victory '78 Dallas, Texas	Principal Place of Business: C00101972 Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $ 5,300.00		300.00
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code Hill's Campaign Ceder Springs Dallas, Texas	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $	11/2/78	1,100.00
Receipt for: ☐ Primary ☒ General ☐ Other			
Full Name, Mailing Address and ZIP Code Kruger for Senator Dallas, Texas	Principal Place of Business: C00070639 Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $	11/7/78	400.00
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code Progressive Voters League 6139 Moonglow Dr. Dallas, Texas	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $	12/1/78	20.00
Receipt for: ☐ Primary ☒ General ☐ Other			
Full Name, Mailing Address and ZIP Code Campaign Victory '78	Principal Place of Business: C00101972 Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $ 10,300	10/25/78	5,000.00
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $		
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $		
Receipt for: ☐ Primary ☐ General ☐ Other			
SUBTOTAL of receipts this page (optional)			$ 6,820.00
TOTAL this period (last page this line number only)			$ 6,820.00

81040302809

In reviewing the reports of Dallas County Democratic Progressive Voters League, I noted the transfers-in from Campaign Victory '78. I checked the reports of Campaign Victory '78-Federal, and discovered that they reported making no transfers to DCDPVL, and in fact, that they have had little money or activity at all.

Therefore, the Campaign Victory committee apparently has another account (Non-Federal) which is not being reported to the Commission.

Necessary changes have been made in the Data Base.

Dug Greevy
5/1/79

In reply please refer to: [illegible]

2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 18, 1979

Treasurer
Campaign Victory '78
(Non-Federal)
5217 Ross Avenue
Dallas, Texas 75201

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by the Dallas County Democratic Progressive Voters League indicates that your organization may have made contributions which total in excess of $1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of $1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed $1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

8104302810

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact David Greevy, in our Reports Analysis Division at (800) 424-9530. Our local number is (202) 357-0023.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipts Requested

8104030281

Commission
W.
20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 1 of 1 for Line Number 15a

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Progressive Voters League

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
Minority Search, Inc 777 R. L. Thornton Fwy. Dallas, Texas Receipt for: ☐ Primary ☐ General ☐ Other	Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 499.50	10/17/78	499.50
Full Name, Mailing Address and ZIP Code Campaign Victory '78 5217 Ross Avenue Dallas, Texas Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 5000.00	Date (month, day, year) 10/20/78	Amount of each Receipt this Period 5,000.00
Full Name, Mailing Address and ZIP Code Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	Date (month, day, year)	Amount of each Receipt this Period
Full Name, Mailing Address and ZIP Code Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	Date (month, day, year)	Amount of each Receipt this Period
Full Name, Mailing Address and ZIP Code Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	Date (month, day, year)	Amount of each Receipt this Period
Full Name, Mailing Address and ZIP Code Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	Date (month, day, year)	Amount of each Receipt this Period
Full Name, Mailing Address and ZIP Code Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	Date (month, day, year)	Amount of each Receipt this Period

SUBTOTAL of receipts this page (optional)	$ 5,499.50
TOTAL this period (last page this line number only)	$ 5,499.50

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Dallas County Democratic Progressive Voters League

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
Campaign Victory '78 Dallas, Texas	Principal Place of Business: Coalition Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $ 5,300.00		300.00
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code Hill's Campaign Cedar Springs Dallas, Texas	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $	11/2/78	1,100.00
Receipt for: ☐ Primary ☒ General ☐ Other			
Full Name, Mailing Address and ZIP Code Kruger for Senator Dallas, Texas	Principal Place of Business: Committee Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $	11/7/78	400.00
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code Progressive Voters League 6139 Moonglow Dr. Dallas, Texas	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $	12/1/78	20.00
Receipt for: ☐ Primary ☒ General ☐ Other			
Full Name, Mailing Address and ZIP Code Campaign Victory '78	Principal Place of Business: P00101072 Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $ 10,300	10/25/78	5,000.00
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $		
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date: $		
Receipt for: ☐ Primary ☐ General ☐ Other			
SUBTOTAL of receipts this page (optional)			$ 6,820.00
TOTAL this period (last page this line number only)			$ 6,820.00

3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463 July 16, 1979

Treasurer
Campaign Victory '78 (Non-Federal)
5217 Ross Avenue
Dallas, TX 75201

Dear Treasurer:

On May 18, 1979, you were notified that you may have made contributions to a political committee which raised problems under 2 U.S.C. 433 and 434.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 433 and 434.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter and demonstrate why no action should be taken against you. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact David Greevy, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202) 357-0023.

Sincerely,

Robert O. Tiernan
Commissioner

Certified Mail:
Return Receipt Requested

8104030281 4

Memo to the File:

Greevy
8/1/79
3SV2/79-29

The above was returned to FEC on 7/31/79. I am mailing it certifed to the committee at 318 Merchants State Bank Building, 5217 Ross Avenue, Dallas, TX, 75201.

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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:
Camp Victory '78 (N-F)

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

(Always obtain signature of addressee or agent)
I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY
POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:
CLERK'S INITIALS

7/16

☆GPO 1977-O-240-506

9 3SV2/79-29

POSTAGE AND FEES PAID

U.S.MAIL

RETURNED TO WRITER
FROM 75206
ADDRESSEE UNKNOWN

8104030281 5

ION CO
.C. 20463

$300

Treasurer
Campaign Victory '78 (Non-Federal)
5217 Ross Avenue
Dallas, TX 75201

10 story office building - Insufficient address

CERTIFIED
943102

D

3501/79-29

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:
Campaign Victory '78
TX

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943710	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Nancy Barnes

4. DATE OF DELIVERY 5-30-79 POSTMARK
DALLAS TX GREENVILLE AVE STA MAY 30 1979

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆GPO 1977 – 0 – 249-595

5/18

12/79-29

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

● SENDER. Comp... 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:
Camp Victory (Non-Fed)
TX

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943320	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Nancy Barnes

4. DATE OF DELIVERY 8-3-79 POSTMARK
DALLAS TX GREENVILLE AVE STA AUG 3 1979

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆GPO 1977 – 0 – 249-595

8/1

8 1 0 4 0 3 0 2 8 1 6

4

Telecon:

Greevy with Ken Kim Molberg
Campaign Victory '78(Non-Federal)
214-821-8840
8/3/79

KM called this day regarding the SV. He thought the packet was just informational, and had not read the letter until today. I informed him that the RTB letter has been sent.

He stated that Campaign Victory does in fact have segregated accounts, and that the transfers questioned were made from the non-Federal account.

He stated however that he was under the impression, when the transfers were made, that they would be placed in the non_Federal account of the recipient committee.

I explained the options to him, including submitting an AOR. He stated that he would contact the recipient committee to see if they could transfer the $10,000 or so to their non-Federal account.

He said he thought the funds were used for GOTV, and that there were 3 Federal candidates and 83 State and local candidates.

He will respond by phone and letter as soon as he knows what the status is.

8104030287

6

LAW OFFICES OF JAMES C. BARBER
318 MERCHANTS STATE BANK BUILDING
5217 ROSS AVENUE
DALLAS, TEXAS 75206

JAMES C. BARBER*
KENNETH H. MOLBERG
STEVEN B. THORPE

* BOARD CERTIFIED—PERSONAL INJURY TRIAL LAW
TEXAS BOARD OF LEGAL SPECIALIZATION

TELEPHONE
214-821-8840

August 8, 1979

79 AUG 10 PM 12:22

David Greevy
Report Analyst
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: 3SV2/79-29; Campaign Victory '78 (Non-Federal)

Dear Mr. Greevy:

I received the attached letter, dated July 16, 1979, on August 8, 1979. The problem may have been with respect to the incorrect zip code.

In any event, I trust that our conversation of last week sufficiently clears up any misunderstanding with respect to delayed responses.

I am presently attempting to clear up the matter to which you referred in your previous letter. I will advise you shortly if a resolution can be reached with respect to the matter.

I did want to emphasize that the contributions reported by the Dallas Progressive Voters' League were not primarily used for the purpose of influencing federal elections. This being the case, I am at a loss to explain why they were so reported. By way of information, the Victory '78 Committee was a committee designed to support Democratic Party candidates whose jurisdictions overlapped Dallas County. Four of these were federal races -- one senatorial and three congressional -- while in excess of 80 were state and local -- the two most prominent races being those for governor and county judge. Previous information was provided you with respect to our "support-the-party" effort.

I will be back in touch shortly.

Sincerely,

Kenneth H. Molberg

KHM/mfm

Enclosures

8 1 0 3 0 2 8 1 8

7

LAW OFFICES OF JAMES C. BARBER
318 MERCHANTS STATE BANK BUILDING
5217 ROSS AVENUE
DALLAS, TEXAS 75206

JAMES C. BARBER*
KENNETH H. MOLBERG
STEVEN B. THORPE

* BOARD CERTIFIED—PERSONAL INJURY TRIAL LAW
TEXAS BOARD OF LEGAL SPECIALIZATION

TELEPHONE
214-821-8840

AUG 27 9 11 19 11:47

Mr. David Greevy
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20515

Re: 3SV1/79-29 and 3SV2/79-29, Campaign Victory '78
(Non-Federal)

Dear Mr. Greevy:

I am enclosing a copy of a letter which I have sent to Dr. Jesse Jones, President of the Progressive Voters League in Dallas. I believe it is self-explanatory, in that I have been advised that the $9,540.48 inappropriately reported on the Federal report for the PVL will now be transferred to an account not used to influence Federal elections. This is as it should be, inasmuch as the $9,540.48 was not used to influence Federal elections.

Our committee's sole contributions to the Progressive Voters League totaled $759.52.

Should you have any further requests of me, please advise.

Sincerely,

Kenneth H. Molberg

KHM/mfm

Enclosure

8 1 0 1 9 3 0 2 8 1 9

LAW OFFICES OF JAMES C. BARBER
318 MERCHANTS STATE BANK BUILDING
5217 ROSS AVENUE
DALLAS, TEXAS 75206

JAMES C. BARBER*
KENNETH H. MOLBERG
STEVEN B. THORPE

TELEPHONE
214-821-8840

* BOARD CERTIFIED—PERSONAL INJURY TRIAL LAW
TEXAS BOARD OF LEGAL SPECIALIZATION

August 27, 1979

Dr. Jesse Jones
Democratic Progressive Voters League
6139 Moonglow
Dallas, Texas 75241

Dear Dr. Jones:

This confirms our conversation of August 21, 1979, wherein I advised you of the problem that has arisen as a result of the Campaign Victory '78 Committee's contribution to the Progressive Voters League.

A review of my records indicates that our Federal account made the following contributions to the Progressive Voters League:

1. 9-26-78, $300 for office rent;

2. 10-17-78, $229.76 for reimbursement for political mailings supporting the democratic ticket; and

3. 10-23-78, $229.76, for the same reasons.

As I understand it, the Committee will effect a transfer of the $9,540.48 inappropriately reported on the PVL's Federal filing.

If I can be of any assistance, please advise. I hope this letter finds you doing well.

Sincerely,

Kenneth H. Molberg

KHM/mfm

8 1 0 4 0 3 2 8 2 0

5

Telecon:

Greevy with Jesse Jones
Dallas County Democratic Progressive Voters League
9/7/79
214-372-8152

Talked this day with Jones.

We received a letter from Campaign Victory '78-Non-Federal, in which it was stated that the DCDPVL would transfer the funds necessary to bring the CV'78NF's contributions under $1,000.

I checked the DCDPVL reports and determined that they did not have enought funds. It was for this reason that I called.

Jones stated that they did in fact have little monies available to transfer, and that he had been in contact with a bank to determine if they could borrow the funds necessary. He said that the bank indicated that they were not familiar with this sort of transaction, i.e. one account borrowing funds to place into another account. As a result of this response, Jones stated that he was going to get in contact with us.

He asked me what should be done. I stated that I really didn't know, but that it may be of some help to request an AO from the Commission. He stated that he would do this, as this was a problem for both the CV'78NF and for the John Hill Campaign.

On another matter--The committee has not yet responded to the YE RFAI regarding cash on hand discrepancy. He said that a response would be in the mail shortly.

8104030281

10

Telecon:

Greevy with Ken Molberg
Campaign Victory '78(Non-Federal)
9/18/79
3SV2/79-29
214-821-8840

Called KM today to tell him of my discussion with Jones.

He said that he was under the impression that the transfer required had been made. I said that that did not appear to be the case.

He said that he was pretty upset because the non-Federal account's transfers to Jones' committee were intended to be used for non-Federal purposes and that he had no idea that they were being placed into their Federal account.

He asked what to do.

I said that in addition to the option of registering and reporting, he could request an AOR. He said that he would do this, and that it would be in the mail within a fortnight.

81043028822

8

PVL

RECD
September 26 1979
COMMISSION

Democratic Progressive Voters League

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

Dear Mr. Oldeker:

This letter is written to request an advisory opinion on behalf of the Progressive Voters League (PVL). While the PVL does not appear to be in violation of any rules or regulations of the FEC, two state committees have inadverently made contributions to PVL in excess of those allowed by the guidelines of the FEC. The two committees have been advised that the problem could most readily be solved by having PVL transfer the funds in excess of the allowable to an account for state and local candidates. This simple solution is complicated by the fact that funds have all been expended from both PVL accounts. I am therefore appealing to you for advise as to what steps are open to the Progressive Voters League which will minimize the difficulties of the two contributors and at the same time assure fair and accurate reporting of all funds.

Cordially yours,

Jesse W. Jones

cc Mr. David Greevy

6139 Moonglow • Dallas, Texas 75241 • (214) 376-1660

Telecon:

Greevy with Ken Molberg
Campaign Victory '78 (Non-Federal)
10/2/79

I called KM today. I asked if he had prepared the AOR which we spoke about before. He stated that he was just now in the process of doing that.

I told him about the Commission's new policy regarding its acceptance of AOR's, and I stated that I did not think that the Commission would consider it.

He asked what should be done.

I told him that in my opinion, absent the necessary refund or transfer to State and local account by the recipient committee, his committee would be required to register and report.

He stated that they could do this, although he thought that there might be some prohibited funds in the account. He stated once again that when his committee made the contributions, they intended for the funds to be used for non-Federal elections purposes only, and that they did not know that the recipient would place them in its Federal account.

I stated once again, that absent the required transfer or refund, the only option I knew of would be for the committee to register and report. He stated that he would send us a letter of explanation and supporting documents, and then we could determine whether the committee should file anything further.

8110030284

Forwarded to WCo 10/15/79

9

OCT 15 1979

Jesse W. Jones
6139 Moonglow
Dallas, Texas 75241

Dear Mr. Jones:

This refers to your letter of September 17, 1979, requesting an advisory opinion concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act").

You have requested an opinion regarding past activity of the Progressive Voters League ("PVL") in receiving transfers in excess of $1,000 from state committees which are not registered with the Commission as "political committees". You suggest that PVL may be willing to transfer an amount equal to the amount received from the unregistered committees, from its Federal to its nonfederal account. However, at this time no funds are available in PVL accounts.

Under the Act and regulations, advisory opinion requests must present an issue concerning application of the Act to a specific factual situation that involves the requesting person. 2 U.S.C. §437f. The cited section enables the requestor to act and rely upon the opinion "in good faith" without being "subject to any sanction provided by" the Act. 2 U.S.C. §437f(b); see also 11 CFR 112.1, 112.5. This "good faith" reliance protection means that persons requesting an opinion must establish some potential jeopardy of committing a violation themselves in order to satisfy the standing requirement.

The situation presented in your request raises an issue regarding application of the Act's registration and reporting requirements to the unregistered state committees that transferred funds to your committee. Although you may be interested in how those unregistered committees can avoid coming within the Act, you do not set forth any facts establishing a basis for us to conclude that your committee may be in violation of the Act as a direct result of the failure of the state committees to register as political committees.

Thus you cannot properly obtain an advisory opinion concerning application of the Act or Commission regulations to your committee in the factual situation as presented.

I regret that the advisory opinion procedure is not available to respond to your request. The Commission or its staff may be in future contact with the unregistered state committees, or with your committee, to deal with these matters pursuant to the Commission's compliance procedures. See 2 U.S.C. §437g.

Sincerely yours,

William C. Oldaker
General Counsel

bcc: Tom Haselhorst

NBLitchfield:bwl:10/12/79

LAW OFFICES OF JAMES C. BARBER
318 MERCHANTS STATE BANK BUILDING
5217 ROSS AVENUE
DALLAS, TEXAS 75206

JAMES C. BARBER*
KENNETH H. MOLBERG
STEVEN B. THORPE

* BOARD CERTIFIED—PERSONAL INJURY TRIAL LAW
TEXAS BOARD OF LEGAL SPECIALIZATION

RECEIVED
FEDERAL ELECTION
COMMISSION
1979 NOV 2 AM 11:47

10

October 29, 1979

Mr. David Greevy
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20515

Re: 3SV1/79-29 and 3SV2/79-29
Campaign Victory 78 (Non-Federal) (Federal)

Dear Mr. Greevy:

This refers to the transfer by this committee to the Democratic Progressive Voters League certain amounts from our State and Federal accounts.

As you advised per your letter of May 18, 1979, total contributions by this committee exceeded $1,000.00 from both the State and Federal accounts. A review of the matter reveals, however, that our Federal account forwarded sums to the League in the amount of $759.52 -- well below the contribution limitation.

The remaining $9,540.48 came from the non-federal account and was not used for the purpose of influencing federal elections. I note, with some distress, that all contributions -- state and federal -- were reported on the League's FEC reports and that four contributions were lumped together and reported as two.

The state and federal monies were expended by this committee for the purpose of urging voters to support the Democratic ticket (see attachments). Without a doubt, the two races of importance during this election period were the Governor's race and the race of Dallas County Judge.

8104030207

As you know, our committee was told that the Voters League would effect a transfer of the monies inappropriately reported on their federal filing. I now understand that this has not been accomplished.

This treasurer has utilized his best efforts to comply with the Act. As far as I know, those efforts have been successful. In view of the circumstances, I would request that the commission seek its remedy through the Progressive Voter's League, inasmuch as this is where the problem occurred. It would appear that the League should probably amend its filing to reflect the actual circumstances surrounding these monies.

For your reference, I am enclosing earlier correspondence, as well as copies of canceled checks and other supporting documents.

Sincerely,

Kenneth H. Molberg

KHM:gr

8102028

1:6275018601 10/23 1978 32-663/1110

PAY TO THE ORDER OF Progressive Voters League $229.76

Two hundred twenty-nine & 76/100 DOLLARS

United NATIONAL BANK
MAIN AND AKARD/DALLAS, TEXAS 75201

PAID OCT 27 78

Kenneth H. Mathers

mailing

⑆1110⑆0663⑆ 00 1419 "00002976"

CAMPAIGN VICTORY '78 (Federal) No. 107

1:6275018601 October 17, 1978 32-663/1110

PAY TO THE ORDER OF Progressive Voters League $229.76

TWO HUNDRED TWENTY-NINE AND 76/100 DOLLARS

PAID

United NATIONAL BANK
MAIN AND AKARD/DALLAS, TEXAS 75201

OCT 26 78

UNITED NATIONAL BANK DALLAS, TEXAS

Kenneth H. Mathers

Mailing

⑆1110⑆0663⑆ 00 1419 "00002976"

Campaign Victory '78 (Federal)
5217 Ross Ave. Suite 318
Dallas, Tx. 75206

No. 105

PAID

9/24 1978 32-663/1110

PAY TO THE ORDER OF Progressive Voters League $300.00

Three hundred & no/100 DOLLARS

OCT 10 78

UNITED NATIONAL BANK DALLAS, TEXAS

United NATIONAL BANK
MAIN AND AKARD/DALLAS, TEXAS 75201

Kenneth H. Mathers

9/78 Rent HQ

⑆1110⑆0663⑆ 00 1419 "0000030000"

CAMPAIGN VICTORY 78 (STATE)
5217 ROSS AVE., SUITE 318 821-8640
DALLAS, TEXAS 75206

108

9 5 2 5 0 1 8 6 0 1 October 17 19 78 32-663 1110

PAY TO THE ORDER OF Progressive Voters League $4,770.24

FOUR THOUSAND SEVEN HUNDRED SEVENTY AND 24/100 ---------- DOLLARS

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

Mailing

CAMPAIGN VICTORY 78 (STATE)

Kenneth H. Mallory

⑆111006634⑆ 00 1398 7⑈ ⑈00004770 24⑈

NATIONAL BANK
MAIN AND AKARD/DALLAS, TEXAS 75208

CAMPAIGN VICTORY 78 (STATE)
5217 ROSS AVE., SUITE 318 821-8640
DALLAS, TEXAS 75206

109

9 6 2 5 0 1 8 6 0 1 10/23 1978 32-663 1110

PAY TO THE ORDER OF Progressive Voters League $4,770.24

Four thousand seven hundred seventy + 24/00 DOLLARS

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

mailing

CAMPAIGN VICTORY 78 (STATE)

Kenneth H. Mallory

⑆111006634⑆ 00 1398 7⑈ ⑈00004770 24⑈

NATIONAL BANK
MAIN AND AKARD/DALLAS, TEXAS 75208

8 1 0 2 3 0 2 8 3 0

August 27, 1979

Dr. Jesse Jones
Democratic Progressive Voters League
6139 Moonglow
Dallas, Texas 75241

Dear Dr. Jones:

This confirms our conversation of August 21, 1979, wherein I advised you of the problem that has arisen as a result of the Campaign Victory '78 Committee's contribution to the Progressive Voters League.

A review of my records indicates that our Federal account made the following contributions to the Progressive Voters League:

1. 9-26-78, $300 for office rent;

2. 10-17-78, $229.76 for reimbursement for political mailings supporting the democratic ticket; and

3. 10-23-78, $229.76, for the same reasons.

As I understand it, the Committee will effect a transfer of the $9,540.48 inappropriately reported on the PVL's Federal filing.

If I can be of any assistance, please advise. I hope this letter finds you doing well.

Sincerely,

Kenneth H. Molberg

KHM/mfm

8102028 1

August 27, 1979

Mr. David Gruey
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20515

Re: MUR 1/79-29 and MUR 2/79-29, Kaptain Victory '78 (Non-Federal)

Dear Mr. Gruey:

I am enclosing a copy of a letter which I have sent to Mr. Jesse Jones, President of the Progressive Voters League in Dallas. I believe it is self-explanatory, in that I have been advised that the $9,540.48 inappropriately reported on the Federal report for the PVL will now be transferred to an account not used to influence Federal elections. This is as it should be, inasmuch as the $9,540.48 was not used to influence Federal elections.

Our committee's sole contributions to the Progressive Voters League totaled $75.00.

Should you have any further requests of me, please advise.

Sincerely,

Kenneth M. Wolberg

KMW/mfm

Enclosure

8 1 0 3 0 2 8 3 2

LAW OFFICES OF JAMES C. BARBER
318 MERCHANTS STATE BANK BUILDING
5217 ROSS AVENUE
DALLAS, TEXAS 75206

JAMES C. BARBER*
KENNETH H. MOLBERG
STEVEN B. THORPE

* BOARD CERTIFIED—PERSONAL INJURY TRIAL LAW
TEXAS BOARD OF LEGAL SPECIALIZATION

TELEPHONE
214-821-8840

February 6, 1979

Mr. David U. Greevy
Federal Elections Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: Campaign Victory '78 (Federal)
Identification No. C001 01 972

Dear Mr. Greevy:

This is in response to your letter of January 29, 1979, a copy of which is attached for your reference, and to our phone conversation of February 6, 1979.

As I informed you, I had listed on line 22(c) of our October 10 quarterly report, and subsequent reports, that this Committee made in-kind contributions to several federal candidates. As I explained, I so listed this because I felt that our efforts on behalf of the entire party ticket would indirectly benefit those four federal candidates whose districts overlap Dallas County. (For names and addresses, see FEC Form 1.)

I am attaching copies of materials which indicate what we were involved with. As you can see, there are no federal candidates mentioned in these attachments, and I have not found any literature in which this Committee specifically supported a particular federal candidate.

I am taking the liberty of again reviewing campaign materials, and if I find any such materials prompted by this Committee which mentions a specific federal candidate directly, I will respond to the Commission accordingly.

Should you have any questions, I would ask that you please call me, as it has always been my intention of complying to the letter with Commission regulations.

8102302833

Thank you very much for your time in this matter.

Sincerely,

Kenneth H. Molberg, Treasurer
Campaign Victory '78 (Federal)

KHM:lg
Enclosure

81040302834

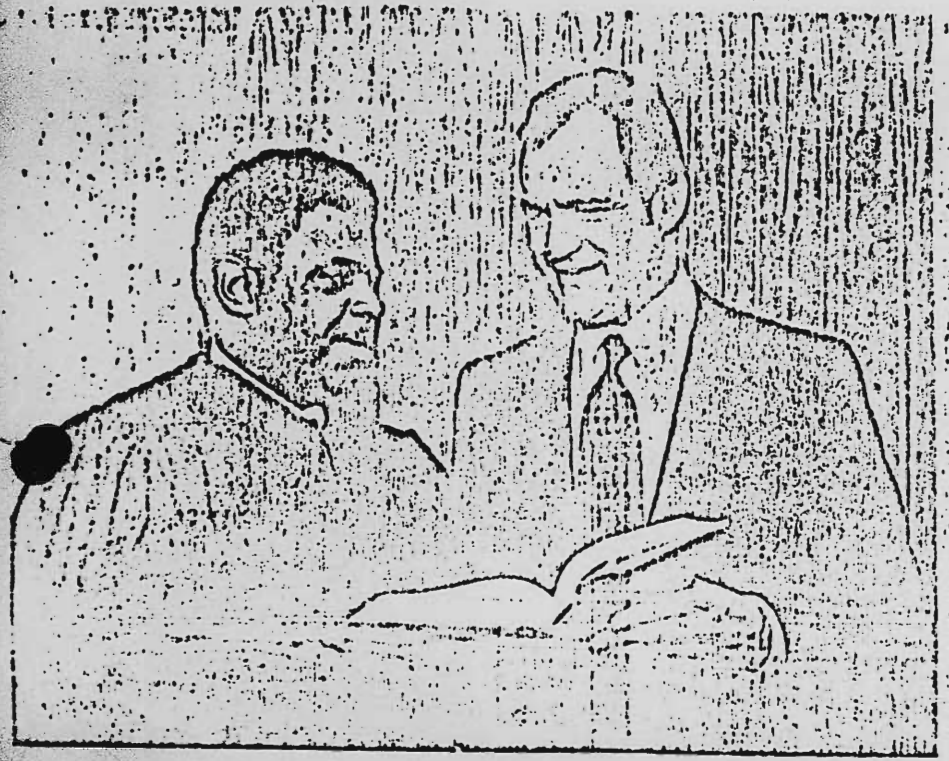
8104030283 5



Billboard

VOTE

TUESDAY, NOV.



Judge Berlaind Brashear and Garry Weber urge you to vote Democratic.

VOTE DEMOC

TO KEEP JUDGE BRA
AND ALL THE DEMO
WORKING FOR YOU!

PULL THE DEMOCRATI

It's the only way to insure the electic
Brashear, our only Black Criminal Cou
and all the Democrats

STICK WITH YOUR FRIENDS
VOTE FOR ALL THE DEMOCRATIC CANDIDATES
"THEY CARE ABOUT YOU"

VOTE

TUESDAY, NOV. 7

THE DEMOCRATIC WAY

Pol. Adv. paid for by campaign Victory 78, Kenneth H. Molberg, Treasurer, 5217 Ross Ave., Dallas, Texas 75206. Authorized by Dallas County Democratic Party.

★ ELITE NEWS ★

KEEP THE DEMOCRATIC TRADITION OF GOOD, HONEST GOVERNMENT.

Under Democratic leadership we have enjoyed good, honest state and local government. Our area is the envy of other parts of the country, and we have the Democratic tradition to thank. Help keep this high standard of good government by voting DEMOCRATIC Tuesday, Nov. 7.

VOTE

TUESDAY, NOV. 7

THE DEMOCRATIC WAY

Pol. Adv. paid for by Campaign Victory 78, Kenneth H. Mathers, Treasurer, 5217 Ross Ave., Dallas. Authorized by Dallas County Democratic Party.

The Shopping News
Wednesday, November 1, 1978 PAGE 15

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OFFICIAL NOTICE TO VOTERS

FROM

YOUR DALLAS COUNTY DEMOCRATIC PARTY

Ron Kessler, Chairman

ELECTION DAY IS TUESDAY, NOV. 7

7 AM-7 PM



PLEASE VOTE DEMOCRATIC TO KEEP JUDGE BERLAIND BRASHEAR

AND ALL OUR DEMOCRATIC FRIENDS WORKING FOR YOU!

PULL THE TOP LEVER DEMOCRAT

Paid for by Committee Victory 78
Kenneth Mayes, Treasurer

...ary, 1978
...ederal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 1 of 1 for Line Number 20(a)

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Campaign Victory '78 (Federal)

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Tycher Properties 2 Turtle Creek Village Suite 505 Dallas, Texas 75219	Office Rent Expenditure for: ☐ Primary ☒ General ☐ Other	9-26-78	$ 962.00
Progressive Voters League 777 S. R. L. Thornton Dallas, Texas 75203	Office Rent Expenditure for: ☐ Primary ☒ General ☐ Other	9-26-78	300.00
	Expenditure for: ☐ Primary ☐ General ☐ Other		
	Expenditure for: ☐ Primary ☐ General ☐ Other		
	Expenditure for: ☐ Primary ☐ General ☐ Other		
	Expenditure for: ☐ Primary ☐ General ☐ Other		
	Expenditure for: ☐ Primary ☐ General ☐ Other		
	Expenditure for: ☐ Primary ☐ General ☐ Other		

SUBTOTAL of expenditures this page (optional)	$
TOTAL this period (last page this line number only)	$ 1,262.00

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nuary, 1978
ederal Election Commission
25 K Street, N.W.
shington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 1 of 1 for Line Number 23(c)

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Campaign Victory '78 (Federal)

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Lynn & Associates Box 4553 Dallas, Texas 75208	Phone Bank Services Expenditure for: ☐ Primary ☒ General ☐ Other	10/10/78	$ 114.92
Progressive Voters League 777 S. R. L. Thornton 1st Floor, Dallas, Texas 75203	Costs of Democratic Mailing Expenditure for: ☐ Primary ☒ General ☐ Other	10/17/78 10/23/78	229.76 229.76
Blacks for Victory 133 Lancaster-Kiest Shopping Center Dallas, Texas 75216	Election Day Activities (GOTV, sound trucks) Expenditure for: ☐ Primary ☒ General ☐ Other	10/20/78	100.00
Dan Wicker 2523 Dunlowe Dallas, Texas 75228	Contract Services for Get-Out-The-Vote Expenditure for: ☐ Primary ☒ General ☐ Other	10/23/78	40.00
Computer Data Processing, Inc., Box 1259 Grand Prairie, Texas 75050	Listing, labels and Phone numbers Expenditure for: ☐ Primary ☒ General ☐ Other	10/23/78	16.20
	Expenditure for: ☐ Primary ☐ General ☐ Other		
	Expenditure for: ☐ Primary ☐ General ☐ Other		
	Expenditure for: ☐ Primary ☐ General ☐ Other		

SUBTOTAL of expenditures this page (optional)	$ 730.64
TOTAL this period (last page this line number only)	$1,261.64

RAD

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE 12/21/79

ANALYST Dug Greevy

TO: Office of General Counsel
ATTENTION: M. Bradon

TEAM CHIEF Bobby Werfel

COMPLIANCE REVIEW GB

THROUGH: STAFF DIRECTOR

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12/10/79

Texas Democratic Voter Participation Project

**PURPOSE: Information

Requests for Additional Information and a Surface Violation Letter were sent on December 19, 1979 for the April 10, '79 and July 10, '79 Reports for the following: 4,5

April 10

1. Krueger expenses--same problem as in referral 441a(d) 2
2. Particular for $1,000 expenditure 2
3. A $10,000 contribution from an individual 2

July 10

1. GOTV expenses--same problem as in referral 2
2. Krueger expenses--same problem as in referral 441a(d) 2

Note: See Memo to the File, 12/12/79 3

OUTCOME: (if applicable)

8104030284 2

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

Attachment 3 (22 pages)

...EA
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...ary, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 1 of 3 for 1
Line Number 14A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full: Dem. Vet. Proj.

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
David Hannah, Jr. P.O. Box 4 Houston, Tx. 77001		Occupation: real-estate ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	1-9-79	3,000.00
Receipt for: ☐ Primary ☐ General ☑ Other				
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
Rex C. Cauble Cauble Enterprises Denton, Tx. 76201	Cauble Enterprises	Occupation: self-employed ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	10,000.00
Receipt for: ☐ Primary ☐ General ☑ Other				
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
Louis A. Beecherl, Jr. 3801 Beverly Dr. Dallas, Tx. 75205	521-0521	Occupation: Chair, Tex. Oil & Gas ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	1,000.00
Receipt for: ☐ Primary ☐ General ☑ Other				
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
ARthur J. Wessely 2001 Bryan Tower, Suite Dallas, Tx. 75201	953 742-2396	Occupation: Independent Oil dealer ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	1,000.00
Receipt for: ☐ Primary ☐ General ☑ Other				
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
W. W. McAllister, Jr. 203 Terrell Rd. San Antonio, Tx. 78209	826-1005	Occupation: investments ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	500.00
Receipt for: ☐ Primary ☐ General ☑ Other				
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
W.W. McAllister, Jr. 203 Terrell Rd. San Antonio, Tx. 78209	826-1005	Occupation: investments ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	500.00
Receipt for: ☐ Primary ☐ General ☑ Other				
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
George P. Mitchell 3900 One Shell Plaza Houston, Tx. 77002		Occupation: geologists ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-22-79	2,000.00
Receipt for: ☐ Primary ☐ General ☑ Other				

SUBTOTAL of receipts this page (optional)	$ 18,000.00
TOTAL this period (last page this line number only)	$

2

...v. 1978
...Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 1 of 2 for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Dem. Val. Prog.

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Ruby Bading 334 Prince New Braunfels, Tx. 78130	reimbursement for services Expenditure for: ☐ Primary ☐ General ☑ Other	1-31-79	200.00
Marc Campos 8700 Broadway # 1131 Houston, Tx. 77061	reimbursement for GOTV travel expenses statewide Expenditure for: ☐ Primary ☐ General ☑ Other	1-31-79	1,000.00
Helen Sneed 614 W. 6th Austin, Tx. 78701	GOTV. Beaumont area Expenditure for: ☐ Primary ☐ General ☑ Other	1-31-79	200.00
Aransas County Ruby Hart - County Clerk Rockport, Tx. 78382	voter list expenses Expenditure for: ☐ Primary ☐ General ☑ Other	1-31-79	19.50
Comal County Gene L. Nuhn P.O. Box 329 New Braunfels, Tx. 78130	voter list expenses Expenditure for: ☐ Primary ☐ General ☑ Other	1-31-79	52.00
New Braunfels Herald 186 S. Castell New Braunfels, Tx. 78130	printing for Krueger expenses Expenditure for: ☐ Primary ☐ General ☑ Other	1-31-79	389.35
New Braunfels Travel Agency 373 Landa Plaza New Braunfels, Tx. 78130	travel expenses for Krueger Expenditure for: ☐ Primary ☐ General ☑ Other	1-31-79	367.00
San Antonio Light P.O. Box 161 San Antonio, Tx. 78291	advertising expense Expenditure for: ☐ Primary ☐ General ☑ Other	1-31-79	77.75

SUBTOTAL of expenditures this page (optional)	$ 2,306.10
TOTAL this period (last page this line number only)	$ [illegible]

FEC FORM 3 (REVISED January, 1978)
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 3 of 9 for Line Number 24

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Dem. Vet. Proj.

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Alamo Natl. Bank P.O. Box 1538 San Antonio, Tx. 78295	Master Charge expense for Bob Krueger Expenditure for: ☐ Primary ☐ General ☑ Other	3-13-79	3,000.00
City Water Board P.O. Box 2449 San Antonio, Tx. 78298	San Antonio GOTV Hdq. Water bill Expenditure for: ☐ Primary ☐ General ☑ Other	3-13-79	612.57
Helix Air Transport, Inc 9300 N. Central Exp. Dallas, Tx. 75231	Helicopter travel Krueger Expenditure for: ☐ Primary ☐ General ☑ Other	3-13-79	610.00
Hillo Package Store 1300 So. Lamar Austin, Tx. 78704	Krueger Party expense San Austin staff Expenditure for: ☐ Primary ☐ General ☑ Other	3-13-79	595.89
Gulf Coast Helicopter 4810 Comal Pearland, Tx. 77581	Krueger Helicopter expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-13-79	470.05
Upshur County J.B. Hill, Jr. Co. Clerk Upshur Courthouse Gilmer, Tx. 75644	voter list expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	142.00
Rio Air Ways Killeen Municipal Airport P.O. Box 636 Killeen, Tx. 76541	Krueger travel Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	156.00
A- Texas Ribbon Supply & Typewriter Co. 6901 N. Lamar Suite 133 Austin, Tx. 78752	GOTV Office Austin - Office supplies Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	157.50
SUBTOTAL of expenditures this page (optional)			$ 7,744.01
TOTAL this period (last page this line number only)			$

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...ral Election Commission
325 K Street, N.W.
...shington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 4 of 9 for
Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Democ. Vet. Prog.

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Travel Lodge 100 Villita St. San Antonio, Tx. 78205	GOTV meeting expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	198.02
Stripling Blake Bldg. Materials P.O. Box 9008 Austin, Tx. 78766	GOTV signs (stakes) Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	242.00
David R. Renegar Canal and D.St. SE. WA-21 Underground Plaza Washington D.C. 20155	Krueger printing Expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	357.20
A.E. Sound P.O. Box 6119 64 Chalmers Austin, Tx. 78762	GOTV sound equipment statewide Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	200.00
San Angelo Flight Service municipal airport Route 5, Box 5242 San Angelo, Tx. 76901	Krueger travel Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	385.50
Sherwin Williams Co. 5301 Everhart Corpus Christi, Tx. 78411	GOTV signs (stakes) Corpus Christi Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	631.55
Jerry Dougherty 158 El Mio #10 San Antonio, Tx. 78216	GOTV expense Bexar county Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	125.00
Stationers, Inc. 4245 Richmond Ave. Houston, Tx. 77027	Office equipment for GOTV Harris Co. Expenditure for: ☐ Primary ☐ General ☑ Other		141.51

SUBTOTAL of expenditures this page (optional)	$ 2,282.78
TOTAL this period (last page this line number only)	$

...v. 1978
...ral Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 5 of 9 for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Dem. Nat. Prty

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Individual Development Center 3401 Armory Rd. Wichita Falls, Tx. 76302	contract labor Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	125.98
Quality Inn 2915 I-40 East Amarillo, Tx. 79107	GOTV Breakfast meeting Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	80.25
Vierra Sound 501 S. Pecos San Antonio, Tx. 78207	GOTV sound equipment statewide (E-DAY) Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	76.93
Holiday Inn P.O. Box 7758 Longview, Tx 75602	GOTV meeting expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	63.30
Houston Executive Air Service 8601 Travelair Houston, Tx.	Krueger Board Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	50.16
Boston Flowers 2700 Canyon Dr. Amarillo, Tx. 79109	flowers for GOTV rally Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	49.88
R.B. Webb, Jr. 20720 Marguerite Bay City, Tx. 77414	GOTV expense travel reimbursement Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	48.00
Ramada Inn 410 South Texas Ave. College Station, Tx. 77840	GOTV meeting expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	43.30

SUBTOTAL of expenditures this page (optional)	$ 547.80
TOTAL this period (last page this line number only)	$

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

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 2 of 9 for Line Number 22A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Marriott Hotel 2101 Stemmons Freeway Dallas, Tx. 75207	GOTV meeting expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	37.10
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Saga Food Service Box 795 Station W. T. Station Canyon, Tx. 79016	GOTV food expense on Election day Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	25.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Sheraton Motor Inn 230 Summerhill Rd. Texarkana, Tx. 75501	GOTV meeting expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	24.13
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Doug Zabel for Congress 2nd St. Austin, Tx. 78701	Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	1,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Russell Stationery Co. P.O. Box 2688 Amarillo, Tx. 79105	Krueger printing expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	1,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Cambridge Survey Research 10 Moulton St. Cambridge, Mass. 02138	Krueger Hindu field Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	1,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
I.B.M. P.O. Box 19192 Kansas City, Missouri 64141	Krueger expense leasing equipment Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	1,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Texas Travelair 10803 Gulfdale, Suite 14 San Antonio, Tx. 78216	Krueger travel expense Expenditure for: ☐ Primary ☐ General ☑ Other		729.00
SUBTOTAL of expenditures this page (optional)			$ 4835.23
TOTAL this period (last page this line number only)			$

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ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 2 of 2
Line Number 22A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Dun & Bradstreet Box 188 Staten Island, N.Y. 10314	Krueger mailing expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-27-79	500.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Aztex Lumber P.O. Box 9114 Corpus Christi, Tx. 78408	GOTV signs (state) expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-27-79	1,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Munguia Printer P.O. Box 7387, Station A San Antonio, Tx. 78207	Krueger printing expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-27-79	3,147.16
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Southwestern Bell P.O. Box 2901 Austin, Tx. 78777	Krueger telephone expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-27-79	2,500.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Alamo National Bank P.O. Box 1538 San Antonio, Tx. 78295	Krueger Master Charge Expenditure for: ☐ Primary ☐ General ☑ Other	3-27-79	8,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Century II 35th & 4 Floor #4 North Natl. Bank Bldg. Fort Worth Tx. 76102	GOTV party expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-27-79	200.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Southern Union Gas P.O. Box 1268 Austin, Tx. 78785	Utilities Austin office Expenditure for: ☐ Primary ☐ General ☑ Other	3-27-79	7.99
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Abby Rento 6801 San Pedro Ave. San Antonio, Tx. 78216	San Antonio GOTV office expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-27-79	11.07
SUBTOTAL of expenditures this page (optional)			$ 15,366.22
TOTAL this period (last page this line number only)			$

...1978
...al Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 5 of 1 for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Zip Printing 307 East Seventh Amarillo, Tx. 79105	GOTV printing Expenditure for: ☐ Primary ☐ General ☑ Other	3-29-79	13.87
Kwik Kopy 118 West 5th St. Austin, Tx. 78701	GOTV printing Expenditure for: ☐ Primary ☐ General ☑ Other	3-29-79	21.77
Ann Wheeler 1507 W. Lynn Austin, Tx. 78704	travel reimbursement Expenditure for: ☐ Primary ☐ General ☑ Other	3-29-79	233.29
Beth Antonius 14122 Duncannon Dr. Houston, Tx. 77015	Houston GOTV expense and travel reimbursement Expenditure for: ☐ Primary ☐ General ☑ Other	3-29-79	272.50
John C Penland 302 Park Ln. Austin, Tx. 78704	salary expense Jan thru March Expenditure for: ☐ Primary ☐ General ☑ Other	3-29-79	200.00
ML Hughes 302 Park Ln. Austin, Tx. 78704	Salary expense Jan thru March Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	200.00
Al's Bar-b-que Barn 1220 West Ave. M Temple, Tx. 76501	GOTV rally Bell Co. Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	340.73
Stacy Waller 101 Hidden Hollow Kerrville, Tx. 78028	Krueger salary expense Expenditure for: ☐ Primary ☐ General ☑ Other		700.00
SUBTOTAL of expenditures this page (optional)			$ 1,982.15
TOTAL this period (last page this line number only)			$

...1978
...al Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Ruby Bading 334 Prince New Braunfels, Tx. 78130	K Mueger Salary expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-29-79	200.00
Janie Reaves Route 2, Box 50022 New Braunfels, Tx. 78130	K Mueger Salary expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-29-79	200.00
Lynda Hallmark 510 College Plano, Tx. 78643	K Mueger Salary expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-29-79	349.00
Ed Wendler 807 Brazos St. Suite 802 Austin, Texas 78701	K Mueger Salary expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-29-79	600.00
Corpus Christi Transit Co. P.O. Box 9277 Corpus Christi, Tx. 78408	Mondal Bus trip Voter registration rally Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	114.00
Tom Green Co. % Mrs. Oma Jones Tom Green Co. Court House San Angelo, Tx. 76902	Voter list expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	75.72
Charles A. Wolda & Assoc. 3100 Richmond, Suite 103 Houston, Tx. 77098	K Mueger expense Bumper Stickers Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	1207.50
Melissa Quinn 418 Saddle Tree New Braunfels, Tx. 78130	K Mueger Salary expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	200.00
SUBTOTAL of expenditures this page (optional)			$ 2,946.22
TOTAL this period (last page this line number only)			$ 38,242.51

...v, 1978
...al Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

(Use Separate Schedules for each numbered line).

Name of Candidate or Committee in Full
DEMOCRATIC VOTER PROJECT

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Helicopters Unlimited 8229 Travelair Houston, Texas	chartered helicopter	5/2/79	200.00
	Expenditure for: ☐ Primary ☒ General ☐ Other	4/23/79	405.00
Aquila & Priscilla Tents Rt. 1, Box 355 Waco, Texas 76710	rented tent	4/23/79	285.00
	Expenditure for: ☐ Primary ☒ General ☐ Other	6/1/79	1000.00
Aztec Lumber P.O. Box 9114 Corpus Christi, Texas 78408	yard signs	5/10/79	400.00
	Expenditure for: ☐ Primary ☒ General ☐ Other	5/2/79	406.36
Linda Hallmark 510 W. College Llano, Texas 78643	printing & typing	5/3/79	773.00
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Rosie Gonzales 109 W. French Place San Antonio, Texas 78212	Get Out the Vote		
	Expenditure for: ☐ Primary ☒ General ☐ Other	5/12/79	66.32
Corporate Aviation 7542 Major Houston, Texas 77061	chartered plane (Get Out the Vote)	6/1/79	4297.50
	" " (Krueger)	6/1/79	4297.50
	Expenditure for: ☐ Primary ☒ General ☐ Other		
Bill Wright 10919 Paulwood Houston, Texas 77071	Get Out the Vote		
	Expenditure for: ☐ Primary ☐ General ☐ Other	5/30/79	2700.00
Southwestern Bell Telephone P.O. Box 2901 Austin, Texas 77777	telephone services (Krueger)	4/23/79	2000.00
	Expenditure for: ☐ Primary ☒ General ☐ Other	4/1/79	3000.00
SUBTOTAL of expenditures this page (optional)			$19,830.68
TOTAL this period (last page this line number only)			$

Federal Election Commission
[illegible] K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made) Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 3 of 5 for Line Number 20a

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
DEMOCRATIC VOTER PROJECT

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Unicopy 5555 N. Lamar Austin, Texas 78751	printing (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	5/3/79 4/23/79 4/1/79	300.00 600.00 400.00
I.B.M. P.O. Box 19192 Kansas City, Missouri 64141	equipment leases (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	4/23/79 4/1/79	1397.27 1775.65
	Expenditure for: ☐ Primary ☒ General ☐ Other		
Neiman, Hanks, Puryear 910 Lavaca Austin, Texas	office rent (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	5/12/79 4/23/79	700.00 379.25
Dallas Flight Center 7454 Freight Lane Dallas, Texas 75235	chartered plane (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	4/23/79	300.00
Galleria Plaza Hotel 5060 W. Alabama Houston, Texas 77056	reception (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	4/23/79 5/2/79 5/12/79	250.00 100.00 669.03
Texas Press Association 718 W. 5th Austin, Texas 78701	clipping service (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	4/23/79	314.00
Adolphus Hotel Dallas, Texas 75221	reception (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	4/23/79	240.00
SUBTOTAL of expenditures this page (optional)			$ 7425.20
TOTAL this period (last page this line number only)			$

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...Commission
...Street, N.W.
...ington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 4 of 5 for 20a
Line Number

(Use Separate Schedules for each numbered line).

Name of Candidate or Committee in Full
DEMOCRATIC VOTER PROJECT

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Western Union Electronic Mail 1600 Anderson Road McLean, Virginia 22101	mail grams (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	4/23/79 5/12/79	413.20 500.00
Cambridge Survey Research 10 Moulton St. Cambridge, Massachusetts 02138	polls (Krueger) Expenditure for: ☒ Primary ☐ General ☐ Other	6/1/79 4/23/79	5000.00 500.00
Apollo Printing P.O. Box 15637 Houston, Texas 77020	printing (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	4/23/79 5/3/79	500.00 346.10
Cruse Aviation 8501 Telephone Road Houston, Texas 77061	chartered plane (Krueger) Expenditure for: ☐ Primary ☐ General ☐ Other	5/3/79 4/23/79	300.00 400.00
Dun & Bradstreet P.O. Box 10545 Newark Post Office Newark, New Jersey 07101	polls (Krueger) Expenditure for: ☒ Primary ☐ General ☐ Other	5/2/79	200.00
Century II Ft. Worth Nat'l Bank Bldg. Ft. Worth, Texas 76106	reception (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	5/2/79 5/12/79	150.00 351.81
G.S.D.&M. 150 E. Riverside Austin, Texas 78704	production (printing & media- Krueger) Expenditure for: ☒ Primary ☐ General ☐ Other	6/1/79	28,298.81
Rio Airways P.O. Box 636 Killeen, Texas 76541	chartered plane (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	6/1/79	90.00
SUBTOTAL of expenditures this page (optional)			$37,049.92
TOTAL this period (last page this line number only)			$

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Commission
N.W.
D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

(Use Separate Schedules for each numbered line).

Name of Candidate or Committee in Full

DEMOCRATIC VOTER PROJECT

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Alamo National Bank P.O. Box 900 San Antonio, Texas 78293	payment of note (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	4/23/79 6/1/79 6/5/79 6/6/79	6500.00 25000.00 5000.00 3000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	6/19/79 6/22/79 6/28/79 6/28/79	25000.00 10000.00 5000.00 20000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period

SUBTOTAL of expenditures this page (optional)	$ 99,500.00
TOTAL this period (last page this line number only)	$ 169,616.39

Memo to the File:

Greevy
12/12/79
Re: Texas Democratic Voter Participation Project
Discussion with David Bolduc on 12/10/79

David Bolduc attended the workshop on party committees in Austin, TX, on 12/10/79. I was a member of the panel.

After the session, David indicated to me that he believed he had the matter regarding John Hill Campaign Committee just about taken care of. He said that $10,000 has been repaid, and that he hoped to repay the other $5,000 in a few days. I told him that we should be informed as soon as possible of any change in that situation.

He also stated that he was working on the amendments to the reports. In particular, he would be filing amendments to show the Krueger expenditures as coordinated expenditures.

He asked if there were any other problems in the committee's reports.

I had the opportunity to look at the committee's first and second quarter '79 reports last week. I noted the following problems, which I related to David.

<u>April 10</u>

1. Krueger expenses--same problem as before.

2. A $1,000 expenditure for which no purpose was provided.

3. A $10,000 receipt from an individual.

<u>July 10</u>

1. GOTV expenses--same problem as before.

2. Krueger expenses--same problem as before.

He said he would check into these matters. He did indicate that he had no knowledge of the $10,000 contribution, as that report was done by the former treasurer, John Pouland.

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In reply please refer to: 3SV1/79173DG

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 19, 1979

David Boldue, Treasurer
Texas Democratic Voter Participation Project
P.O. Box 1672
Austin, TX 78767

Dear Mr. Boldue:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, (the Act) as amended. During review of the April 10 Report of Receipts and Expenditures, we noticed an entry indicating that you may have received a contribution which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

The Act precludes an individual from making a political contribution to a multicandidate committee in any calendar year in excess of $5,000.

The Commission recommends that if you find the contribution you received was in excess of the limits set forth in the Act, you return the amount in excess of $5,000 to the donor. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution, your prompt refund of the excessive contribution to the donor will be taken into consideration by the Commission. Please notify the Commission of your determination on this matter by letter within fifteen (15) days from the date of this notification. If you have any questions concerning this matter, please do not hesitate to contact David Greevy (800)424-9530, our Reports Analyst assigned to you. Our local number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst

Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

Enclosure

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...RY. 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 1 of 3 for
Line Number 14A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full: Dem. Vet. Proj. — Texas Democratic Voter Participation Project

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
David Hannah, Jr. P.O. Box 4 Houston, Tx. 77001 Receipt for: ☐ Primary ☐ General ☑ Other	Occupation: real-estate ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	1-9-79	3,000.00
Full Name, Mailing Address and ZIP Code Rex C. Cauble Cauble Enterprises Denton, Tx. 76201 Receipt for: ☑ Primary ☐ General ☑ Other	Principal Place of Business: Cauble Enterprises Occupation: self-employed ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	10,000.00
Full Name, Mailing Address and ZIP Code Louis A. Beecherl, Jr. 3801 Beverly Dr. Dallas, Tx. 75205 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: 521-0521 Occupation: Chair, Tex. Oil & gas ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	1,000.00
Full Name, Mailing Address and ZIP Code Arthur J. Wessely 2001 Bryan Tower, Suite 953 Dallas, Tx. 75201 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: 742-2396 Occupation: Independent Oil dealer ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	1,000.00
Full Name, Mailing Address and ZIP Code W. W. McAllister, Jr. 203 Terrell Rd. San Antonio, Tx. 78209 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: 826-1005 Occupation: investments ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	500.00
Full Name, Mailing Address and ZIP Code W.W. McAllister, Jr. 203 Terrell Rd. San Antonio, Tx. 78209 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: 826-1005 Occupation: investments ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	500.00
Full Name, Mailing Address and ZIP Code George P. Mitchell 3900 One Shell Plaza Houston, Tx. 77002 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: Occupation: geologists ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-22-79	2,000.00
SUBTOTAL of receipts this page (optional)			$ 18,000.00
TOTAL this period (last page this line number only)			$

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 19, 1979

David Bolduc, Treasurer
Texas Democratic Voter Participation Project
P.O. Box 1672
Austin, Texas 78767

Dear Mr. Bolduc:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the April 10 & July 10 Reports of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact David Greevy in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

8104030285 9

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

TO: Texas Democratic Voter Participation Project

DATE: December 19, 1979

I.D. NO.: C00099267

REQUEST FOR ADDITIONAL INFORMATION FOR THE April 10 REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 1/1/79 THROUGH 3/31/79, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Detailed Summary (Page 2) Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Schedule Totals: ___ disagree with Detailed Summary (Page 2) or ___ omitted

___ Date(s): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Full Name(s)/Mailing Address(es): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Occupation/Principal Place(s) of Business: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Election Designation: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Aggregate Year-to-Date Totals: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Expenditure: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Receipt: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Inadequate Description of: ___ proceeds ___ dates ___ events ___ location of Schedule

___ Signature: ___ omitted ___ inadequate
11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

___ Other: Please See Page Two

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEC Form 12
(Revised November 1978)

Texas Democratic Voter Participation Project
April 10

The committee reports several expenditures the purposes of which include "Krueger". All or a portion of these expenditures may be allocable Federal candidate support and should be identified as such to include the amount, name, address, and office sought by each candidate on whose behalf such expenditures were made. If these expenditures constitute in-kind contributions, they should be reported on Schedule B, Line 22c. If they constitute expenditures made in accordance with 2 U.S.C. 441a(d), they should be reported on Schedule F, Line 24.

Please provide the purpose of expenditure for the payment made to Doug Zabel, as reported on Schedule B, Line 20a, Page 6 of 9.

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

TO: Texas Democratic Voter Participation Project

DATE: December 19, 1979

I.D. NO.: C00099267

REQUEST FOR ADDITIONAL INFORMATION FOR THE July 10 REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 4/1/79 THROUGH 6/30/79, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Detailed Summary (Page 2) Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Schedule Totals: ___ disagree with Detailed Summary (Page 2) or ___ omitted

___ Date(s): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Full Name(s)/Mailing Address(es): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Occupation/Principal Place(s) of Business: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Election Designation: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Aggregate Year-to-Date Totals: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Expenditure: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Receipt: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Inadequate Description of: ___ proceeds ___ dates ___ events ___ location of Schedule

___ Signature: ___ omitted ___ inadequate
11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

___ Other: Please See Page Two

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEC Form 12
(Revised November 1978)

Texas Democratic Voter Participation Project
July 10

On Line 20a of Schedule B, you disclose payments for GOTV expenses. Please be advised that Section 104.2(b)(9) of the Commission's Regulations requires the "particulars" to be provided for each expenditure which exceeds $100 in the aggregate to a single payee. Please amend your report to clarify the purposes of these expenditures.

The committee reports several expenditures the purposes of which include "Krueger". All or a portion of these expenditures may be allocable Federal Candidate support and should be identified as such to include the amount, name, address, and office sought by each candidate on whose behalf such expenditures were made. If these expenditures constitute in-kind contributions, they should be reported on Line 22c. If they constitute expenditures made in accordance with 2 U.S.C. 441a(d), they should be reported on Schedule F, Line 24.

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REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

M. Bonker

DATE January 10, 1980

ANALYST Dug Greevy DG

TO: Office of General Counsel

ATTENTION:

TEAM CHIEF Bobby Werfel

THROUGH: STAFF DIRECTOR B.L. for A.B.F.

COMPLIANCE REVIEW CB/KS

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12/10/79

Re: Texas Democratic Voter Participation Project

**PURPOSE: INFORMATION

Previous Update referred to possible excessive contribution from an individual, Rex C. Cauble.

The committee was informed of this possible violation and submitted a response which appears to be adequate.

3SV1/79173DG, 12/19/79, April 10 Report 1

Response received 1/8/80 2

OUTCOME: (if applicable)

8 1 0 4 0 0 2 8 5 4

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

Attachment 4 (4 pages)

In reply please refer to: 3SV1/79173DG

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 19, 1979

David Boldue, Treasurer
Texas Democratic Voter Participation Project
P.O. Box 1672
Austin, TX 78767

Dear Mr. Boldue:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, (the Act) as amended. During review of the April 10 Report of Receipts and Expenditures, we noticed an entry indicating that you may have received a contribution which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

The Act precludes an individual from making a political contribution to a multicandidate committee in any calendar year in excess of $5,000.

The Commission recommends that if you find the contribution you received was in excess of the limits set forth in the Act, you return the amount in excess of $5,000 to the donor. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution, your prompt refund of the excessive contribution to the donor will be taken into consideration by the Commission. Please notify the Commission of your determination on this matter by letter within fifteen (15) days from the date of this notification. If you have any questions concerning this matter, please do not hesitate to contact David Greevy (800)424-9530, our Reports Analyst assigned to you. Our local number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst

Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

Enclosure

9104030865

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 1 of 3 for Line Number 14A

(Use Separate Schedules for each numbered line)

Candidate or Committee in Full: Texas Democratic Voter Participation Project

Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
David Hannah, Jr. P.O. Box 4 Houston, Tx. 77001 Receipt for: ☐ Primary ☐ General ☑ Other	Occupation: real-estate ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	1-9-79	3,000.00
Full Name, Mailing Address and ZIP Code Ray C. Cauble Cauble Enterprises Denton, Tx. 76201 Receipt for: ☑ Primary ☐ General ☑ Other	Principal Place of Business: Cauble Enterprises Occupation: self-employed ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	10,000.00
Full Name, Mailing Address and ZIP Code Louis A. Beacherl, Jr. 3801 Beverly Dr. Dallas, Tx. 75205 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: 521-0521 Occupation: Chair. Tex. Oil & gas ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	1,000.00
Full Name, Mailing Address and ZIP Code Arthur J. Wessely 2001 Bryan Tower, Suite Dallas, Tx. 75201 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: 953 742-2396 Occupation: Independent Oil dealer ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	1,000.00
Full Name, Mailing Address and ZIP Code W. W. McAllister, Jr. 203 Terrell Rd. San Antonio, Tx. 78209 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: 826-1005 Occupation: investments ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	500.00
Full Name, Mailing Address and ZIP Code W.W. McAllister, Jr. 203 Terrell Rd. San Antonio, Tx. 78209 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: 826-1005 Occupation: investments ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	500.00
Full Name, Mailing Address and ZIP Code George P. Mitchell 3900 One Shell Plaza Houston, Tx. 77002 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: Occupation: geologists ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-22-79	2,000.00
SUBTOTAL of receipts this page (optional)			$ 18,000.00
TOTAL this period (last page this line number only)			$

DAVID BOLDUC
ATTORNEY AT LAW
1210 NUECES ST., SUITE 100
AUSTIN, TEXAS 78701
(512) 477-1187

RECEIVED
FEDERAL ELECTION
COMMISSION
'80 JAN 8 PM 12:09

2

January 4, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas J. Haselhorst
Federal Election Commission
Washington, D.C. 20463

Re: Texas Democratic Voter Participation Project
3SV1/79173DG

Dear Mr. Haselhorst:

With regard to your request for information on the Project's April 10 report, after a conversation with Mr. Cauble it has become apparent that the transaction in question was reported incorrectly by the previous treasurer. This should have been shown as a $5,000.00 contribution from Mr. Cauble and a $5,000.00 contribution from Mrs. Rex C. Cauble at the same address, occupation housewife.

I apologize for any inconvenience this may have caused. Please note the correct spelling of my name and the correct address above.

Yours truly,

DAVID BOLDUC

DB:mkm

8104030286 7

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD M. Brown

DATE January 23, 1980

ANALYST Dug Groovy

TO: Office of General Counsel
ATTENTION:

TEAM CHIEF Bobby Werfel 1/23/80

COMPLIANCE REVIEW CC/as

THROUGH: STAFF DIRECTOR JHP.

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12/10/79

Texas Democratic Voter Participation Project

**PURPOSE: Information

Response received regarding possible in-kind contributions and GOTV expenses, 1/14/80, April 10 and July 10 Reports 1

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

Attachment 5 (2 pages)

8104302859

DAVID BOLDUC
ATTORNEY AT LAW
1210 NUECES ST., SUITE 100
AUSTIN, TEXAS 78701
(512) 477-1187

January 14, 1980

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

Re: Texas Democratic Voter Participation Project
C 00099267
April 10 Report
July 10 Report

Dear Sir:

With regard to your communication of December 19, 1979, the "Krueger" expenditures appear to be §441a(d) expenditures. I am in the process of amending the Project's reports to report all of these correctly, and will forward them to you when they are complete.

The expenditure to Doug Zabal is apparently also a §441a(d) expenditure and will be reported with the rest.

As you know, I am also attempting to do the same with the "GOTV" expenditures.

Yours truly,

DAVID BOLDUC

DB:mkm

8 9 0 0 3 0 0 4 4 8 3 6

REPORTS ANALYSIS REFERRAL DATE

*ORIGIN: RAD

M Brown

DATE February 7, 1980

ANALYST Dug Greevy

TO: Office of General Counsel
ATTENTION:

TEAM CHIEF Bobby Werfel

COMPLIANCE REVIEW CB/BS

THROUGH: STAFF DIRECTOR

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12/10/79

Texas Democratic Voter Participation Project

**PURPOSE: Information

The $15,000 contribution from the John Hill Campaign Committee to the Texas Democratic Voter Participation Project was refunded.

1

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

Attachment 6 (4 pages)

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SCHEDULE B
VISED
uary, 1978
eral Election Commission
35 K Street, N.W.
shington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating Expenditures, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 1 of 1
Line Number 21(a)

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Texas Democratic Voter Participation Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure / Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
John Hill Campaign Fund 300 W. 6th Austin, Texas 78701	refund of contribution ☐ Primary ☐ General ☐ Other	11/28/79 12/11/79	$10,000.00 5,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period

SUBTOTAL of expenditures this page (optional)	$ 15,000.00
TOTAL this period (last page this line number only)	$ 15,000.00

REPORTS ANALYSIS REFERRAL [redacted]ATE

D-550

*ORIGIN: RAD

M Brown

DATE February 7, 1980

ANALYST Dug Greevy

TO: Office of General Counsel
ATTENTION:

TEAM CHIEF Bobby Harfst

COMPLIANCE REVIEW OB/E

THROUGH: STAFF DIRECTOR OSP

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12/10/79

John Hill Campaign Committee

**PURPOSE: Information

The $15,000 contribution from the John Hill Campaign Committee to the Texas Democratic Voter Participation Project was refunded.

1

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

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...
...
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...
...E K Street, N.W.
...ington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 1 of 1 for Line Number 21(a)

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Texas Democratic Voter Participation Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
ohn Hill Campaign Fund 00 W. 6th ustin, Texas 78701	refund of contribution Expenditure for: ☐ Primary ☐ General ☐ Other	11/28/79 12/11/79	$10,000.00 5,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (optional)			$ 15,000.00
TOTAL this period (last page this line number only)			$ 15,000.00

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

M. Brown

DATE March 28, 1980

ANALYST Dug Greevy

TO: Office of General Counsel
ATTENTION:

TEAM CHIEF Bobby Werfel

COMPLIANCE REVIEW

THROUGH: STAFF DIRECTOR

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12/10/79

Texas Democratic Voter Participation Project

**PURPOSE: Information

Second Letter, RFAI, 3/4/80 (Copy of original RFAI attached)	1
Telecon: Greevy with Bolduc, 3/12/80	2
Response received, 3/17/80, Adequate	3

8104302874

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

Attachment 7 (6 pages)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 4, 1980

David Bolduc, Treasurer
Texas Democratic Voter Participation
Project
1210 Nueces, Suite 1000
Austin, Texas 78701

REFERENCE: October 10 Quarterly Report (7/1/79 - 9/30/79)

Dear Mr. Bolduc:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated January 14, 1980. That notice requested information essential to full public disclosure of your Federal election financial activity and to assure compliance with provisions of the Federal Election Campaign Act (the Act).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to take legal action to insure compliance with the Act.

If you should have any questions related to this matter, please contact David Greevy on our toll free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

Thomas J. Haselhorst

Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

8104302875

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JAN 14 1980

David Bolduc, Treasurer
Texas Democratic Voter Participation Project
1210 Nueces, Suite 100
Austin, TX 78701

Dear Mr. Bolduc:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the October 10 Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact David Greevy in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

8104030287 6

1325 K Street, N.W.
Washington, D.C. 20463

TO: Texas Democratic Voter Participation Project DATE: JAN 14 1980

I.D. NO.: C00099267

REQUEST FOR ADDITIONAL INFORMATION FOR THE October 10 REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 7/1/79 THROUGH 9/30/79. PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (X):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Detailed Summary (Page 2) Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Schedule Totals: ___ disagree with Detailed Summary (Page 2) or ___ omitted

___ Date(s): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Full Name(s)/Mailing Address(es): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Occupation/Principal Place(s) of Business: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Election Designation: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Aggregate Year-to-Date Totals: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Expenditure: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Receipt: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Inadequate Description of: ___ proceeds ___ dates ___ events ___ location of Schedule

___ Signature: ___ omitted ___ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

___ Other: The committee reports an expenditure the purpose of which is listed as, "Payment of note (Krueger)." Please state whether this constitutes an in-kind contribution or an expenditure made in accordance with 2 U.S.C. 441a(d) on behalf of a federal candidate.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-4048 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEC Form 12
(Revised November 1978)

Telecon:

Greevy with David Bolduc
Texas Democratic Voter Participation Project
512-477-1187
3/12/80

DB called this day. He stated:

1. The committee is considering terminating and opening a new committee. What should be done? I stated that a termination report would be filed, and that it would cover 1/1/80-effective date of termination. In addition, the committee would not be able to have any outstanding debts or obligations, if it wished to terminate. Further, the committee should provide a statement regarding disposition of residual funds if they are any funds left on hand. I suggested that were this to be done, the new committee should register prior to the termination of the present committee. At the time of registration, both committees should file 1 amendments to show affiliation. By so doing, the multicandidate status of the present committee would pass on to the new committee.

2. He stated that he is working on the amendments. All of the reports will be completely amended, and the 441a(d) activity will be explicitly provided. He has some reports completed at this time, but he was waiting until they were all done before sending any in. I suggested that he send in what he has now.

3. The State party received a letter from FEC concerning possible 433 and 434 problems. I was not familiar with the letter, so I asked him to get a copy of it and give me a call when he had it.

4. He will be sending the completed amendments shortly.

8104302878

DAVID BOLDUC
ATTORNEY AT LAW
1210 NUECES ST., SUITE 100
AUSTIN, TEXAS 78701
(512) 477-1187

RECEIVED
FEDERAL ELECTION
COMMISSION

'80 MAR 17 AM 9:15

March 11, 1980

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

Re: Texas Democratic Voter Participation Project
#C00099267; Reports 7/1/79 - 9/30/79

Dear Mr. Potter:

With regard to your letter of January 14, 1980, the expenditure listed as "Payment of note (Krueger)" constitutes an expenditure made in accordance with 2 U.S.C. § 441a(d) on behalf of Robert (Bob) Krueger, a candidate for the U. S. Senate.

As you know, I am in the process of amending all of this committee's reports and will forward this one to you with the rest.

Yours truly,

DAVID BOLDUC

DB:mkm

8003150257
810402872

RAD Referral

M. Brown

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE May 30, 1980

ANALYST DU Greevy

TO: OGC

ATTENTION:

TEAM CHIEF Bobby Werfel

COMPLIANCE REVIEW Wade McArthur
Peggy Sims

THROUGH: STAFF DIRECTOR A.L. for C.D.R.

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12-10-79

John Hill Campaign Committee

**PURPOSE: Information

Telecon: Greevy with Marion Sanford, 5/23/80

8 1 0 4 0 0 2 8 9 0

OUTCOME: (if applicable)

Attachment 8

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION. or RESULTS OF RAD ACTION, as appropriate.

Attachment 8 (4 pages)

Telecon:

Greevy with Marion Sanford
5/23/80
713-651-2510

Re: Bill Hobby Campaign Committee
John Hill Campaign

MS stated that he was contacted by the Hobby Committee concerning the letter dated 5/12/80. He has also been in contact with Jim Bushala of the Hill Committee. He has been asked to help straighten the matters out.

Hobby--I told him why the letter was sent. I stated that there appear to be three alternatives available, if in fact the committee does qualify as a political committee.

1. Register and report for the period 9/1/78-10/23/78.

   He stated that they did not want to do this because:
   A. There may be a problem with contribution limitations. Although the committee would not have accepted any corporate/union funds, it may have received more than $5,000 from an individual(s).
   B. The committee may have accepted partnership contributions. The problem here would be the break downs of the partners' shares.
   C. The extreme amount of problems in trying to put the information together.

2. Request refunds from the recipient committees.

   He stated they could do this, but the recipient committees may not want to provide the refunds because of the upcoming elections.

3. Have the recipient committees transfer to State and local accounts enough funds so that the remaining amount of funds contributed by Hobby Committee does not exceed $1,000.

   He stated this may be a good option, as the committees are amassing funds now, and it would not hurt them to transfer the funds to State and local accounts.

He said he would contact both the State committee and the Harris County committee to see if this might work. In the absence of this, he plans to send a letter stating that the funds were intended to be used in connection with the State-wide race.

After he indicated that this was the intent for the use of the funds, I suggested that he write a letter to that effect, if the other alternative did not work. I stated that I did not know how the Commission would respond to this, but from my point of view, it appears that the committee did qualify as a political committee. The alternatives above are those given to such

8102302881

unregistered committees. Beyond those alternatives, I am not in a position to assess how any other response would be viewed by the Commission.

He stated that he understood this, and that he would attempt to have the recipient committees transfer the funds to State and local accounts.

I asked him to send a letter as soon as possible on the matter, but preferably after any discussion with the recipient committees. He stated that he would be in contact with them today, and that we would hear from him very shortly.

Hill--We went over pretty much of the same information as with the Hobby situation. I stated the same three alternatives were available.

I stated further that the Texas Democratic Voter Participation Project had refunded the $15,000 received from the Hill committee. Therefore, he would not have to be concerned with that. We discussed the amounts received by Bexar County, Harris County, and Dallas County.

I also reviewed my conversations with Jim Bushala, and the responses he received from Jones (no response), Krier (no funds available to transfer), and Stanley (no funds available to transfer).

He said he would contact the committees again, as they may have funds on hand at this point in time.

He also said that he believes some of the receipts were payments for services/items purchased by Hill from the party committees. I stated that depending on the nature of the services/items, we may not view the payments as expenditures. I also said that the amount (usual and normal charge) may have a bearing on this.

He said he would check on this and get back to me. He was aware that Jon Lindsay and Jim Baker were in somewhat of the same fix, and he asked if there were any others. I told him that I did not know.

He indicated that were this matter not to be cleared up with the transfer alternative, he would probably send a letter concerning the itent for the use of the funds, as described in the Hobby conversation above. Statements regarding payments for services/ items would also be made if they were applicable.

I told him that were these statements to be made regarding such payments, we should also have a statement regarding the amount paid. I indicated that were the payment to be greater than the usual and normal charge, that amount in excess of the usual and normal charge would probably be considered a contribution.

He finally indicated that he would be in contact with Jim Bushala on this situation.

He wants to get these things cleared up. He will be out of town next week, but if things aren't resolved by then, I will be contacted by John Kuhl.

8100402832

Please note: Sanford, in my previous conversations with him, appeared to be representing Hobby and the Harris County Democratic Voter Project.

In this conversation, he indicated that he would be working for both Hill and Hobby.

8104030283

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PAY TO THE ORDER OF Progressive Voters League $229.76

Two hundred twenty-nine & 76/100 DOLLARS

United NATIONAL BANK
MAIN AND AKARD/DALLAS, TEXAS 75201

PAID
OCT 26 78

Kenneth H. Mallory

mailing

⑆1110⑆0663⑆ 00 1419 "00000 22976"

CAMPAIGN VICTORY '78 (Federal) No. 107

1:1 0 2 7 5 4 2 5 7 0 1 8 6 0 ! October 17, 1978 32-663 1110

PAY TO THE ORDER OF Progressive Voters League $229.76

TWO HUNDRED TWENTY-NINE AND 76/100 DOLLARS

United NATIONAL BANK
MAIN AND AKARD/DALLAS, TEXAS 75201

PAID
OCT 26 78
UNITED NATIONAL BANK
DALLAS, TEXAS

Kenneth A. Mallory

Mailing

⑆1110⑆0663⑆ 00 1419 "00000 22976"

Campaign Victory '78 (Federal)
5217 Ross Ave. Suite 318
Dallas, Tx. 75206

No. 105

PAID
OCT 16 78
UNITED NATIONAL BANK
DALLAS, TEXAS

PAY TO THE ORDER OF Progressive Voters League 9/24 1978 32-663 1110

$300.00

Three hundred & no/100 DOLLARS

United NATIONAL BANK
MAIN AND AKARD/DALLAS, TEXAS 75201 2-663

Kenneth A. Mallory

9/78 Rent HQ ⑆1110⑆0663⑆ 00 1419 "00000 30000"

Attachment 9 (2 pages)

CAMPAIGN VICTORY 78 (STATE)
5217 ROSS AVE., SUITE 318 821-8840
DALLAS, TEXAS 75206

108

9 6 2 7 5 0 1 8 6 0 !

October 17 1978 32-663 1110

PAY TO THE ORDER OF Progressive Voters League $4,770.24

FOUR THOUSAND SEVEN HUNDRED SEVENTY AND 24/100 ---------- DOLLARS

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

Mailing	

CAMPAIGN VICTORY 78 (STATE)

Kenneth H. Mathers

Union National Bank
Main and Akard/Dallas, Texas 75202

⑆111006634⑆ 00 1398 7⑈ ⑈00004770 24⑈

CAMPAIGN VICTORY 78 (STATE)
5217 ROSS AVE., SUITE 318 821-8840
DALLAS, TEXAS 75206

109

9 6 2 7 5 0 1 8 6 0 !

10/23 1978 32-663 1110

PAY TO THE ORDER OF Progressive Voters League $4,770.24

Four thousand seven hundred seventy + 24/00 DOLLARS

OCT 25 78

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

-mailing	

CAMPAIGN VICTORY 78 (STATE)

Kenneth H. Mathers

Union National Bank
Main and Akard/Dallas, Texas 75202

⑆111006634⑆ 00 1398 7⑈ ⑈00004770 24⑈

⑆113028885⑆ 8 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David Bolduc
Texas Democratic Voter
Participation Project
1210 Nueces Street
Suite 100
Austin, Texas 78701

Re: MUR 1104

Dear Mr. Bolduc:

The Federal Election Commission notified you in a letter dated September 14, 1979, that there was reason to believe your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act").

Upon further review of the information available to the Commission, the Commission determined, on , 1980, that there is reason to believe that your committee has violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from the John Hill Campaign Committee. A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

The Commission recognizes that you are presently preparing disclosure report amendments with regard to the Commission's September 14, 1979 reason to believe finding and which will include specific purposes for each get-out-the-vote and voter registration expenditure and which will specify which expenditures were § 441a(d) expenditures made on behalf of Robert Krueger. We request that you submit the amendments to the Commission within ten days of your receipt of this letter.

We acknowledge receipt of your written response which was dated November 13, 1979. In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and

Attachment 10 (4 pages)

proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Michele D. Brown, the staff member assigned to this matter at (202)523-4175.

Sincerely,

Enclosures

1. Notification of Reason to Believe Finding
2. Procedures

8104302897

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE:

MUR # 1104
STAFF MEMBER & TEL. NO.
Michele Brown (202)523-4175

RESPONDENT: Texas Democratic Voter Participation Project

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

The Commission alleged that the Texas Democratic Voter Participation Project (the "Texas Committee") 1) failed to disclose, as required by 2 U.S.C. § 434, the particulars for its voter registration and get-out-the-vote expenditures and failed to disclose, also as required by § 434, whether its expenditures made on behalf of Robert Krueger were expenditures in accordance with 2 U.S.C. § 441a(d) or were in-kind contributions; 2) received contributions from the John Hill Campaign Committee and Rex Cauble, an individual, each in excess of the contribution limitations set forth in 2 U.S.C. § 441a(a)(1)(C), in violation of 2 U.S.C. § 441a(f), and; 3) failed to disclose the purpose of a $1,000 expenditure.

FACTUAL BASIS AND LEGAL ANALYSIS

The Reports Analysis Division sent to the Texas Committee on June 18, 1979, a request for additional information about the voter registration, get-out-the-vote, and Robert Krueger expenditures. With regard to the excessive contribution from the John Hill Campaign Committee, the Reports Analysis Division sent a letter to the Texas Committee on July 19, 1979. After the Commission failed to receive a response to the June 18th request, the Commission determined on September 14, 1979, that there was reason to believe that the Texas Committee had violated 2 U.S.C. § 434.

The Texas Committee received a contribution of $15,000 from the John Hill Campaign Committee. 2 U.S.C. § 441a(a)(1)(C) allows a committee to contribute only $5,000 to any other political committee in any calendar year. The Texas Committee's acceptance of this excessive contribution constitutes a violation of 2 U.S.C. § 441a(f) which states that a political committee shall not knowingly accept any contribution in violation of the provisions of section 441a.

8104020898

With regard to the possible excessive contribution from Mr. Cauble, the Texas Committee has submitted a letter stating that the contribution was incorrectly reported. The contribution should have been reported as two contributions: one from Mr. Cauble and one from Mrs. Cauble. The Commission has determined to take no further action on this particular matter because of the explanation given by the Texas Committee.

Based on the foregoing analysis, the Federal Election Commission has found:

1. reason to believe the Texas Committee has violated 2 U.S.C. § 434;

2. reason to believe the Texas Committee has violated 2 U.S.C. § 441a(f).

8104030289

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jim Bushala, Jr.
Hughes and Hill
1200 American Bank Tower
Austin, Texas 78701

Re: MUR 1104

Dear Mr. Bushala:

The Federal Election Commission notified your client, John Hill Campaign Committee, in a letter dated July 16, 1979, that there was reason to believe the Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act").

Upon further review of the information available to the Commission, the Commission determined on , 1980, that there is reason to believe that your client has violated 2 U.S.C. § 441a(a)(1)(C) by contributing $15,000 to the Texas Democratic Voter Participation Project. A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

With regard to the Commission's July 16, 1979 finding of reason to believe that your client violated 2 U.S.C. §§ 433 and 434, the Commission requests that your client file a Statement of Organization and disclosure reports for the period in which the transfers were made to the Texas Democratic Voter Participation Project, the Bexar County Democratic Victory Fund, the Democratic Voter Project and the Dallas County Democratic Progressive Voters League.

In the absence of any additional information which demonstrates that no further action should be taken against your client, the Commission may find probable cause to believe that a violation has occurred and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

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Attachment 11 (4 pages)

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Micheld D. Brown, the staff member assigned to this matter at (202)523-4175.

Sincerely,

Enclosures

1. Notification of Reason to Believe Finding
2. Procedures

8104030289 1

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE:

MUR # 1104
STAFF MEMBER & TEL. NO.
Michele Brown (202)523-4175

RESPONDENT: John Hill Campaign Committee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

It is alleged that the John Hill Campaign Committee might be a political committee as defined by 2 U.S.C. § 431(d) of the Federal Election Campaign Act because it transferred $15,000 to the federal account of the Texas Democratic Voter Participation Project, $525.70 to the federal account of the Bexar County Democratic Victory Fund, $2,198 to the federal account of the Democratic Voter Project and $2,100 to the federal account of the Dallas County Democratic Progressive Voters League. It is further alleged that the contribution to the Texas Democratic Voter Participation Project was in an amount exceeding the limit on contributions set forth in 2 U.S.C. § 44la(a)(1)(C).

FACTUAL BASIS AND LEGAL ANALYSIS

Section 431(d) defines a political committee as:

> "any committee, club, association, or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding $1,000."

Because the contributions made by the John Hill Campaign Committee were deposited into the federal accounts of the Texas Democratic Voter Participation Project, the Bexar County Democratic Victory Fund, the Democratic Voter Project and the Dallas County Democratic Progressive Voters League, the John Hill Campaign Committee would be considered a political committee and would, therefore, have to file a Statement of Organization and disclosure reports as required by 2 U.S.C. §§ 433 and 434. The committee did not comply with these requirements, therefore, the Commission, on July 16, 1979, found reason to believe that the John Hill Campaign Committee violated 2 U.S.C. §§ 433 and 434.

Section 44la(a)(1)(C) limits contributions from a committee to any other political committee to $5,000. The $15,000 contribution exceeds this limit and would thus constitute a violation of 2 U.S.C. § 44la(a)(1)(C).

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Based on the foregoing analysis, the Federal Election Commission has found:

1. reason to believe the John Hill Campaign Committee violated 2 U.S.C. §§ 433 and 434, and;

2. reason to believe the John Hill Campaign Committee violated 2 U.S.C. § 441a(a)(1)(C).

8104030289 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kenneth H. Molberg
Campaign Victory '78 (Non-Federal)
318 Merchants State Bank Building
5217 Ross Avenue
Dallas, Texas 75206

Re: MUR 1104

Dear Mr. Molberg:

The Federal Election Commission notified you in a letter dated July 16, 1979, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act").

Upon further review of the information available to the Commission, the Commission determined, on , 1980, that there is reason to believe that your committee has violated 2 U.S.C. § 441a(a)(1)(C) by making a contribution to the Dallas County Democratic Progressive Voters League in excess of the contribution limitations. A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

Under the Act, you have an opportunity to demonstrate that no further action should be taken against your committee in connection with this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Also in connection with this matter, please submit answers to the enclosed interrogatories. Where appropriate, statements should be submitted under oath. Your

Your response must be submitted within ten days of your receipt of this letter. If no response is received within ten days, the Commission may find probable cause to believe that a

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Attachment 12 (4 pages)

violation has occurred and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Michele D. Brown, the staff member assigned to this matter at (202)523-4175.

Sincerely,

Enclosures

1. Notification of Reason to Believe Findings
2. Procedures
3. Interrogatories

8104302895

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE:

MUR NO# 1104
STAFF MEMBER & TEL. NO.
Michele Brown (202)523-4175

RESPONDENT: Campaign Victory '78 (Non-Federal)

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

It is alleged that Campaign Victory '78 (Non-Federal) made a contribution of $9,540.48 to the federal account of the Dallas County Democratic Progressive Voters League and, therefore, is a political committee which should have filed a Statement of Organization and disclosure reports with the Commission. It is further alleged that this contribution to the Dallas County Democratic Progressive Voters League was in an amount exceeding the limit on contributions set forth in 2 U.S.C. § 441a(a)(1)(C).

FACTUAL BASIS AND LEGAL ANALYSIS

Section 431(d) defines a political committee as:

> "any committee, club, association, or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding $1,000."

Because the contribution made by Campaign Victory '78 (Non-Federal) was deposited into the federal account of the Dallas County Democratic Progressive Voters League, Campaign Victory '78 (Non-Federal) would be considered a political committee and would, therefore, have to file a Statement of Organization and disclosure reports as required by 2 U.S.C. §§ 433 and 434. Campaign Victory '78 (Non-Federal) did not comply with these requirements, therefore, the Commission on July 16, 1979, found reason to believe that Campaign Victory '78 (Non-Federal) violated 2 U.S.C. §§ 433 and 434.

Section 441a(a)(1)(C) limits contributions from a committee to any other political committee to $5,000. The $9,540.48 contribution exceeds this limit and would thus constitute a violation of 2 U.S.C. § 441a(a)(1)(C).

Based on the foregoing analysis, the Federal Election Commission has found:

1. reason to believe Campaign Victory '78 (Non-Federal) violated 2 U.S.C. § 433 and 434, and;

2. reason to believe Campaign Victory '78 (Non-Federal) violated 2 U.S.C. § 441a(a)(1)(C).

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FEDERAL ELECTION COMMISSION

INTERROGATORIES

Kenneth H. Molberg **MUR 1104**

1. Did Campaign Victory '78 transfer funds from its non-federal account to the Dallas County Democratic Progressive Voters League? Please provide the date and amount and form (cash, check, money order) for each transfer.

2. Did the Dallas County Democratic Progressive Voters League solicit the contribution? If so, how did it do this? Who contacted Campaign Victory '78? Please provide copies of any solicitation letters which Campaign Victory '78 may have received. Were the solicitations directed specifically to either the federal account or the non-federal account? If so, to which one?

3. If the Dallas County Democratic Progressive Voters League did not solicit Campaign Victory '78 for a contribution, who made the decision for Campaign Victory '78 to contribute to Dallas County Democratic Progressive Voters League?

4. From which account (federal or non-federal) of Campaign Victory '78 were the funds drawn?

5. Were funds drawn from both accounts? If so, why was this done? How much money was drawn from each account?

6. How were the contributions (checks) transmitted to the Dallas County Democratic Progressive Voters League (by mail, hand-delivered, etc)? Please provide copies of any letters or memoranda which may have accompanied the checks.

7. Were the contributions made for any particular purpose? If so, what was the purpose? To your knowledge, was the money used for that purpose? How do you know this?

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Jesse W. Jones
Dallas County Democratic
Progressive Voters League
6139 Moonglow
Dallas, Texas 75241

Re: MUR 1104

Dear Dr. Jones:

This letter is to notify you that, 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 has violated 2 U.S.C. § 441a(f) of the Federal Election Campaign Act of 1971, as amended (the "Act"), by knowingly accepting an excessive contribution from Campaign Victory '78 (non-Federal). A report on the Commission's finding is attached for your information.

Under the Act, you have the opportunity to demonstrate that no further action should be taken against your committee in connection with this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Also in connection with this matter, please submit answers to the enclosed interrogatories. Where appropriate, statements should be submitted under oath.

Your response must be submitted within ten days of your receipt of this letter. If no response is received within ten days, the Commission may find probable cause to believe a violation has occurred and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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Attachment 1a (4 pages)

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address, and telephone number of such counsel and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Michele D. Brown, the staff member assigned to this matter at (202)523-4175. For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

Enclosures

1. Notification of Reason to Believe Finding
2. Procedures
3. Interrogatories

8104030289

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE:

MUR NO# 1104
STAFF MEMBER & TEL. NO.
Michele Brown (202)523-4175

RESPONDENT: Dallas County Democratic
Progressive Voters League

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

It is alleged that the Dallas County Democratic Progressive Voters League violated 2 U.S.C. § 441a(f) by accepting a contribution which exceeded the contribution limitations set forth in 2 U.S.C. § 441a(a)(1)(C).

FACTUAL BASIS AND LEGAL ANALYSIS

The Dallas County Democratic Progressive Voters League received a contribution of $9,540.48 from Campaign Victory '78 (Non-Federal). 2 U.S.C. § 441a(a)(1)(C) allows a committee to contribute only $5,000 to any other political committee in any calendar year. The Dallas County Democratic Progressive Voters League's acceptance of this illegal contribution constitutes a violation of 2 U.S.C. § 441a(f) which states that a political committee shall not knowingly accept any contribution in violation of the provisions of section 441a.

Based on the foregoing analysis, the Federal Election Commission has found reason to believe the Dallas County Progressive Voters League has violated 2 U.S.C. § 441(a)(f).

8104302900

FEDERAL ELECTION COMMISSION

INTERROGATORIES

Jesse W. Jones MUR 1104

1. Did Campaign Victory '78 transfer funds from its non-federal account to the Dallas County Democratic Progressive Voters League? Please provide the date and amount and form (cash, check, money order) for each transfer.

2. Did the Dallas County Democratic Progressive Voters League solicit the contribution? If so, how did it do this? Who contacted Campaign Victory '78? Please provide copies of any solicitation letters which the Dallas County Democratic Progressive Voters League may have sent to Campaign Victory '78. Were the solicitations directed specifically to either the federal account or the non-federal account? If so, to which one?

3. If the Dallas County Democratic Progressive Voters League did not solicit Campaign Victory '78 for a contribution, when was it first contacted about the contribution from Campaign Victory '78?

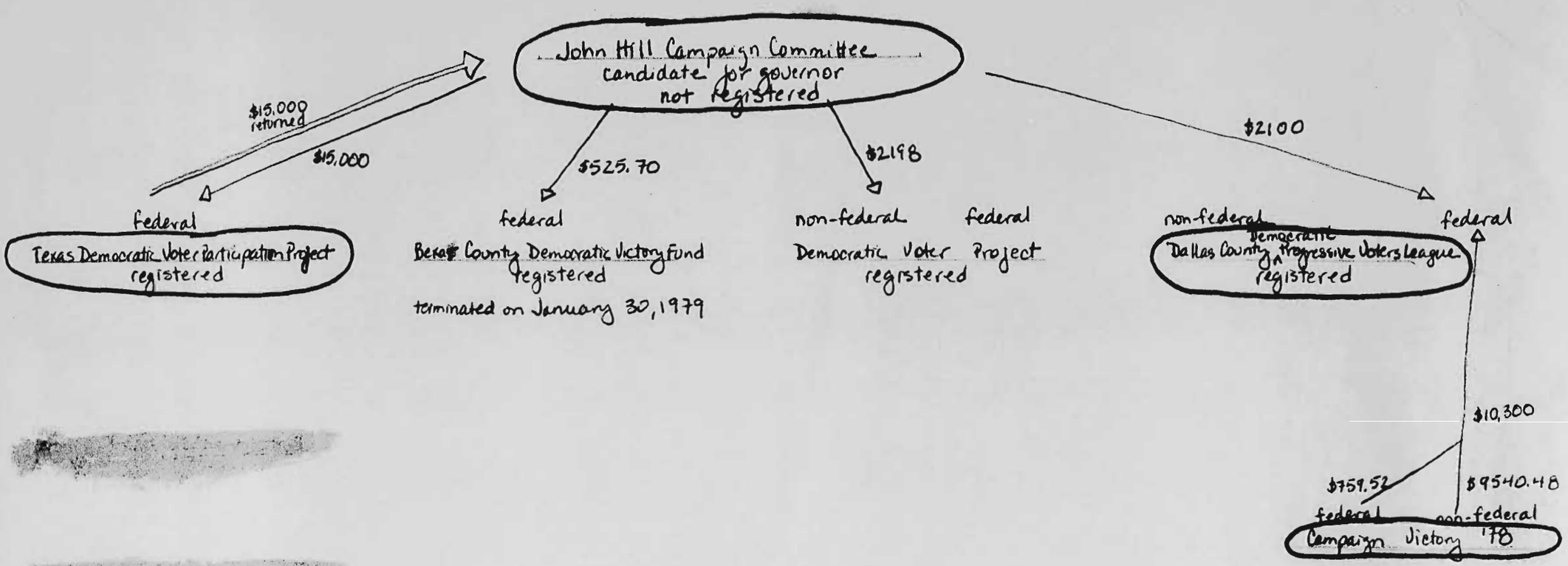
4. From which account (federal or non-federal) of Campaign Victory '78 were the funds drawn?

5. Were funds drawn from both accounts? If so, did this affect the way the Dallas County Democratic Progressive Voters League handled the funds? How much money was drawn from each account?

6. How were the contributions (checks) transmitted to the Dallas County Progressive Voters League (by mail, hand-delivered, etc.)? Please provide copies of any letters or memoranda which may have accompanied the checks.

7. Were the contributions made for any particular purpose? If so, what was the purpose? Was the money used for that purpose?

8104302901



[redacted]

[redacted]

[redacted]

[redacted]

respondent committees are circled

Attachment 1

8104030292

8104103009

D 549
RAD 9/4-21-2

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12-10-79 ANALYST Dug Greevy

TO: Office of General Counsel TEAM CHIEF Bobby Werfel

THROUGH: STAFF DIRECTOR [illegible] COMPLIANCE REVIEW PS/CB

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [illegible]

CANDIDATE/COMMITTEE: Texas Democratic Voter Participation Project
TREASURER: David Bolduc (FEC has been informed by phone)
ADDRESS: 1210 Nueces, Suite 100
Austin, TX 78701

AFFILIATE(S):

ALLEGATION(S):	CITE:	ATTACHMENT(S)
Inadequate Disclosure	2 U.S.C. 434	2
Receipt of Excessive Contribution	2 U.S.C. 441a	4

DATE INITIATED: 6/18/79

MANNER IN WHICH REVIEW WAS INITIATED:
☒ Normal Review ☐ Other: ATTACHMENT
☐ Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 7/1/78 TO 12/31/78

TOTAL RECEIPTS $ 91,410 TOTAL EXPENDITURES $ 91,329

CASH ON HAND $ 79.00(12/31/78) DEBTS $ 0

HISTORY:

RESULTS OF REVIEW: *ATTACHMENT*
Request for Additional Information, Oct. 10, 10 Day Pre-Election, 30 Day Post-Election Reports, 6/18/79 2
3RQ2/79-52, 9/14/79 (for no response) 3
3SV1/79-76, Oct. 10, 7/19/79 4

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: *ATTACHMENT*
Telecon: Greevy with TX Demo. Party secretary, 9/14/79 5
Telecon: Greevy with Bolduc, 10/11/79 6
Telecon: Greevy with Bolduc, 10/23/79 7

REASON(S) FOR REFERRAL: *ATTACHMENT*
Response to 3RQ2/79-52 , 11/12/79, inadequate 11
Response to 3SV1/79-76 , 11/19/79, question of adequacy 12
Note: The recipient committee's cash on hand as of 9/30/79 was $864.

OTHER PENDING ACTIONS INITIATED BY RAD: *ATTACHMENT*
None

OTHER RELEVANT INFORMATION:
Memo to the File: Greevy, 8/1/79 8
Memo to the File: Greevy, 10/17/79 9
Substantive portions of committee's reports for which information was requested in FEC letter of 6/18/79 10
Referral for contributing committee (John Hill Campaign Committee) is submitted with this referral

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:
None

10403029 RAD 549 / 92-212A

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/10/79 ANALYST Dug Greevy

TO: Office of General Counsel TEAM CHIEF Bobby Werfel 9/18

THROUGH: STAFF DIRECTOR ORP! COMPLIANCE REVIEW PS/EB

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: John Hill Campaign Committee(Hill's Campaign)

TREASURER: James Bushala, Jr., Legal Counsel

ADDRESS: Hughes and Hill
1200 American Bank Tower
Austin, TX 78701

AFFILIATE(S):

ALLEGATION(S):	CITE:	ATTACHMENT(S)
Unregistered Political Committee	2 U.S.C. 433 & 434	1
Excessive Contribution Made	2 U.S.C. 441a	1

Note: Contributing committee was not informed in letter of the excessive contribution.

DATE INITIATED: 5/1/79

MANNER IN WHICH REVIEW WAS INITIATED: ATTACHMENT

[X] Normal review [ ] Other:
[ ] Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, ~~see attachment~~

PERIOD COVERED FROM _____ TO _____

TOTAL RECEIPTS $ _____ TOTAL EXPENDITURES $ _____

CASH ON HAND $ _____ DEBTS $ _____

HISTORY:

RESULTS OF REVIEW: *ATTACHMENT*

3SV1/79-40, dated 5/18/79	2
3SV2/79-40, dated 7/16/79(for no response)	3
3SV2/79-40 returned 7/23/79, remailed 7/24/79	4
3SV1/79-74, dated 7/19/79	5
Certified Receipt Cards	6, 7

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: *ATTACHMENT*

Telecon: Greevy with Bushala, 7/31/79	7
Telecon: Stolaruk with Bushala, 8/9/79	8
Telecon: Greevy with Bushala, 9/24/79	12

REASON(S) FOR REFERRAL: *ATTACHMENT*

Response of 8/13/79 9

1. Status of State candidate committee transfers to political committees unclear.
2. Indication that at least two recipient committees cannot refund Hill funds received. 10, 11

OTHER PENDING ACTIONS INITIATED BY RAD: *ATTACHMENT*

None

OTHER RELEVANT INFORMATION:

3SV2/79-40 & 3SV1/79-74 combined	8
Telecon: Greevy with Sanford(member of recipient committee), 8/21/79	10
~~PREVIOUS OGC/AUDIT REFERRALS FROM RAD:~~	
Telecon: Greevy with Jones(member of recipient committee), 9/7/79	11
Request for Advisory Opinion submitted by one of the recipient committees	13

NO PREVIOUS OGC/AUDIT REFERRALS FROM RAD

continued on next page

D 549
RAD 94-212B

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12-10-79 ANALYST Dug Greevy

TO: Office of General Counsel TEAM CHIEF Bobby Werfel

THROUGH: STAFF DIRECTOR WRP COMPLIANCE REVIEW CB/BS

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: Campaign Victory '78 (Non-Federal) (non-registered)

TREASURER: Kenneth H. Molberg

ADDRESS: 318 Merchants State Bank Building
5217 Ross Avenue
Dallas, TX 75206

AFFILIATE(S): Campaign Victory '78 (registered-C00101972)

ALLEGATION(S):	CITE:	ATTACHMENT(S)
Unregistered Political Committee	2 U.S.C. 433 & 434	1

DATE INITIATED: 5/1/79

MANNER IN WHICH REVIEW WAS INITIATED: ATTACHMENT
[XXX] Normal review [ ] Other:
[ ] Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed. see Attachment 1.

PERIOD COVERED FROM _____ TO _____

TOTAL RECEIPTS $ _____ TOTAL EXPENDITURES $ _____

CASH ON HAND $ _____ DEBTS $ _____

HISTORY:

RESULTS OF REVIEW: *ATTACHMENT*
3SV1/79-29, 5/18/79 2
3SV2/79-29, 7/16/79 3
Note: 3SV2/79-29 returned to FEC on 7/31/79, remailed 8/1/79

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: *ATTACHMENT*
Telecon: Greevy with Molberg, 8/3/79 4
Telecon: Greevy with Jones (Recipient committee treasurer), 9/7/79 5
Telecon: Greevy with Molberg, 9/18/79 10
Telecon: Greevy with Molberg, 10/2/79 11

REASON(S) FOR REFERRAL: *ATTACHMENT*
Molberg letter of 8/8/79 6
Molberg letter of 8/27/79 7
Molberg letter of 10/29/79 10
Question of adequacy of response

OTHER PENDING ACTIONS INITIATED BY RAD: *ATTACHMENT*
NONE

OTHER RELEVANT INFORMATION:
Campaign Victory '78 (federal account) reports transfers out reflecting the checks attached to Molberg response of 10/29/79. 12

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:
Request for Advisory Opinion from recipient committee, 9/30/79 8
General Counsel's response to Request for Advisory Opinion, 10/15/79 9
NO PREVIOUS OGC/AUDIT REFERRALS FROM RAD

RAD Form 3

D 549
RAD 9 - 212

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE 27 APR 1981

ANALYST Mark Kleinman

TO: Office of General Counsel
ATTENTION: [redacted]

TEAM CHIEF Bobby Werfel

COMPLIANCE REVIEW

THROUGH: STAFF DIRECTOR

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12-31-79

**PURPOSE:

INFORMATION:

Texas Democratic Voter Participation Project receipt from an unregistered committee Friends of Bob Armstrong. Attachment #1

The Texas Democratic Voter Participation Project has also reported receipts from other unregistered committees.

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

8104030290 6

IEDULE A

ITEMIZED RECEIPTS

Page 1 of 1 for LINE NUMBER ____
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
Texas Democratic Voter Participation Project

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Senator Lloyd Bentsen Re-Election Comm. P. O. Box 61202 Houston, Texas 77206 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	N/A Occupation Aggregate Year-to-Date- $ 5,000.00	6/10/80	$5,000.00
Full Name, Mailing Address and ZIP Code Friends of Bob Armstrong P. O. Box 13144 Austin, Texas 78711 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer N/A Occupation Aggregate Year-to-Date- $	Date (month, day, year) 4/16/80	Amount of Each Receipt This Period $5,000.00
Full Name, Mailing Address and ZIP Code F/D Political Involvement Committee 2900 Entex Bldg. Houston, Texas 77002 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date- $	Date (month, day, year) 6/13/80	Amount of Each Receipt This Period $2,000.00
Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date- $	Date (month, day, year)	Amount of Each Receipt This Period
Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date- $	Date (month, day, year)	Amount of Each Receipt This Period
Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date- $	Date (month, day, year)	Amount of Each Receipt This Period
Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date- $	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			12,000.00

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

[redacted]

MEMORANDUM

TO: Office of General Counsel

ATTN: Carolyn Weeder

FROM: Reports Analysis Division
Phyliss Thompson PT for PST

DATE: April 27, 1981

SUBJECT: M Letter related to MUR 1104

Please reveiw and note whether you approve or disapprove of RAD sending a copy of the attached RFAI notification to Friends of Bob Armstrong. Please foward your response to RAD no later than COB, April 29, 1981.

_____ I approve _____ I disapprove

REMARKS:

8104030290A

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Friends of Bob Armstrong
P.O. Box 13144
Austin, TX 78711

Dear Treasurer :

This letter is prompted by the Commission's interest in assisting committees which may be subject to the registration and reporting requirements of the Federal Election Campaign Act (the Act) but are not registered with the Commission.

The Act defines a "political committee" to include any committee, club, association, or other group of persons which receives contributions aggregating in excess of $1,000 during a calendar year or which makes expenditures aggregating in excess of $1,000 during a calendar year (for the purpose of influencing any election for Federal office). 2 U.S.C. 431(4).

A review of the receipts reported by the Texas Democratic Voter Participation Project Committee and the Travis County Democratic Executive Committee indicate that your organization may have made expenditures in excess of $1,000 during the calendar year 80 to influence Federal elections. The term "expenditures" includes contributions to Federal candidates and committees supporting Federal candidates. 2 U.S.C. 431(9). This activity may qualify you as a "political committee" subject to the registration, reporting and other requirements of the Act. A copy of the receipt schedule(s) which list your contribution(s) is enclosed for your review.

If the contributions in question were specifically designated by you to be used for State and local elections only, please inform the Commission. Please identify the source of funds used and provide copies of any memoranda or letters which designated these contributions.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which will clarify this matter.

If you are a "political committee" but you do not wish to be considered one, you must obtain refund(s) from the candidate(s) or the political committee(s) to which you have made a contribution. As an alternative, the recipient candidate(s) or political committee(s) may transfer all or part of the contributions to accounts which are not used

8104302909

to influence Federal elections. These refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed $1,000 during a calendar year.

If your organization has made contributions or expenditures from an account containing receipts from corporations or labor organizations, you must either obtain a full refund, or request the recipient candidate(s) or political committee(s) to transfer the full amount(s) to an account which is not used to influence Federal elections. Contributions or expenditures from corporate or labor organization sources are prohibited by 2 U.S.C. 441b.

If your committee does not obtain the recommended refunds or insure that the required transfers are made, you must submit a Statement of Organization on FEC Form 1 (2 U.S.C. 433) and file disclosure reports on FEC Form 3X (2 U.S.C. 434). We have enclosed relevant informational materials and forms.

Please notify the Commission within fifteen (15) days from the date on this letter of your decision on this matter. If you have any questions, please contact me on our toll free number, (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Mark Kleinman

Mark Kleinman
Reports Analyst
Reports Analysis Division

Enclosures

8104302910

EDULE A

ITEMIZED RECEIPTS

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

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

Name of Committee (in Full)
Texas Democratic Voter Participation Project

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Senator Lloyd Bentsen Re-Election Comm. P. O. Box 61202 Houston, Texas 77206	N/A Occupation Aggregate Year-to-Date-$ 5,000.00	6/10/80	$5,000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
Friends of Bob Armstrong P. O. Box 13144 Austin, Texas 78711	N/A Occupation Aggregate Year-to-Date-$	4/16/80	$5,000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify)			
F/D Political Involvement Committee 2900 Entex Bldg. Houston, Texas 77002	N/A Occupation Aggregate Year-to-Date-$	6/13/80	$2,000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date-$	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date-$	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date-$	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)			
Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date-$	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)			
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			12,000.00

Page 2 of 6 for Line Number 11a

Name of Committee (in full): TRAVIS COUNTY DEMOCRATIC EXECUTIVE COMMITTEE

A. Full Name, Mailing Address and ZIP Code Campaign Committee to Elect Dylon Hines P.O. Box 6246 Austin, Texas 78762 Receipt For: ☐ Primary ☐ General ☒ Other (specify): County Convention	Name of Employer Occupation Aggregate Year-to-Date—$ 200.00	Date (month, day, year) 2/4/80	Amount of Each Receipt This Period 200.00
B. Full Name, Mailing Address and ZIP Code Friends of Bob Armstrong P.O. Box 13144 Austin, Texas 78711 Receipt For: ☐ Primary ☐ General ☒ Other (specify): County Convention	Name of Employer Occupation Aggregate Year-to-Date—$ 50.00	Date (month, day, year) 2/6/80	Amount of Each Receipt This Period 50.00
C. Full Name, Mailing Address and ZIP Code Communications Workers of America COPE - PCC 1925 K Street, N.W. Washington, D.C. 20006 Receipt For: ☐ Primary ☐ General ☒ Other (specify): County Convention	Name of Employer Occupation Aggregate Year-to-Date—$ 200.00	Date (month, day, year) 2/6/80	Amount of Each Receipt This Period 200.00
D. Full Name, Mailing Address and ZIP Code FINANPAC 2520 Austin Nat. Bank Tower Austin, Texas 78701 Receipt For: ☐ Primary ☐ General ☒ Other (specify): County Convention	Name of Employer Occupation Aggregate Year-to-Date—$ 50.00	Date (month, day, year) 2/6/80	Amount of Each Receipt This Period 50.00
E. Full Name, Mailing Address and ZIP Code United Transportation Union Educational Committee 1011 Congress, Suite 508 Austin, Texas 78701 Receipt For: ☐ Primary ☐ General ☒ Other (specify): County Convention	Name of Employer Occupation Aggregate Year-to-Date—$ 200.00	Date (month, day, year) 2/21/80	Amount of Each Receipt This Period 200.00
F. Full Name, Mailing Address and ZIP Code Bob Perkins Re-Election Committee P.O. Box 12984 Austin, Texas 78711 Receipt For: ☐ Primary ☐ General ☒ Other (specify): County Convention	Name of Employer Occupation Aggregate Year-to-Date—$ 200.00	Date (month, day, year) 2/27/80	Amount of Each Receipt This Period 200.00
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			900.00
TOTAL This Period (last page this line number only)			3350.00

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RAD

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE March 18, 1981

ANALYST Alva Smith

TO: Office of General Counsel
ATTENTION: Carolyn Weeder

TEAM CHIEF Bobby Werfel

COMPLIANCE REVIEW Peggy Sims

THROUGH: STAFF DIRECTOR

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12/10/79

**PURPOSE:
The attached request for additional information is for your information. As of March 17, 1981, no response has been received.

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OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 27, 1981

David Bolduc, Treasurer
Texas Democratic Voter
Participation Project
807 Brazos Sreet, Suite 802
Austin, TX 78701

Identification No: C00099267

Reference: October 15 Quarterly Report (7/1/80 - 9/30/80)

Dear Mr. Bolduc:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated February 3, 1981. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

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

If you should have any questions related to this matter, please contact Alva Smith on our toll-free number (800)424-9530 or our local number (202)357-0026.

Sincerely,

John D. Gibson

John D. Gibson
Acting Assist. Staff Director
Reports Analysis Division

Enclosure

8100302914

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 3, 1981

David Bolduc, Treasurer
Texas Democratic Voter
Participation Project
807 Brazos Sreet, Suite 802
Austin, TX 78701

Identification No: C00099267

Reference: October 15 Quarterly Report (7/1/80 - 9/30/80)

Dear Mr. Bolduc:

This letter is prompted by the Commission's preliminary review of your October Quarterly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-When preparing your next report, please enter the total amount of contributions to Federal candidates and other political committees on Line 21. Contributions made to non-Federal candidates should not be entered on this line, but on Line 27. The total amount of transfers to all other political party committees should be entered on Line 20.

-The purpose of all itemized expenditures must be provided for each contribution/transfer on Lines 20 and 21.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Alva Smith

Alva Smith
Reports Analyst
Reports Analysis Division

8104029015

RAD 9[illegible]12

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE 12/[illegible]/80

ANALYST Alva Smith

TO: Office of General Counsel
ATTENTION: M. Brown

TEAM CHIEF Bobby Wenfel

COMPLIANCE REVIEW Peggy Sims

THROUGH: STAFF DIRECTOR

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12/13/79

**PURPOSE:

For your perusal is the attached information.

OUTCOME: (if applicable)

8102302916

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

TELECON:
12/3/80 (aporoximate date)

Mr. David Bolduc called this day in reference to a letter I had sent him dated 11/19/80. He stated that according to his copy of the Q1 report there is no evidence of transfers from affiliated or other party committees. I check his report to find that he was correct. I apologized for the mix-up and told him the letter dated 11/19/80 will be deleted from his records.

8104290917

DAVID BOLDUC
ATTORNEY AT LAW
1210 NUECES ST., SUITE 100
AUSTIN, TEXAS 78701
(512) 477-1187

December 16, 1980

Mr. Bill Loughery
Deputy Staff Director
Federal Election Commission
Washington, D. C. 20463

Re: Identification No.: C00099267
April 15 Quarterly Report (1/1/80 - 3/31/80)

Dear Mr. Loughery:

In light of our recent telephone conversation with your Alva Smith, I trust that your letter of December 12th, with copy of Alva Smith's letter attached (copies enclosed), is no longer germaine.

As noted in that conversation, there are no transfers to or from Affiliated/Other Party Committees on the April 15 report.

Sincerely yours,

David Bolduc Jr

David Bolduc

DB/ps
Enc.

8104302918

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 12, 1980

David Bolduc, Treasurer
Texas Democratic Voter
Participation Project
807 Brazos Sreet, Suite 802
Austin, TX 78701

Identification No: C00099267

Reference: April 15 Quarterly Report (1/1/80 - 3/31/80)

Dear Mr. Bolduc:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated November 19, 1980. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

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

If you should have any questions related to this matter, please contact Alva Smith on our toll-free number (800)424-9530 or our local number (202)357-0026.

Sincerely,

Bill Loughery

Bill Loughery
Deputy Staff Director
Federal Election Commission

Enclosure

8104030290

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 19, 1980

David Bolduc, Treasurer
Texas Democratic Voter
Participation Project
807 Brazos Sreet, Suite 802
Austin, TX 78701

Identification No: C00099267

Reference: April 15 Quarterly Report (1/1/80-3/31/80)

Dear Mr. Bolduc:

This letter is prompted by the Commission's preliminary review of your April Quarterly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Each transfer of funds between party committees of the same party must be itemized regardless of whether such committees are affiliated. 11 C.F.R. 104.3.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Alva Smith

Alva Smith
Reports Analyst
Reports Analysis Division

8104030920

DAVID BOLDUC
ATTORNEY AT LAW
1210 NUECES ST., SUITE 100
AUSTIN, TEXAS 78701

8104030291

AUSTIN, TX
PM
16 DEC
1980

15¢

Mr. Bill Loughery
Deputy Staff Director
Federal Election Commission
Washington, D. C. 20463

REPORTS ANALYSIS REFERRAL UPDATE

D-549

*ORIGIN: RAD

DATE [redacted] November 19, 1980

ANALYST Alva Smith

TO: Office of General Counsel
ATTENTION: M. Brown

TEAM CHIEF Bobby Werfel

COMPLIANCE REVIEW Peggy Sims

THROUGH: STAFF DIRECTOR

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12/13/79

**PURPOSE:

Attached for your perusal is a copy of the amended Statement of Organization submitted by the Texas Democratic Voter Participation Project.

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

STATEMENT OF ORGANIZATION

(see re TX for instructions)

1. (a) Name of Committee (in Full) — X Check if name or address is changed.

Texas Democratic Voter Participation Project

2. Date: 10/15/80

(b) Address (Number and Street)

807 Brazos Street, Suite 802

3. FEC Identification Number: C00099267

(c) City, State and ZIP Code

Austin, Texas 78701

4. Is this an amended Statement? X YES ☐ NO

5. TYPE OF COMMITTEE (check one):

= (a) This committee is a principal campaign committee. (Complete the candidate information below.)

= (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

= (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)

= (d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)

= (e) This committee is a separate segregated fund.

= (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number — optional) and position, the person in possession of committee books and records.

Full Name	Mailing Address and ZIP Code	Title or Position
Garry Mauro	807 Brazos Street, Suite 802 Austin, Texas 78701	Treasurer

8. Treasurer: List the name and address (phone number — optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address and ZIP Code	Title or Position
Garry Mauro	807 Brazos Street, Suite 802 Austin, Texas 78701	Treasurer

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code

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

David Bolduc
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

10/15/80
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

FEC FORM 1 (3 80

8490336044736

RAD 1104-12

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE June 23, 1980

ANALYST DU Greevy DG 6/17/80

TO: Office of General Counsel

ATTENTION:

TEAM CHIEF Bobby Werfel

COMPLIANCE REVIEW

THROUGH: STAFF DIRECTOR A.L. for O.A.P.

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL Dec. 10, 1979

Texas Democratic Voter Participation Project

**PURPOSE: Information

Telecon: Greevy with Bolduc, 6/17/80

OUTCOME: (if applicable)

8104030292 4

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

6

Telecon:

Greevy with David Bolduc
Texas Democratic Party/Voter Participation Project/Party-Federal
6/17/80
512/477-1187

I called DB today on the following matters:

Texas Democratic Party--

I stated that we have not received a response to the letters sent on this matter. He said that he was familiar with the letters, but through an oversight, has not yet responded to them.

He said a letter would be sent shortly. It will state that they acknowledge the problem, and that they intend to resolve the matter by having the recipient committee transfer $4,000 or more from its federal account to its local account.

I stated that we should be kept abreast of any changes in the status of the matter, and that we should receive a letter from him as soon as possible.

Texas Democratic Party-Federal--

I stated that an RFAI was sent to the committee for its termination report. As of yet, no response has been received. He stated that he was working on the response, but that he needed more information from the committee personnel. He hoped that he would be sending a response in the near future.

Texas Democratic Voter Participation Project--

I reminded him that we were awaiting amendments to the '78 and '79 reports which would indicate the 441a(d) activity on behalf of Krueger and provide more information on the GOTV expenditures. He stated that he was still working on those.

I also stated that there were a couple of problems with the '79 YE report: Omitted addresses and clarification of "return of check now-stale credit."

He said that he would send a letter providing this information.

Telecon:

Greevy with Bolduc
6/18/80

I neglected to inform DB yesterday of the additional funds transferred to the Harris County committee by the Texas Democratic Party. These were in the amount of $668.53, and were transferred on 9/15/79. I called today to inform him of this.

I also stated that there was a notation that the funds were for reimbursement for shared expenses. I told him that I did not know whether the Commission would view these funds as contributions, but if it did, the amount transferred by Harris County to its non-federal

8104030925

account would have to be at least $4,668.53, provided the Texas Democratic Party had made no other contributions in '79. He stated that he understood this, and that he would proceed upon the assumption that the $668.53 constituted a contribution.

I indicated that I did not know whether the Commission would view those funds as a contribution. He said that it would be better to have at least the $4,668.53 transferred, as it might take some time to get the legal analysis of what the $668.53 constituted.

8104030292 6

RAD 1-2124

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE June 11, 1980

ANALYST DU Greevy Aug 6/9

TO: Office of General Counsel

ATTENTION:

TEAM CHIEF Bobby Werfel

THROUGH: STAFF DIRECTOR A.L. for O.B.P.

COMPLIANCE REVIEW EG/PS

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104 (79)

DATE OF ORIGINAL REFERRAL 12/10/79

John Hill Campaign Committee

**PURPOSE: Information

One of the recipient committees of the Hill contributions made a transfer to its segregated State and local account. The transfer was specifically listed as being comprised of funds received from Hill, and the amount was $850.

OUTCOME: (if applicable)

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*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

REPORT OF RECEIPTS AND EXPENDITURES FOR A CANDIDATE OR COMMITTEE SUPPORTING CANDIDATE(S) FOR NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

80 APR 23 AM 11:52

Note: *Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.*

1 Name of Candidate or Committee (in full): Dallas County Democratic Progressive Voters League

2 I.D. No. C00091777 (Candidate/Committee)

Address (number and street): 6139 Moonglow Drive

3 Office Sought, State/District (if applicable): N/A

City, State and ZIP Code: Dallas, Texas 75241

☐ Check if address is different than previously reported.

Year of Election _____

4 Type of Report (check appropriate boxes)

☒ April 10 Quarterly Report
☐ July 10 Quarterly Report
☐ October 10 Quarterly Report
☐ January 31 Annual Report
☐ Monthly Report _____ (month)

☐ Tenth day report preceding _____ election (primary, general or convention) on _____ (date) in the State of _____
☐ Thirtieth day report following _____ election (primary, general or convention) on _____ (date) in the State of _____

☐ Termination Report
☐ Amendment for: _____ (which report)

This is a report for ☐ Primary Election ☐ General Election ☐ Primary and General ☐ Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES

(Figures may be rounded to nearest dollar.)

5 Covering Period 1-1-80 Through 4-7-80

	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19		$ 35.17
7 Cash on hand at beginning of reporting period	$ 35.17	
8 Total receipts (from line 19)	$ 1500.00	$ 1500.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	$ 1535.17	$ 1535.17
9 Total expenditures (from line 25)	$ 1314.00	$ 1314.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	$ 221.17	$ 221.17
11 Value of contributed items on hand to be liquidated (Attach itemized list) $ N/A		
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	$ -0-	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	$ -0-	

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

4-10-80 (Date)

Jesse W. Jones (Typed Name of Treasurer or Candidate)

Jesse W. Jones (Signature of Treasurer or Candidate)

Note: *Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441j (see reverse side of form).*

For further information, Contact: Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463 or call 800/424-9530

Approved by GAO B-187620 (R0506) Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

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, 1978
ral Election Commission
:25 K Street, N.W.
fashington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 4 of 4 for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Coalition of Black Democrats Ft. Worth Tx. 241	Political Ad Expenditure for: ☐ Primary ☐ General ☒ Other	2/14	60.00
J. W. Lockridge Scholarship Fund Dallas Tx. 241	Candidate Promotion Expenditure for: ☐ Primary ☐ General ☐ Other	2/29	44.00
PVL State/Local Account 6139 Moonglow Drive Dallas Tx. 75241 241	Excess Contributions FROM JOHN HILL CAMPAIGN Expenditure for: ☐ Primary ☐ General ☒ Other		850.00
	Expenditure for: ☐ Primary ☐ General ☐ Other		
	Expenditure for: ☐ Primary ☐ General ☐ Other		
	Expenditure for: ☐ Primary ☐ General ☐ Other		
	Expenditure for: ☐ Primary ☐ General ☐ Other		
	Expenditure for: ☐ Primary ☐ General ☐ Other		

SUBTOTAL of expenditures this page (optional)	$954.00
TOTAL this period (last page this line number only)	$314.00

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RAD -2126

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE June 11, 1980

ANALYST DU Greavy

TO: Office of General Counsel

ATTENTION:

TEAM CHIEF Bobby Werfel

COMPLIANCE REVIEW

THROUGH: STAFF DIRECTOR B.L. for O.R.

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104 (79)

DATE OF ORIGINAL REFERRAL 12/10/79

Campaign '78 (Non-Federal)

**PURPOSE: Information

The recipient committee of the Campaign '78 contribution made a transfer to its segregated State and local account. The transfer was specifically listed as being comprised of funds received from Campaign '78, and the amount was $9,540.48.

8 1 0 1 0 3 0 2 9 3 0

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

80 MAY 5 PM 2 03

(Summary Page)

1. Name of Committee (in Full)
Dallas County Democratic Progressive Voters League

Address (Number and Street)
6139 Moonglow Drive

City, State and ZIP Code
Dallas, Texas 75241

☐ Check if address is different than previously reported.

2. FEC Identification Number
C00091777

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

12/10/79
Amd 9L.2.12.13

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Monthly Report for _____
- ☒* Twelfth day report preceding Primary (Type of Election) election on May 3 in the State of Texas
- ☐ Thirtieth day report following the General Election on _____ in the State of _____
- ☐ Termination Report

(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period 4/8/80 Through 4/22/80		
6. (a) Cash on Hand January 1, 1980		$ 35.17
(b) Cash on Hand at Beginning of Reporting Period	$ 221.17	
(c) Total Receipts (from Line 18)	$ 13,225.00	$ 14,725.00
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	$ 13,446.00	$ 14,760.17
7. Total Disbursements (from Line 28)	$ 11,410.93	$ 12,724.93
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	$ 2,035.07	$ 2,025.24
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ -0-	

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

Jesse W. Jones
Type or Print Name of Treasurer

Jesse W. Jones
SIGNATURE OF TREASURER

4/23/80
Date

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X 3/80

8 0 0 0 1 3 5 5 3 9 3 2 7

SCHEDULE B **ITEMIZED DISBURSEMENTS**

Page 1 of 1 for
LINE NUMBER 19
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (In Full)
Democratic Progressive Voters League

A. Full Name, Mailing Address and ZIP Code Progressive Voters League State/Local Account 2654 Anderson Dallas, Texas 75215	Purpose of Disbursement Transfer: Excess cont.(Car. Vctry '78) Disbursement for: ☐Primary ☐General ☐Other (specify):	Date (month, day, year) 4/17/80	Amount of Each Disbursement This Period 9,540.48
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			9,540.48
TOTAL This Period (last page this line number only)			9,540.48

8100430150523993321

RAD 80-218

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE May 30, 1980

ANALYST DU Greevy

TO: OGC

ATTENTION:

TEAM CHIEF Bobby Werfel

THROUGH: STAFF DIRECTOR A.L. for OSA

COMPLIANCE REVIEW Wade McArthur wmc
Peggy Sims ps

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12-10-79

John Hill Campaign Committee

**PURPOSE: Information

Telecon: Greevy with Marion Sanford, 5/23/80

8104302933

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

Telecon:

Greevy with Marion Sanford
5/23/80
713-651-2510

Re: Bill Hobby Campaign Committee
John Hill Campaign

MS stated that he was contacted by the Hobby Committee concerning the letter dated 5/12/80. He has also been in contact with Jim Bushala of the Hill Committee. He has been asked to help straighten the matters out.

Hobby--I told him why the letter was sent. I stated that there appear to be three alternatives available, if in fact the committee does qualify as a political committee.

1. Register and report for the period 9/1/78-10/23/78.

   He stated that they did not want to do this because:
   A. There may be a problem with contribution limitations. Although the committee would not have accepted any corporate/union funds, it may have received more than $5,000 from an individual(s).
   B. The committee may have accepted partnership contributions. The problem here would be the break downs of the partners' shares.
   C. The extreme amount of problems in trying to put the information together.

2. Request refunds from the recipient committees.

   He stated they could do this, but the recipient committees may not want to provide the refunds because of the upcoming elections.

3. Have the recipient committees transfer to State and local accounts enough funds so that the remaining amount of funds contributed by Hobby Committee does not exceed $1,000.

   He stated this may be a good option, as the committees are amassing funds now, and it would not hurt them to transfer the funds to State and local accounts.

He said he would contact both the State committee and the Harris County committee to see if this might work. In the absence of this, he plans to send a letter stating that the funds were intended to be used in connection with the State-wide race.

After he indicated that this was the intent for the use of the funds, I suggested that he write a letter to that effect, if the other alternative did not work. I stated that I did not know how the Commission would respond to this, but from my point of view, it appears that the committee did qualify as a political committee. The alternatives above are those given to such

8104030293 4

unregistered committees. Beyond those alternatives, I am not in a position to assess how any other response would be viewed by the Commission.

He stated that he understood this, and that he would attempt to have the recipient committees transfer the funds to State and local accounts.

I asked him to send a letter as soon as possible on the matter, but preferably after any discussion with the recipient committees. He stated that he would be in contact with them today, and that we would hear from him very shortly.

Hill--We went over pretty much of the same information as with the Hobby situation. I stated the same three alternatives were available.

I stated further that the Texas Democratic Voter Participation Project had refunded the $15,000 received from the Hill committee. Therefore, he would not have to be concerned with that. We discussed the amounts received by Bexar County, Harris County, and Dallas County.

I also reviewed my conversations with Jim Bushala, and the responses he received from Jones (no response), Krier (no funds available to transfer), and Stanley (no funds available to transfer).

He said he would contact the committees again, as they may have funds on hand at this point in time.

He also said that he believes some of the receipts were payments for services/items purchased by Hill from the party committees. I stated that depending on the nature of the services/items, we may not view the payments as expenditures. I also said that the amount (usual and normal charge) may have a bearing on this.

He said he would check on this and get back to me. He was aware that Jon Lindsay and Jim Baker were in somewhat of the same fix, and he asked if there were any others. I told him that I did not know.

He indicated that were this matter not to be cleared up with the transfer alternative, he would probably send a letter concerning the itent for the use of the funds, as described in the Hobby conversation above. Statements regarding payments for services/ items would also be made if they were applicable.

I told him that were these statements to be made regarding such payments, we should also have a statement regarding the amount paid. I indicated that were the payment to be greater than the usual and normal charge, that amount in excess of the usual and normal charge would probably be considered a contribution.

He finally indicated that he would be in contact with Jim Bushala on this situation.

He wants to get these things cleared up. He will be out of town next week, but if things aren't resolved by then, I will be contacted by John Kuhl.

8104030293 5

Please note: Sanford, in my previous conversations with him, appeared to be representing Hobby and the Harris County Democratic Voter Project.

In this conversation, he indicated that he would be working for both Hill and Hobby.

8104030293 6

RAD 12-12

M. Brown

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE March 28, 1980

ANALYST Dug Greevy 3/24

TO: Office of General Counsel
ATTENTION:

TEAM CHIEF Bobby Werfel

COMPLIANCE REVIEW

THROUGH: STAFF DIRECTOR

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12/10/79

Texas Democratic Voter Participation Project

**PURPOSE: Information

Second Letter, RFAI, 3/4/80 (Copy of original RFAI attached)	1
Telecon: Greevy with Bolduc, 3/12/80	2
Response received, 3/17/80, Adequate	3

8104030937

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 4, 1980

David Bolduc, Treasurer
Texas Democratic Voter Participation
Project
1210 Nueces, Suite 1000
Austin, Texas 78701

REFERENCE: October 10 Quarterly Report (7/1/79 - 9/30/79)

Dear Mr. Bolduc:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated January 14, 1980. That notice requested information essential to full public disclosure of your Federal election financial activity and to assure compliance with provisions of the Federal Election Campaign Act (the Act).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to take legal action to insure compliance with the Act.

If you should have any questions related to this matter, please contact David Greevy on our toll free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

Thomas J. Haselhorst

Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

8104302938

1325 K Street, N.W.
Washington, D.C. 20463

TO: Texas Democratic Voter Participation Project DATE: [illegible]

I.D. NO C00079267

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

REQUEST FOR ADDITIONAL INFORMATION FOR THE October 10 REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 7/1/79 THROUGH 9/30/79 PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED

JAN 14 1980

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this letter with your response submission(s).

Please provide the following information as required:

___ Coverage Dates ___ omitted or ___ incorrect

___ Summary Page (Line(s) ___ Column(s) ___ Totals ___ ___ omitted or ___ incorrect

___ Detailed Summary Page (Line(s) ___ Column(s) ___ Totals ___ ___ omitted or ___ incorrect

___ Schedule(s) ___ Date(s) ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Full Name, Mailing Address and Zip Code of Contributor for Schedule(s) ___ Line(s) ___

___ Occupation and Principal Place of Business for Schedule(s) ___ Line(s) ___

___ Election Designation for Schedule(s) ___ Line(s) ___

___ Aggregate ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Name and Address of Payee for Schedule(s) ___ Line(s) ___

___ Name and Address of Candidate for Schedule(s) ___ Line(s) ___

___ Inadequate description of disbursement for Schedule(s) ___ Line(s) ___

___ Signature ___ omitted ___ inadequate

11 CFR 104.12(a) requires each person having duties with respect to a report to sign the original report. Please resubmit a signed copy of your report.

The committee reports an expenditure made in accordance with 441a(d) on behalf of a Federal candidate but does not report the contribution or an expenditure made in accordance with 441a(d) on behalf of a Federal candidate.

Other ___

Your immediate attention to the above matter(s) is requested. Please submit your response together with this request for additional information, which has been given sequential identification number 81040302939, to facilitate processing. Upon receipt of your response, we will review it and determine whether or not additional information is required. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800)424-9530. The local Washington, D.C. telephone number is (202)523-4068 (Baker, Nan-Perry), 523-4176 (Hoeg) or 523-4068 (Penn).

Senate filers must file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D Street, N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

81040302939

Dear Mr. Bolduc:

David Bolduc, Treasurer
Texas Democratic Voter Participation Project
1210 Nueces, Suite 100
Austin, TX 78701

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the October 10 Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact David Greevy in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

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

TO: Texas Democratic Voter Participation Project DATE: JAN 14 1980

I.D. NO.: C00099267

REQUEST FOR ADDITIONAL INFORMATION FOR THE October 10 REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 7/1/79 THROUGH 9/30/79. PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Detailed Summary (Page 2) Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Schedule Totals: ___ disagree with Detailed Summary (Page 2) or ___ omitted

___ Date(s): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Full Name(s)/Mailing Address(es): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Occupation/Principal Place(s) of Business: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Election Designation: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Aggregate Year-to-Date Totals: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Expenditure: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Receipt: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Inadequate Description of: ___ proceeds ___ dates ___ events ___ location of Schedule

___ Signature: ___ omitted ___ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

___ Other: The committee reports an expenditure the purpose of which is listed as, "Payment of note (Krueger)." Please state whether this constitutes an in-kind contribution or an expenditure made in accordance with 2 U.S.C. 441a(d) on behalf of a federal candidate.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-4048 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records. 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEC Form 12
(Revised November 1978)

Letter Mailed 3/4/8

Telecon:

Greevy with David Bolduc
Texas Democratic Voter Participation Project
512-477-1187
3/12/80

DB called this day. He stated:

1. The committee is considering terminating and opening a new committee. What should be done? I stated that a termination report would be filed, and that it would cover 1/1/80-effective date of termination. In addition, the committee would not be able to have any outstanding debts or obligations, if it wished to terminate. Further, the committee should provide a statement regarding disposition of residual funds if they are any funds left on hand. I suggested that were this to be done, the new committee should register prior to the termination of the present committee. At the time of registration, both committees should file 1 amendments to show affiliation. By so doing, the multicandidate status of the present committee would pass on to the new committee.

2. He stated that he is working on the amendments. All of the reports will be completely amended, and the 441a(d) activity will be explicitly provided. He has some reports completed at this time, but he was waiting until they were all done before sending any in. I suggested that he send in what he has now.

3. The State party received a letter from FEC concerning possible 433 and 434 problems. I was not familiar with the letter, so I asked him to get a copy of it and give me a call when he had it.

4. He will be sending the completed amendments shortly.

8104030294 1

DAVID BOLDUC
ATTORNEY AT LAW
1210 NUECES ST., SUITE 100
AUSTIN, TEXAS 78701
(512) 477-1187

RECEIVED
FEDERAL ELECTION
COMMISSION
'80 MAR 17 AM 9:15

March 11, 1980

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

Re: Texas Democratic Voter Participation Project
#C00099267; Reports 7/1/79 - 9/30/79

Dear Mr. Potter:

With regard to your letter of January 14, 1980, the expenditure listed as "Payment of note (Krueger)" constitutes an expenditure made in accordance with 2 U.S.C. § 441a(d) on behalf of Robert (Bob) Krueger, a candidate for the U. S. Senate.

As you know, I am in the process of amending all of this committee's reports and will forward this one to you with the rest.

Yours truly,

DAVID BOLDUC

DB:mkm

8003105023577

RAD 80-212

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE February 7, 1980

ANALYST Dug Greevy

TO: Office of General Counsel
ATTENTION:

TEAM CHIEF Bobby Merfel

COMPLIANCE REVIEW CB/CB

THROUGH: STAFF DIRECTOR

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12/10/79

Texas Democratic Voter Participation Project

**PURPOSE: Information

The $15,000 contribution from the John Hill Campaign Committee to the Texas Democratic Voter Participation Project was refunded.

1

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

8104302943

[illegible]
[illegible]
[illegible] Election Commission
[illegible] K Street, N.W.
[illegible]ington, D.C. [illegible]

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 1 of 1 for Line Number 21(a)

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Texas Democratic Voter Participation Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
John Hill Campaign Fund 900 W. 6th Austin, Texas 78701	refund of contribution Expenditure for: ☐ Primary ☐ General ☐ Other	11/28/79 12/11/79	$10,000.00 5,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (optional)			$ 15,000.00
TOTAL this period (last page this line number only)			$ 15,000.00

9
9

DATE February 7, 1980

ANALYST Doc Gentry

TO: Office of General Counsel
ATTENTION:

TEAM CHIEF Bobby Harris

COMPLIANCE REVIEW OK

THROUGH: STAFF DIRECTOR OAP

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12/10/79

John Hill Campaign Committee

**PURPOSE: Information

The $15,000 contribution from the John Hill Campaign Committee to the Texas Democratic Voter Participation Project was refunded.

1

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

8104030295

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE January 23, 1980

ANALYST Dug Greevy

TO: Office of General Counsel
ATTENTION:

TEAM CHIEF Bobby Werfel 1/23/80

COMPLIANCE REVIEW 02/05

THROUGH: STAFF DIRECTOR

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12/10/79

Texas Democratic Voter Participation Project

**PURPOSE: Information

Response received regarding possible in-kind contributions and GOTV expenses, 1/14/80, April 10 and July 10 Reports 1

OUTCOME: (if applicable)

8104029946

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

DAVID BOLDUC
ATTORNEY AT LAW
1210 NUECES ST., SUITE 100
AUSTIN, TEXAS 78701
(512) 477-1187

January 14, 1980

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

Re: Texas Democratic Voter Participation Project
C 00099267
April 10 Report
July 10 Report

Dear Sir:

With regard to your communication of December 19, 1979, the "Krueger" expenditures appear to be §441a(d) expenditures. I am in the process of amending the Project's reports to report all of these correctly, and will forward them to you when they are complete.

The expenditure to Doug Zabal is apparently also a §441a(d) expenditure and will be reported with the rest.

As you know, I am also attempting to do the same with the "GOTV" expenditures.

Yours truly,

DAVID BOLDUC

DB:mkm

8 J 0 0 0 1 3 0 1 3 0 4 2 4 9 8 4 3 7 6

RAD

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE January 10, 1980

ANALYST Dug Greevy

TO: Office of General Counsel

TEAM CHIEF Bobby Werfel

ATTENTION:

COMPLIANCE REVIEW CB/KS

THROUGH: STAFF DIRECTOR B.L. for O.B.P.

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12/10/79

Re: Texas Democratic Voter Participation Project

**PURPOSE: INFORMATION

Previous Update referred to possible excessive contribution from an individual, Rex C. Cauble.

The committee was informed of this possible violation and submitted a response which appears to be adequate.

3SV1/79173DG, 12/19/79, April 10 Report 1

Response received 1/8/80 2

8104030294 8

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

In reply please refer to: 3SV1/79173DG

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 19, 1979

David Boldue, Treasurer
Texas Democratic Voter Participation Project
P.O. Box 1672
Austin, TX 78767

Dear Mr. Boldue:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, (the Act) as amended. During review of the April 10 Report of Receipts and Expenditures, we noticed an entry indicating that you may have received a contribution which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

The Act precludes an individual from making a political contribution to a multicandidate committee in any calendar year in excess of $5,000.

The Commission recommends that if you find the contribution you received was in excess of the limits set forth in the Act, you return the amount in excess of $5,000 to the donor. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution, your prompt refund of the excessive contribution to the donor will be taken into consideration by the Commission. Please notify the Commission of your determination on this matter by letter within fifteen (15) days from the date of this notification. If you have any questions concerning this matter, please do not hesitate to contact David Greevy (800)424-9530, our Reports Analyst assigned to you. Our local number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst

Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

Enclosure

8104302949

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 1 of 3 for Line Number 14A

(Use Separate Schedules for each numbered line)

Candidate or Committee in Full: Dem. Vet. Prog. Texas Democratic Voter Participation Project

Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
David Hannah, Jr. P.O. Box 4 Houston, Tx. 77001 Receipt for: ☐ Primary ☐ General ☑ Other	Occupation: real-estate ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	1-9-79	3,000.00
Full Name, Mailing Address and ZIP Code Roy C. Cauble Cauble Enterprises Denton, Tx. 76201 Receipt for: ☑ Primary ☐ General ☑ Other	Principal Place of Business: Cauble Enterprises Occupation: self-employed ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	10,000.00
Full Name, Mailing Address and ZIP Code Louis A. Beecherl, Jr. 3801 Beverly Dr. Dallas, Tx. 75205 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: 521-0521 Occupation: Chair. Tex. Oil & gas ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	1,000.00
Full Name, Mailing Address and ZIP Code Arthur J. Wessely 2001 Bryan Tower, Suite Dallas, Tx. 75201 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: 953 742-2396 Occupation: Independent Oil dealer ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	1,000.00
Full Name, Mailing Address and ZIP Code W. W. McAllister, Jr. 203 Terrell Rd. San Antonio, Tx. 78209 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: 826-1005 Occupation: investments ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	500.00
Full Name, Mailing Address and ZIP Code W.W. McAllister, Jr. 203 Terrell Rd. San Antonio, Tx. 78209 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: 826-1005 Occupation: investments ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	500.00
Full Name, Mailing Address and ZIP Code George P. Mitchell 3900 One Shell Plaza Houston, Tx. 77002 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: Occupation: geologists ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-22-79	2,000.00
SUBTOTAL of receipts this page (optional)			$ 18,000.00
TOTAL this period (last page this line number only)			$

DAVID BOLDUC
ATTORNEY AT LAW
1210 NUECES ST., SUITE 100
AUSTIN, TEXAS 78701
(512) 477-1187

RECEIVED
FEDERAL ELECTION
COMMISSION
'80 JAN 8 PM 12:09

2

January 4, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas J. Haselhorst
Federal Election Commission
Washington, D.C. 20463

Re: Texas Democratic Voter Participation Project
3SV1/79173DG

Dear Mr. Haselhorst:

With regard to your request for information on the Project's April 10 report, after a conversation with Mr. Cauble it has become apparent that the transaction in question was reported incorrectly by the previous treasurer. This should have been shown as a $5,000.00 contribution from Mr. Cauble and a $5,000.00 contribution from Mrs. Rex C. Cauble at the same address, occupation housewife.

I apologize for any inconvenience this may have caused. Please note the correct spelling of my name and the correct address above.

Yours truly,

DAVID BOLDUC

DB:mkm

8101302951

RAD 79-171

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE 12/21/79

ANALYST Dug Greevy

TO: Office of General Counsel
ATTENTION: M. Bragon

TEAM CHIEF Bobby Werfel

COMPLIANCE REVIEW OB

THROUGH: STAFF DIRECTOR

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1104

DATE OF ORIGINAL REFERRAL 12/10/79

Texas Democratic Voter Participation Project

**PURPOSE: Information

Requests for Additional Information and a Surface Violation Letter were sent on December 19, 1979 for the April 10, '79 and July 10, '79 Reports for the following: 4,5

April 10

1. Krueger expenses--same problem as in referral 2
2. Particular for $1,000 expenditure 2
3. A $10,000 contribution from an individual 1

July 10

1. GOTV expenses--same problem as in referral 2
2. Krueger expenses--same problem as in referral 2

Note: See Memo to the File, 12/12/79 3

OUTCOME: (if applicable)

8100302952

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

FORM A
...ary, 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 1 of 2 for 1

Line Number 14A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full: Dem. Nat. Proj.

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each Receipt this Period
David Hannah, Jr. P.O. Box 4 Houston, Tx. 77001 Receipt for: ☐ Primary ☐ General ☑ Other	Occupation: real-estate ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	1-9-79	3,000.00
Full Name, Mailing Address and ZIP Code Rex C. Cauble Cauble Enterprises Denton, Tx. 76201 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: Cauble Enterprises Occupation: self-employed ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	10,000.00
Full Name, Mailing Address and ZIP Code Louis A. Beecherl, Jr. 3801 Beverly Dr. Dallas, Tx. 75205 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: 521-0521 Occupation: Chair, Tex. Oil & gas ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	1,000.00
Full Name, Mailing Address and ZIP Code Arthur J. Wessely 2001 Bryan Tower, Suite 953 Dallas, Tx. 75201 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: 742-2396 Occupation: Independent Oil dealer ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	1,000.00
Full Name, Mailing Address and ZIP Code W. W. McAllister, Jr. 203 Terrell Rd. San Antonio, Tx. 78209 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: 826-1005 Occupation: investments ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	500.00
Full Name, Mailing Address and ZIP Code W. W. McAllister, Jr. 203 Terrell Rd. San Antonio, Tx. 78209 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: 826-1005 Occupation: investments ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	500.00
Full Name, Mailing Address and ZIP Code George P. Mitchell 3900 One Shell Plaza Houston, Tx. 77002 Receipt for: ☐ Primary ☐ General ☑ Other	Principal Place of Business: Occupation: geologists ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-22-79	2,000.00
SUBTOTAL of receipts this page (optional)			$ 18,000.00
TOTAL this period (last page this line number only)			$

2

Rev. 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 1 of 2 for Line Number 23-1

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Dem. Vet. Prog.

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Ruby Bading 334 Prince New Braunfels, Tx. 78130	reimbursement for services Expenditure for: ☐ Primary ☐ General ☑ Other	1-31-79	200.00
Marc Campos 8700 Broadway #1131 Houston, Tx. 77061	reimbursement for GOTV travel expenses statewide Expenditure for: ☐ Primary ☐ General ☑ Other	1-31-79	1,000.00
Helen Sneed 614 W. 6th Austin, Tx. 78701	GOTV. Beaumont area Expenditure for: ☐ Primary ☐ General ☑ Other	1-31-79	200.00
Aransas County Ruby Hart - County Clerk Rockport, Tx. 78382	voter list expenses Expenditure for: ☐ Primary ☐ General ☑ Other	1-31-79	19.50
Comal County Gene L. Nuhn P.O. Box 329 New Braunfels, Tx. 78130	voter list expenses Expenditure for: ☐ Primary ☐ General ☑ Other	1-31-79	32.00
New Braunfels Herald 186 S. Castell New Braunfels, Tx. 78130	printing for Krueger expenses Expenditure for: ☐ Primary ☐ General ☑ Other	1-31-79	389.35
New Braunfels Travel Agency 373 Landa Plaza New Braunfels, Tx. 78130	travel expenses for Krueger Expenditure for: ☐ Primary ☐ General ☑ Other	1-31-79	367.00
San Antonio Light P.O. Box 161 San Antonio, Tx. 78291	advertising expense Expenditure for: ☐ Primary ☐ General ☑ Other	1-31-79	77.75

SUBTOTAL of expenditures this page (optional)	$ 2,306.10
TOTAL this period (last page this line number only)	$

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FORM E
...ary, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 3 of 9 for Line Number 23-24

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Dem. Vet. Proj.

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Alamo Natl. Bank P.O. Box 1538 San Antonio, Tx. 78295	Master Charge expense for Pete Krueger Expenditure for: ☐ Primary ☐ General ☐ Other	3-13-79	1,000.00
City Water Board P.O. Box 2449 San Antonio, Tx. 78298	San Antonio GOTV Hdq. Water bill Expenditure for: ☐ Primary ☐ General ☑ Other	3-13-79	612.57
Helix Air Transport, Inc 9300 N. Central Exp. Dallas, Tx. 75231	Helicopter travel Krueger Expenditure for: ☐ Primary ☐ General ☐ Other	3-13-79	610.00
Hills Package Store 1300 So. Lamar Austin, Tx. 78704	Krueger Party expense San Austin staff Expenditure for: ☐ Primary ☐ General ☐ Other	3-13-79	595.89
Gulf Coast Helicopter 4810 Comal Pearland, Tx. 77581	Krueger Helicopter expense Expenditure for: ☐ Primary ☐ General ☐ Other	3-13-79	470.05
Upshur County J.B. Hill, Jr. Co. Clerk Upshur Courthouse Gilmer, Tx. 75644	Voter list expense Expenditure for: ☐ Primary ☐ General ☐ Other	3-21-79	142.00
Rio Air Ways Killeen Municipal Airport P.O. Box 636 Killeen, Tx. 76541	Krueger travel Expenditure for: ☐ Primary ☐ General ☐ Other	3-21-79	156.00
A-Texas Ribbon Supply & Typewriter Co. 6901 N. Lamar Suite 133 Austin, Tx. 78752	GOTV office Austin - Office supplies Expenditure for: ☐ Primary ☐ General ☐ Other	3-21-79	157.50

SUBTOTAL of expenditures this page (optional)	$ 7,744.01
TOTAL this period (last page this line number only)	$

Federal Election Commission
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Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 4 of 9 for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Dem. Vet. Proj.

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Travel Lodge 100 Villita St. San Antonio, Tx. 78205	GOTV meeting expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	198.02
Stripling Blake Bldg. Materials P.O. Box 9008 cc Austin, Tx. 78766	GOTV signs (stakes) Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	242.00
David R. Ramage Canal and D.C. SE. WA-29 Underground Plaza Washington D.C. 20155	Krueger Printing Expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	357.20
A.E. Sound P.O. Box 6119 64 Chalmers Austin, Tx. 78762	GOTV sound equipment statewide Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	200.00
San Angelo Flight Service municipal airport Route 5, Box 5242 San Angelo, Tx. 76901	Krueger travel Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	385.50
Sherwin Williams Co. 5301 Everhart Corpus Christi, Tx. 78411	GOTV signs (stakes) Corpus Christi Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	631.55
Terry Dougherty 158 El Trio #10 San Antonio, Tx. 78216	GOTV expense Bexar county Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	125.00
Stationers, Inc. 4245 Richmond Ave. Houston, Tx. 77027	Office equipment for GOTV Harris Co. Expenditure for: ☐ Primary ☐ General ☑ Other		141.51
SUBTOTAL of expenditures this page (optional)			$ 2,282.78
TOTAL this period (last page this line number only)			$

...9078
...l Election Commission
...5 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 5 of 9 for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Dem. Nat. Prty

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Individual Development Center 3401 Armory Rd. Wichita Falls, Tx. 76302	contract labor Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	125.98
Quality Inn 2915 I-40 East Amarillo, Tx. 79107	GOTV Breakfast meeting Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	80.25
Vierra Sound 501 E. Pecos San Antonio, Tx. 78207	GOTV sound equipment statewide (E-DAY) Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	76.93
Holiday Inn P.O. Box 7758 Longview, Tx 75602	GOTV meeting expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	63.30
Houston Executive Air Service 8601 Travelair Houston, Tx.	Krueger Band Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	50.16
Boston Flowers 2700 Canyon Dr. Amarillo, Tx. 79109	flowers for GOTV rally Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	49.88
R.B. Webb, Jr. 20720 Marguerite Bay City, Tx. 77414	GOTV expense travel reimbursement Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	48.00
Ramada Inn 410 South Texas Ave. College Station, Tx. 77840	GOTV meeting expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	43.30

SUBTOTAL of expenditures this page (optional)	$ 547.80
TOTAL this period (last page this line number only)	$

FEC 6/79 FEC 6/79 FEC 6/79

...ission Commission
...K Street, N.W.
...ington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 1a of 9 for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Marriott Hotel 2101 Stemmons Freeway Dallas, Tx. 75207	COTU meeting expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	37.10
Full Name, Mailing Address and ZIP Code Saga Food Service Box 395 Station W. Texas Canyon, Tx. 79016	Particulars of Expenditure COTU food expense on Election day Expenditure for: ☐ Primary ☐ General ☑ Other	Date (month, day, year) 3-21-79	Amount of each expenditure this period 25.00
Full Name, Mailing Address and ZIP Code Sheraton Metrocrest 230 Summerhill Rd. Texarkana, Tx. 75501	Particulars of Expenditure COTU meeting expense Expenditure for: ☐ Primary ☐ General ☑ Other	Date (month, day, year) 3-21-79	Amount of each expenditure this period 24.13
Full Name, Mailing Address and ZIP Code Doug Zabel for Congress 2nd St. Austin, Tx. 78701	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☑ Other	Date (month, day, year) 3-21-79	Amount of each expenditure this period 1,000.00
Full Name, Mailing Address and ZIP Code Russell Stationery Co. P.O. Box 2688 Amarillo, Tx. 79105	Particulars of Expenditure Krueger printing expense Expenditure for: ☐ Primary ☐ General ☑ Other	Date (month, day, year) 3-21-79	Amount of each expenditure this period 1,000.00
Full Name, Mailing Address and ZIP Code Cambridge Survey Research 10 Moulton St. Cambridge, Mass. 02138	Particulars of Expenditure Krueger Attitude field Expenditure for: ☐ Primary ☐ General ☑ Other	Date (month, day, year) 3-21-79	Amount of each expenditure this period 1,000.00
Full Name, Mailing Address and ZIP Code I.B.M. P.O. Box 19192 Kansas City, Missouri 64141	Particulars of Expenditure Krueger expense leasing equipment Expenditure for: ☐ Primary ☐ General ☑ Other	Date (month, day, year) 3-21-79	Amount of each expenditure this period 1,000.00
Full Name, Mailing Address and ZIP Code Texas Travelair 18803 Gulfdale, Suite 14 San Antonio, Tx. 78216	Particulars of Expenditure Krueger travel expense Expenditure for: ☐ Primary ☐ General ☑ Other	Date (month, day, year)	Amount of each expenditure this period 729.00
SUBTOTAL of expenditures this page (optional)			$ 4835.23
TOTAL this period (last page this line number only)			$

...ission Commission
...K Street, N.W.
...ington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 2 of 2 for Line Number 22A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Dun & Bradstreet Box 188 Staten Island, N.Y. 10314	Krueger mailing expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-27-79	500.00
Full Name, Mailing Address and ZIP Code Aztec Lumber P.O. Box 9114 Corpus Christi, Tx. 78408	Particulars of Expenditure GOTV signs (stake expense) Expenditure for: ☐ Primary ☐ General ☑ Other	Date (month, day, year) 3-27-79	Amount of each expenditure this period 1,000.00
Full Name, Mailing Address and ZIP Code Mungia Printers P.O. Box 7387, Station A San Antonio, Tx. 78207	Particulars of Expenditure Krueger printing expense Expenditure for: ☐ Primary ☐ General ☑ Other	Date (month, day, year) 3-27-79	Amount of each expenditure this period 3,147.16
Full Name, Mailing Address and ZIP Code Southwestern Bell P.O. Box 2901 Austin, Tx. 78777	Particulars of Expenditure Krueger telephone expense Expenditure for: ☐ Primary ☐ General ☑ Other	Date (month, day, year) 3-27-79	Amount of each expenditure this period 2,500.00
Full Name, Mailing Address and ZIP Code Alamo National Bank P.O. Box 1538 San Antonio, Tx. 78295	Particulars of Expenditure Krueger Master Charge Expenditure for: ☐ Primary ☐ General ☑ Other	Date (month, day, year) 3-27-79	Amount of each expenditure this period 8,000.00
Full Name, Mailing Address and ZIP Code Century II 35th 4 floor 1st Worth Natl. Bank Bldg. Fort Worth, Tx. 76102	Particulars of Expenditure GOTV party expense Expenditure for: ☐ Primary ☐ General ☑ Other	Date (month, day, year) 3-27-79	Amount of each expenditure this period 200.00
Full Name, Mailing Address and ZIP Code Southern Union Gas P.O. Box 1068 Austin, Tx. 78785	Particulars of Expenditure Utilities Austin office Expenditure for: ☐ Primary ☐ General ☑ Other	Date (month, day, year) 3-27-79	Amount of each expenditure this period 7.99
Full Name, Mailing Address and ZIP Code Abby Rento 6801 San Pedro Ave. San Antonio, Tx. 78216	Particulars of Expenditure San Antonio GOTV office expense Expenditure for: ☐ Primary ☐ General ☑ Other	Date (month, day, year) 3-27-79	Amount of each expenditure this period 11.07
SUBTOTAL of expenditures this page (optional)			$ 15,366.22
TOTAL this period (last page this line number only)			$

1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 8 of 1 for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Zip Printing 307 East Seventh Amarillo, Tx. 79105	GOTV printing Expenditure for: ☐ Primary ☐ General ☑ Other	3-29-79	13.87
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Kwik Kopy 118 West 5th St. Austin, Tx. 78701	GOTV printing Expenditure for: ☐ Primary ☐ General ☑ Other	3-29-79	21.77
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Ann Wheeler 1507 N. Lynn Austin, Tx. 78704	travel reimbursement Expenditure for: ☐ Primary ☐ General ☑ Other	3-29-79	233.29
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Beth Antonius 14422 Duncannon Dr. Houston, Tx. 77015	Houston GOTV expense and travel reimbursement Expenditure for: ☐ Primary ☐ General ☑ Other	3-29-79	272.50
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
John C Penland 302 Park Ln. Austin, Tx. 78704	salary expense Jan thru March Expenditure for: ☐ Primary ☐ General ☑ Other	3-29-79	200.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
ML Hughes 302 Park Ln. Austin, Tx. 78704	Salary expense Jan thru March Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	200.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Al's Bar-b-que Barn 1220 West Ave. M Temple, Tx. 76501	GOTV rally Bell Co. Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	340.73
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Stacy Waller 101 Hidden Hollow Kerrville, Tx. 78028	Krueger salary expense Expenditure for: ☐ Primary ☐ General ☑ Other		700.00
SUBTOTAL of expenditures this page (optional)			$ 1,982.15
TOTAL this period (last page this line number only)			$

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...K Street, N.W.
...Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made) Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 7 of 7 for Line Number 20a

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Ruby Bading 334 Prince New Braunfels, Tx. 78130	Krueger Salary expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-29-79	200.00
Janie Reaves Route 2, Box 500-22 New Braunfels, Tx. 78130	Krueger Salary expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-29-79	200.00
Lynda Hallmark 510 College Plano, Tx. 78643	Krueger Salary expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-29-79	349.00
Ed Wendler 807 Brazos St. Suite 202 Austin, Texas 78701	Krueger Salary expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-29-79	600.00
Corpus Christi Transit Co. P.O. Box 9277 Corpus Christi, Tx. 78408	Mondal Bus trip Voter registration rally Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	114.00
Tom Green Co. c/o Mrs. Oma Jones Tom Green Co. Court House San Angelo, Tx. 76902	Voter list expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	76.72
Charles A. Wolda & Assoc. 3100 Richmond, Suite 103 Houston, Tx. 77098	Krueger Expense Bumper Stickers Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	1207.50
Melissa Quinn 418 Saddle Tree New Braunfels, Tx. 78130	Krueger Salary expense Expenditure for: ☐ Primary ☐ General ☑ Other	3-21-79	200.00
	SUBTOTAL of expenditures this page (optional)		$ 2,946.22
	TOTAL this period (last page this line number only)		$38,242.51

...2,946.22

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

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 2 of 5 for Line Number ~~20a~~

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
DEMOCRATIC VOTER PROJECT

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
Helicopters Unlimited 8229 Travelair Houston, Texas	chartered helicopter	☐ Primary ☒ General ☐ Other	5/2/79 4/23/79	200.00 405.00
Aquila & Priscilla Tents Rt. 1, Box 355 Waco, Texas 76710	rented tent	☐ Primary ☒ General ☐ Other	4/23/79 6/1/79	285.00 1000.00
Aztec Lumber P.O. Box 9114 Corpus Christi, Texas 78408	yard signs	☐ Primary ☒ General ☐ Other	5/10/79 5/2/79	400.00 406.36
Linda Hallmark 510 W. College Llano, Texas 78643	printing & typing	☐ Primary ☐ General ☐ Other	5/3/79	773.00
Rosie Gonzales 109 W. French Place San Antonio, Texas 78212	Get Out the Vote	☐ Primary ☒ General ☐ Other	5/12/79	66.32
Corporate Aviation 7542 Major Houston, Texas 77061	chartered plane (Get Out the Vote) " " (Krueger)	☐ Primary ☒ General ☐ Other	6/1/79 6/1/79	4297.50 4297.50
Bill Wright 10919 Paulwood Houston, Texas 77071	Get Out the Vote	☐ Primary ☒ General ☐ Other	5/30/79	2700.00
Southwestern Bell Telephone P.O. Box 2901 Austin, Texas 78777	telephone services (Krueger)	☐ Primary ☒ General ☐ Other	4/23/79 4/1/79	2000.00 3000.00
SUBTOTAL of expenditures this page (optional)				$19,830.68
TOTAL this period (last page this line number only)				$

FEC 3/91 Ln 3, 4h Ln 39 & 79

...ion Commission
...t, N.W.
...gton, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 3 of 5 for Line Number 20a

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
DEMOCRATIC VOTER PROJECT

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Unicopy 5555 N. Lamar Austin, Texas 78751	printing (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	5/3/79 4/23/79 4/1/79	300.00 600.00 400.00
I.B.M. P.O. Box 19192 Kansas City, Missouri 64141	equipment leases (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	4/23/79 4/1/79	1397.27 1775.65
	Expenditure for: ☐ Primary ☒ General ☐ Other		
Neiman, Hanks, Puryear 910 Lavaca Austin, Texas	office rent (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	5/12/79 4/23/79	700.00 379.25
Dallas Flight Center 7454 Freight Lane Dallas, Texas 75235	chartered plane (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	4/23/79	300.00
Galleria Plaza Hotel 5060 W. Alabama Houston, Texas 77056	reception (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	4/23/79 5/2/79 5/12/79	250.00 100.00 669.03
Texas Press Association 718 W. 5th Austin, Texas 78701	clipping service (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	4/23/79	314.00
Adolphus Hotel Dallas, Texas 75221	reception (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	4/23/79	240.00
SUBTOTAL of expenditures this page (optional)			$ 7425.20
TOTAL this period (last page this line number only)			$

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...e Commission
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...n, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 4 of 5 for Line Number 20a

(Use Separate Schedules for each numbered line).

Name of Candidate or Committee in Full
DEMOCRATIC VOTER PROJECT

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
Western Union Electronic Mail 1600 Anderson Road McLean, Virginia 22101	mail grams (Krueger)	☐ Primary ☒ General ☐ Other	4/23/79 5/12/79	413.20 500.00
Cambridge Survey Research 10 Moulton St. Cambridge, Massachusetts 02138	polls (Krueger)	☐ Primary ☐ General ☐ Other	6/1/79 4/23/79	5000.00 500.00
Apollo Printing P.O. Box 15637 Houston, Texas 77020	printing (Krueger)	☐ Primary ☐ General ☐ Other	4/23/79 5/3/79	500.00 346.10
Cruse Aviation 8501 Telephone Road Houston, Texas 77061	chartered plane (Krueger)	☐ Primary ☐ General ☐ Other	5/3/79 4/23/79	300.00 400.00
Dun & Bradstreet P.O. Box 10545 Newark Post Office Newark, New Jersey 07101	polls (Krueger)	☐ Primary ☒ General ☐ Other	5/2/79	200.00
Century II Ft. Worth Nat'l Bank Bldg. Ft. Worth, Texas 76106	reception (Krueger)	☐ Primary ☒ General ☐ Other	5/2/79 5/12/79	150.00 351.81
G.S.D.&M. 150 E. Riverside Austin, Texas 78704	production (printing & media- Krueger)	☐ Primary ☒ General ☐ Other	6/1/79	28,298.81
Rio Airways P.O. Box 636 Killeen, Texas 76541	chartered plane (Krueger)	☐ Primary ☒ General ☐ Other	6/1/79	90.00

SUBTOTAL of expenditures this page (optional)	$37,049.92
TOTAL this period (last page this line number only)	$

...90313419

Commission
, N.W.
, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 5 of 5 for Line Number 20a

(Use Separate Schedules for each numbered line).

Name of Candidate or Committee in Full

DEMOCRATIC VOTER PROJECT

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Alamo National Bank P.O. Box 900 San Antonio, Texas 78293	payment of note (Krueger) Expenditure for: ☐ Primary ☒ General ☐ Other	4/23/79 6/1/79 6/5/79 6/6/79	6500.00 25000.00 5000.00 3000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	6/19/79 6/22/79 6/28/79 6/28/79	25000.00 10000.00 5000.00 20000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period

SUBTOTAL of expenditures this page (optional)	$ 99,500.00
TOTAL this period (last page this line number only)	$ 169,616.39

79031340320

Memo to the File:

Greevy
12/12/79
Re: Texas Democratic Voter Participation Project
Discussion with David Bolduc on 12/10/79

David Bolduc attended the workshop on party committees in Austin, TX, on 12/10/79. I was a member of the panel.

After the session, David indicated to me that he believed he had the matter regarding John Hill Campaign Committee just about taken care of. He said that $10,000 has been repaid, and that he hoped to repay the other $5,000 in a few days. I told him that we should be informed as soon as possible of any change in that situation.

He also stated that he was working on the amendments to the reports. In particular, he would be filing amendments to show the Krueger expenditures as coordinated expenditures.

He asked if there were any other problems in the committee's reports.

I had the opportunity to look at the committee's first and second quarter '79 reports last week. I noted the following problems, which I related to David.

April 10

1. Krueger expenses--same problem as before.

2. A $1,000 expenditure for which no purpose was provided.

3. A $10,000 receipt from an individual.

July 10

1. GOTV expenses--same problem as before.

2. Krueger expenses--same problem as before.

He said he would check into these matters. He did indicate that he had no knowledge of the $10,000 contribution, as that report was done by the former treasurer, John Pouland.

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In reply please refer to: 3SV1/79173DG

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 19, 1979

David Boldue, Treasurer
Texas Democratic Voter Participation Project
P.O. Box 1672
Austin, TX 78767

Dear Mr. Boldue:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, (the Act) as amended. During review of the April 10 Report of Receipts and Expenditures, we noticed an entry indicating that you may have received a contribution which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

The Act precludes an individual from making a political contribution to a multicandidate committee in any calendar year in excess of $5,000.

The Commission recommends that if you find the contribution you received was in excess of the limits set forth in the Act, you return the amount in excess of $5,000 to the donor. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution, your prompt refund of the excessive contribution to the donor will be taken into consideration by the Commission. Please notify the Commission of your determination on this matter by letter within fifteen (15) days from the date of this notification. If you have any questions concerning this matter, please do not hesitate to contact David Greevy (800)424-9530, our Reports Analyst assigned to you. Our local number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst

Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

Enclosure

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...y. 1978
...ederal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 1 of 3 for
Line Number 14A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full: Dem. Vet. Proj. — Texas Democratic Voter Participation Project

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
David Hannah, Jr. P.O. Box 4 Houston, Tx. 77001 Receipt for: ☑ Primary ☐ General ☑ Other	Occupation: real-estate ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	1-9-79	3,000.00
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Rex C. Cauble Cauble Enterprises Denton, Tx. 76201 Receipt for: ☑ Primary ☐ General ☑ Other	Cauble Enterprises Occupation: self-employed ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	10,000.00
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Louis A. Beecherl, Jr. 3801 Beverly Dr. Dallas, Tx. 75205 Receipt for: ☐ Primary ☐ General ☑ Other	521-0521 Occupation: Chair. Tex. Oil & Gas ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	1,000.00
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Arthur J. Wessely 2001 Bryan Tower, Suite Dallas, Tx. 75201 Receipt for: ☐ Primary ☐ General ☑ Other	953 742-2396 Occupation: Independent Oil dealer ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	1,000.00
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
W. W. McAllister, Jr. 203 Terrell Rd. San Antonio, Tx. 78209 Receipt for: ☐ Primary ☐ General ☑ Other	826-1005 Occupation: investments ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	500.00
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
W. W. McAllister, Jr. 203 Terrell Rd. San Antonio, Tx. 78209 Receipt for: ☐ Primary ☐ General ☑ Other	826-1005 Occupation: investments ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-6-79	500.00
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
George P. Mitchell 3900 One Shell Plaza Houston, Tx. 77002 Receipt for: ☐ Primary ☐ General ☑ Other	Occupation: geologists ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	3-22-79	2,000.00

SUBTOTAL of receipts this page (optional)	$ 18,000.00
TOTAL this period (last page this line number only)	$

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 19, 1979

David Bolduc, Treasurer
Texas Democratic Voter Participation Project
P.O. Box 1672
Austin, Texas 78767

Dear Mr. Bolduc:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the July 10 / April 10 & Reports of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact David Greevy in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter.

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

8 1 0 1 3 0 2 9 6 9

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

TO: Texas Democratic Voter Participation Project

DATE: December 19, 1979

I.D. NO.: C00099267

REQUEST FOR ADDITIONAL INFORMATION FOR THE April 10 REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 1/1/79 THROUGH 3/31/79, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Detailed Summary (Page 2) Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Schedule Totals: ___ disagree with Detailed Summary (Page 2) or ___ omitted

___ Date(s): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Full Name(s)/Mailing Address(es): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Occupation/Principal Place(s) of Business: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Election Designation: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Aggregate Year-to-Date Totals: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Expenditure: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Receipt: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Inadequate Description of: ___ proceeds ___ dates ___ events ___ location of Schedule

___ Signature: ___ omitted ___ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

___ Other: Please See Page Two

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEC Form 12
(Revised November 1978)

Texas Democratic Voter Participation Project
April 10

The committee reports several expenditures the purposes of which include "Krueger". All or a portion of these expenditures may be allocable Federal candidate support and should be identified as such to include the amount, name, address, and office sought by each candidate on whose behalf such expenditures were made. If these expenditures constitute in-kind contributions, they should be reported on Schedule B, Line 22c. If they constitute expenditures made in accordance with 2 U.S.C. 441a(d), they should be reported on Schedule F, Line 24.

Please provide the purpose of expenditure for the payment made to Doug Zabel, as reported on Schedule B, Line 20a, Page 6 of 9.

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

TO: Texas Democratic Voter Participation Project

DATE: December 19, 1979

I.D. NO.: C00099267

REQUEST FOR ADDITIONAL INFORMATION FOR THE July 10 REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 4/1/79 THROUGH 6/30/79, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Detailed Summary (Page 2) Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Schedule Totals: ___ disagree with Detailed Summary (Page 2) or ___ omitted

___ Date(s): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Full Name(s)/Mailing Address(es): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Occupation/Principal Place(s) of Business: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Election Designation: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Aggregate Year-to-Date Totals: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Expenditure: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Receipt: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Inadequate Description of: ___ proceeds ___ dates ___ events ___ location of Schedule

___ Signature: ___ omitted ___ inadequate
11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

___ Other: Please See Page Two

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEC Form 12
(Revised November 1978)

Texas Democratic Voter Participation Project
July 10

On Line 20a of Schedule B, you disclose payments for GOTV expenses. Please be advised that Section 104.2(b)(9) of the Commission's Regulations requires the "particulars" to be provided for each expenditure which exceeds $100 in the aggregate to a single payee. Please amend your report to clarify the purposes of these expenditures.

The committee reports several expenditures the purposes of which include "Krueger". All or a portion of these expenditures may be allocable Federal Candidate support and should be identified as such to include the amount, name, address, and office sought by each candidate on whose behalf such expenditures were made. If these expenditures constitute in-kind contributions, they should be reported on Line 22c. If they constitute expenditures made in accordance with 2 U.S.C. 441a(d), they should be reported on Schedule F, Line 24.

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rec'd 12/12/79
5:45 PM

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DECEMBER 10, 1979

MEMORANDUM

MUR1104

TO : CHARLES N. STEELE, GENERAL COUNSEL

THROUGH: ORLANDO B. POTTER OBP

FROM : THOMAS J. HASELHORST TJH

RE : REFERRALS OF TEXAS DEMOCRATIC VOTER PARTICIPATION PROJECT, CAMPAIGN VICTORY '78 (NON-FEDERAL), AND JOHN HILL CAMPAIGN COMMITTEE

Attached is a referral for Texas Democratic Voter Participation Project and related referrals for two unregistered committees who transferred funds which were put into the registered committee's federal account. The three committees are being referred together in order that they may be reviewed together by the Office of General Counsel.

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D 549
RAD 92-212

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 13 10 79 ANALYST Dug Greevy

TO: Office of General Counsel TEAM CHIEF Bobby Werfel

THROUGH: STAFF DIRECTOR [illegible] COMPLIANCE REVIEW RS/CB

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: Texas Democratic Voter Participation Project
TREASURER: David Bolduc (FEC has been informed by phone)
ADDRESS: 1210 Nueces, Suite 100
Austin, TX 78701

AFFILIATE(S):

ALLEGATION(S):	CITE:	ATTACHMENT(S)
Inadequate Disclosure	2 U.S.C. 434	2
Receipt of Excessive Contribution	2 U.S.C. 441a	4

DATE INITIATED: 6/18/79

MANNER IN WHICH REVIEW WAS INITIATED:
☒ Normal Review ☐ Other: ATTACHMENT
☐ Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 7/1/78 TO 12/31/78

TOTAL RECEIPTS $ 91,410 TOTAL EXPENDITURES $ 91,329

CASH ON HAND $ 79.00(12/31/78) DEBTS $ 0

HISTORY:

RESULTS OF REVIEW: *ATTACHMENT*
Request for Additional Information, Oct. 10, 10 Day Pre-Election, 30 Day Post-Election Reports, 6/18/79 2
3RQ2/79-52, 9/14/79 (for no response) 3
3SV1/79-76, Oct. 10, 7/19/79 4

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: *ATTACHMENT*
Telecon: Greevy with TX Demo. Party secretary, 9/14/79 5
Telecon: Greevy with Bolduc, 10/11/79 6
Telecon: Greevy with Bolduc, 10/23/79 7

REASON(S) FOR REFERRAL: *ATTACHMENT*
Response to 3RQ2/79-52 , 11/12/79, inadequate 11
Response to 3SV1/79-76 , 11/19/79, question of adequacy 12
Note: The recipient committee's cash on hand as of 9/30/79 was $864.

OTHER PENDING ACTIONS INITIATED BY RAD: *ATTACHMENT*
None

OTHER RELEVANT INFORMATION:
Memo to the File: Greevy, 8/1/79 8
Memo to the File: Greevy, 10/17/79 9
Substantive portions of committee's reports for which information was requested in FEC letter of 6/18/79 10
Referral for contributing committee (John Hill Campaign Committee) is submitted with this referral
PREVIOUS OGC/AUDIT REFERRALS FROM RAD:
None

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 31OCT79
PAGE 1

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COMMITTEE / DOCUMENT	RECEIPTS PRIMARY	RECEIPTS GENERAL	EXPENDITURES PRIMARY	EXPENDITURES GENERAL	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
TEXAS DEMOCRATIC VOTER PARTICIPATION PROJECT							ID# C00099267
1978 STATEMENT OF ORGANIZATION					10JUL78	4	78FEC/078/4560
STATEMENT OF ORGANIZATION- AMENDMENT					12OCT78	6	78FEC/089/0082
OCTOBER 10 QUARTERLY	37,650		35,700		1JUL78 -30SEP78	14	78FEC/089/0088
REQUEST FOR ADDITIONAL INFORMATION					1JUL78 -30SEP78	2	79FEC/129/0192
REQUEST FOR ADDITIONAL INFORMATION					1JUL78 -30SEP78	2	79FEC/133/1027
10 DAY PRE-GENERAL		21,620		19,631	10OCT78 -23OCT78	7	78FEC/093/1674
REQUEST FOR ADDITIONAL INFORMATION					23OCT78	2	79FEC/129/0194
30 DAY POST-GENERAL		32,140		29,258	24OCT78 -27NOV78	13	79FEC/114/5438
REQUEST FOR ADDITIONAL INFORMATION					24OCT78 -27NOV78	2	79FEC/129/0196
YEAR END REPORT		0		6,740	31DEC78	5	79FEC/121/2653
TOTAL	37,650	53,760	35,700	55,629		57	TOTAL PAGES

All reports reviewed

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ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 2 of 2 for Line Number 20A

(Use Separate Schedules for each numbered line) 10

Name of Candidate or Committee in Full

Texas Democratic Voter Participation Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Mr. Wizard 512 W. Mt. King. Austin, Texas 78701	Office furniture rental Expenditure for: ☐ Primary ☑ General ☐ Other	8-14-78	35.00
Nueces Co. Dem. Hdq. 720 Buffalo Corpus Christi, Tx.	office rent C.C - Aug " " " - Sept voter registration ex. Oct. Expenditure for: ☐ Primary ☑ General ☐ Other	8-17-78 9-6-78 9-27-78	325.00 325.00 300.00
Frank Perea P.O. Box 242 Pecos, Tx. 79772	travel expense " " / gas & mileage reimbursement Expenditure for: ☐ Primary ☑ General ☐ Other	8-17-78 9-6-78	200.00 400.00
Lowell Starling 1911 W. Harmony Tyler, Texas 75702	travel reimbursement Contract labor Expenditure for: ☐ Primary ☑ General ☐ Other	8-21-78 9-6-78	200.00 300.00
Kerrville Bus Co. P.O. Box 615-4 Austin, Tx. 78702	travel expenses (bus rental) Expenditure for: ☐ Primary ☑ General ☐ Other	8-23-78	185.60
Blanche Darley 2008 Atlanta El Paso, Tx. 79902	travel expense Contract labor Expenditure for: ☐ Primary ☑ General ☐ Other	8-24-78 8-24-78	200.00 200.00
Petty Cash - miscellaneous (office rese)	gas/mileage Postage, travel office supplies Expenditure for: ☐ Primary ☑ General ☐ Other	8-28-78 9-12-78 9-21-78 9-28-78	100.00 100.00 100.00 100.00
Grace Garcia 2139 W. Kings Hwy. San Antonio, Tx.	Salary (contract labor) travel ex person mileage reimbursement contract labor ; travel ex. Expenditure for: ☐ Primary ☑ General ☐ Other	8-26-78 8-28-78 8-28-78 8-28-78 9-6-78	450.00 100.00 156.95 14.95 450.00 ; 100
SUBTOTAL of expenditures this page (optional)			$ 4442.51
TOTAL this period (last page this line number only)			$

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ITEMIZED EXPENDITURES

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Loans, Loan Repayments and Refunds Made;
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

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Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Texas Democratic Voter Participation Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Brady Fisher Rt. 2 Box 16 Paris, Tx. 75460	contract labor travel ex. Expenditure for: ☐ Primary ☑ General ☐ Other	9-6-78 9-6-78	300.00 200.00
Mingo Chapa 1203 Metro Tower 1220 Broadway Lubbock, Tx. 79401	travel expense Expenditure for: ☐ Primary ☑ General ☐ Other		
Larry Jackson 1406 Willow Creek #102 Austin, Texas 78741	contract labor reimburse on refreshments mileage Igas. Reimbursment contract labor & mileage reim Expenditure for: ☐ Primary ☑ General ☐ Other	9-6-78 9-15-78 9-19-78 9-26-78	300.00 107.00 140.96 (300.00) 43.00
Joan Hinojosa 2829 Iris McAllen, Texas 78501	travel expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-7-78	300.00
Rosa Olivo 3202 Ave. O. Rosenberg, Tx. 77471	travel expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-7-78	100.00
Charlene Hooker 704 Citizen Tower Waco, Tex. 76701	travel reimbursmet Expenditure for: ☐ Primary ☑ General ☐ Other	9-12-78	23.00
Raymond Campbell 1102 Sapphire Longview Tx. 75602	traveling expense " " Expenditure for: ☐ Primary ☑ General ☐ Other	9-12-78 9-20-78	35.00 15.00
E. Robles 100 Alamo St. Hearne, Tx.	BBQ for Hearne tour voter registration expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-15-78 9-26-78	510.00 15.00
SUBTOTAL of expenditures this page (optional)			$ 2608.96
TOTAL this period (last page this line number only)			$

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ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 1 of 6 for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Texas Democratic Voter Participation Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Greyhound Lines Congress Ave. Austin, Tx. 78701	tour thru Central Texas Expenditure for: ☐ Primary ☑ General ☐ Other	9-15-78	450.08
Nueces Co. Voter Reg. Project P.O. Box 5445 Corpus Christi, Tx.	voter registration expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-18-78	1,000.00
Duke Fox 511 N. Ave. Pittsburg, Tx. 75686	travel & expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-18-78	30.00
C.L. Belton 422 Victory Pittsburg, Tx. 75686	traveling expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-18-78	30.00
Mike Williams 4610 Bowie Midland, Tx. 79701	300 - salary / contract 200 - travel expenses Expenditure for: ☐ Primary ☑ General ☐ Other	9-19-78	500.00
J.C. Calvert 912 W. French San Antonio, Tx. 78212	traveling expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-19-78	200.00
Linda Lewis McGowan 2503 New York Dr. #157 Austin, Tx. 78702	travel expense/gas/mileage reim. contract labor Expenditure for: ☐ Primary ☑ General ☐ Other	9-14-78 9-28-78	107.52 300.00
M. L. Hughes 302 Park Ln. Austin, Tx. 78704	travel/mileage mileage reimbursement Expenditure for: ☐ Primary ☑ General ☐ Other	9-19-78 9-26-78	84.30 34.50
SUBTOTAL of expenditures this page (optional)			$2736.40
TOTAL this period (last page this line number only)			$

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ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-K... Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 2 of 7 for Line Number 29A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Texas Democratic Vote Participation Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
William Glenn 207 W. Mulberry Kaufman, Tx.	voter registration expense Expenditure for: ☐ Primary ☑ General ☐ Other	9/22/78	150.00
KTAE RADIO Taylor, Tx.	Radio spots / media V.R. Expenditure for: ☐ Primary ☑ General ☐ Other	9-21-78	88.00
Gilden Creek Baptist Ch. Rt. # 2 Box - 3-D Manor, Tx.	Voter registration expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-22-78	25.00
Alice Taylor Rt. # 2 Box 3-D Manor, Tx.	travel expense (V.R. ") Expenditure for: ☐ Primary ☑ General ☐ Other	9-22-78	3.00
Jerdie Baker Rt. # 2 Box 3-D Manor Tx.	travel expenses (V.R. ") Expenditure for: ☐ Primary ☑ General ☐ Other	9-22-78	6.25
Grace Garcia 2139 Knigp Hwy. San Antonio, Tx.	gas / mileage Reimb. Contract labor travel expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-19-78 9-26-78 9-26-78	104.60 450.00 100.00
Voter Registration Comm. Court Place Bldg. Suite 701 Lubbock, Tx. 79401	voter registration expense Expenditure for: ☐ Primary ☑ General ☐ Other	9-26-78	500.00
Southwestern Bell Tele. Co. P.O. Box 2901 Austin, Tx. 78777	telephone - Sept main Austin office Expenditure for: ☐ Primary ☑ General ☐ Other	9-28-78	28.40
SUBTOTAL of expenditures this page (optional)			$1645.25
TOTAL this period (last page this line number only)			$

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ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 6 of 7 for Line Number 22A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Texas Democratic Voter Participation Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
James Pace / Cameron Co. Democratic Party 1325 Willow [illegible] 74772 Brownsville, Tx. 78520	gas/mileage reimb. voter registration expens Expenditure for: ☐ Primary ☑ General ☐ Other	9-12-78	250.00
Cameron Co. Democratic Party 1325 Willow [illegible] 74772 Brownsville, Tx. 78520	Voter registration expenses Expenditure for: ☐ Primary ☑ General ☐ Other	9-26-78	1,500.00
Quik Print 101 Saturation Life Bldg. Austin, Tx. 78701	Printing of campaign brochures letters etc. Expenditure for: ☐ Primary ☑ General ☐ Other	9-12-78 9-26-78	80.28 10.45
Rosie Centeno 1810 San Bernardo Laredo, Tx. 78040	travel ex/mileage reim. voter registration expens Expenditure for: ☐ Primary ☑ General ☐ Other	9-12-78 9-26-78	250.00 450.00
Democratic Victory Fund 214 Dwyer Suite 205 San Antonio, Tx. 78204	voter registration expens - Bexar Co. Expenditure for: ☐ Primary ☑ General ☐ Other	9-26-78	200.00
Mt. Caramel Lodge 1704 E. 12th St. Austin, Tx.	E. Austin office rent 9-25 thru 11-7-78 Expenditure for: ☐ Primary ☑ General ☐ Other	9-26-78	200.00
Arlington Democratic Club Peg Hall 900 Linda Vista #5 Arlington, Tx. 76013	voter registration expenses - Arlington Expenditure for: ☐ Primary ☑ General ☐ Other	9-26-78	100.00
Ruby Carey Campaign 1804 Bunche Ft. Worth, Tx. 76112	voter registration expenses Ft. Worth Tarrant Co. Expenditure for: ☐ Primary ☑ General ☐ Other	9-27-78	100.00
SUBTOTAL of expenditures this page (optional)			$ 3140.73
TOTAL this period (last page this line number only)			$

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ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 7 of 7 for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Texas Democratic Voter Part. Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Mrs. Ann Byers 1029 E. Marion Ft. Worth, Tx. 76104	Voter registration expense - Ft. Worth Tarrant Co. Expenditure for: ☐ Primary ☑ General ☐ Other	9-27-78	100.00
LULAC Council #312 c/o Jacinto Ortega-President Box 426 Pearsall, Tx. 78061	Voter registration expenses Frio Co. Expenditure for: ☐ Primary ☑ General ☐ Other	9-28-78	15.00
Texas State Bank 900 Congress Austin, Tx. 78701	bank service charge Expenditure for: ☐ Primary ☑ General ☐ Other	9-5-78	1.55
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period

SUBTOTAL of expenditures this page (optional)	$ 116.55
TOTAL this period (last page this line number only)	$ 33,200.3

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January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 1 of 2 for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Texas Democratic Voter Registration Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Nueces Co. Demo. Party 722 Buffalo Corpus Christi, Tx. 78401	Office rent (Krueger) Cont 76911 Expenditure for: ☐ Primary ☑ General ☐ Other	10-16-78	487.50
Marc Campos 2005 Willow Creek #1054 Austin, Tx.	Sign Program Expenditure for: ☐ Primary ☑ General ☐ Other	10-16-78	300.00
Larry Jackson 3100 Rexford Austin, Tx.	Reimbursement for travel Expenditure for: ☐ Primary ☑ General ☐ Other	10-17-78	59.31
Houston AASO 3303 Parkwood Houston, Tx. 77021	Get-Out-the-Vote Program Expenditure for: ☐ Primary ☑ General ☐ Other	10-17-78	2,000.00
San Antonio Voters Action League 307 Dillon Walk, Bldg. #32 San Antonio, Tx. 78208 C/O J.C. Calvert	Calt out the vote Program Expenditure for: ☐ Primary ☑ General ☐ Other	10-17-78	1,700.00
American Printers Exchange 6618 N. Lamar Austin, Tx.	Printing for Election Day/Pamphlets Expenditure for: ☐ Primary ☑ General ☐ Other	10-18-78	350.00
Campaign Victory '78 Turtle Creek Village Suite 514 Dallas, Tx. 75219	Dallas Co. GOTV Cont 10197 Expenditure for: ☐ Primary ☑ General ☐ Other	10-18-78	1,250.00
Ace Lumber Co. P.O. Box 892 Austin, Tx. 78767	yard stakes for political signs Expenditure for: ☐ Primary ☑ General ☐ Other	10-18-78	192.78
SUBTOTAL of expenditures this page (optional)			$ 6,339.59
TOTAL this period (last page this line number only)			$

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

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 2 of 3 for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Texas Democratic Voter ~~Participation~~ Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Southwestern Bell P.O. Box 2[illegible] Austin, Tx. 78777	Krueger / Austin Off / telephone bill Expenditure for: ☐ Primary ☑ General ☐ Other	10-18-78	1,771.33
La Quinta Royale 401 North Water Corpus Christi, Tx.	hotel expenses for Morale Tour Expenditure for: ☐ Primary ☑ General ☐ Other	10-18-78	1,677.99
Vic Gonzales P.O. Box 215 Stockdale, Tx. 78601	contract labor Expenditure for: ☐ Primary ☑ General ☐ Other	10-18-78	400.00
Kwick Kopy 2407-B S. Congress Ave. Austin, Tx.	printing for E-DAY Expenditure for: ☐ Primary ☑ General ☐ Other	10-23-78	873.38
Oscar Gomez P.O. Box 215 Stockdale, Tx. 7860[illegible]	Contract labor Expenditure for: ☐ Primary ☑ General ☐ Other	10-23-78	500.00
Southwestern Bell P.O. Box 2901 Austin Tx. 78777	Krueger / Austin off - [illegible] telephone bill Expenditure for: ☐ Primary ☑ General ☐ Other	10-23-78	4,769.74
Barbara Klein 722 Buffalo Corpus Christi, Tx.	Contract labor Expenditure for: ☐ Primary ☑ General ☐ Other	10-23-78	550.00
Joe Gonzales 722 Buffalo Corpus Christi, Tx.	Contract labor Expenditure for: ☐ Primary ☑ General ☐ Other	10-23-78	500.00
SUBTOTAL of expenditures this page (optional)			$ 11,242.44
TOTAL this period (last page this line number only)			$

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ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 1 of 2 for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Texas Democratic Voter Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
U.S. Post Office Houston, Tx.	Mailing of Dem. Krueger Brochure postage Expenditure for: ☐ Primary ☑ General ☐ Other	10-25-78	750.00
David Butts 3112 Dancy Austin, Tx. 78722	Aug. Contract labor Expenditure for: ☐ Primary ☑ General ☐ Other	10-24-78	600.00
Democratic Party 215 Stokes Bldg. Austin, Tx. 78701	postage / shipping Expenditure for: ☐ Primary ☑ General ☐ Other	10-24-78	20.00
Campaign Victory 178 1 Turtle Creek Village suite 514 Dallas, Tx. 75219	Dallas Co. - GOTV C10101772 Expenditure for: ☐ Primary ☑ General ☐ Other	10-24-78	1,000.00
PCA 2017 Cedar Springs Dallas, Tx. 75201	Dallas Co. Phoning Expenditure for: ☐ Primary ☑ General ☐ Other	10-24-78	1,000.00
Val Mendoza 1601 W. Westheimer Austin, Tx. 78703	Cars Caravan salary Expenditure for: ☐ Primary ☑ General ☐ Other	10-24-78	1,000.00
Joe Gonzales AUSTIN, TX.	TRAVEL EXPENSE Expenditure for: ☐ Primary ☑ General ☐ Other	10-24-78	250.00
Ace Lumber Co. Inc. 408 Comal Austin, Tx.	Stakes for yard signs Expenditure for: ☐ Primary ☑ General ☐ Other	10-26-78	102.90
SUBTOTAL of expenditures this page (optional)			$ 4,622.90
TOTAL this period (last page this line number only)			$

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ITEMIZED EXPENDITURES
(Operating, Transfers Out, Contributions In-[illegible], Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 2 of 5 for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Texas Democratic Voter Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
G.S.D. & M. 150 E. Riverside Dr. Austin, Tx.	Media for KT & Dem. Party, E-Day Expenditure for: ☐ Primary ☑ General ☐ Other	10-26-78	5,000.00
PARMER Marketing (Gerry Myron) 805 LAMAR Ft. Worth, Tx. 76102	Phoning in Ft. Worth/Tarrant Co. Expenditure for: ☐ Primary ☑ General ☐ Other	10-26-78	3,000.00
Alan Schoenbaum 614 E. 6th St. Austin, Tx. 78701	GOTV expenses Expenditure for: ☐ Primary ☑ General ☐ Other	10-28-78	100.00
G.S.D. & M. 150 E. Riverside Dr. Austin, Tx.	Media for KT & E-Day Expenditure for: ☐ Primary ☑ General ☐ Other	10-30-78	3,000.00
Frank Candelaria 2720 Montana El Paso, Tx. 79902	Salary Expenditure for: ☐ Primary ☑ General ☐ Other	10-30-78	500.00
Daily Sentinel Box 68 Nacogdoches, Tx. 75961	Newspaper ad Expenditure for: ☐ Primary ☑ General ☐ Other	11-1-78	288.96
PASO 3303 Parkwood Houston, Tx. 77023	GOTV Harris Co. Mexican-Am. Expenditure for: ☐ Primary ☑ General ☐ Other	11-2-78	2,000.00
Campaign Victory '78 1 Forth Creek Village Suite 514 Dallas, Tx. 75218	GOTV Dallas Expenditure for: ☐ Primary ☑ General ☐ Other	11-3-78	1,750.00
SUBTOTAL of expenditures this page (optional)			$ 15,638.96
TOTAL this period (last page this line number only)			$

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ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 1 of 3 for Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Texas Democratic Vote Project

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Munguia Printers 2201 Buena Vista San Antonio, Tx.	Printing door-hangers Expenditure for: ☐ Primary ☑ General ☐ Other	11-3-78	2,000.00
Arnold Gonzales P.O. Box 2910 Austin, Tx. 78711	GOTV in Nueces Co. Expenditure for: ☐ Primary ☑ General ☐ Other	11-3-78	200.00
Larry Jackson 3100 Rexford Austin, Tx.	Travel expenses - 200.00 Travel reimbursement 150.00 Expenditure for: ☐ Primary ☑ General ☐ Other	11-3-78	350.00
Parmer Mkt. 805 Lamar Ft. Worth, Tx. 76102	Phone Bank Ft. Worth Expenditure for: ☐ Primary ☑ General ☐ Other	11-3-78	1,000.00
Lowell Starling 1911 W. Harmony Tyler, Tx. 75702	Salary - 300.00 Travel - 200.00 Expenditure for: ☐ Primary ☑ General ☐ Other	11-4-78	500.00
Harris Co. Dem. Vote Project 2016 Main Suite 102 Houston, Tx. 77002	GOTV in Harris Co. Expenditure for: ☐ Primary ☑ General ☐ Other	11-4-78	500.00
Grace Garcia 2139 Kings Hwy. San Antonio, Tx.	Salary - 450.00 Travel - 100.00 Travel reimbursment - $48.36 Expenditure for: ☐ Primary ☑ General ☐ Other	11-10-78	692.36
Larry Jackson 3100 Rexford Austin, Tx.	Salary - 300.00 Travel reimbursement 66.58 Expenditure for: ☐ Primary ☑ General ☐ Other	11-10-78	366.58
SUBTOTAL of expenditures this page (optional)			$ 5,608.94
TOTAL this period (last page this line number only)			$

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ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 1 of 20
Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

DEMOCRATIC VOTER PROJECT

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
M L Hughes 302 Park Ln. Austin, Tx. 78701	Salary - 400.00 travel expenses - 200.00 travel reimb - 88.00 Expenditure for: ☐ Primary ☑ General ☐ Other	11-13-78	688.00
J.C. Pouland 302 Park Ln. Austin, Tx. 78701	travel reimbursement Expenditure for: ☐ Primary ☑ General ☐ Other	11-13-78	80.42
David Butts 3112 Dancy Austin, Tx. 78722	Salary - 1,050.00 Travel for Sept. & Oct 400.00 Expenditure for: ☐ Primary ☑ General ☐ Other	11-14-78	1,450.00
Linda McGowen 2503 New York Dr. #157 Austin, Tx. 78702	Salary - 300.00 Travel Expenses - 100.00 Expenditure for: ☐ Primary ☑ General ☐ Other	11-14-78	400.00
Hastings North off 7701 N. Lamar Blvd. Austin, Tx.	Answering Service Fee Expenditure for: ☐ Primary ☑ General ☐ Other	11-17-78	32.41
Joyce Peters 214 Dwyer San Antonio, Tx. 78205	For Dem. Buttons Expenditure for: ☐ Primary ☑ General ☐ Other	11-17-78	300.00
Petty Cash	Office expenditures Expenditure for: ☐ Primary ☑ General ☐ Other	10-27-78	100.00
City Bank P.O. Box 1727 Austin, Tx. 78767	Service charge Expenditure for: ☐ Primary ☑ General ☐ Other	10-31-78	2.25
SUBTOTAL of expenditures this page (optional)			$ 3,053.0
TOTAL this period (last page this line number only)			$

8493173483

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page ____ of ____
Line Number 20A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

DEMOCRATIC VOTER PROJECT

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Galveston Daily News Box 628 Galveston, Tx 77553	advertising Expenditure for: ☐ Primary ☑ General ☐ Other	10-28-78	334.40
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (optional)			$ 334.40
TOTAL this period (last page this line number only)			$ 29258.2

87033694444

2

FEDERAL ELECTION COMMISSION

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

June 18, 1979

John C. Pouland
Texas Democratic Voter Participation Project
601 International Life Building
Austin, Texas 78701

Dear Mr. Pouland:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the October 10 Quarterly, 10 Day Pre-General, & 30 Day Post-General Reports of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact David Greevy in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)357-0023.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

8104029990

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

7-16

Texas Democratic Voter Participation Project DATE: June 18, 1979

I.D. NO.: C00099267

REQUEST FOR ADDITIONAL INFORMATION FOR THE October 10 Quarterly REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 7/1/78 THROUGH 9/30/78, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___omitted or ___incorrect

___ Detailed Summary (Page 2) Line(s):___ Column(s):___ Totals:___ ___omitted or ___incorrect

___ Schedule Totals: ___disagree with Detailed Summary (Page 2) or ___omitted

___ Date(s): ___omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Full Name(s)/Mailing Address(es): ___omitted or ___ inadequate for Schedule(s)___ Line(s)___

___ Occupation/Principal Place(s) of Business: ___omitted or ___inadequate for Schedule(s)___ Line(s)___

___ Election Designation: ___omitted or ___inadequate for Schedule(s)___ Line(s)___

___ Aggregate Year-to-Date Totals: ___ omitted or ___ inadequate for Schedule(s)___ Line(s)___

_X_ Nature or Purpose of Expenditure: ___ omitted or _X_ inadequate for Schedule(s) B Line(s) 20

___ Nature or Purpose of Receipt: ___ omitted or ___inadequate for Schedule(s)___ Line(s)___

___ Inadequate Description of: ___ proceeds ___dates ___events ___location of Schedule

___ Signature: ___ omitted ___ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

___ Other: The committee has reported several expenditures the purposes of which are listed as "Voter Registration Expenses." Please be advised that these descriptions are not sufficient to meet the statutory requirements. Please amend your report to clarify the nature of these expenditures. 2 USC

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 357-0023 Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEC Form 12
(Revised November 1978)

TO: Texas Democratic Voter Participation Project DATE: June 18, 1979

I.D. NO.: C00099267

REQUEST FOR ADDITIONAL INFORMATION FOR THE 10 Day Pre-General REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD ? THROUGH ?, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

X Coverage Dates: X omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___omitted or ___incorrect

___ Detailed Summary (Page 2) Line(s): ___ Column(s): ___ Totals: ___ ___omitted or ___incorrect

___ Schedule Totals: ___disagree with Detailed Summary (Page 2) or ___omitted

___ Date(s): ___omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Full Name(s)/Mailing Address(es): ___omitted or ___ inadequate for Schedule(s)___ Line(s)___

___ Occupation/Principal Place(s) of Business: ___omitted or ___inadequate for Schedule(s)___ Line(s)___

___ Election Designation: ___omitted or ___inadequate for Schedule(s)___ Line(s)___

X Aggregate Year-to-Date Totals: X omitted or ___ inadequate for Schedule(s) A Line(s) 14

X Nature or Purpose of Expenditure: ___ omitted or X inadequate for Schedule(s) B Line(s) 20

___ Nature or Purpose of Receipt: ___omitted or ___inadequate for Schedule(s)___ Line(s)___

___ Inadequate Description of: ___proceeds ___dates ___events ___location of Schedule

___ Signature: ___ omitted ___ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

___ Other: Please See Page Two

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 357-0023 Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEC Form 12
(Revised November 1978)

Texas Democratic Voter Participation Project
10 Day Pre-General Election

The committee has reported several expenditures the purposes of which are listed as "Get-Out-The-Vote Program" and "GOTV." Please be advised that these descriptions are not sufficient to meet the statutory requirements. Please amend your report to clarify the nature of these expenditures.

The committee has reported several expenditures the purposes of which are listed as, "Office Rent(Krueger)", "Krueger/Austin office telephone bill", and "Krueger/Austin office watts bill." Please state whether these expenditures constitute in-kind contributions made to a candidate for Federal office or expenditures made in accordance with 2 U.S.C. 441a(d) made on behalf of a candidate for Federal office. If so, please provide the name of the candidate, his/her address, and the office sought. In addition, the amount of support provided through the expenditures should be provided.

8190312901995

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

7-16

TO: Texas Democratic Voter Participation Project

DATE: June 18, 1979

I.D. NO.: C00099267

REQUEST FOR ADDITIONAL INFORMATION FOR THE 30 Day Post-General REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 10/24/78 THROUGH 11/27/78, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Detailed Summary (Page 2) Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Schedule Totals: ___ disagree with Detailed Summary (Page 2) or ___ omitted

___ Date(s): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Full Name(s)/Mailing Address(es): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Occupation/Principal Place(s) of Business: ___ omitted or _X_ inadequate for Schedule(s) _A_ Line(s) 14

___ Election Designation: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

_X_ Aggregate Year-to-Date Totals: _X_ omitted or ___ inadequate for Schedule(s) _A_ Line(s) 14

_X_ Nature or Purpose of Expenditure: ___ omitted or _X_ inadequate for Schedule(s) _B_ Line(s) 20

___ Nature or Purpose of Receipt: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Inadequate Description of: ___ proceeds ___ dates ___ events ___ location of Schedule

___ Signature: ___ omitted ___ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

___ Other: Please See Page Two

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 357-0023 Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEC Form 12
(Revised November 1978)

Texas Democratic Voter Participation Project
30 Day Post-General Election

Please note the name of the committee as registered. The committee is not registered as "Democratic Voter Project."

The committee has reported several expenditures the purposes of which are listed as "GOTV." Please be advised that these descriptions are not sufficient to meet the statutory requirements. Please amend your report to clarify the nature of these expenditures.

The committee has reported an expenditure the purpose of which is listed as "Krueger Brochure Poster." Please state whether this expenditure constitutes an in-kind contribution made to a candidate for Federal office or an expenditure made in accordance with 2 U.S.C. 441a(d) made on behalf of a candidate for Federal office. If so, please provide the name of the candidate, his/her address, and the office sought. In addition, the amount of support provided through the expenditure should be provided.

The committee has reported several expenditures all or some of which may constitute in-kind contributions made to candidate(s) for Federal office(s). Please state whether these expenditures do constitute in-kind contributions made to candidate(s) for Federal office(s). If they do, please provide the name(s) of the candidate(s) supported, the address(es), and the office(s) sought. In addition, the amount of support provided for each expenditure made should be provided.

Please be advised that Section 100.11 of the FEC Regulations defines "occupation" to be "principal job title or position and whether or not self-employed." Section 100.12 of those regulations defines "principal place of business" to be "full name under which the business is conducted and the city in which the person is employed or conducts business. Please amend your report providing this information for your itemized contributors.

8203023092927

In reply please refer to: 3SVL/79-76

4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 19, 1979

John C. Pouland, Treasurer
Texas Democratic Voter
Participation Project
601 International Life Bldg.
Austin, Texas 78701

Dear Mr. Pouland:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, (the Act) as amended. During the review of the October 10 Quarterly Report of Receipts and Expenditures, we noticed an entry indicating that you may have received a contribution which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

The Act prohibits political committees from making contributions to any other political committee in any calendar year which, in the aggregate, exceed $5,000.

If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

Alternatively, if you find that you have received a contribution in excess of the limits set forth in the Act, the Commission recommends that you notify the donor and refund the amount in excess of $5,000. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures.

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions, please do not hesitate to contact David Greevy, (800) 424-9530, our Reports Analyst assigned to you. Our local number is (202)357-0023.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Enclosure
Certified Mail
Return Receipt Requested

8 1 0 3 0 2 9 9 6

ection Commission
Street, N.W.
ton, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 1 of 2 for
Line Number ~~14a~~ 14A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
TEXAS DEMOCRATIC VOTER PARTICIPATION PROJECT

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
JOHN HILL CAMP. COMM.	1035 BROWN BLDG. Austin, Tx. 78701 DEM. NOMINEE For Tex. Gov. ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	7-11-78 8-1-78 8-16-78 8-29-78 9-12-78	2,500.00 2,500.00 2,500.00 2,500.00 2,500.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code Royce E. Wisenbaker	Principal Place of Business 14th Floor Peoples Bank Bldg. Tyler, Texas 75701 Occupation BANKER at Peoples Bank ☑ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 5000	Date (month, day, year) 8-24-78	Amount of each Receipt this Period 5,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code J. R. PARTEN	Principal Place of Business 1638 BANK of Southwest Bldg. Houston, Tx. 77002 Occupation Oil Business ☑ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 5000	Date (month, day, year) 8-31-78	Amount of each Receip this Period 5,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code B.J. McCombs	Principal Place of Business 1025 San Pedro San Antonio, Tx. 78212 Occupation Car Dealer ☑ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 1,000	Date (month, day, year) 9-6-78	Amount of each Receip this Period 1,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code Committee for 12532 Good Government	Principal Place of Business 8000 E. Jefferson Ave. Detroit, Michigan 48214 Occupation United Auto Workers Political Action Comm. ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 1,000	Date (month, day, year) 9-12-78	Amount of each Recei this Period 1,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code JOHN HILL CAMP. COMM.	Principal Place of Business 1035 BROWN BLDG. Austin, Tx. 78701 Occupation Dem. Nom. for Tex. Gov. ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 15,000	Date (month, day, year) 9-28-78	Amount of each Rece this Period 2,500.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code Frank Pool	Principal Place of Business P.O. Box 1940 San Angelo, Tx. 76902 Occupation Oil Business ☑ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 1,000	Date (month, day, year) 9-19-78	Amount of each Rece this Period 1,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
SUBTOTAL of receipts this page (optional)			$ 28,000
TOTAL this period (last page this line number only)			$

8

Memo to the File

Greevy
8/1/79
3SV1/79-76

The above was returned to FEC on 7/31/79. I am mailing it certified to Pouland at P.O. Box 1672, Austin, TX, 78767.

TEX 02 012415N1 07/24/79

RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

COMMISSION
0463

RETURNED TO SENDER
Not Deliverable as Addressed
UNABLE TO FORWARD

POSTAGE AND FEES PAID
U.S.MAIL

TEX*01 POU 01 TEX 01 TEX 02 POU 0 TEX 01 012612N1 07/2

TEX DEM
302 PAF NOT D NOT D NOT D NOT
AUSTIN

RETURN TO SEI
NOT DELIVERABLE AS AI
UNABLE TO FOI

John C. Pouland, Treasurer
Texas Democratic Voter
Participation Project
601 International Life Bldg.
Austin, Texas 78701

CERTIFIED
P3170

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:
Pouland
TX Demo Voter Partic. P

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. P3170 | INSURED NO.
(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:

POSTMARK

CLERK'S INITIALS

☆GPO 1977-O-249-585

3SV1/79-76

7/79

8

Rule Red Case 3541/79-76

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)

RQ SEP 24 2:56

2. ARTICLE ADDRESSED TO:
TX Dems Voter Part Proj

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943842	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. Susan Boswell

DATE OF DELIVERY	POSTMARK
9-17-79	

5. ADDRESS (Complete only if requested)

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

☆GPO: 1977—0—249-595

9/14

0 0 6 2 0 5 0 4 0 1 8

3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 14, 1979

John C. Pouland, Treasurer
Texas Democratic Voter Participation Project
601 International Life Building
Austin, Texas 78701

Dear Mr. Pouland:

On June 18, 1979, you were notified that the October 10 Quarterly, 10 Day Pre-General and 30 Day Post-General Reports of Receipts and Expenditures filed by your committee omitted certain required information.

As of this date, however, we have received no response from you. Your failure to amend your report gives the Commission reason to believe that you are in violation of 2 U.S.C. 434.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact David Greevy, our Reports Analyst assigned to you on our toll free number (800)424-4930. Our local number is (202)523-4048.

Sincerely,

John W. McGarry

Commissioner

8104303000

5

Telecon:

Greevy with Secretary of TX Democratic Party
Re: Texas Democratic Voter Participation Project
3SV1/79-76
9/14/79
512-478-8746

There has been a problem in getting the above letter to the committee. I called today to ascertain to what address the letter can be sent.

The secretary stated that the committee operated out of the office, and that the address was 215 Stokes Building
Austin, TX 78701

She stated that Fred Williams was the executive director, and that the letter should be sent to him. She indicated that the party leadership has changed somewhat, and that she did not know the address of John C. Pouland.

The letter(copy) will be sent to the address above, today certified.

Other addresses for Pouland:

John C. Pouland
Texas Democratic Voter Participation
Project
613 Brown Building
Austin, TX 78701

John C. Pouland
Texas Democratic Voter Participation
Project
P.O. Box 1672
Austin, TX 78767

John C. Pouland
Texas Democratic Voter Participation
Project
601 International Life Building
Austin, TX 78701

8104303001

6

Telecon:

Greevy with David Bolduc
Texas Democratic Voter Participation Project
10/11/79
512/477-1187
C00099267

DB called this day. He stated that he is the new treasurer of the committee, and that the former treasurer had stated that we had sent some letters to the committee.

DB asked what these were about.

I knew that the problems were extensive, so I told him that I would review the file, and call him back.

He was in court when I returned the call.

8104030002

9

Memo to the File:

Re: Texas Democratic Voter Participation Project

Greevy
10/17/79

I attempted to phone Bolduc on Friday, 10/12, and on Monday, Tuesday, and Wednesday of this week. He has been in court each time that I called.

I've left messages for him, but I've not heard from him.

I got his address from the secretary and I shall send copies of the following to him, certified.

1. 3SV1/79-76
2. RFAI's for 10G, 30G, and Q3

In addition, I will give Compliance copies of the RFAI's so that they can track them. They were sent out 7/19/79. I do not know why there was no follow up.

Dup RFAI Cpys 3SV1/79-76 + RQ's

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: Bolduc TX Democratic Voter Participation Project

3. ARTICLE DESCRIPTION: REGISTERED NO. | CERTIFIED NO. 943[illegible] | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
[signature] Frith

4. DATE OF DELIVERY: [illegible] 1979 | POSTMARK

5. ADDRESS (Complete only if requested)

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

☆GPO 1977-O-249-595

10/17

FEDERAL ELECTION COMMISSION RETURN RECEIPT REQUESTED, REGISTERED, INSURED AND CERTIFIED MAIL

Address

1210 Nueces
Suite 100
Austin, TX
78701

Telecon:

Greevy with David Bolduc
Texas Democratic Voter Participation Project
3SV1/79-76 & other Requests
10/23/79
512-477-1187

Bolduc called this day. We talked about the following:

3SV1/79-76

He said the previous treasurer (Pouland) really made a mess of this. He said that various candidates throughout the State made an agreement whereby they would get individuals to contribute to the TDVPP. The funds would be used for GOTV and for voter registration. The agreement (made informally) was for each participant to arrange a total of $15,000 in contributions to the TDVPP.

John Hill was not able to arrange for these contributions for the "expense sharing deal." Because of this, he made the $15,000 transfer to the TDVPP.

I stated that the transfer was definitely in excess of the limits. Bolduc said that he knew it was, and he did not understand why it was accepted.

He said that he would transfer the $10,000 excess to Hill, but his committee has only about $800 on hand. I then informed him of Hill's problem regarding the possible 433 & 434 violation. He said the transfer should then be $15,000.

He asked if he should send a letter acknowledging the problem, and showing a debt to Hill for $15,000 on their next report. I said that he could certainly do that, but that compliance would not be met until the required refund is made.

We continued our discussion by talking about Texas Democratic Party-Federal. This portion of the discussion may affect the means by which TDVPP could get the funds to refund Hill.

Texas Democratic Party-Federal

Bolduc briefly related what the committee does. (I am familiar with the situation because I review the committee's reports)

In essence, TDP-F receives funds from Dollars for Democrats. That is the fundraising arm for the Association of State Democratic Chairpersons. Once the funds are received, they are immediately transferred to the State and local account of the Texas Democratic Party.

Bolduc asked whether the TDP-F is required to remain registered and reporting with the Commission. I stated that this would not be required by virtue of the fact that it receives funds from Dollars for Democrats. Furthermore, if the funds are just going into the non-Federal account of the organization, we would not

8104030004

require the TDP-F to remain reporting to us. He stated that he thought the committee should terminate with the FEC, because the funds do just go into the non-Federal account of the organization.

I then suggested that the following may be possible in order to get the funds for the TDVPP to refund to Hill:

> Dollars for Democrats has been rather successful for the Texas Democratic Party. Instead of putting the transfers from D for D into the TDP-F account, they could be put into the TDVPP account. Once enough funds are received to make the refund to Hill, the TDVPP could make the refund to Hill.

Regarding this, Bolduc asked whether Hill could then contribute the funds to the non-Federal account of the organization. I stated that that would be up to Hill, as our concern at this point is just that the refunds should be made.

I emphasized that in all instances, any transfers from unregistered entities to the TDVPP must be permissible under FECA and that the contributing entity would trigger a reporting responsibility were the transfer to exceed $1,000 during a calnedar year. I mentioned this because he asked about making transfers from the non-Federal account to the Federal account.

8107330005

Requests for Additional Information

Bolduc stated that he received the copies sent to him. He said that with respect to GOTV and voter registration, he would get back in touch with the payees and get records on how the funds were expended-

He stated that the committee did not make in-kind contributions to Krueger, but that he was under the impression that they made coordinated expenditures on Krueger's behalf. I stated that we have not been so informed.

He said that that was the case, because he and Krueger worked together on what the party would do for the Krueger campaign under 441a(d). I said that I would send him Schedules F and that he should provide the information as necessary.

He said that the TDVPP is the registered State central committee, and therefore they were in charge of the 441a(d) activity. I asked if any subordinate committees had been authorized by the committee to make such expenditures. He said that he thought not, but that he would get in contact with me for further instruction if he found that not to be the case.

Misc.

I told him to submit a 1 amend showing that he is the treasurer of the committee.

DAVID BOLDUC
ATTORNEY AT LAW
1210 NUECES ST., SUITE 100
AUSTIN, TEXAS 78701
(512) 477-1187

RECEIVED
FEDERAL ELECTION
COMMISSION
'79 NOV 15 PM 12:00

11

November 12, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: Texas Democratic Voter Participation Project
ID No: C00099267
In response to: Your letter of June 18, 1979

8101903112401
79031130305

Dear Sir:

Your letter of June 18, 1979 raises questions concerning "voter registration," "Get-Out-The-Vote," and "GOTV," expenditures, expenditures for "Krueger," and information regarding contributions.

In reviewing this matter, it appears that the past treasurer of the committee has made a number of reporting errors. I propose to clear up this matter by doing the following:

1. Reviewing the "GOTV" and other expenditures to attempt to be more specific, and amending the reports in question. This may not be feasible, however, as my past experience has been that voter registration and GOTV expenditures are done on a contract basis; ie, the payment of a fixed sum to work a specific amount of time on either voter registration or get-out-the-vote activities. Transportation and other expenses are provided by the worker involved. Futhermore, a number of these expenditures appear to be transfers out to state and/or local committees for the same service.

2. Reviewing all the "Krueger" expenditures and amending the reports in question. As far as I know, these are expenditures under 2 U.S.C. § 441a(d), that were not listed on Schedule F.

3. Reviewing and amending reports where inadequate information was provided.

I apologize for the delay the committee's change in treasurers has caused in dealing with this, and I would appreciate knowing whether our action meets with your approval.

Yours truly,

DAVID BOLDUC

DB:mkm

12

DAVID BOLDUC
ATTORNEY AT LAW
1210 NUECES ST., SUITE 100
AUSTIN, TEXAS 78701
(512) 477-1187

79 NOV 19 A8:48

November 13, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: Texas Democratic Voter Participation Project
ID No: C00099267
In Response to: 35V1/79-76

Dear Sir:

In reviewing the letter referred to above, it appears that contributions to this committee were accepted by its past treasurer from the John Hill Campaign Committee in the amount of $15,000.00.

I can see no exception that would allow receipt of funds in this amount, so the entire amount will be refunded as soon as funds to do so are available. In the meantime, this amount will be listed by this committee as a debt to the John Hill Campaign Committee.

I apologize for the delay that our change in treasurers has caused in dealing with this matter, and I would appreciate knowing whether our action meets with your approval.

Yours truly,

DAVID BOLDUC

DB:mkm

8103011343 7

10403030 RAD D 549 92-212A

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/10/79 ANALYST Dug Greevy

TO: Office of General Counsel TEAM CHIEF Bobby Werfel BW 9/18

THROUGH: STAFF DIRECTOR OAD COMPLIANCE REVIEW RS/ER

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS DLH

CANDIDATE/COMMITTEE: John Hill Campaign Committee(Hill's Campaign)

TREASURER: James Bushala, Jr., Legal Counsel

ADDRESS: Hughes and Hill
1200 American Bank Tower
Austin, TX 78701

AFFILIATE(S):

ALLEGATION(S):	CITE:	ATTACHMENT(S)
Unregistered Political Committee	2 U.S.C. 433 & 434	1
Excessive Contribution Made	2 U.S.C. 441a	1

Note: Contributing committee was not informed in letter of the excessive contribution.

DATE INITIATED: 5/1/79

MANNER IN WHICH REVIEW WAS INITIATED: ATTACHMENT

☒ Normal review ☐ Other:
☐ Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, ~~see attachment~~

PERIOD COVERED FROM _____ TO _____

TOTAL RECEIPTS $ _____ TOTAL EXPENDITURES $ _____

CASH ON HAND $ _____ DEBTS $ _____

HISTORY:

RESULTS OF REVIEW: *ATTACHMENT*
- 3SV1/79-40, dated 5/18/79 — 2
- 3SV2/79-40, dated 7/16/79(for no response) — 3
- 3SV2/79-40 returned 7/23/79, remailed 7/24/79 — 4
- 3SV1/79-74, dated 7/19/79 — 5
- Certified Receipt Cards — 6, 7

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: *ATTACHMENT*
- Telecon: Greevy with Bushala, 7/31/79 — 7
- Telecon: Stolaruk with Bushala, 8/9/79 — 8
- Telecon: Greevy with Bushala, 9/24/79 — 12

REASON(S) FOR REFERRAL: *ATTACHMENT*
Response of 8/13/79 — 9
1. Status of State candidate committee transfers to political committees unclear.
2. Indication that at least two recipient committees cannot refund Hill funds received. — 10, 11

OTHER PENDING ACTIONS INITIATED BY RAD: *ATTACHMENT*

None

OTHER RELEVANT INFORMATION:
- 3SV2/79-40 & 3SV1/79-74 combined — 8
- Telecon: Greevy with Sanford(member of recipient committee), 8/21/79 — 10
- Telecon: Greevy with Jones(member of recipient committee), 9/7/79 — 11
- Request for Advisory Opinion submitted by one of the recipient committees — 13

PREVIOUS OGC/AUDIT REFERRALS FROM RAD: NO PREVIOUS OGC/AUDIT REFERRALS FROM RAD

continued on next page

CONTINUATION: Other Relevant Information

General Counsel response to Request for Advisory Opinion 14
Telecon: Greevy with Bolduc (Recipient Committee),10/11/79 15
Memo to the File: Greevy, 10/17/79 16
Telecon: Greevy with Bolduc (Recipient Committee),10/23/79 17

Referral for Recipient Committee (Texas Democratic Voter Participation Project) is submitted with this referral

Response received from Texas Democratic Voter Participation Project, 11/19/79 18

Note: This committee's cash on hand as of 9/30/79 was $864.

81040303009

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Line Number 15c

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Dallas County Democratic Progressive Voters League

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
Campaign Victory '78 Dallas, Texas	Principal Place of Business: Coalition Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 5,300.00		300.00
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code Hill's Campaign Cedar Springs Dallas, Texas	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	11/2/78	1,100.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code Kruger for Senator Dallas, Texas	Principal Place of Business: Committee Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	11/7/78	400.00
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code Progressive Voters League 6139 Moonglow Dr. Dallas, Texas	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	12/1/78	20.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code Campaign Victory '78	Principal Place of Business: C00101972 Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 10,300	10/25/78	5,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $		
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $		
Receipt for: ☐ Primary ☐ General ☐ Other			
SUBTOTAL of receipts this page (optional)			$ 6,820.00
TOTAL this period (last page this line number only)			$ 6,820.00

SCHEDULE A
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 4 of 6
Line Number 15b
(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Dallas County Democratic Progressive Voters League

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each this Period
Mattox In 78 Committee P. O. Box 50071 Dallas, Texas 75250 Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 500.00	3-31-78	$ 500.0
John Cutright Business Account 315 Westgate Blvd. Austin, Texas 78701 Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 500.00	3-31-78	$ 500.0
Judge Geo. Martinez Campaign Fund-6733 Keswick Circle Dallas, Texas 75232 Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 250.00	3-30-78	$ 250.01
Ron Chapman For Judge Campaign Fund 10509 Hapleridge Dallas, Texas 75238 Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 100.00	3-30-78	$ 100.00
Phil L. Adams Campaign Fund 905 Grinnell Richardson, Texas 75081 Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 250.00	3-28-78	$ 250.00
Judge Berlaind L. Brashear Campaign Fund 1412 Main Street, No.900 Dallas, Texas 75202 Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 250.00	4-1-78	$ 250.00
John Hill Campaign Fund 2523 Tanglewood Trail Austin, Texas 78703 Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 1,000.00	3-28-78	$1,000.00

SUBTOTAL of receipts this page (optional)

81040330011

Commission
Street, N.W.
ton, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 1 of 2 for
Line Number 14A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

TEXAS DEMOCRATIC VOTER PARTICIPATION PROJECT

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
JOHN HILL CAMP. COMM.	1035 BROWN BLDG. Austin, Tx. 78701 Occupation: DEM. NOMINEE For Tex. Gov. ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	7-11-78 8-1-78 8-16-78 8-29-78 9-12-78	2,500.00 2,500.00 2,500.00 2,500.00 2,500.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Royce E. Wisenbaker	Principal Place of Business: 14th Floor Peoples Bank Bldg. Tyler, Texas 75701 Occupation: BANKER at Peoples Bank ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 5000	8-24-78	5,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
J. R. PARTEN	Principal Place of Business: 1638 BANK of Southwest Bldg. Houston, Tx. 77002 Occupation: Oil Business ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 5000	8-31-78	5,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
B. J. McCombs	Principal Place of Business: 1025 San Pedro San Antonio, Tx. 78212 Occupation: Car Dealer ☑ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 1,000	9-6-78	1,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Committee for Good Government	Principal Place of Business: 8000 E. Jefferson Ave. Detroit, Michigan 48214 Occupation: United Auto Workers Political Action Comm. ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 1,000	9-12-78	1,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
JOHN HILL CAMP. COMM.	Principal Place of Business: 1035 BROWN BLDG. Austin, Tx. 78701 Occupation: Dem. Nom. for Tex. Gov. ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 15,000	9-28-78	2,500.00
Receipt for: ☐ Primary ☑ General ☐ Other			
Frank Pool	Principal Place of Business: P.O. Box 1940 San Angelo, Tx. 76902 Occupation: Oil Business ☑ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 1,000	9-19-78	1,000.00
Receipt for: ☐ Primary ☑ General ☐ Other			
SUBTOTAL of receipts this page (optional)			$ 28,000.0
TOTAL this period (last page this line number only)			$

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SCHEDULE A
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and or 18a of FEC FORM 3

Page 1 of 1
Line Number 15b

Name of Candidate or Committee in Full
Democratic Voter Project

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date	Amount of each Receipt this Period
Harris County Democratic Voter Registration Comte. 4741 Kingfisher Houston, Texas 77033 Receipt for: ☐ Primary ☐ General ☐ Other	Final report filed ☐ Check if memo item Aggregate Year to Date $ 78.18	8-10-78	30.34
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date	Amount of each Receipt this Period
Harris County Democratic Get-Out-The-Vote Comte. 4741 Kingfisher, Houston TX 77045 Receipt for: ☐ Primary ☒ General ☐ Other	final report filed ☐ Check if memo item Aggregate Year to Date $ 81.09	8-10-78	81.09
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date	Amount of each Receipt this Period
John Hill Campaign 2016 Main Houston, Texas 77002 Receipt for: ☐ Primary ☒ General ☐ Other	2016 Main Houston, Texas 77002 ☐ Check if memo item Aggregate Year to Date $ 2198.00	8-10-78 8-10-78	198.00 2000.00
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date	Amount of each Receipt this Period
Mark White for Attorney General Comte. 6101 Gulfgate Dr. Houston, Texas 77017 Receipt for: ☐ Primary ☒ General ☐ Other	6101 Gulfgate Dr. Houston, Texas 77017 ☐ Check if memo item Aggregate Year to Date $ 200.00	8-10-78	200.00
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date	Amount of each Receipt this Period
Gammage for Congress Committee '78 8328 Gulf Dr. Houston, Texas 77017 Receipt for: ☐ Primary ☒ General ☐ Other	8328 Gulf Dr. Houston, Texas 77017 Campaign Committee ☐ Check if memo item Aggregate Year to Date $ 1000.00	8-10-78 8-10-78	991.00 1991.00
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date	Amount of each Receipt this Period
Joe Pentony Campaign Comte. 3219 Milam Houston, Texas 77002 Receipt for: ☐ Primary ☒ General ☐ Other	3219 Milam Houston, Texas 77002 Campaign Committee ☐ Check if memo item Aggregate Year to Date $ 1371.00	8-10-78	71.00
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date	Amount of each Receipt this Period
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if memo item Aggregate Year to Date $		

SUBTOTAL of receipts this page (optional)	$ 4546.41
TOTAL this period (last page this line number only)	$ 4546.41

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SCHEDULE A
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page ____ of ____ for
Line Number ____
(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Bexar County Democratic Victory Fund

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
Dr. Louis T. Bogy 4402 Vance Jackson Road. San Antonio, TX Receipt for: ☐ Primary ☑ General ☐ Other	146 Park North Med. Prof. Building Podiatrist ☐ Check if Contributor is self-employed Aggregate Year-To-Date $	-3-78	$200.00
Dr. W.R. Elizondo 2219 Cincinnati Ave. San Antonio, TX 78228 Receipt for ☐ Primary ☒ General ☐ Other	Optometrist ☐ Check if Contributor is self-employed Aggregate Year-To-Date $	10-24-78	$140.00
Robert D. Green Campaign Fund c/o Bexar County Clerks Office, Bexar County Courthouse, San Antonio, TX Receipt for ☐ Primary ☒ General ☐ Other	Bexar County Courthouse Co Clerk ☐ Check if Contributor is self-employed Aggregate Year-To-Date $	10-6-78	$100.00
Mr. Herbert D. Kelleher 711 Navarro, Suite 620 San Antonio, TX 78205 Receipt for ☐ Primary ☒ General ☐ Other	Suite 620, 711 Navarro San Antonio, TX Attorney ☐ Check if Contributor is self-employed Aggregate Year-To-Date $	10-8-78	$250.00
John Hill Campaign Committee 201 Brown Bldg. Austin, TX 78701 Receipt for ☐ Primary ☒ General ☐ Other	Austin, Texas Candidate for Governor ☐ Check if Contributor is self-employed Aggregate Year-To-Date $	10-26-78	$525.70
Maury Holden , Col. 9406 E. Valleyview Ln San Antonio, TX Receipt for ☐ Primary ☒ General ☐ Other	Banker ☐ Check if Contributor is self-employed Aggregate Year-To-Date $	10-3-78	$100.00
Gerald C. Henckel 3438 Northmoor San Antonio, TX 78230 Receipt for ☐ Primary ☒ General ☐ Other	City Hall 506 Dolorosa San Antonio, TX City of San Antonio ☐ Check if Contributor is self-employed Aggregate Year-To-Date $	10-13-78	$100.00

SUBTOTAL of receipts this page (optional)
TOTAL this period (last page this line number only)

8010 2501

In reply please refer to: ASV1/79-40

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 18, 1979

Treasurer
Hill's Campaign
Cedar Springs
Dallas, Texas 75201

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by the Dallas County Democratic Progressive Voters League indicates that your organization may have made contributions which total in excess of $1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of $1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed $1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

8104030015

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact David Greevy, in our Reports Analysis Division at (800) 424-9530. Our local number is (202) 357-0023.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipts Requested

8104030016

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Line Number 15c

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Dallas County Democratic Progressive Voters League

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Receipt for:	Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
Campaign Victory '78 Dallas, Texas	Coalition	☐ Primary ☐ General ☐ Other	$ 5,300.00		300.00
Hill's Campaign Cedar Springs Dallas, Texas		☐ Primary ☑ General ☐ Other	$	11/2/78	1,100.00
Kruger for Senator Dallas, Texas	Coalition	☐ Primary ☐ General ☐ Other	$	11/7/78	400.00
Progressive Voters League 6139 Moonglow Dr. Dallas, Texas		☐ Primary ☑ General ☐ Other	$	12/1/78	20.00
Campaign Victory '78	P00101072	☐ Primary ☑ General ☐ Other	$ 10,300	10/25/78	5,000.00
		☐ Primary ☐ General ☐ Other	$		
		☐ Primary ☐ General ☐ Other	$		

SUBTOTAL of receipts this page (optional)	$ 6,820.00
TOTAL this period (last page this line number only)	$ 6,820.00

In reply please refer to: 3892/79-40

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1979

Treasurer
Hill's Campaign
Cedar Springs
Dallas, TX 75201

Dear Treasurer:

On May 18, 1979, you were notified that you may have made contributions to a political committee which raised problems under 2 U.S.C. 433 and 434.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 433 and 434.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter and demonstrate why no action should be taken against you. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact David Greevy, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202) 357-0023.

Sincerely,

Robert O. Tiernan
Commissioner

Certified Mail:
Return Receipt Requested

8104030018

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 19, 1979

Treasurer
John Hill Campaign Committee
201 Brown Building
Austin, Texas 78703

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by Dallas County Democratic Progressive Voters League, Texas Democratic Voter Participation Project, Democratic Voter Project, and Bexar County Democratic Victory Fund indicates that your organization may have made contributions which total in excess of $1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of $1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed $1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact David Greevy, in our Reports Analysis Division at (800)424-9530. Our local number is (202)357-0023.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipt Requested

8104230220

SCHEDULE A
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 4 of 6

Line Number 15b

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Dallas County Democratic Progressive Voters League

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each this Period
Mattox In 78 Committee P. O. Box 50071 Dallas, Texas 75250	Occupation	3-31-78	$ 500.0
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 500.00		
Full Name, Mailing Address and ZIP Code John Cutright Business Account 315 Westgate Blvd. Austin, Texas 78701	Principal Place of Business Occupation	3-31-78	$ 500.0
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 500.00		
Full Name, Mailing Address and ZIP Code Judge Geo. Martinez Campaign Fund-6733 Keswick Circle Dallas, Texas 75232	Principal Place of Business Occupation	3-30-78	$ 250.0
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 250.00		
Full Name, Mailing Address and ZIP Code Ron Chapman For Judge Campaign Fund 10509 Mapleridge Dallas, Texas 75238	Principal Place of Business Occupation	3-30-78	$ 100.00
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 100.00		
Full Name, Mailing Address and ZIP Code Phil L. Adams Campaign Fund 905 Grinnell Richardson, Texas 75081	Principal Place of Business Occupation	3-28-78	$ 250.00
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 250.00		
Full Name, Mailing Address and ZIP Code Judge Berlaind L. Brashear Campaign Fund 1412 Main Street, No. 900 Dallas, Texas 75202	Principal Place of Business Occupation	4-1-78	$ 250.00
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 250.00		
Full Name, Mailing Address and ZIP Code John Hill Campaign Fund 2528 Tanglewood Trail Austin, Texas 78703	Principal Place of Business Occupation	3-28-78	$1,000.00
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date $ 1,000.00		

SUBTOTAL of receipts this page (optional)

Federal Election Commission
Street, N.W.
ton, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 1 of 2 for
Line Number 14A

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
TEXAS DEMOCRATIC VOTER PARTICIPATION PROJECT

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
JOHN HILL CAMP. COMM.	1035 BROWN BLDG. Austin, Tx. 78701 DEM. NOMINEE FOR TEX. GOV.	7-11-78	2,500.00
		8-1-78	2,500.00
		8-16-78	2,500.00
Receipt for: ☐ Primary ☑ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	8-29-78	2,500.00
		9-12-78	2,500.00
Royce E. Wisenbaker	Principal Place of Business: 14th Floor Peoples Bank Bldg. Tyler, Texas 75701 Occupation: BANKER at Peoples Bank	8-24-78	5,000.00
Receipt for: ☐ Primary ☑ General ☐ Other	☑ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 5000		
J. R. PARTEN	Principal Place of Business: 1638 BANK of Southwest Bldg. Houston, Tx. 77002 Occupation: Oil Business	8-31-78	5,000.00
Receipt for: ☐ Primary ☑ General ☐ Other	☑ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 5000		
B. J. McCombs	Principal Place of Business: 1025 San Pedro San Antonio, Tx. 78212 Occupation: Car Dealer	9-6-78	1,000.00
Receipt for: ☐ Primary ☑ General ☐ Other	☑ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 1,000		
Committee for Good Government	Principal Place of Business: 8000 E. Jefferson Ave. Detroit, Michigan 48214 Occupation: United Auto Workers Political Action Comm.	9-12-78	1,000.00
Receipt for: ☐ Primary ☑ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 1,000		
JOHN HILL CAMP. COMM.	Principal Place of Business: 1035 BROWN BLDG. Austin, Tx. 78701 Occupation: Dem. Nom. for Gov.	9-28-78	2,500.00
Receipt for: ☐ Primary ☑ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 15,000		
Frank Pool	Principal Place of Business: P.O. Box 1940 San Angelo, Tx. 76902 Occupation: Oil Business	9-19-78	1,000.00
Receipt for: ☐ Primary ☑ General ☐ Other	☑ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 1,000		
SUBTOTAL of receipts this page (optional)			$ 28,000.00
TOTAL this period (last page this line number only)			$

FEC 0900 0809 0807

SCHEDULE A
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and or 18a of FEC FORM 3

Page 1 of 1
Line Number 15b

Name of Candidate or Committee in Full
Democratic Voter Project

Full Name, Mailing Address and ZIP Code	Date of Receipt	Amount of each Receipt this Period
Harris County Democratic Voter Registration Comte. 4741 Kingfisher Houston, Texas 77035 Receipt for: ☐ Primary ☐ General ☐ Other	final report filed	34.34
Harris County Democratic Get-Out-The-Vote Comte. 4741 Kingfisher, Houston TX 77045 Receipt for: ☐ Primary ☐ General ☐ Other	final report filed	81.07
John Hill Campaign 2016 Main Houston, Texas 77002 Receipt for: ☐ Primary ☐ General ☐ Other	2016 Main Houston, Texas 77002	198.00 2000.00
Mark White for Attorney General Comte. 6101 Southwest Fwy. Houston, Texas 77057 Receipt for: ☐ Primary ☐ General ☐ Other	6101 Southwest Fwy. Houston, Texas 77057	211.00
Gammage for Congress Committee '78 8328 Gulf Fwy. Houston, Texas 77017 Receipt for: ☐ Primary ☐ General ☐ Other	8328 Gulf Fwy. Houston, Texas 77017	201.00 201.00
Joe Pentony Campaign Comte. 1219 Milam Houston, Texas 77002 Receipt for: ☐ Primary ☐ General ☐ Other	1219 Milam Houston, Texas 77002	71.00
SUBTOTAL of receipts this page (optional)		$ 4546.41
TOTAL this period (last page with this line number only)		$ 4546.41

8104030023

SCHEDULE A
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page ____ of ____ for

Line Number ____

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Bexar County Democratic Victory Fund

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
Dr. Louis T. Bogy 4402 Vance Jackson Road. San Antonio, TX Receipt for: ☐ Primary ☒ General ☐ Other	146 Park North Med. Prof. Building Podiatrist ☐ Check if Contributor is self-employed $	-3-78	$200.00
Dr. W.R. Elizondo 2219 Cincinnati Ave. San Antonio, TX 78228 Receipt for ☐ Primary ☒ General ☐ Other	Optometrist ☐ Check if Contributor is self-employed $	10-24-78	$140.00
Robert D. Green Campaign Fund c/o Bexar County Clerks Office, Bexar County Courthouse, San Antonio, TX Receipt for ☐ Primary ☒ General ☐ Other	Bexar County Courthouse Co Clerk ☐ Check if Contributor is self-employed $	10-6-78	$100.00
Mr. Herbert D. Kelleher 711 Navarro, Suite 620 San Antonio, TX 78205 Receipt for ☐ Primary ☒ General ☐ Other	Suite 620, 711 Navarro San Antonio, TX Attorney ☐ Check if Contributor is self-employed $	10-8-78	$250.00
John Hill Campaign Committee 201 Brown Bldg. Austin, TX 78701 Receipt for ☐ Primary ☒ General ☐ Other	Austin, Texas Candidate for Governor ☐ Check if Contributor is self-employed $	10-26-78	$525.70
Maury Holden , Col. 9406 E. Valleyview Ln San Antonio, TX Receipt for ☐ Primary ☒ General ☐ Other	Banker ☐ Check if Contributor is self-employed $	10-3-78	$100.00
Gerald C. Henckel 3438 Northmoor San Antonio, TX 78230 Receipt for ☐ Primary ☒ General ☐ Other	City Hall 506 Dolorosa San Antonio, TX City of San Antonio ☐ Check if Contributor is self-employed $	10-13-78	$100.00

SUBTOTAL of receipts this page (optional)

TOTAL this period (last page this line number only)

8104030324

Telecon:

Groovy with Jesse Jones
Dallas County Democratic Progressive Voters League
7/24/79
214-372-8152

Called Jones on two matters:

1. Hill's Campaign--3SV2/79-40

The above letter was sent on 7/16/79, and was returned to the Commission on 7/23/79.

He stated that the committee has disbanded, but that the treasurer could be reached at: Dallas County Democratic Headquarters
Attention: Susan Buck
1 Turtle Creek
Dallas, TX

The letter will be sent certified to that address today. Copy of SV1 will also be sent.

2. Campaign Advisors--3SV1/78-105

He stated that the committee's secretary had verified that the refund made to Campaign Advisors was $162. He thought a letter had been sent on this, but I told him it had not been received.

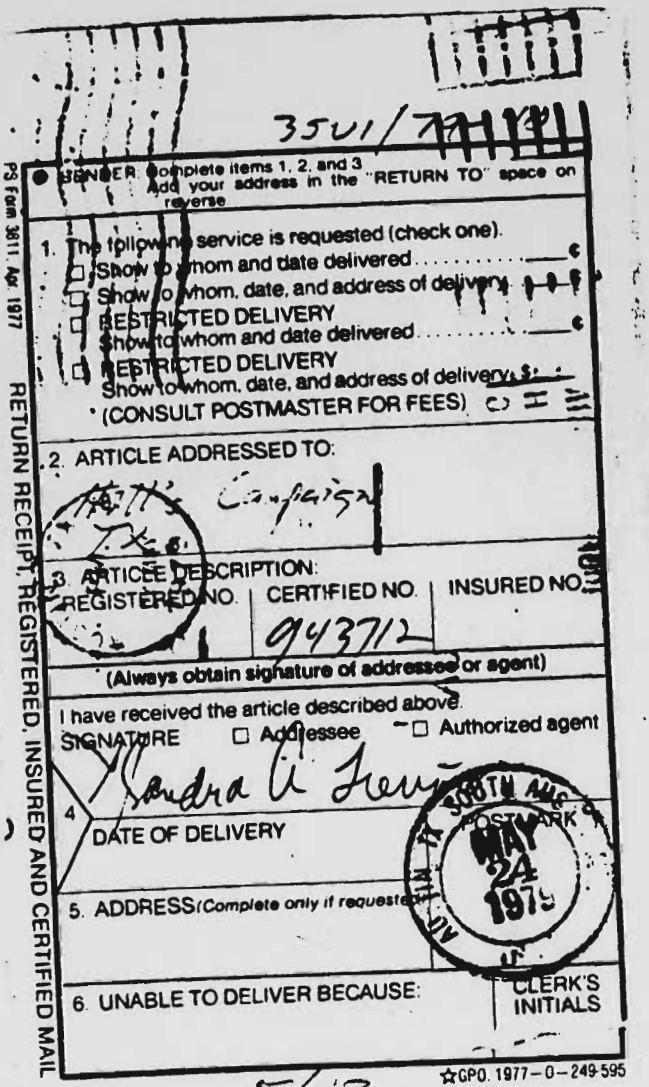
I told him that we were under the impression that the entity was a committee. He stated that this was not the case, that in fact it is a business. He stated that funds are received by the agency, which in turn provides these funds to local committees to disburse for mailings, etc.

I asked him to send a letter to this effect. He said that it would be in the mail shortly.

Note: While this does verify the nature of the business, as stated by Amps in the letter received 11/9/78, this may be a question for OGC.

Will talk to Peggy about this.

8104030252



3501/79-74

P3 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:
John Hill Camp Conte
TX

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943712	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Sandra A Terry

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

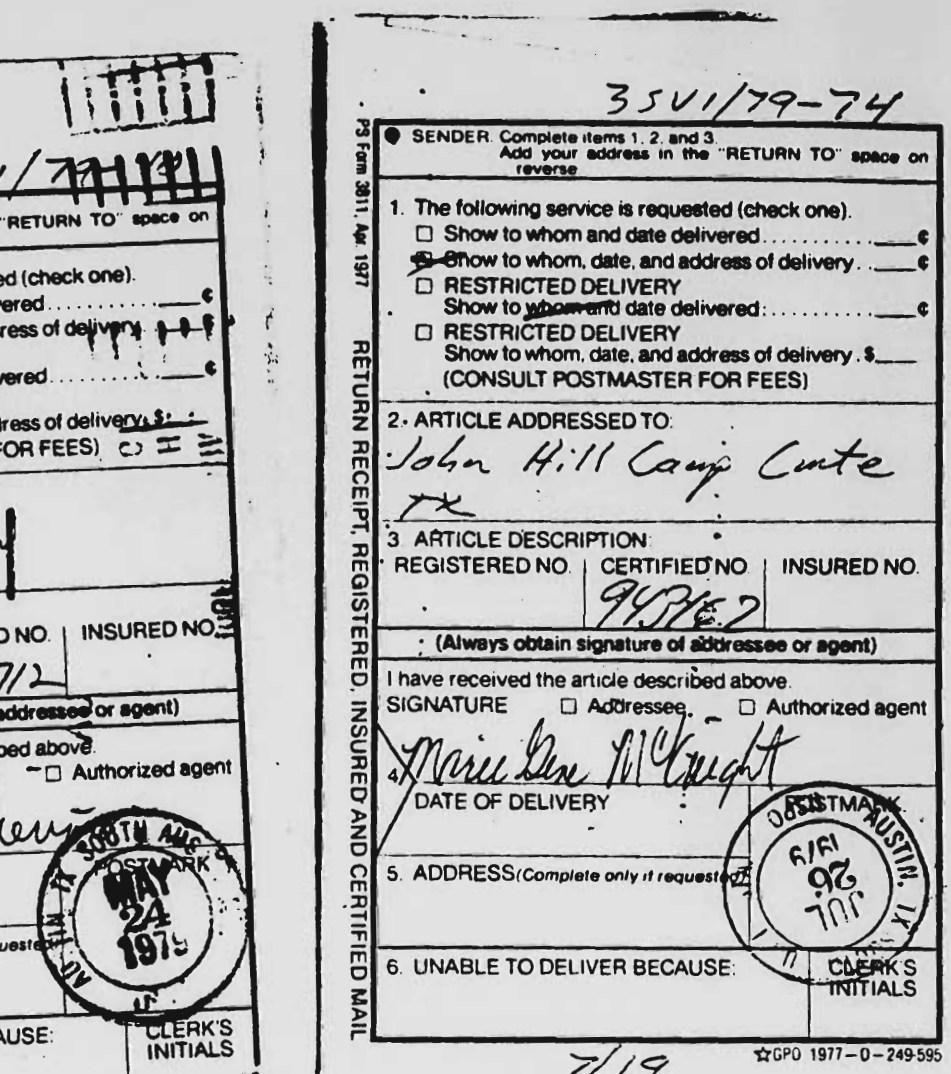
6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

POSTMARK: SOUTH AUSTIN TX MAY 24 1979

☆GPO 1977—0—249-595

5/18



3501/79-74

P3 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:
John Hill Camp Conte
TX

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	94362	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Marie Lee McKnight

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

POSTMARK: AUSTIN TX JUL 26 1979

☆GPO 1977—0—249-595

7/19

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use $300

Not in Directory
Insufficient address

Treasurer
Hill's Campaign
Cedar Springs
Dallas, TX 75201

RETURNED TO SENDER

Insufficient address

3502/79-40

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:
Hill's Campaign
TX

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

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY | POSTMARK

5. ADDRESS (Complete only if requested)

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

☆GPO 1977—0—249-595

7/16

Copy 3501 + 3502/79-40

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: Perry Section Hill's Campaign TX

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

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☒ Addressee ☐ Authorized agent
Susan C. Bush

4. DATE OF DELIVERY 7-30-79 | POSTMARK

5. ADDRESS (Complete only if requested)

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

☆GPO 1977—0—249-595

7/24

8104035027

Telecon:

Greevy with Jim Bushala
John Hill Campaign Committee 3SV1/79-74
Hill's Campaign 3SV1/79-40
7/31/79
512-474-6050

JB called yesterday. I returned the call today.

Susan Buck gave him the information sent to her for 3SV1/79-40. I told him why the letter was sent, what the options are, and stated as well that a request for an AO could be submitted.

We then discussed the John Hill Campaign Committee. He stated that the two organizations are one and the same, but that separate offices were established in Dallas and Austin. He indicated that there was one account for the organization.

With this information, I went over with him all the transfers included in both SV's.

I further mentioned the possibility of 441a problems with respect to the transfers to Texas Democratic Voter Participation Project.

He asked for copies of all materials sent out on this matter. Same was sent today, certified.

He asked that he, as counsel for the Hill Campaign, be apprised of all matters involving that campaign. I told him that I would arrange for all future information and requests to be directed to him at:

Jim Bushala
Hughes and Hill
1200 American Bank Tower
Austin, TX 78701

I shall integrate these two matters and suspend matter until 8/31/79

8104030329

Doug Caey - 3SV2/79-40/3SV1/79-74

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: Bushala Hill Campaign Committee TX

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

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

DATE OF DELIVERY 7-31-79 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

7/31

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

☆GPO 1977 - O - 249 595

TELECON

DATE: 8/9/79

TIME: 2:00

COMMITTEE: John Hill for Governor Campaign Committee

PERSON SPOKEN TO: Jim Bushala, Legal Advisor (512)474-6050

FEC'R: Lisa Stolaruk

SUBJECT: M letter

Mr. Bushala called for Dug yesterday, but Dug was out of the office, and is also absent today. I reviewed the SV and decided to call Mr. Bushala back today to see if I could be of any assistance.

Mr. Bushala said that Dug had given him various alternatives to rectify the situation, and before pursuing any of them, he wanted to have each alternative explained once more. I gave him 4 alternatives:

1) Have the re cipient committees establish a separate, non-federal account, and transfer the excessive amount. (I emphasized the fact that the Campaign Committee contributed to 4 federal committees, and thus its total contributions could not exceed $1,000. We figured that each recipient committee would conceivably be able to retain $250.)

2) Register the Campaign Committee and file reports during the period(s) in which the transfers took place.

3) Seek a refund of the total amount over $1,000 from the recipient committees

4) Request an Advisory Opinion.

Mr. Bushala favored option #1 over all others. I gave him the names of the treasurers of the recipient committees and their addresses. He asked the best way of alerting the FEC of the result, if all committees agreed to establish a separate fund. I said that he should first of all write a letter to the FEC stating that he is working on the matter. If all committees agree to the option, I said that they should each write a letter stating that they have opened a separate account. Then , the transfers-out should appear on their next report. I told Mr. Bushala that the only committee that might pose a problem is Bexar County, which appears on our B index as terminated. He suggested that perhaps the committee could re-open an account, amend their federal report, and then terminate again. But, he said that he would have to ask the committee first if this option was amenable to them in any case.

I stressed the fact that I was not the analyst that normally handles Texas, and that any further communications (orally or otherwise) should be addressed to Dug. I also said that if anything I told him was incorrect, that Dug would call him back Monday.

8 1 0 4 0 3 0 2 9

HUGHES & HILL
1200 AMERICAN BANK TOWER
AUSTIN, TEXAS 78701
(512) 474-6050

RECEIVED FEDERAL ELECTION COMMISSION
'79 AUG 16 AM 11

DALLAS OFFICE
1000 MERCANTILE DALLAS BUILDING
DALLAS, TEXAS 75201
(214) 651-0477

August 13, 1979

Mr. David Greevy
Reports Analyst
Federal Election Commission
Washington, D. C. 20463

Re: 3SV2/79-40
3SV1/79-74

Dear Mr. Greevy:

With regard to your inquiries relating to the John Hill for Governor Committee contributions to four registered federal committees here in Texas during the 1978 gubernatorial campaign, please be advised of the following:

1. Earlier this week, I had the pleasure of visiting with your assistant, Ms. Lisa Stolaruk. We reviewed each of the four federally registered committee reports.

2. I have prepared and mailed letters to the designated treasurers of the four committees, explaining the situation in which we find ourselves and requesting that they open "State and Local Accounts" and make the bookkeepping transfer of the designated amounts of money from their federal account.

The individuals to whom I have writtten and the committees of which they served as treasurer are as follows:

1. Dr. Jesse W. Jones
Dallas County Progressive Voters League

2. Mr. John C. Pouland
Texas Democratic Voter Participation Project

3. Ms. Barbara Stanley
Democratic Voter Project

4. Mr. Joseph Krier
Bexar County Democratic Victory Fund

8104030330

I have asked that each of them review my letter and then give me a call so that we might discuss the matter on the telephone and agree on what needs to be done with each of the respective committees. As soon as I hear from them, I will of course be back in touch with you. I have asked that they give these matters priority attention.

Thank you for the cooperation that you have exhibited thus far as we attempt to hopefully bring to a close the John Hill for Governor Campaign of 1978. I apologize for our not having filed the necessary papers at an earlier date, but please be assured that whatever was not done, was not the result of malicious intent, but purely an oversight.

Sincerely,

Jim Bushala, Jr.

JBJr:mkh

cc: Ms. Lisa Stolaruk
Assistant Reports Analyst
Federal Election Commission
Washington, D. C. 20463

8104030031

Telecon:

Greevy with Marion Sanford
8/21/79
Harris County Democratic Voter Project
Re: Hill/Hobby Campaign Committees

MS called this day. He has been contacted by both Hill and Hobby regarding the letters they received from us. Regarding Hobby, it appeared that he may be handling the situation.

MS stated:

Harris Project(HP) established segregated accounts about 9/15/78.

After the segregation of accounts, all funds from State candidates were placed into the non-Federal account. Those funds remaining in the Federal account at the time of segregation were not transferred to the newly established non-Federal account.

HP reports to FEC disclosed only the activity of the Federal account.

The function of HP(which is described by MS as a "party-type committee", not a "party committee formally") was to provide GOTV services for all candidates.

To this end, the committee expended about $14,000 from the Federal account and $35,000 from the non-Federal account.

In essence, HP is a vendor type committee, providing services to candidates who pay for those services. This status is a bit muddied however because the committee did receive some individual contributions.

HP closed its Federal account recently and submitted its termination report.

HP would have been willing to transfer funds received from Hill/Hobby to its non-Federal account, but the bank accounts have been closed and HP has, of course, no money at this time.

He asked what he should do with respect to Hill. I stated that a letter outlining the above should be sent to Jim Bushola, and that he should send copy to FEC. At that point, I would get in touch with Hill.

He asked if the situation with Hobby was analagous. I stated that I thought so, and that the same should be done in that situation.

He stated that Hobby had also contributed to the Texas Democratic Voter Participatio Project . He said that he believed this committee had only one account, but that he was not sure about this.

His phone: 713-651-2510

8104030032

Telecon:

Greevy with Jesse Jones
Dallas County Democratic Progressive Voters League
9/7/79
214-372-8152

Talked this day with Jones.

We received a letter from Campaign Victory '78-Non-Federal, in which it was stated that the DCDPVL would transfer the funds necessary to bring the CV'78NF's contributions under $1,000.

I checked the DCDPVL reports and determined that they did not have enough funds. It was for this reason that I called.

Jones stated that they did in fact have little monies available to transfer, and that he had been in contact with a bank to determine if they could borrow the funds necessary. He said that the bank indicated that they were not familiar with this sort of transaction, i.e. one account borrowing funds to place into another account. As a result of this response, Jones stated that he was going to get in contact with us.

He asked me what should be done. I stated that I really didn't know, but that it may be of some help to request an AO from the Commission. He stated that he would do this, as this was a problem for both the CV'78NF and for the John Hill Campaign.

On another matter--The committee has not yet responded to the YE RFAI regarding cash on hand discrepancy. He said that a response would be in the mail shortly.

8104030033

Telecon:

Greevy with Jim Bushala
John Hill Campaign Committee
9/24/79

I called JB today.

I asked what the status of the matter was. He stated that he sent four letters out requesting the recipient committees to transfer the funds to segregated State and local accounts.

The letter to Jones (Dallas County Progressive Voters League) has not been responded to.

The letter to Pouland (Texas Democratic Voter Participation Project) was returned. Contact still not made.

The letter to Stanley (Democratic Voter Project) has been responded to. The response stated that funds are not available to transfer.

The letter to Krier (Bexar County Democratic Victory Fund) has been responded to. The response stated that funds are not available to transfer.

I told him that the committee may be required to register and report, in light of the difficulty regarding the inability of the committees to transfer the funds.

I briefly described to him the requirements of the law regarding filing of Form 1 and Form 3. I also directed him to the Act and the Regulations.

He stated that all contributions made by the Hill committee were made with the intention of those funds being used to further the Hill campaign.

I asked him to send a letter describing the current status of the matter and explaining the purposes of the contributions.

8104303034

FILED
COMMISSION

September 20, 1979

'79 SEP 20 P 1:20

Democratic Progressive Voters League

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

Dear Mr. Oldeker:

This letter is written to request an advisory opinion on behalf of the Progressive Voters League (PVL). While the PVL does not appear to be in violation of any rules or regulations of the FEC, two state committees have inadverently made contributions to PVL in excess of those allowed by the guidelines of the FEC. The two committees have been advised that the problem could most readily be solved by having PVL transfer the funds in excess of the allowable to an account for state and local candidates. This simple solution is complicated by the fact that funds have all been expended from both PVL accounts. I am therefore appealing to you for advise as to what steps are open to the Progressive Voters League which will minimize the difficulties of the two contributors and at the same time assure fair and accurate reporting of all funds.

Cordially yours,

Jesse W. Jones

cc Mr. David Greevy

6139 Moonglow • Dallas, Texas 75241 • (214) 376-1660

Telecon:

Greevy with David Bolduc
Texas Democratic Voter Participation Project
10/11/79
512/477-1187
C00099267

DB called this day. He stated that he is the new treasurer of the committee, and that the former treasurer had stated that we had sent some letters to the committee.

DB asked what these were about.

I knew that the problems were extensive, so I told him that I would review the file, and call him back.

He was in court when I returned the call.

Address

1210 Nueces
Suite 100
Austin, TX
78701

81040330376

Forwarded to WCC 10/18/79

OCT 15 1979

Jesse W. Jones
6139 Moonglow
Dallas, Texas 75241

Dear Mr. Jones:

This refers to your letter of September 17, 1979, requesting an advisory opinion concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act").

You have requested an opinion regarding past activity of the Progressive Voters League ("PVL") in receiving transfers in excess of $1,000 from state committees which are not registered with the Commission as "political committees". You suggest that PVL may be willing to transfer an amount equal to the amount received from the unregistered committees, from its Federal to its nonfederal account. However, at this time no funds are available in PVL accounts.

Under the Act and regulations, advisory opinion requests must present an issue concerning application of the Act to a specific factual situation that involves the requesting person. 2 U.S.C. §437f. The cited section enables the requestor to act and rely upon the opinion "in good faith" without being "subject to any sanction provided by" the Act. 2 U.S.C. §437f(b); see also 11 CFR 112.1, 112.5. This "good faith" reliance protection means that persons requesting an opinion must establish some potential jeopardy of committing a violation themselves in order to satisfy the standing requirement.

The situation presented in your request raises an issue regarding application of the Act's registration and reporting requirements to the unregistered state committees that transferred funds to your committee. Although you may be interested in how those unregistered committees can avoid coming within the Act, you do not set forth any facts establishing a basis for us to conclude that your committee may be in violation of the Act as a direct result of the failure of the state committees to register as political committees.

Thus you cannot properly obtain an advisory opinion concerning application of the Act or Commission regulations to your committee in the factual situation as presented.

I regret that the advisory opinion procedure is not available to respond to your request. The Commission or its staff may be in future contact with the unregistered state committees, or with your committee, to deal with these matters pursuant to the Commission's compliance procedures. See 2 U.S.C. §437g.

Sincerely yours,

William C. Oldaker
General Counsel

bcc: Tom Haselhorst

NBLitchfield:bwl:10/12/79

Memo to the File:

Re: Texas Democratic Voter Participation Project

Greevy
10/17/79

I attempted to phone Bolduc on Friday, 10/12, and on Monday, Tuesday, and Wednesday of this week. He has been in court each time that I called.

I've left messages for him, but I've not heard from him.

I got his address from the secretary and I shall send copies of the following to him, certified.

1. 3SV1/79-76
2. RFAI's for 10G, 30G, and Q3

In addition, I will give Compliance copies of the RFAI's so that they can track them. They were sent out 7/19/79. I do not know why there was no follow up.

8104030039

Telecon:

Greevy with David Bolduc
Texas Democratic Voter Participation Project
3SV1/79-76 & other Requests
10/23/79
512-477-1187

Bolduc called this day. We talked about the following:

3SV1/79-76

He said the previous treasurer (Pouland) really made a mess of this. He said that various candidates throughout the State made an agreement whereby they would get individuals to contribute to the TDVPP. The funds would be used for GOTV and for voter registration. The agreement (made informally) was for each participant to arrange a total of $15,000 in contributions to the TDVPP.

John Hill was not able to arrange for these contributions for the "expense sharing deal." Because of this, he made the $15,000 transfer to the TDVPP.

I stated that the transfer was definitely in excess of the limits. Bolduc said that he knew it was, and he did not understand why it was accepted.

He said that he would transfer the $10,000 excess to Hill, but his committee has only about $800 on hand. I then informed him of Hill's problem regarding the possible 433 & 434 violation. He said the transfer should then be $15,000.

He asked if he should send a letter acknowledging the problem, and showing a debt to Hill for $15,000 on their next report. I said that he could certainly do that, but that compliance would not be met until the required refund is made.

We continued our discussion by talking about Texas Democratic Party-Federal. This portion of the discussion may affect the means by which TDVPP could get the funds to refund Hill.

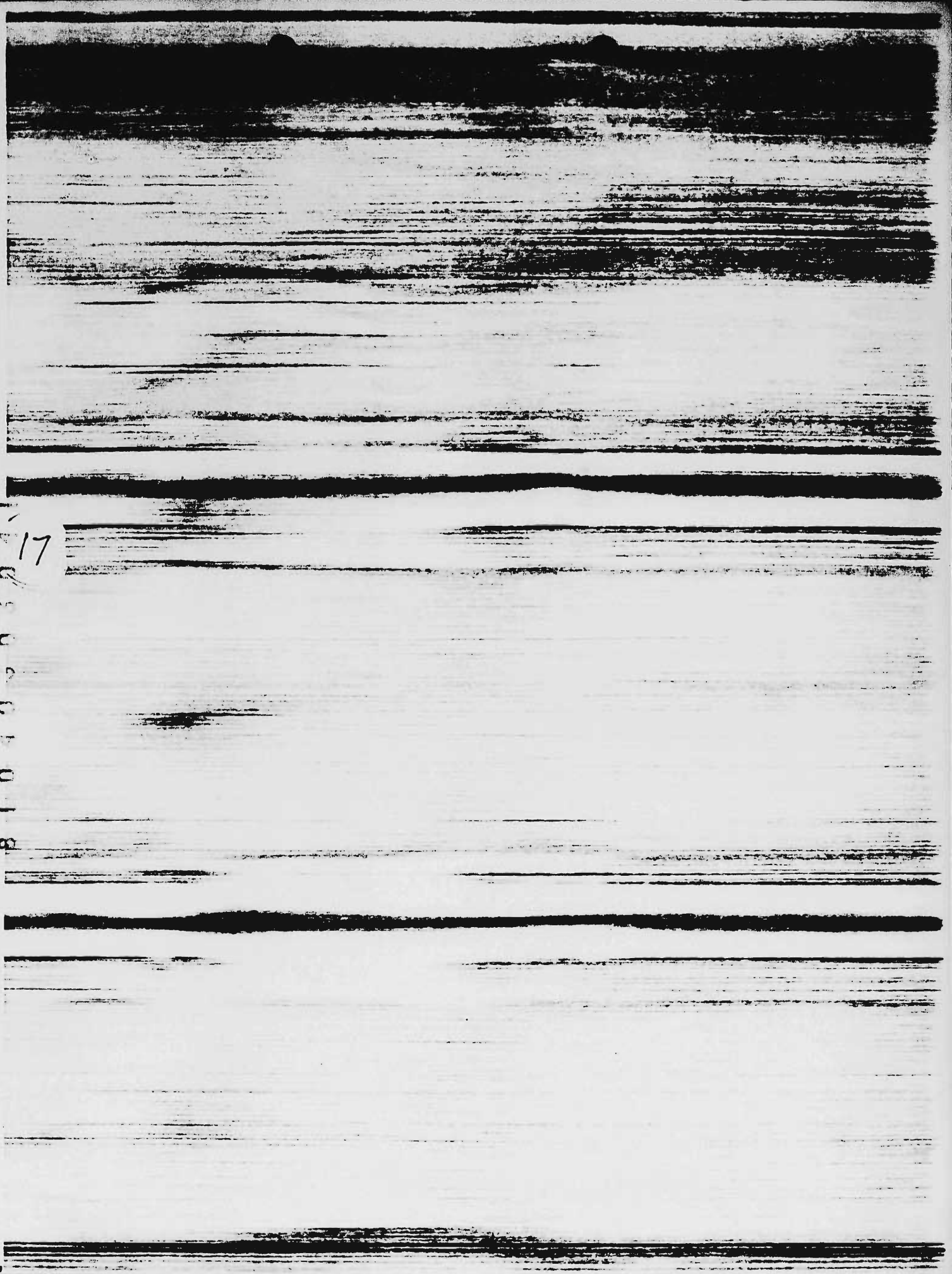
Texas Democratic Party-Federal

Bolduc briefly related what the committee does. (I am familiar with the situation because I review the committee's reports)

In essence, TDP-F receives funds from Dollars for Democrats. That is the fundraising arm for the Association of State Democratic Chairpersons. Once the funds are received, they are immediately transferred to the State and local account of the Texas Democratic Party.

Bolduc asked whether the TDP-F is required to remain registered and reporting with the Commission. I stated that this would not be required by virtue of the fact that it receives funds from Dollars for Democrats. Furthermore, if the funds are just going into the non-Federal account of the organization, we would not

8104030040



Telecon:

continued
Bolduc
10/23/79

require the TDP-F to remain reporting to us. He stated that he thought the committee should terminate with the FEC, because the funds do just go into the non-Federal account of the organization.

I then suggested that the following may be possible in order to get the funds for the TDVPP to refund to Hill:

> Dollars for Democrats has been rather successful for the Texas Democratic Party. Instead of putting the transfers from D for D into the TDP-F account, they could be put into the TDVPP account. Once enough funds are received to make the refund to Hill, the TDVPP could make the refund to Hill.

Regarding this, Bolduc asked whether Hill could then contribute the funds to the non-Federal account of the organization. I stated that that would be up to Hill, as our concern at this point is just that the refunds should be made.

I emphasized that in all instances, any transfers from unregistered entities to the TDVPP must be permissible under FECA and that the contributing entity would trigger a reporting responsibility were the transfer to exceed $1,000 during a calendar year. I mentioned this because he asked about making transfers from the non-Federal account to the Federal account.

Requests for Additional Information

Bolduc stated that he received the copies sent to him. He said that with respect to GOTV and voter registration, he would get back in touch with the payees and get records on how the funds were expended-

He stated that the committee did not make in-kind contributions to Krueger, but that he was under the impression that they made coordinated expenditures on Krueger's behalf. I stated that we have not been so informed.

He said that that was the case, because he and Krueger worked together on what the party would do for the Krueger campaign under 441a(d). I said that I would send him Schedules F and that he should provide the information as necessary.

He said that the TDVPP is the registered State central committee, and therefore they were in charge of the 441a(d) activity. I asked if any subordinate committees had been authorized by the committee to make such expenditures. He said that he thought not, but that he would get in contact with me for further instruction if he found that not to be the case.

Misc.

I told him to submit a 1 amend showing that he is the treasurer of the committee.

8104030342

DAVID BOLDUC
ATTORNEY AT LAW
1210 NUECES ST., SUITE 100
AUSTIN, TEXAS 78701
(512) 477-1187

79 NOV 19 A8:48

November 13, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: Texas Democratic Voter Participation Project
ID No: C00099267
In Response to: 35V1/79-76

Dear Sir:

In reviewing the letter referred to above, it appears that contributions to this committee were accepted by its past treasurer from the John Hill Campaign Committee in the amount of $15,000.00.

I can see no exception that would allow receipt of funds in this amount, so the entire amount will be refunded as soon as funds to do so are available. In the meantime, this amount will be listed by this committee as a debt to the John Hill Campaign Committee.

I apologize for the delay that our change in treasurers has caused in dealing with this matter, and I would appreciate knowing whether our action meets with your approval.

Yours truly,

DAVID BOLDUC

DB:mkm

8119031130437

D 247
RAD 92-212 B

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12-10-79 ANALYST Dug Greevy

TO: Office of General Counsel TEAM CHIEF Bobby Werfel

THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW CB/

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: Campaign Victory '78 (Non-Federal) (non-registered)

TREASURER: Kenneth H. Molberg

ADDRESS: 318 Merchants State Bank Building
5217 Ross Avenue
Dallas, TX 75206

AFFILIATE(S): Campaign Victory '78
(registered-C00101972)

ALLEGATION(S):	CITE:	ATTACHMENT(S)
Unregistered Political Committee	2 U.S.C. 433 & 434	1

DATE INITIATED: 5/1/79

MANNER IN WHICH REVIEW WAS INITIATED: ATTACHMENT

[XXX] Normal review [ ] Other:
[ ] Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed. see Attachment 1.

PERIOD COVERED FROM _____ TO _____

TOTAL RECEIPTS $ _____ TOTAL EXPENDITURES $ _____

CASH ON HAND $ _____ DEBTS $ _____

HISTORY:

RESULTS OF REVIEW: *ATTACHMENT*

3SV1/79-29, 5/18/79 2
3SV2/79-29, 7/16/79 3
Note: 3SV2/79-29 returned to FEC on 7/31/79, remailed 8/1/79

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: *ATTACHMENT*

Telecon: Greevy with Molberg, 8/3/79 4
Telecon: Greevy with Jones (Recipient committee treasurer), 9/7/79 5
Telecon: Greevy with Molberg, 9/18/79 10
Telecon: Greevy with Molberg, 10/2/79 11

REASON(S) FOR REFERRAL: *ATTACHMENT*

Molberg letter of 8/8/79 6
Molberg letter of 8/27/79 7
Molberg letter of 10/29/79 10
Question of adequacy of response

OTHER PENDING ACTIONS INITIATED BY RAD: *ATTACHMENT*

NONE

OTHER RELEVANT INFORMATION:

Campaign Victory '78 (federal account) reports transfers out reflecting the checks attached to Molberg response of 10/29/79. 12

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

Request for Advisory Opinion from recipient committee, 9/30/79 8
General Counsel's response to Request for Advisory Opinion, 10/15/79 9
NO PREVIOUS OGC/AUDIT REFERRALS FROM RAD

Commission
N.W.
C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 1 of 1 for Line Number 15a

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Progressive Voters League

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
Minority Search, Inc 777 R. L. Thornton Fwy. Dallas, Texas Receipt for: ☐ Primary ☐ General ☐ Other	Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 499.50	10/17/78	499.50
Campaign Victory '78 5217 Ross Avenue Dallas, Texas Receipt for: ☐ Primary ☐ General ☐ Other	Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 5000.00	10/20/78	5,000.00
Full Name, Mailing Address and ZIP Code Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	Date (month, day, year)	Amount of each Receipt this Period
Full Name, Mailing Address and ZIP Code Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	Date (month, day, year)	Amount of each Receipt this Period
Full Name, Mailing Address and ZIP Code Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	Date (month, day, year)	Amount of each Receipt this Period
Full Name, Mailing Address and ZIP Code Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	Date (month, day, year)	Amount of each Receipt this Period
Full Name, Mailing Address and ZIP Code Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	Date (month, day, year)	Amount of each Receipt this Period

SUBTOTAL of receipts this page (optional)	$ 5,499.50
TOTAL this period (last page this line number only)	$ 5,499.50

81030301-15

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Line Number 15c

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Dallas County Democratic Progressive Voters League

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Receipt for:	Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Rec this Period
Campaign Victory '78 Dallas, Texas	Occupation	☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 5,300.00		300.00
Hill's Campaign Ceder Springs Dallas, Texas	Principal Place of Business Occupation	☐ Primary ☒ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . $	11/2/78	1,100.00
Kruger for Senator Dallas, Texas	Principal Place of Business Occupation	☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	11/7/78	400.00
Progressive Voters League 6139 Moonglow Dr. Dallas, Texas	Principal Place of Business Occupation	☐ Primary ☒ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . $	12/1/78	20.00
Campaign Victory '78	Principal Place of Business Occupation	☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 10,300	10/25/78	5,000.00
	Principal Place of Business Occupation	☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . $		
	Principal Place of Business Occupation	☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . $		
SUBTOTAL of receipts this page (optional)					$ 6,820.00
TOTAL this period (last page this line number only)					$ 6,820.00

81030047

In reviewing the reports of Dallas County Democratic Progressive Voters League, I noted the transfers-in from Campaign Victory '78. I checked the reports of Campaign Victory '78-Federal, and discovered that they reported making no transfers to DCDPVL, and in fact, that they have had little money or activity at all.

Therefore, the Campaign Victory committee apparently has another account (Non-Federal) which is not being reported to the Commission.

Necessary changes have been made in the Data Base.

Dug Greevy
5/1/79

In reply please refer to: 3571/79-29

2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 18, 1979

Treasurer
Campaign Victory '78
(Non-Federal)
5217 Ross Avenue
Dallas, Texas 75201

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by the Dallas County Democratic Progressive Voters League indicates that your organization may have made contributions which total in excess of $1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of $1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed $1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

8104030348

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact David Greevy, in our Reports Analysis Division at (800) 424-9530. Our local number is (202) 357-0023.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipts Requested

8104030049

Commission
N.W.
C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 1 of 1 for Line Number 15a

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Progressive Voters League

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each Receipt this Period
Minority Search, Inc 777 R. L. Thornton Fwy. Dallas, Texas	Occupation	10/17/78	499.50
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 499.50		
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each Receipt this Period
Campaign Victory '78 5217 Ross Avenue Dallas, Texas	Occupation	10/20/78	5,000.00
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 5000.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $		
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $		
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $		
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $		
Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $		
SUBTOTAL of receipts this page (optional)			$ 5,499.50
TOTAL this period (last page this line number only)			$ 5,499.50

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Line Number

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Dallas County Democratic Progressive Voters League

Full Name, Mailing Address and ZIP Code	Principal Place of Business / Occupation / Check if Contributor is self-employed / Aggregate Year-To-Date	Date (month, day, year)	Amount of each Receipt this Period
Campaign Victory '78 Dallas, Texas Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business: C0010172 Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 5,300.00		300.00
Hill's Campaign Cedar Springs Dallas, Texas Receipt for: ☐ Primary ☒ General ☐ Other	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	11/2/78	1,100.00
Kruger for Senator Dallas, Texas Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business: C00710151 Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	11/7/78	400.00
Progressive Voters League 6139 Moonglow Dr. Dallas, Texas Receipt for: ☐ Primary ☒ General ☐ Other	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	12/1/78	20.00
Campaign Victory '78 Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business: C00101072 Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $ 10,300	10/25/78	5,000.00
Full Name, Mailing Address and ZIP Code Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	Date (month, day, year)	Amount of each Receipt this Period
Full Name, Mailing Address and ZIP Code Receipt for: ☐ Primary ☐ General ☐ Other	Principal Place of Business: Occupation: ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . $	Date (month, day, year)	Amount of each Receipt this Period
SUBTOTAL of receipts this page (optional)			$ 6,820.00
TOTAL this period (last page this line number only)			$ 6,820.00

In reply please refer to: 3572/79-29

3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1979

Treasurer
Campaign Victory '78 (Non-Federal)
5217 Ross Avenue
Dallas, TX 75201

Dear Treasurer:

On May 18, 1979, you were notified that you may have made contributions to a political committee which raised problems under 2 U.S.C. 433 and 434.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 433 and 434.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter and demonstrate why no action should be taken against you. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact David Greevy, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202) 357-0023.

Sincerely,

Robert O. Tiernan

Commissioner

Certified Mail:
Return Receipt Requested

8104030352

Memo to the File:

Greevy
8/1/79
3SV2/79-29

The above was returned to FEC on 7/31/79. I am mailing it certifed to the committee at 318 Merchants State Bank Building, 5217 Ross Avenue, Dallas, TX, 75201.

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:
Camp Victory '78 (NE

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

(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

POSTMARK

☆GPO 1977-O-249 536

7/16

8 g-3SV2/79-29

POSTAGE AND FEES PAID

U.S.MAIL

RETURNED TO WRITER
FROM 75206
ADDRESSEE UNKNOWN

8104030353

ION CO
.C. 20463

: $300

Treasurer
Campaign Victory '78 (Non-Federal)
5217 Ross Avenue
Dallas, TX 75201

10 story office building - Insufficient address

D

CERTIFIED

943102

3501/79-29

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:
Campaign Victory '78
TX

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	94370	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Nancy Graham

4. DATE OF DELIVERY 5-30-78 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

MAY 30 1978 DALLAS TX GREENVILLE AVE STA

☆GPO 1977 - O - 249-595

5/18

12-79-29

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

SENDER Comp... 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:
Camp Victory (Non-Fed)
TX

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943320	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Nancy Sachse

4. DATE OF DELIVERY 8-8-79 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

AUG 8 1979 DALLAS TX GREENVILLE AVE STA

☆GPO 1977 - O - 249 595

8/1

8 1 0 4 0 3 0 5 4

4

Telecon:

Greevy with Ken Kim Molberg
Campaign Victory '78(Non-Federal)
214-821-8840
8/3/79

KM called this day regarding the SV. He thought the packet was just informational, and had not read the letter until today. I informed him that the RTB letter has been sent.

He stated that Campaign Victory does in fact have segregated accounts, and that the transfers questioned were made from the non-Federal account.

He stated however that he was under the impression, when the transfers were made, that they would be placed in the non_Federal account of the recipient committee.

I explained the options to him, including submitting an AOR. He stated that he would contact the recipient committee to see if they could transfer the $10,000 or so to their non-Federal account.

He said he thought the funds were used for GOTV, and that there were 3 Federal candidates and 83 State and local candidates.

He will respond by phone and letter as soon as he knows what the status is.

8104030355

6

LAW OFFICES OF JAMES C. BARBER
318 MERCHANTS STATE BANK BUILDING
5217 ROSS AVENUE
DALLAS, TEXAS 75206

JAMES C. BARBER*
KENNETH H. MOLBERG
STEVEN B. THORPE

* BOARD CERTIFIED—PERSONAL INJURY TRIAL LAW
TEXAS BOARD OF LEGAL SPECIALIZATION

TELEPHONE
214-821-8840

August 8, 1979

79 AUG 10 PM 12:22

David Greevy
Report Analyst
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: 3SV2/79-29; Campaign Victory '78 (Non-Federal)

Dear Mr. Greevy:

I received the attached letter, dated July 16, 1979, on August 8, 1979. The problem may have been with respect to the incorrect zip code.

In any event, I trust that our conversation of last week sufficiently clears up any misunderstanding with respect to delayed responses.

I am presently attempting to clear up the matter to which you referred in your previous letter. I will advise you shortly if a resolution can be reached with respect to the matter.

I did want to emphasize that the contributions reported by the Dallas Progressive Voters' League were not primarily used for the purpose of influencing federal elections. This being the case, I am at a loss to explain why they were so reported. By way of information, the Victory '78 Committee was a committee designed to support Democratic Party candidates whose jurisdictions overlapped Dallas County. Four of these were federal races -- one senatorial and three congressional -- while in excess of 80 were state and local -- the two most prominent races being those for governor and county judge. Previous information was provided you with respect to our "support-the-party" effort.

I will be back in touch shortly.

Sincerely,

Kenneth H. Molberg

KHM/mfm

Enclosures

8104030856

LAW OFFICES OF JAMES C. BARBER
318 MERCHANTS STATE BANK BUILDING
5217 ROSS AVENUE
DALLAS, TEXAS 75206

JAMES C. BARBER*
KENNETH H. MOLBERG
STEVEN B. THORPE

* BOARD CERTIFIED—PERSONAL INJURY TRIAL LAW
TEXAS BOARD OF LEGAL SPECIALIZATION

TELEPHONE
214-821-8840

AUG 27 11 11 19 11:47

Mr. David Greevy
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20515

Re: 3SV1/79-29 and 3SV2/79-29, Campaign Victory '78
(Non-Federal)

Dear Mr. Greevy:

I am enclosing a copy of a letter which I have sent to Dr. Jesse Jones, President of the Progressive Voters League in Dallas. I believe it is self-explanatory, in that I have been advised that the $9,540.48 inappropriately reported on the Federal report for the PVL will now be transferred to an account not used to influence Federal elections. This is as it should be, inasmuch as the $9,540.48 was not used to influence Federal elections.

Our committee's sole contributions to the Progressive Voters League totaled $759.52.

Should you have any further requests of me, please advise.

Sincerely,

Kenneth H. Molberg

KHM/mfm

Enclosure

8104030357

LAW OFFICES OF JAMES C. BARBER
318 MERCHANTS STATE BANK BUILDING
5217 ROSS AVENUE
DALLAS, TEXAS 75206

JAMES C. BARBER*
KENNETH H. MOLBERG
STEVEN B. THORPE

* BOARD CERTIFIED—PERSONAL INJURY TRIAL LAW
TEXAS BOARD OF LEGAL SPECIALIZATION

TELEPHONE
214-821-8840

August 27, 1979

Dr. Jesse Jones
Democratic Progressive Voters League
6139 Moonglow
Dallas, Texas 75241

Dear Dr. Jones:

This confirms our conversation of August 21, 1979, wherein I advised you of the problem that has arisen as a result of the Campaign Victory '78 Committee's contribution to the Progressive Voters League.

A review of my records indicates that our Federal account made the following contributions to the Progressive Voters League:

1. 9-26-78, $300 for office rent;

2. 10-17-78, $229.76 for reimbursement for political mailings supporting the democratic ticket; and

3. 10-23-78, $229.76, for the same reasons.

As I understand it, the Committee will effect a transfer of the $9,540.48 inappropriately reported on the PVL's Federal filing.

If I can be of any assistance, please advise. I hope this letter finds you doing well.

Sincerely,

Kenneth H. Molberg

KHM/mfm

8104030058

5

Telecon:

Greevy with Jesse Jones
Dallas County Democratic Progressive Voters League
9/7/79
214-372-8152

Talked this day with Jones.

We received a letter from Campaign Victory '78-Non-Federal, in which it was stated that the DCDPVL would transfer the funds necessary to bring the CV'78NF's contributions under $1,000.

I checked the DCDPVL reports and determined that they did not have enought funds. It was for this reason that I called.

Jones stated that they did in fact have little monies available to transfer, and that he had been in contact with a bank to determine if they could borrow the funds necessary. He said that the bank indicated that they were not familiar with this sort of transaction, i.e. one account borrowing funds to place into another account. As a result of this response, Jones stated that he was going to get in contact with us.

He asked me what should be done. I stated that I really didn't know, but that it may be of some help to request an AO from the Commission. He stated that he would do this, as this was a problem for both the CV'78NF and for the John Hill Campaign.

On another matter--The committee has not yet responded to the YE RFAI regarding cash on hand discrepancy. He said that a response would be in the mail shortly.

8104030309

10

Telecon:

Greevy with Ken Molberg
Campaign Victory '78(Non-Federal)
9/18/79
3SV2/79-29
214-821-8840

Called KM today to tell him of my discussion with Jones.

He said that he was under the impression that the transfer required had been made. I said that that did not appear to be the case.

He said that he was pretty upset because the non-Federal account's transfers to Jones' committee were intended to be used for non-Federal purposes and that he had no idea that they were being placed into their Federal account.

He asked what to do.

I said that in addition to the option of registering and reporting, he could request an AOR. He said that he would do this, and that it would be in the mail within a fortnight.

8104030360

8

RECEIVED
SEP 26 1979
FEDERAL ELECTION COMMISSION

79 SEP 26 PM 1:20

Democratic Progressive Voters League

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

Dear Mr. Oldeker:

This letter is written to request an advisory opinion on behalf of the Progressive Voters League (PVL). While the PVL does not appear to be in violation of any rules or regulations of the FEC, two state committees have inadverently made contributions to PVL in excess of those allowed by the guidelines of the FEC. The two committees have been advised that the problem could most readily be solved by having PVL transfer the funds in excess of the allowable to an account for state and local candidates. This simple solution is complicated by the fact that funds have all been expended from both PVL accounts. I am therefore appealing to you for advise as to what steps are open to the Progressive Voters League which will minimize the difficulties of the two contributors and at the same time assure fair and accurate reporting of all funds.

Cordially yours,

Jesse W. Jones

cc Mr. David Greevy

6139 Moonglow • Dallas, Texas 75241 • (214) 376-1660

//

Telecon:

Greevy with Ken Molberg
Campaign Victory '78 (Non-Federal)
10/2/79

I called KM today. I asked if he had prepared the AOR which we spoke about before. He stated that he was just now in the process of doing that.

I told him about the Commission's new policy regarding its acceptance of AOR's, and I stated that I did not think that the Commission would consider it.

He asked what should be done.

I told him that in my opinion, absent the necessary refund or transfer to State and local account by the recipient committee, his committee would be required to register and report.

He stated that they could do this, although he thought that there might be some prohibited funds in the account. He stated once again that when his committee made the contributions, they intended for the funds to be used for non-Federal elections purposes only, and that they did not know that the recipient would place them in its Federal account.

I stated once again, that absent the required transfer or refund, the only option I knew of would be for the committee to register and report. He stated that he would send us a letter of explanation and supporting documents, and then we could determine whether the committee should file anything further.

8104030362

Forwarded to WCS 10/15/79

OCT 15 1979

Jesse W. Jones
6139 Moonglow
Dallas, Texas 75241

Dear Mr. Jones:

This refers to your letter of September 17, 1979, requesting an advisory opinion concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act").

You have requested an opinion regarding past activity of the Progressive Voters League ("PVL") in receiving transfers in excess of $1,000 from state committees which are not registered with the Commission as "political committees". You suggest that PVL may be willing to transfer an amount equal to the amount received from the unregistered committees, from its Federal to its nonfederal account. However, at this time no funds are available in PVL accounts.

Under the Act and regulations, advisory opinion requests must present an issue concerning application of the Act to a specific factual situation that involves the requesting person. 2 U.S.C. §437f. The cited section enables the requestor to act and rely upon the opinion "in good faith" without being "subject to any sanction provided by" the Act. 2 U.S.C. §437f(b); see also 11 CFR 112.1, 112.5. This "good faith" reliance protection means that persons requesting an opinion must establish some potential jeopardy of committing a violation themselves in order to satisfy the standing requirement.

The situation presented in your request raises an issue regarding application of the Act's registration and reporting requirements to the unregistered state committees that transferred funds to your committee. Although you may be interested in how those unregistered committees can avoid coming within the Act, you do not set forth any facts establishing a basis for us to conclude that your committee may be in violation of the Act as a direct result of the failure of the state committees to register as political committees.

Thus you cannot properly obtain an advisory opinion concerning application of the Act or Commission regulations to your committee in the factual situation as presented.

I regret that the advisory opinion procedure is not available to respond to your request. The Commission or its staff may be in future contact with the unregistered state committees, or with your committee, to deal with these matters pursuant to the Commission's compliance procedures. See 2 U.S.C. §437g.

Sincerely yours,

William C. Oldaker
General Counsel

bcc: Tom Haselhorst

NBLitchfield:bwl:10/12/79

LAW OFFICES OF JAMES C. BARBER
318 MERCHANTS STATE BANK BUILDING
5217 ROSS AVENUE
DALLAS, TEXAS 75206

JAMES C. BARBER*
KENNETH H. MOLBERG
STEVEN B. THORPE

* BOARD CERTIFIED—PERSONAL INJURY TRIAL LAW
TEXAS BOARD OF LEGAL SPECIALIZATION

RECEIVED
FEDERAL ELECTION COMMISSION
79 NOV 2 AM 11:47

10

October 29, 1979

Mr. David Greevy
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20515

Re: 3SV1/79-29 and 3SV2/79-29
Campaign Victory 78 (Non-Federal) (Federal)

Dear Mr. Greevy:

This refers to the transfer by this committee to the Democratic Progressive Voters League certain amounts from our State and Federal accounts.

As you advised per your letter of May 18, 1979, total contributions by this committee exceeded $1,000.00 from both the State and Federal accounts. A review of the matter reveals, however, that our Federal account forwarded sums to the League in the amount of $759.52 -- well below the contribution limitation.

The remaining $9,540.48 came from the non-federal account and was not used for the purpose of influencing federal elections. I note, with some distress, that all contributions -- state and federal -- were reported on the League's FEC reports and that four contributions were lumped together and reported as two.

The state and federal monies were expended by this committee for the purpose of urging voters to support the Democratic ticket (see attachments). Without a doubt, the two races of importance during this election period were the Governor's race and the race of Dallas County Judge.

8104303065

As you know, our committee was told that the Voters League would effect a transfer of the monies inappropriately reported on their federal filing. I now understand that this has not been accomplished.

This treasurer has utilized his best efforts to comply with the Act. As far as I know, those efforts have been successful. In view of the circumstances, I would request that the commission seek its remedy through the Progressive Voter's League, inasmuch as this is where the problem occurred. It would appear that the League should probably amend its filing to reflect the actual circumstances surrounding these monies.

For your reference, I am enclosing earlier correspondence, as well as copies of canceled checks and other supporting documents.

Sincerely,

Kenneth H. Molberg

KHM:gr

8104030056

1627 0 1 8 6 0 ! 10/23 1978 32-663 1110

PAY TO THE ORDER OF Progressive Voters League $229.76

Two hundred twenty-nine & 76/100 DOLLARS

United NATIONAL BANK
MAIN AND AKARD/DALLAS, TEXAS 75201

PAID OCT 23 78

Kenneth H. Mathers

mailing

⑆1110⑆0663⑆ 00 1419 "00000229 76"

CAMPAIGN VICTORY '78 (Federal) No. 107

1627 0 1 8 6 0 ! October 17, 1978 32-663 1110

PAY TO THE ORDER OF Progressive Voters League $229.76

TWO HUNDRED TWENTY-NINE AND 76/100 DOLLARS

United NATIONAL BANK
MAIN AND AKARD/DALLAS, TEXAS 75201

PAID OCT 26 78

Kenneth A. Mathers

Mailing

⑆1110⑆0663⑆ 00 1419 "00000229 76"

Campaign Victory '78 (Federal)
5217 Ross Ave. Suite 318
Dallas Tx. 75206

No. 105

PAID OCT 10 78 UNITED NATIONAL BANK DALLAS, TEXAS

PAY TO THE ORDER OF Progressive Voters League 9/24 1978 32-663 1110 $300.00

Three hundred & no/100 DOLLARS

United NATIONAL BANK
MAIN AND AKARD/DALLAS, TEXAS 75201

Kenneth A. Mathers

9/78 Rent HQ

⑆1110⑆0663⑆ 00 1419 "0000030000"

CAMPAIGN VICTORY 78 (STATE)
5217 ROSS AVE., SUITE 318 821-8840
DALLAS, TEXAS 75206

108

9 5 4 5 0 1 8 6 0 !

October 17 19 78 32-663 1110

PAY TO THE ORDER OF Progressive Voters League $4,770.24

FOUR THOUSAND SEVEN HUNDRED SEVENTY AND 24/100 ---------- DOLLARS

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

Mailing

CAMPAIGN VICTORY 78 (STATE)

Kenneth H. Mattox

NATIONAL BANK
MAIN AND AKARD/DALLAS, TEXAS 75201

⑆111006634⑆ 00 1398 7⑈ ⑈00004770 24⑈

CAMPAIGN VICTORY 78 (STATE)
5217 ROSS AVE., SUITE 318 821-8840
DALLAS, TEXAS 75206

109

9 6 2 7 5 0 1 8 6 0 !

10/23 19 78 32-663 1110

PAY TO THE ORDER OF Progressive Voters League $4,770.24

Four thousand seven hundred seventy + 24/00 DOLLARS

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

-mailing

CAMPAIGN VICTORY 78 (STATE)

Kenneth H. Mattox

NATIONAL BANK
MAIN AND AKARD/DALLAS, TEXAS 75201

⑆111006634⑆ 00 1398 7⑈ ⑈00004770 24⑈

8 1 0 1 2 3 3 0 3 6

August 27, 1979

Mr. David Gracey
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20515

Re: MUR1/79-29 and MUR2/79-29, Republican Victory '78 (Non-Federal)

Dear Mr. Gracey:

I am enclosing a copy of a letter which I have sent to Mr. Jesse Jones, President of the Progressive Voters League in Dallas. I believe it is self-explanatory, in that I have been advised that the $9,840.45 inappropriately reported on the Federal report for the PVL will now be transferred to an account not used to influence Federal elections. This is as it should be, inasmuch as the $9,840.45 was not used to influence Federal elections.

Our committee's sole contributions to the Progressive Voters League totaled $7,500.

Should you have any further requests of me, please advise.

Sincerely,

Kenneth M. Wolberg

KMW/dh

Enclosure

8104030069

LAW OFFICES OF JAMES C. BARBER
318 MERCHANTS STATE BANK BUILDING
5217 ROSS AVENUE
DALLAS, TEXAS 75206

JAMES C. BARBER*
KENNETH H. MOLBERG
STEVEN B. THORPE

* BOARD CERTIFIED—PERSONAL INJURY TRIAL LAW
TEXAS BOARD OF LEGAL SPECIALIZATION

TELEPHONE
214-821-8840

February 6, 1979

Mr. David U. Greevy
Federal Elections Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: Campaign Victory '78 (Federal)
Identification No. C001 01 972

Dear Mr. Greevy:

This is in response to your letter of January 29, 1979, a copy of which is attached for your reference, and to our phone conversation of February 6, 1979.

As I informed you, I had listed on line 22(c) of our October 10 quarterly report, and subsequent reports, that this Committee made in-kind contributions to several federal candidates. As I explained, I so listed this because I felt that our efforts on behalf of the entire party ticket would indirectly benefit those four federal candidates whose districts overlap Dallas County. (For names and addresses, see FEC Form 1.)

I am attaching copies of materials which indicate what we were involved with. As you can see, there are no federal candidates mentioned in these attachments, and I have not found any literature in which this Committee specifically supported a particular federal candidate.

I am taking the liberty of again reviewing campaign materials, and if I find any such materials prompted by this Committee which mentions a specific federal candidate directly, I will respond to the Commission accordingly.

Should you have any questions, I would ask that you please call me, as it has always been my intention of complying to the letter with Commission regulations.

8104030070

Thank you very much for your time in this matter.

Sincerely,

Kenneth H. Molberg, Treasurer
Campaign Victory '78 (Federal)

KHM:lg
Enclosure

81040303071

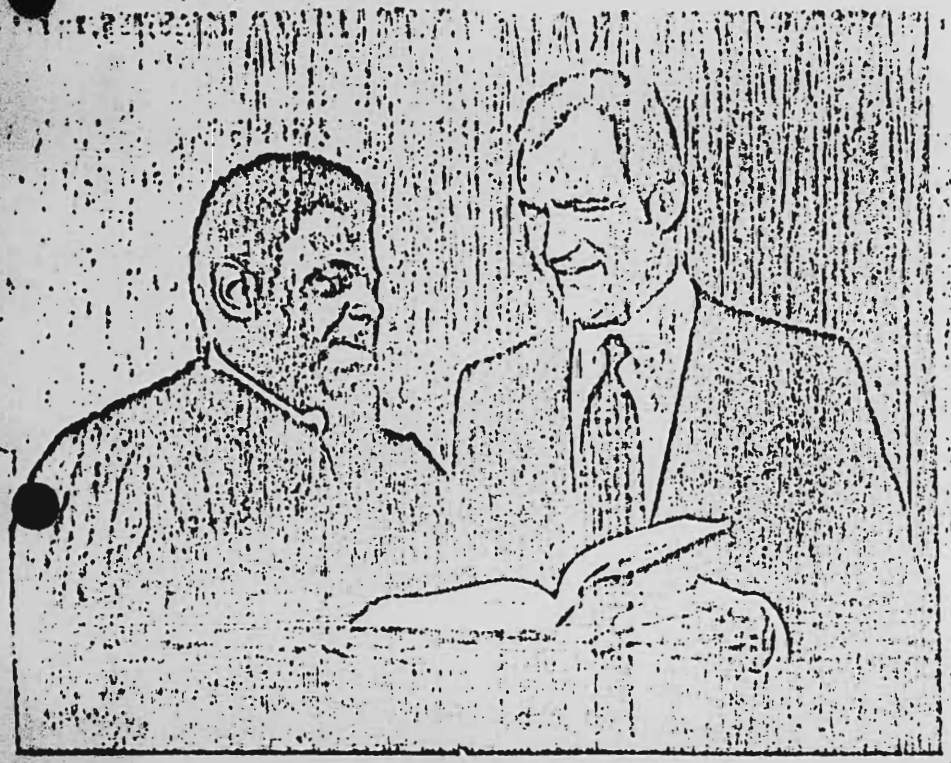


Billboard

8104030072

VOTE

TUESDAY, NOV.



Judge Berleind Brashear and Garry Weber urge you to vote Democratic.

VOTE DEMOCI

TO KEEP JUDGE BRA

AND ALL THE DEMO

WORKING FOR YOU!

PULL THE DEMOCRATI

It's the only way to insure the electic

Brashear, our only Black Criminal Cou

and all the Democrats

TUESDAY, NOV.

STICK WITH YOUR FRIENDS

VOTE FOR ALL THE DEMOCRATIC CANDIDATES

"THEY CARE ABOUT YOU"

VOTE

TUESDAY, NOV. 7

THE DEMOCRATIC WAY

Pol. Adv. paid for by campaign Victory 78, Kenneth H. Molberg, Treasurer, 5217 Ross Ave., Dallas, Texas 75206. Authorized by Dallas County Democratic Party.

★ ELITE NEWS ★

Only Sound

KEEP THE DEMOCRATIC TRADITION OF GOOD, HONEST GOVERNMENT.

Under Democratic leadership we have enjoyed good, honest state and local government. Our area is the envy of other parts of the country, and we have the Democratic tradition to thank. Help keep this high standard of good government by voting DEMOCRATIC Tuesday, Nov. 7.

VOTE

TUESDAY, NOV. 7

THE DEMOCRATIC WAY

Pol. Adv. paid for by Campaign Victory 78, Kenneth H. Molberg, Treasurer, 5217 Bass Ave., Dallas. Authorized by Dallas County Democratic Party

The Shopping News
Wednesday, November 1, 1978 PAGE 15

8 1 0 4 0 3 0 7 5

OFFICIAL NOTICE TO VOTERS

FROM

YOUR DALLAS COUNTY DEMOCRATIC PARTY

Ron Kessler, Chairman

ELECTION DAY IS TUESDAY, NOV. 7

7 AM-7 PM



PLEASE VOTE DEMOCRATIC TO KEEP JUDGE BERLAIND BRASHEAR

AND ALL OUR DEMOCRATIC FRIENDS WORKING FOR YOU!

PULL THE TOP LEVER DEMOCRAT

Printed by Century Valley 72
Kenneth Mack, Director

8104030076

12

...ary, 1978
...ederal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 1 of 1 for Line Number 20(a)

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Campaign Victory '78 (Federal)

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Tycher Properties 2 Turtle Creek Village Suite 505 Dallas, Texas 75219	Office Rent Expenditure for: ☐ Primary ☒ General ☐ Other	9-26-78	$ 962.00
Progressive Voters League 777 S. R. L. Thornton Dallas, Texas 75203	Office Rent Expenditure for: ☐ Primary ☒ General ☐ Other	9-26-78	300.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	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)	$ 1,262.00

8 1 78010 32 07771 8

JULE B
ISED
nuary, 1978
deral Election Commission
325 K Street, N.W.
ashington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 1 of 1 for Line Number 23(c)

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

Campaign Victory '78 (Federal)

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Lynn & Associates Box 4553 Dallas, Texas 75208	Phone Bank Services Expenditure for: ☐ Primary ☒ General ☐ Other	10/10/78	$ 114.92
Progressive Voters League 777 S. R. L. Thornton 1st Floor, Dallas, Texas 75203	Costs of Democratic Mailing Expenditure for: ☐ Primary ☒ General ☐ Other	10/17/78 10/23/78	229.76 229.76
Blacks for Victory 133 Lancaster-Kiest Shopping Center Dallas, Texas 75216	Election Day Activities (GOTV, sound trucks) Expenditure for: ☐ Primary ☒ General ☐ Other	10/20/78	100.00
Dan Wicker 2523 Dunlowe Dallas, Texas 75228	Contract Services for Get-Out-The-Vote Expenditure for: ☐ Primary ☒ General ☐ Other	10/23/78	40.00
Computer Data Processing, Inc., Box 1259 Grand Prairie, Texas 75050	Listing, labels and Phone numbers Expenditure for: ☐ Primary ☒ General ☐ Other	10/23/78	16.20
	Expenditure for: ☐ Primary ☐ General ☐ Other		
	Expenditure for: ☐ Primary ☐ General ☐ Other		
	Expenditure for: ☐ Primary ☐ General ☐ Other		

SUBTOTAL of expenditures this page (optional)	$ 730.64
TOTAL this period (last page this line number only)	$1,261.64

FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1104

Date Filmed 11/30/81 Camera No. --- 2

Cameraman DPC

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