



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1661

Date Filmed 12/13/84 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

Letter-ops memo's; routing cards,
drafts and agents,

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

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

Signed

date

[Signature]
12/7/84

84040491151

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

American General PAC)

David M. Ferguson, as Treasurer)

MUR 1661

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 15, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1661:

1. Accept the proposed agreement attached to the General Counsel's report dated November 13, 1984.
2. Close the file.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

11-16-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

84040491152



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 20, 1984

Brooks Morgan, Esquire
American General Corporation
Box 3247
Houston, Texas 77253

Re: MUR 1661
American General PAC
David M. Ferguson, as Treasurer

Dear Mr. Morgan:

On November 16, 1984, the Commission accepted the conciliation agreement signed by William Phelps and the civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(B), a provision 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.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

84040491153

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
American General Political) MUR 1661
Action Committee)
David M. Ferguson, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that American General Political Action Committee ("AG-PAC") and David M. Ferguson, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. § 104.5(c)(3) by failing to file its monthly reports in a timely manner.

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation, prior to a finding a probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

III. Respondents enter voluntarily into this agreement with the Commission.

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

1. Respondent AG-PAC is a political committee registered with the Commission.

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2. Respondent David M. Fergeson is the Treasurer of AG-PAC.

3. Respondents AG-PAC and David M. Fergeson, as treasurer, were required to file monthly reports of receipts and disbursements with the Commission no later than the 20th day after the last day of the month covered by the report.

4. The Commission has found reason to believe that AG-PAC and David M. Fergeson, as treasurer, failed to file the 1981 August, October, November and December monthly reports in a timely manner and failed to file the 1982 August, September, October monthly reports and the 1982 12 Day Pre-General reports in a timely manner.

V. Such a failure to file the monthly reports in a timely manner is in violation of 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. § 104.5(c)(3).

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Four Hundred Dollars (\$400), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree not to undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. 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 own motion, may review compliance with this agreement. If the Commission believes that this agreement

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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.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondents 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.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

November 16, 1984
Date

FOR THE RESPONDENTS:

William C. Phelps
(Name) *William C. Phelps*
(Position) *Chairman, American*
General Political Action Committee

Oct 16, 1984
Date

84040491156



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Brooks Morgan, Esquire
American General Corporation
Box 3247
Houston, Texas 77253

Re: MUR 1661
American General PAC
David M. Fergeson, as Treasurer

Dear Mr. Morgan:

On November , 1984, the Commission accepted the conciliation agreement signed by William Phelps and the civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(B), a provision 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.

Sincerely,

Charles N. Steele
General Counsel

CS 1/16/84

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

84040491157

AMERICAN GENERAL POLITICAL
ACTION COMMITTEE

2727 ALLEN PARKWAY
HOUSTON, TEXAS 77019

1678

October 16 19 84

35-637
1130

PAY TO THE ORDER OF Treasurer of the United States

\$ **400.00

Four hundred dollars and no/100

DOLLARS

Banc TEXAS Allen Parkway
Member BancTEXAS Group Inc.
P.O. Box 1278 Houston, Texas 77251

FOR MUR 1661

David M. Ferguson
David M. Ferguson

⑈001678⑈ ⑆113006373⑆ ⑈ 206 995⑈

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4

MEMORANDUM

GCC# 5265

TO: CHERYL THOMAS

TO: JOAN HARRIS

FROM: JOAN HARRIS

FROM: CHERYL THOMAS

CHECK NO. 1678 (a copy of which is attached) RELATING
TO MUR 1661 AND NAME American General PAC
and David M. Ferguson, Treas.

WAS RECEIVED ON October 22, 1984. PLEASE INDICATE THE ACCOUNT INTO
WHICH IT SHOULD BE DEPOSITED:

BUDGET CLEARING ACCOUNT (#95F3875.16)

CIVIL PENALTIES ACCOUNT (#95-1099.160)

OTHER _____

SIGNATURE

Cheyl R. Thomas

DATE

11/22/84

4



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Brooks Morgan, Esquire
American General Corporation
Box 3247
Houston, Texas 77253

Re: MUR 1661
American General PAC
David M. Fergeson, as Treasurer

Dear Mr. Morgan:

On November 1, 1984, the Commission accepted the conciliation agreement signed by William Phelps and the civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(B), a provision 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.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

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5

RECEIVED AT THE FEC
GCC # 5265
04 OCT 19 12:52

American General

BOX 3247 • HOUSTON, TEXAS • 77263

BROOKS MORGAN
Staff Attorney

October 16, 1984

CERTIFIED-RETURN RECEIPT REQUESTED

Federal Election Commission
1325 K Street, N.W.
7th Floor
Washington, D.C. 20463

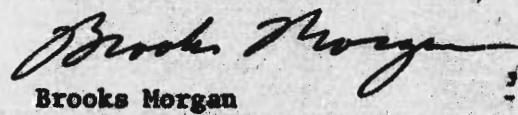
Attention: Mr. Duane A. Brown

Dear Mr. Brown:

I have enclosed on behalf of the American General Political Action Committee two copies of the conciliation agreement signed by William C. Phelps, Chairman of the committee, and a check in the amount of \$400.00 made payable to the Treasurer of the United States. We would greatly appreciate it if you would have both copies signed by the FEC and return one for our records.

Thank you for your assistance in the resolution of this matter. If you need anything further, please call me at (713) 831-3368.

Very truly yours,



Brooks Morgan

WBM:shj
Enclosures
101684703

34 OCT 22 1984
P 3:07

84040491161

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
American General Political)	MUR 1661
Action Committee)	
David M. Ferguson, Treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary for the Federal Election Commission, do hereby certify that on July 6, 1984, the Commission decided by a vote of 5-0 to take the following actions in MUR 1661:

1. Enter into pre-probable cause conciliation with American General PAC prior to a finding of probable cause to believe.
2. Approve the conciliation agreement attached to the General Counsel's report dated June 29, 1984.
3. Approve and send the letter attached to the General Counsel's report dated June 29, 1984.

Commissioners Aikens, Elliott, McDonald, McGarry, and Reiche voted affirmatively for the decision. Commissioner Harris did not cast a vote.

Attest:

7-6-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

84 JUL 2 9:24

In the Matter of)
American General Political) MUR 1661
Action Committee)
David M. Ferguson, Treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

BACKGROUND

As a result of the review of the 1981-82 reports filed by the American General Political Action Committee ("AG-PAC"), Reports Analysts determined that the respondent failed to file eight (8) reports in a timely manner during the 1981-82 election cycle. The filings were between 7 and 34 calendar days late.

AG-PAC was sent a chronic late filing notice on September 14, 1983, requesting reasons for lateness. On October 4, 1983, a response was received which explained that the reports were late due to a turnover in personnel, an oversight on the part of the treasurer, and a workload problem. AG-PAC further stated that in the future, they expect to be able to file all reports on a timely basis due to changes which have been instituted.

On April 3, 1984, the Commission decided to make this matter a MUR and find reason to believe AG-PAC and David Ferguson, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. § 104.5 (c)(3). On April 23, Otto Gerlach, counsel to AG-PAC filed a response to the Commission's reason to believe finding. (Attachment I).

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In its response, AG-PAC included a schedule of reporting and mailing dates in an effort to illustrate its recent attempts to comply with the reporting requirements of the Act. In fact, the schedule shows that for the seven monthly reporting periods beginning September 1, 1983 and ending March 31, 1984, AG-PAC mailed its reports by certified mail between 2 and 25 days in advance of the due date. AG-PAC contends that it has established an exemplary record since its internal procedures have been organized, and, requests that the Commission give it favorable consideration as a result. AG-PAC also requests pre-probable cause conciliation with the Commission in an effort to conclude this matter as expeditiously as possible.

LEGAL ANALYSIS

Below is a list of the monthly reports which AG-PAC failed to file in a timely manner.

<u>REPORT</u>	<u>RECEIPTS</u>	<u>EXPENDITURES</u>	<u>REPORT DUE</u>	<u>REPORT FILED</u>	<u>DAYS LATE</u>
1981 August Monthly	\$2,359	\$0	8/20/81	8/28	8
1981 October Monthly	\$5,799	\$0	10/20/81	11/2	13
1981 November Monthly	\$5,527	\$2,685	11/20/81	12/4	14
1981 December Monthly	\$2,574	\$ 750	12/20	12/28	8
1982 August Monthly	\$2,891	\$ 627	8/20/82	8/27	7
1982 September Monthly	\$2,880	\$1,000	9/20/82	9/30	10

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<u>REPORT</u>	<u>RECEIPTS</u>	<u>EXPENDITURES</u>	<u>REPORT DUE</u>	<u>REPORT FILED</u>	<u>DAYS LATE</u>
1982 October Monthly	\$5,976	\$14,800	10/20/82	10/28	8
1982 12 Day Pre-General	\$4,113	\$ 300	10/21/82	11/24	33

2 U.S.C. § 434(a) (4) (B) states that:

monthly reports in an calendar years shall be filed no later than the 20th day after the last day of the [preceding] month . . .

It appears that AG-PAC failed to file eight (8) reports in a timely manner in violation of 2 U.S.C. § 434(a) (4) (B).

DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

It is recommended that the Commission enter into pre-probable cause conciliation with AG-PAC. Since receiving the Commission's reason to believe notification, AG-PAC has been in compliance with the Act in respect to its reporting responsibilities.

RECOMMENDATIONS

1. Enter into pre-probable cause conciliation with American General PAC prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement.

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3. Approve and send the attached letter.

Charles W. Steele
General Counsel

June 29, 1984
Date

By: 
Kenneth A. Gross
Associate General Counsel

Attachments

- 1 - Letter from Otto Gerlach
- 2 - Proposed Conciliation Agreement
- 3 - Proposed letter

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ATTACHMENT I

God 2033

24 APR 23 09:00



American General CORPORATION

BOX 3247 • HOUSTON, TEXAS • 77263

MUR 1661
Brown

OTTO S. GERLACH III
Assistant Vice President and
Assistant General Counsel

April 20, 1984

ALL: 29

Federal Election Commission
1325 K Street, N.W.
7th Floor
Washington, D.C. 20463

Attention: Duane A. Brown

Re: MUR No. 1661

Dear Mr. Brown:

Following up on our telephone conversation of this morning I hereby request, as attorney for American General Political Action Committee, that a pre-probable cause conciliation be entered into. For your consideration I would like to submit the following schedule which indicates our compliance over the last seven reporting periods covering the period subsequent to your September 14, 1983 notice of late filing:

<u>Report Dates</u>	<u>Due Date</u>	<u>Date Sent by Certified Mail</u>
09/01/83 - 09/30/83	10/20/83	10/14/83
10/01/83 - 10/31/83	11/20/83	11/18/83
11/01/83 - 11/30/83	12/20/83	12/09/83
12/01/83 - 12/31/83	01/31/84	01/06/84
01/01/84 - 01/31/84	02/20/84	02/10/84
02/01/84 - 02/29/84	03/20/84	03/09/84
03/01/84 - 03/31/84	04/20/84	04/09/84

Secondly, to the extent that our size might be relevant in determining any fine which might be considered, I would like to point out that in 1983 our

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contributions on the state and federal level were less than \$45,000 for the calendar year.

We believe that we have established an exemplary record over the last seven filing periods and feel that we have gotten our internal procedures organized so that we can continue to be in strict compliance with your requirements and therefore request that you give our case favorable consideration.

Very truly yours,



Otto B. Gerlach

OBG:shj
042084701

cc: David M. Ferguson

84040491168



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 9, 1984

Otto B. Gerlach
Assistant Vice President and
Assistant General Counsel
American General Corporation
P.O. Box 3247
Houston, Texas 77253

Re: MUR. 1661
American General Political
Action Committee
David M. Ferguson, as treasurer

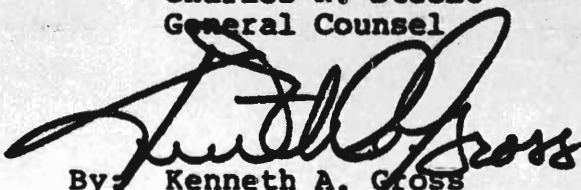
Dear Mr. Gerlach:

On April 3, 1984, the Commission found reason to believe that American General Political Action Committee and David M. Ferguson, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. § 104.5(c)(3). At your request, the Commission determined on July 6, 1984, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-4000.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosures

84040491169



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Otto B. Gerlach
Assistant Vice President and
Assistant General Counsel
American General Corporation
P.O. Box 3247
Houston, Texas 77253

Re: MUR 1661
American General Political
Action Committee
David M. Fergeson, as treasurer

Dear Mr. Gerlach:

On April 3, 1984, the Commission found reason to believe that American General Political Action Committee and David M. Fergeson, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. § 104.5(c)(3). At your request, the Commission determined on _____, 1984, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

84040491170

ATTACHMENT II



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Otto B. Gerlach
Assistant Vice President and
Assistant General Counsel
American General Corporation
P.O. Box 3247
Houston, Texas 77253

Re: MUR 1661
American General Political
Action Committee
David M. Fergeson, as treasurer

Dear Mr. Gerlach:

On April 3, 1984, the Commission found reason to believe that American General Political Action Committee and David M. Fergeson, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. § 104.5(c)(3). At your request, the Commission determined on [redacted], 1984, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

84040491171



**AMERICAN GENERAL
POLITICAL ACTION COMMITTEE**

2727 ALLEN PARKWAY
HOUSTON, TEXAS 77019
(713) 522-1111

14 AUG 1 P 1:05

GENERAL

July 27, 1984

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

Attention: Duane A. Brown

Dear Mr. Brown:

Please be advised that Mr. Brooks Morgan of the American General Corporation law department has been appointed to succeed Otto B. Gerlach as Counsel to the American General Political Action Committee.

Very truly yours

William C. Phelps
Chairman

WCP:ab

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84040491173



American General Companies

BOX 3247 • HOUSTON, TEXAS • 77253

To

Federal Election Commission
1325 K Street, N.W.
7th Floor
Washington, DC 20463

Attn: Mr. Duane A. Brown

FIRST CLASS MAIL

GR 220-1 REV 782

CERTIFIED MAIL

No. 100 14

RETURN RECEIPT REQUESTED

RECEIVED AT THE FEC
Gail 2053
84 APR 23 4 00

American General

BOX 3247 • HOUSTON, TEXAS • 77263

OTTO B. GERLACH III
Assistant Vice President and
Assistant General Counsel

April 20, 1984

MUR 1661
Brown

APR 29

Federal Election Commission
1325 K Street, N.W.
7th Floor
Washington, D.C. 20463

Attention: Duane A. Brown
Re: MUR No. 1661

Dear Mr. Brown:

Following up on our telephone conversation of this morning I hereby request, as attorney for American General Political Action Committee, that a pre-probable cause conciliation be entered into. For your consideration I would like to submit the following schedule which indicates our compliance over the last seven reporting periods covering the period subsequent to your September 14, 1983 notice of late filing:

<u>Report Dates</u>	<u>Due Date</u>	<u>Date Sent by Certified Mail</u>
09/01/83 - 09/30/83	10/20/83	10/14/83
10/01/83 - 10/31/83	11/20/83	11/18/83
11/01/83 - 11/30/83	12/20/83	12/09/83
12/01/83 - 12/31/83	01/31/84	01/06/84
01/01/84 - 01/31/84	02/20/84	02/10/84
02/01/84 - 02/29/84	03/20/84	03/09/84
03/01/84 - 03/31/84	04/20/84	04/09/84

Secondly, to the extent that our size might be relevant in determining any fine which might be considered, I would like to point out that in 1983 our

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contributions on the state and federal level were less than \$45,000 for the calendar year.

We believe that we have established an exemplary record over the last seven filing periods and feel that we have gotten our internal procedures organized so that we can continue to be in strict compliance with your requirements and therefore request that you give our case favorable consideration.

Very truly yours,



Otto B. Gerlach

OBG:shj
042084701

cc: David M. Fergeson

84040491175

04040491173



American General Companies

BOX 3247 • HOUSTON, TEXAS • 77253

To

Federal Election Commission
Attn: Duane A. Brown
1325 K Street, N. W.
7th Floor
Washington, D. C. 20463

FIRST CLASS MAIL

GR 220.1 REV 782



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 9, 1984

David M. Ferguson
American General Political
Action Committee
2727 Allen Parkway
Houston, Texas 77019

Re: MUR 1661
American General Political
Action Committee
David M. Ferguson, Treasurer

Dear Mr. Ferguson:

On April 3, 1984, the Federal Election Commission determined that there is reason to believe that American General Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. § 104.5(c)(3), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, 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 so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form

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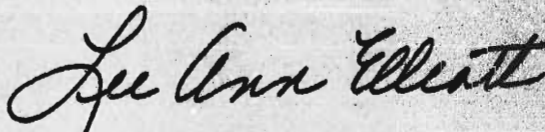
Letter to David M. Ferguson
Page 2

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.

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

84040491178

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1661

RESPONDENT: American General Political
Action Committee
David M. Fergeson, Treasurer

STAFF MEMBER & TEL. NO.
Duane A. Brown (523-5071)

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

As a result of the review of the 1981-82 reports filed by the American General Political Action Committee ("AG-PAC"), RAD determined that the respondent failed to file eight (8) reports in a timely manner during the 1981-82 election cycle. The filings were between 7 and 34 calendar days late. Below is a list of the reports in question, as well as the due dates and the dates filed.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
August Monthly (7/1/81-7/31/81)	8/20/81	8/28/81
October Monthly (9/1/81-9/30/81)	10/20/81	11/2/81
November Monthly (10/1/81-10/31/81)	11/20/81	12/4/81
December Monthly (11/1/81-11/30/81)	12/20/81	12/28/81
August Monthly (7/1/82-7/31/82)	8/20/82	8/27/82
September Monthly (8/1/82-8/31/82)	9/20/82	9/30/82
October Monthly (9/1/82-9/30/82)	10/20/82	10/28/82
12 Day Pre-General (10/1/82-10/13/82)	10/21/82	11/24/82

84040491179

FACTUAL AND LEGAL ANALYSIS

AG-PAC was sent a chronic late filing notice on September 14, 1983, requesting reasons for lateness. On October 4, 1983, a response was received which explained that the reports were late due to a turnover in personnel, an oversight on the part of the treasurer, and a workload problem. AG-PAC further stated that in the future, they expect to be able to file all reports on a timely basis due to changes which have been instituted.

Nonetheless, since the reports were filed late, the Office of General Counsel recommends that the Commission find reason to believe that AG-PAC and David Ferguson, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. § 104.5(c)(3).

84040421180



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David M. Fergeson
American General Political
Action Committee
2727 Allen Parkway
Houston, Texas 77019

Re: MUR 1661
American General Political
Action Committee
David M. Fergeson, Treasurer

Dear Mr. Fergeson:

On April 3, 1984, the Federal Election Commission determined that there is reason to believe that American General Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. § 104.5(c)(3), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, 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 so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form

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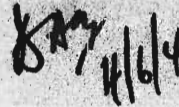
Letter to David M. Ferguson
Page 2

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.

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosures

- General Counsel's Factual and Legal Analysis Procedures
- Designation of Counsel Statement

84040491182

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
American General Political Action)
Committee) RAD REF #84NF-2
David M. Ferguson, Treasurer)

CERTIFICATION

I, Marjorie W. Emons, recording secretary for the Federal Election Commission executive session on April 3, 1984, do hereby certify the Commission decided by a vote of 4-0 to take the following actions with respect to the above-captioned referral:

1. Open a Matter Under Review.
2. Find reason to believe that American General Political Action Committee and David Ferguson, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. § 104.5(c)(3).
3. Send the letter attached to the General Counsel's report dated March 20, 1984.

Commissioners Aikens, Elliott, McDonald, and McGarry voted affirmatively for the decision; Commissioners Harris and Reiche were not present at the time of the vote.

Attest:

4-4-84

Date

Marjorie W. Emons

Marjorie W. Emons
Secretary of the Commission

84040491183

FIRST GENERAL COUNSEL'S REPORT

84 MAR 20 11: 28

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 2-20-84 11:30am

RAD REF #84NF-2
STAFF MEMBER:
D. A. Brown

SOURCE OF MUR: INTERNALLY GENERATED
RESPONDENT'S NAME: American General Political Action Committee
David M. Ferguson, Treasurer
RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(B)
11 C.F.R. § 104.5(c)(3)

SENSITIVE

INTERNAL REPORTS CHECKED: Respondent's
FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This matter was generated as the result of a review by the Reports Analysis Division ("RAD").

SUMMARY OF ALLEGATIONS

As a result of the review of the 1981-82 reports filed by the American General Political Action Committee ("AG-PAC"), RAD determined that the respondent failed to file eight (8) reports in a timely manner during the 1981-82 election cycle. The filings were between 7 and 34 calendar days late. Below is a list of the reports in question, as well as the due dates and the dates filed.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
August Monthly (7/1/81-7/31/81)	8/20/81	8/28/81
October Monthly (9/1/81-9/30/81)	10/20/81	11/2/81

(continued)

84040491184

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
November Monthly (10/1/81-10/31/81)	11/20/81	12/4/81
December Monthly (11/1/81-11/30/81)	12/20/81	12/28/81
August Monthly (7/1/82-7/31/82)	8/20/82	8/27/82
September Monthly (8/1/82-8/31/82)	9/20/82	9/30/82
October Monthly (9/1/82-9/30/82)	10/20/82	10/28/82
12 Day Pre-General (10/1/82-10/13/82)	10/21/82	11/24/82

FACTUAL AND LEGAL ANALYSIS

8 4 0 4 0 4 9 1 1 3 5
AG-PAC was sent a chronic late filing notice on September 14, 1983, requesting reasons for lateness. On October 4, 1983, a response was received which explained that the reports were late due to a turnover in personnel, an oversight on the part of the treasurer, and a workload problem. AG-PAC further stated that in the future, they expect to be able to file all reports on a timely basis due to changes which have been instituted. Nonetheless, since the reports were filed late, the Office of General Counsel recommends that the Commission find reason to believe that AG-PAC and David Fergeson, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. § 104.5(c)(3).

RECOMMENDATION

1. Open a MUR
2. Find reason to believe American General Political Action Committee and David Fergeson, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. § 104.5(c)(3).

3. Approve proposed letter.

Charles N. Steele
General Counsel

3/19/84
Date

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

Attachments

1. RAD Referral
2. Letter to David Fergeson
3. Factual and Legal Analysis

84040491186

REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: 13 January 1984

ANALYST: Theresa Harley

I. COMMITTEE: American General Political Action
Committee (C00024299)
David M. Ferguson, Treasurer
2727 Allen Parkway
Houston, TX 77019

II. RELEVANT STATUTE: 2 U.S.C. 434 (a) (4) (B)
11 CFR 104.5 (c) (3)

III. BACKGROUND:

Failure to Timely File Reports of Receipts and Disbursements

The American General Political Action Committee ("AG-PAC") failed to file eight (8) reports in a timely manner during the 1981-1982 election cycle (Attachments 2a-h). The filings were between 7 and 34 calendar days late. Below is a list of the reports in question, as well as the due dates and the dates filed.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
August Monthly (7/1/81-7/31/81)	8/20/81	8/28/81
October Monthly (9/1/81-9/30/81)	10/20/81	11/2/81
November Monthly (10/1/81-10/31/81)	11/20/81	12/4/81
December Monthly (11/1/81-11/30/81)	12/20/81	12/28/81
August Monthly (7/1/82-7/31/82)	8/20/82	8/27/82
September Monthly (8/1/82-8/31/82)	9/20/82	9/30/82
October Monthly (9/1/82-9/30/82)	10/20/82	10/28/82
12 Day Pre-General (10/1/82-10/13/82)	10/21/82	11/24/82

84040491187

AG-PAC was sent a chronic late filing notice on September 14, 1983 requesting reasons for lateness (Attachment 3). On October 4, 1983 a response was received which explained that the reports were late due to a turnover in personnel, an oversight on the part of the treasurer, and a workload problem. AG-PAC further stated that in the future, they expect to be able to file all reports on a timely basis due to changes which have been instituted (Attachment 4).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

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84040491189

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (41-82)DATE 29DEC83
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILE COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
AMERICAN GENERAL POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: AMERICAN GENERAL INSURANCE CO				NON-PARTY QUALIFIED		ID #000024299
1981	STATEMENT OF ORGANIZATION - AMENDMENT			3NOV81	2	01FEC/206/4397
	FEBRUARY MONTHLY	1,644	352	1JAN81 -31JAN81	11	01FEC/191/5182
	FEBRUARY MONTHLY - AMENDMENT	1,644	352	1JAN81 -31JAN81	6	03FEC/271/1456
	1'ST LETTER INFORMATIONAL NOTICE			1JAN81 -31JAN81	1	02FEC/237/3450
	MARCH MONTHLY	1,746	500	1FEB81 -28FEB81	10	01FEC/192/5056
	MARCH MONTHLY - AMENDMENT	1,746	500	1FEB81 -28FEB81	4	03FEC/271/1463
	1'ST LETTER INFORMATIONAL NOTICE			1FEB81 -28FEB81	1	02FEC/237/3451
	APRIL MONTHLY	1,798	100	1MAR81 -31MAR81	10	01FEC/194/2603
	APRIL MONTHLY - AMENDMENT	1,798	100	1MAR81 -31MAR81	5	03FEC/271/1468
	1'ST LETTER INFORMATIONAL NOTICE			1MAR81 -31MAR81	1	02FEC/237/3452
	MAY MONTHLY	1,730	125	1APR81 -30APR81	10	01FEC/196/1723
	MAY MONTHLY - AMENDMENT	1,730	625	1APR81 -30APR81	6	01FEC/210/3378
	MAY MONTHLY - AMENDMENT	2,155	625	1APR81 -30APR81	4	03FEC/271/1473
	1'ST LETTER INFORMATIONAL NOTICE			1APR81 -30APR81	1	02FEC/237/3453
	JUNE MONTHLY	1,762	350	1MAY81 -31MAY81	10	01FEC/197/3017
	JUNE MONTHLY - AMENDMENT	2,143	100	1MAY81 -31MAY81	4	03FEC/271/1479
	1'ST LETTER INFORMATIONAL NOTICE			1MAY81 -31MAY81	1	02FEC/237/3454
	1'ST LETTER INFORMATIONAL NOTICE			1MAY81 -31MAY81	1	02FEC/237/3461
	JULY MONTHLY	1,722	200	1JUN81 -30JUN81	11	01FEC/201/2798
	JULY MONTHLY - AMENDMENT	2,176	450	1JUN81 -30JUN81	6	03FEC/271/1484
	1'ST LETTER INFORMATIONAL NOTICE			1JUN81 -30JUN81	1	02FEC/237/3455
	AUGUST MONTHLY	1,904	0	1JUL81 -31JUL81	11	01FEC/205/1003
	AUGUST MONTHLY - AMENDMENT	2,359	0	1JUL81 -31JUL81	5	03FEC/271/1491
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL81 -31JUL81	3	03FEC/284/0885
	1'ST LETTER INFORMATIONAL NOTICE			1JUL81 -31JUL81	1	02FEC/237/3456
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31JUL81	2	03FEC/282/0203
	SEPTEMBER MONTHLY	3,609	2,400	1AUG81 -31AUG81	12	01FEC/206/1756
	SEPTEMBER MONTHLY - AMENDMENT	2,394	2,400	1AUG81 -31AUG81	4	02FEC/242/1942
	SEPTEMBER MONTHLY - AMENDMENT	2,394	2,400	1AUG81 -31AUG81	7	03FEC/271/1497
	REQUEST FOR ADDITIONAL INFORMATION			1AUG81 -31AUG81	1	02FEC/236/2111
	1'ST LETTER INFORMATIONAL NOTICE			1AUG81 -31AUG81	1	02FEC/237/3457
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1AUG81 -31AUG81	1	02FEC/240/1332
	REQUEST FOR ADDITIONAL INFORMATION			1AUG81 -31AUG81	1	03FEC/284/0894
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1AUG81 -31AUG81	2	03FEC/284/1915
	OCTOBER MONTHLY	5,541	0	1SEPT81 -30SEPT81	12	01FEC/208/4017
	OCTOBER MONTHLY - AMENDMENT	5,799	0	1SEPT81 -30SEPT81	6	03FEC/271/1505
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEPT81 -30SEPT81	1	03FEC/284/1028
	1'ST LETTER INFORMATIONAL NOTICE			1SEPT81 -30SEPT81	1	02FEC/237/3458
	REQUEST FOR ADDITIONAL INFORMATION			1SEPT81 -30SEPT81	1	03FEC/284/0366
	NOVEMBER MONTHLY	4,369	2,285	1OCT81 -31OCT81	14	01FEC/210/3364
	NOVEMBER MONTHLY - AMENDMENT	5,527	2,285	1OCT81 -31OCT81	8	03FEC/271/1512
	NOVEMBER MONTHLY - AMENDMENT	-	-	1OCT81 -31OCT81	1	03FEC/284/1027
	1'ST LETTER INFORMATIONAL NOTICE			1OCT81 -31OCT81	1	02FEC/237/3459
	REQUEST FOR ADDITIONAL INFORMATION			1OCT81 -31OCT81	1	02FEC/282/0365

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 2/26/83

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NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILE COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	DECEMBER MONTHLY	1,316	750	30NOV81 - 1NOV81	9	81FEC/211/8430
	DECEMBER MONTHLY - AMENDMENT	3,574	750	1NOV81 - 30NOV81	6	82FEC/271/1521
	DECEMBER MONTHLY - AMENDMENT	-	-	1NOV81 - 30NOV81	1	83FEC/283/1026
	1'ST LETTER INFORMATIONAL NOTICE			1NOV81 - 30NOV81	1	82FEC/237/3460
	1'ST LETTER INFORMATIONAL NOTICE			1NOV81 - 30NOV81	1	82FEC/236/2202
	REQUEST FOR ADDITIONAL INFORMATION			1NOV81 - 30NOV81	1	83FEC/283/0364
	YEAR-END	3,292	1,050	1DEC81 - 31DEC81	8	82FEC/213/2936
	YEAR-END - AMENDMENT	2,550	1,550	1DEC81 - 31DEC81	8	83FEC/271/1528
	1'ST LETTER INFORMATIONAL NOTICE			1DEC81 - 31DEC81	1	82FEC/236/2204
1982	FEBRUARY MONTHLY	2,632	1,450	1JAN82 - 31JAN82	5	82FEC/224/3450
	FEBRUARY MONTHLY - AMENDMENT	2,632	1,050	1JAN82 - 31JAN82	5	83FEC/271/1537
	MARCH MONTHLY	2,649	750	1FEB82 - 28FEB82	6	82FEC/225/1487
	MARCH MONTHLY - AMENDMENT	2,649	750	1FEB82 - 28FEB82	5	83FEC/271/1543
	APRIL MONTHLY	17,150	16,043	1MAR82 - 31MAR82	11	82FEC/226/1060
	APRIL MONTHLY - AMENDMENT	17,150	16,143	1MAR82 - 31MAR82	9	83FEC/271/1549
	MAY MONTHLY	12,507	6,300	1APR82 - 30APR82	11	82FEC/231/1516
	MAY MONTHLY - AMENDMENT	12,507	6,300	1APR82 - 30APR82	9	83FEC/271/1559
	JUNE MONTHLY	5,603	10,285	1MAY82 - 31MAY82	9	82FEC/232/3742
	JUNE MONTHLY - AMENDMENT	5,603	10,285	1MAY82 - 31MAY82	7	83FEC/271/1569
	JULY MONTHLY	5,709	16,712	1JUN82 - 30JUN82	15	82FEC/233/3136
	JULY MONTHLY - AMENDMENT	5,709	16,963	1JUN82 - 30JUN82	13	83FEC/271/1577
	AUGUST MONTHLY	2,891	1,600	1JUL82 - 30AUG82	8	82FEC/234/6457
	AUGUST MONTHLY - AMENDMENT	2,891	627	1JUL82 - 1JUL82	8	83FEC/271/1581
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL82 - 31JUL82	1	83FEC/284/1025
	REQUEST FOR ADDITIONAL INFORMATION			1JUL82 - 31JUL82	1	83FEC/283/0363
	SEPTEMBER MONTHLY	2,621	-	1AUG82 - 31AUG82	7	82FEC/234/5396
	SEPTEMBER MONTHLY - AMENDMENT	2,880	1,000	1AUG82 - 31AUG82	7	83FEC/271/1590
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG82 - 31AUG82	1	83FEC/284/1025
	REQUEST FOR ADDITIONAL INFORMATION			1AUG82 - 31AUG82	1	83FEC/283/0361
	OCTOBER MONTHLY	2,555	14,900	1SEP82 - 30SEP82	12	82FEC/233/0103
	OCTOBER MONTHLY - AMENDMENT	5,976	14,800	1SEP82 - 30SEP82	11	83FEC/271/1608
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP82 - 30SEP82	1	83FEC/284/1030
	REQUEST FOR ADDITIONAL INFORMATION			1SEP82 - 30SEP82	1	83FEC/283/0361
	PRE-GENERAL	4,327	300	1OCT82 - 13OCT82	9	82FEC/234/2867
	PRE-GENERAL - AMENDMENT	4,113	500	1OCT82 - 13OCT82	7	83FEC/271/1620
	PRE-GENERAL - AMENDMENT	-	-	1OCT82 - 13OCT82	1	83FEC/284/1031
	REQUEST FOR ADDITIONAL INFORMATION			1OCT82 - 13OCT82	1	83FEC/283/0360
	POST-GENERAL	3,584	8,905	14OCT82 - 22NOV82	12	82FEC/234/2855
	POST-GENERAL - AMENDMENT	3,584	8,685	14OCT82 - 22NOV82	10	83FEC/271/1628
	YEAR-END	6,536	1,300	23NOV82 - 31DEC82	12	83FEC/284/0223
	YEAR-END - AMENDMENT	3,348	1,300	23NOV82 - 31DEC82	10	83FEC/271/1639
	TOTAL	101,907	0	81,332	466	TOTAL PAGES

All reports reviewed (BASIC REVIEW)

Cash on hand at close of period \$21,332. (12-31-82)

Outstanding debts \$0

8 4 0 4 0 4 9 1 1 9 1

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)DATE 29DEC83
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
AMERICAN GENERAL POLITICAL ACTION COMMITTEE				NON-PARTY QUALIFIED		ID #C00024399
CONNECTED ORGANIZATION: AMERICAN GENERAL INSURANCE CO						
1983	STATEMENT OF ORGANIZATION - AMENDMENT			17JAN83	3	83FEC/261/337
	STATEMENT OF ORGANIZATION - AMENDMENT			26SEP83	2	83FEC/283/338
	FEBRUARY MONTHLY	2,688	1,500	1JAN83 -31JAN83	7	83FEC/267/0328
	FEBRUARY MONTHLY - AMENDMENT	2,688	1,500	1JAN83 -31MAR83	5	83FEC/271/1650
	MARCH MONTHLY	3,032	1,200	1FEB83 -28FEB83	8	83FEC/268/3861
	MARCH MONTHLY - AMENDMENT	3,287	1,200	1FEB83 -28FEB83	7	83FEC/270/1488
	MARCH MONTHLY - AMENDMENT	3,287	1,200	1FEB83 -28FEB83	6	83FEC/271/1656
	APRIL MONTHLY	4,028	6,043	1MAR83 -31MAR83	10	83FEC/270/1478
	APRIL MONTHLY - AMENDMENT	4,028	6,043	1MAR83 -31MAR83	9	83FEC/271/1683
	MAY MONTHLY	3,951	3,400	1APR83 -30APR83	9	83FEC/273/2492
	JUNE MONTHLY	2,752	600	1MAY83 -31MAY83	9	83FEC/273/2520
	JULY MONTHLY	3,130	6,450	1JUN83 -30JUN83	10	83FEC/277/0458
	AUGUST MONTHLY	3,092	5,609	1JUL83 -31JUL83	10	83FEC/282/0729
	AUGUST MONTHLY - AMENDMENT	3,092	3,600	1JUL83 -31JUL83	9	83FEC/283/2451
	SEPTEMBER MONTHLY	4,027	3,225	1AUG83 -31AUG83	12	83FEC/283/2439
	OCTOBER MONTHLY	4,489	6,834	1SEP83 -30SEP83	13	83FEC/285/2108
	NOVEMBER MONTHLY	4,173	6,050	1OCT83 -31OCT83	15	83FEC/287/3180
	DECEMBER MONTHLY	4,318	5,600	1NOV83 -30NOV83	12	83FEC/288/5147
	TOTAL	38,835	0	44,582	0	157 TOTAL PAGES

No reports reviewed

Cash on hand at close of period \$15,671. (11-30-83)

Outstanding debts \$0

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

81 NOV 2 AIO: 5

(Summary Page)

Attachment 2b

1. Name of Committee (In Full)
American General Political Action Committee

Address (Number and Street)
2727 Allen Parkway

City, State and ZIP Code
Houston, TX. 77019

Check if address is different than previously reported.

2. FEC Identification Number
C00024299

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

4. TYPE OF REPORT (check appropriate boxes)

(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 September, 1981
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

93
9
4049
4
8

SUMMARY

5. Covering Period 9/01/81 Through 9/30/81

6. (a) Cash on Hand January 1, 1981

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))

9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

	Column A This Period	Column B Calendar Year to-Date
6(a)		\$ 6,795.56
6(b)	\$ 18,687.60	
6(c)	\$ 5,541.07	\$ 21,460.67
6(d)	\$ 24,228.67	\$ 28,256.23
7	\$ -0-	\$ 4,027.56
8	\$ 24,228.67	\$ 24,228.67
9	\$	
10	\$	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Larry M. Karren
Type or Print Name of Treasurer

Larry M. Karren
SIGNATURE OF TREASURER

8/29/81
Date

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.

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FEC FORM 3X (3/80)

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

81 DEC 4 P1:

(Summary Page)

Attachment 2c

Name of Committee (In Full)
American General Political Action Committee

Address (Number and Street)
2727 Allen Parkway

City, State and ZIP Code
Houston, TX. 77019

Check if address is different than previously reported.

FEC Identification Number
C00024299

This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (check appropriate boxes)

(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 October, 1981
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

64040491194

SUMMARY

Covering Period 10/01/81 Through 10/31/81

(a) Cash on Hand January 1, 19 <u>81</u>		
(b) Cash on Hand at Beginning of Reporting Period	\$ 24,228.67	
(c) Total Receipts (from Line 18)	\$ 4,869.27	\$ 26,329.94
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 29,097.94	\$ 33,125.50
Total Disbursements (from Line 28)	\$ 2,365.00	\$ 6,892.56*
Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 26,732.94	\$ 26,232.94*
Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

	Column A This Period	Column B Calendar Year-to-Date
		\$ 6,795.56
	\$ 24,228.67	
	\$ 4,869.27	\$ 26,329.94
	\$ 29,097.94	\$ 33,125.50
	\$ 2,365.00	\$ 6,892.56*
	\$ 26,732.94	\$ 26,232.94*
	\$	
	\$	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 702-523-4068

David M. Ferguson
Signature or Print Name of Treasurer
David M. Ferguson
SIGNATURE OF TREASURER

12/1/81
Date

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.

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FEC FORM 3X (3/80)

1. Name of Committee (in Full)
American General Political Action Committee
Address (Number and Street)
2727 Allen Parkway
City, State and ZIP Code
Houston, Texas 77019
 Check if address is different than previously reported.

2. FEC Identification Number
C 00024299

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

4. TYPE OF REPORT (check appropriate boxes)

(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 July 1982
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

HAND DELIVERED

84040491196

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>July 1, 1982 Through July 30, 1982</u>		
6. (a) Cash on Hand January 1, 19<u>82</u>		\$ 28,641.52
(b) Cash on Hand at Beginning of Reporting Period	\$ 23,254.80	
(c) Total Receipts (from Line 18)	\$ 2,891.12	\$ 49,144.99
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 26,145.92	\$ 77,786.51
7. Total Disbursements (from Line 28)	\$ 1,600.00	\$ 53,240.59
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ...	\$ 24,545.92	\$ 24,545.92
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

For further information, contact:

Federal Election Commission
 Toll Free 800-424-9530
 Local 202-523-4068

DAVID M. FERGESON
 Type or Print Name of Treasurer

David M. Ferguson
 SIGNATURE OF TREASURER

8/26/82
 Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437;

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

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Name of Committee (In Full)
American General Political Action Committee

Address (Number and Street)
2727 Allen Parkway

City, State and ZIP Code
Houston, Texas 77019

Check if address is different than previously reported.

FEC Identification Number
C00024299

This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (check appropriate boxes)

(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 August 1982
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

7
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SUMMARY

Covering Period Aug. 1, 1982 Through Aug. 31, 1982

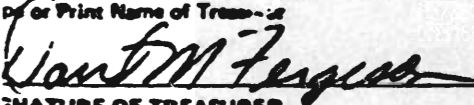
(a) Cash on Hand January 1, 1982		\$	28,641.52
(b) Cash on Hand at Beginning of Reporting Period	\$	24,545.92	
(c) Total Receipts (from Line 18)	\$	2,621.82	\$ 51,766.81
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$	27,167.74	\$ 80,408.33
Total Disbursements (from Line 28)	\$	-	\$ 53,240.59
Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$	27,167.74	\$ 27,167.74
Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$		
Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$		

	Column A This Period	Column B Calendar Year-to-Date
(a) Cash on Hand January 1, 1982		\$ 28,641.52
(b) Cash on Hand at Beginning of Reporting Period	\$ 24,545.92	
(c) Total Receipts (from Line 18)	\$ 2,621.82	\$ 51,766.81
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 27,167.74	\$ 80,408.33
Total Disbursements (from Line 28)	\$ -	\$ 53,240.59
Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 27,167.74	\$ 27,167.74
Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9630
Local 202-523-4088

David M. Ferguson
 or Print Name of Treasurer

 SIGNATURE OF TREASURER

Sept. 28, 1982
Date

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.

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82 OCT 28 P 1: 28

(Summary Page)

Attachment 2g

ALION AREA

ALION AREA

Name of Committee (In Full)

American General Political Action Committee

Address (Number and Street)

727 Allen Parkway

City, State and ZIP Code

Douston, Texas 77019

Check here if address is different than previously reported.

FEC Identification Number

This committee qualified as a multicandidate committee during this Reporting Period on _____

4. TYPE OF REPORT (Check appropriate boxes)

- April 15 Quarterly Report
 - July 15 Quarterly Report
 - July 31 Mid Year Report (Non-Election Year Only)
 - Monthly Report for September
 - Twelfth day report preceding _____
Election on _____ in the State of _____
 - Thirtieth day report following the General Election
on _____ in the State of _____
 - Termination Report
- (b) Is this Report an Amendment?
 YES NO

SUMMARY

Covering Period Sept. 1, 1982 through Sept. 30, 1982

(a) Cash on hand January 1, 19 82

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

Total Disbursements (from Line 28)

Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

Debts and Obligations Owed TO The Committee
(Itemize all on Schedule C or Schedule D)

Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D)

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

DAVID M. FERGESON
Print Name of Treasurer

David M. Fergeson
Signature of Treasurer

10/26/82
Date

For further information contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4088

TE Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. 643g

All previous versions of FEC FORM 3 and FEC FORM 2a are obsolete and should no longer be used.

12

STATE OF TEXAS RECEIPTS AND DISBURSEMENTS
For Political Committee Other Than an Authorized Committee

11:24 11:2:47

(Summary Page)

ALIGN AREA Attachment 2h ALIGN AREA

1. Name of Committee (In Full)
American General Political Action Committee

Address (Number and Street)
2727 Allen Parkway

City, State and ZIP Code
Houston, Texas 77019

Check here if address is different than previously reported.

2. FEC Identification Number
C 00024299

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

4. TYPE OF REPORT (Check appropriate boxes)

(a) April 15 Quarterly Report October 15 Quarterly Report
 July 15 Quarterly Report January 31 Year End Report
 July 31 Mid Year Report (Non Election Year Only)
 Monthly Report for _____
 Twelfth day report preceding General (Type of Election)
election on Nov. 2, 1982 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

84040491199

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>October 1, 1982</u> through <u>October 13, 1982</u>		
6. (a) Cash on hand January 1, 19<u>82</u>		\$ 28,641.52
(b) Cash on Hand at Beginning of Reporting Period	\$ 14,622.69	
(c) Total Receipts (from Line 1B)	\$ 4,327.61	\$ 58,649.77
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 19,150.70	\$ 87,291.29
7. Total Disbursements (from Line 2B)	\$ 300.00	\$ 68,440.59
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6-d)	\$ 16,850.70	\$ 18,850.70
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	\$ -	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -	

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

David M. Ferguson
Type or Print Name of Treasurer

David M. Ferguson
SIGNATURE OF TREASURER

11-23-82
Date

For further information contact
 Federal Election Commission
 1100 L Street, N.W.
 Washington, D.C. 20543

All previous editions of FEC FORM 3 and FEC FORM 26 are obsolete and should no longer be used.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachment 3

RQ-2

September 14, 1983

David M. Fergeson, Treasurer
American General Political Action
Committee
2727 Allen Parkway
Houston, TX 77019

Identification Number: C00024299

Reference: 1981-82 Election Cycle Reports

Dear Mr. Fergeson:

This letter is prompted by the Commission's review of the reports filed by your committee for the 1981-82 election cycle. A review of the reports listed below indicates that your committee repeatedly failed to file reports in a timely manner. Timely filing is a specific requirement of the Federal Election Campaign Act and essential to fulfilling the public disclosure concept embodied in the law. The Commission views late filing as a serious violation of the Act.

84040491200
030329???

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
August Monthly (7/1/81-7/31/81)	8/20/81	8/28/81
October Monthly (9/1/81-9/30/81)	10/20/81	11/2/81
November Monthly (10/1/81-10/31/81)	11/20/81	12/4/81
December Monthly (11/1/81-11/30/81)	12/20/81	12/28/81
August Monthly (7/1/82-7/31/82)	8/20/82	8/27/82
September Monthly (8/1/82-8/31/82)	9/20/82	9/30/82
October Monthly (9/1/82-9/30/82)	10/20/82	10/28/82
12 Day Pre-General (10/1/82-10/13/82)	10/21/82	11/24/82

This communication affords you the opportunity to present the reasons behind the late tenders noted above. Your response should be filed with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 within fifteen (15) days of the date of this letter. The Commission will consider your response

to this notice before taking action in this matter. If you need assistance or have any questions regarding this matter, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,



Michael B. Filler
Chief
Party/Non-Party Branch
Reports Analysis Division

84040491201
03052733204



33 OCT 4

**AMERICAN GENERAL
POLITICAL ACTION COMMITTEE**
2727 ALLEN PARKWAY
HOUSTON, TEXAS 77019

September 29, 1983

Mr. Michael B. Filler
Chief, Party/Non-Party Branch
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: 1981-82 Election Cycle Reports for American General
Political Action Committee, C 00024299

Dear Mr. Filler:

This letter is in response to your letter dated September 14, 1983 concerning late filing of eight reports in the 1981-82 Election Cycle for American General Political Action Committee. Even though our best efforts were utilized during the reporting period, regrettably, we were able to file only two-thirds of the required reports on time.

In regard to the reports specifically identified in your letter:

- * The first report mentioned, 7/1/81 - 7/31/81, was filed by my predecessor, who is no longer with this organization.
- * The second report mentioned, 9/1/81 - 9/30/81, was due October 20, 1981, which was two days after I became Treasurer of this committee. Being new to these filings, I was immediately at a disadvantage and, as a result, was unable to file until November 2, 1981.
- * The last report mentioned, the 12-day pre-general, was late due to an oversight on my part. Since we normally file monthly, I was not aware that a 12-day pre-general report was due. This error was discovered when I began preparing what I thought would be the 10/1/82 - 10/31/82 monthly report.

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0:116271.93:

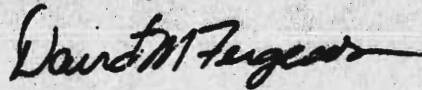
- * The remaining reports were late due to work overload involving my other duties and also because of a cumbersome manual recordkeeping system.

In the future, we expect to be able to make all reports on a timely basis due to changes which have been instituted. I have recently changed positions within the organization, which will provide me with the time necessary to report on a timely basis. In addition, extra personnel will be utilized to ensure prompt reporting. The committee's records will be processed on the computer by year end, which will make gathering the data for reporting much more efficient and effective. In addition, the committee's new chairman, Mr. William C. Phelps, has taken an active role in monitoring the proper filing of reports.

With these positive steps being taken to enhance our recordkeeping and reporting capabilities, we plan to fully comply with and, hopefully, exceed the "best efforts" requirements.

If I can be of further assistance in this matter, please let me know.

Sincerely,



David M. Ferguson
Treasurer

DMF:ab

copy: William C. Phelps, Chairman
Larry D. King, Counsel

84040491203.

ATTACHMENT I



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David M. Ferguson
American General Political
Action Committee
2727 Allen Parkway
Houston, Texas 77019

Re: MUR
American General Political
Action Committee
David M. Ferguson, Treasurer

Dear Mr. Ferguson:

On March , 1984, the Federal Election Commission determined that there is reason to believe that American General Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. § 104.5(c)(3), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, 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 so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form

84040491204

Letter to David M. Ferguson
Page 2

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.

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-5071.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

84040491205

ATTACHMENT III

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.
RESPONDENT: American General Political Action Committee
David M. Ferguson, Treasurer
STAFF MEMBER & TEL. NO.
Duane A. Brown (523-5071)

SOURCE OF MUR: INTERNALLY GENERATED

SUMMARY OF ALLEGATIONS

As a result of the review of the 1981-82 reports filed by the American General Political Action Committee ("AG-PAC"), RAD determined that the respondent failed to file eight (8) reports in a timely manner during the 1981-82 election cycle. The filings were between 7 and 34 calendar days late. Below is a list of the reports in question, as well as the due dates and the dates filed.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
August Monthly (7/1/81-7/31/81)	8/20/81	8/28/81
October Monthly (9/1/81-9/30/81)	10/20/81	11/2/81
November Monthly (10/1/81-10/31/81)	11/20/81	12/4/81
December Monthly (11/1/81-11/30/81)	12/20/81	12/28/81
August Monthly (7/1/82-7/31/82)	8/20/82	8/27/82
September Monthly (8/1/82-8/31/82)	9/20/82	9/30/82
October Monthly (9/1/82-9/30/82)	10/20/82	10/28/82
12 Day Pre-General (10/1/82-10/13/82)	10/21/82	11/24/82

84040491206

FACTUAL AND LEGAL ANALYSIS

AG-PAC was sent a chronic late filing notice on September 14, 1983, requesting reasons for lateness. On October 4, 1983, a response was received which explained that the reports were late due to a turnover in personnel, an oversight on the part of the treasurer, and a workload problem. AG-PAC further stated that in the future, they expect to be able to file all reports on a timely basis due to changes which have been instituted.

Nonetheless, since the reports were filed late, the Office of General Counsel recommends that the Commission find reason to believe that AG-PAC and David Fergeson, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. § 104.5(c)(3).

84040491207



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

84 APR 6 9:39

April 6, 1984

MEMORANDUM TO: The Commission
David M. Ferguson, Treasurer

FROM: Charles N. Steele
General Counsel

RAD REF #

SENSITIVE

By: Kenneth A. Gross
Associate General Counsel

L. Marjorie W. Emmons, Secretary

SUBJECT: RAD Referral 84NF-2
Election Commission executive session on April 3, 1984, do hereby

On April 3, 1984 the Commission approved the
recommendation that the subject RAD Referral be made a MUR.

Therefore, all documents which had previously been identified

as RAD Referral 84NF-2 should now become MUR # 1661.

Political Action Committee and David Ferguson,
as treasurer, violated 2 U.S.C. § 434(a)(4)(B)
and 11 C.F.R. § 104.5(c)(3).

Attachment. Send the letter attached to the General Counsel's
Copy of Certification March 20, 1984.

Commissioners Aikens, Elliott, McDonald, and McGarry voted
affirmatively for the decision; Commissioners Harris and Reiche
were not present at the time of the vote.

Attest:

4-4-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

84040491208

12 DAY REPORT
January 31, 1984

MUR: 84NF-2

Staff: D.A. BROWN

Date Assigned to Staff: 1/17/84

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME: America General PAC
David M. Ferguson, Treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(B)
11 C.F.R. § 104.5(c)(3)

INTERNAL REPORTS CHECKED: Respondent

FEDERAL AGENCIES CHECKED: N/A

STATEMENT OF THE CASE

The American General Political Action Committee ("AG-PAC") failed to file eight (8) reports in a timely manner during the 1981-1982 election cycle. The filings were between 7 and 34 calendar days late. Below is a list of the reports in question, as well as the due dates and the dates filed.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
August Monthly (7/1/81-7/31/81)	8/20/81	8/28/81
October Monthly (9/1/81-9/30/81)	10/20/81	11/2/81
November Monthly (10/1/81-10/31/81)	11/20/81	12/4/81
December Monthly (11/1/81-11/30/81)	12/20/81	12/28/81
August Monthly (7/1/82-7/31/82)	8/20/82	8/27/82
September Monthly (8/1/82-8/31/82)	9/20/82	9/30/82
October Monthly (9/1/82-9/30/82)	10/20/82	10/28/82
12 Day Pre-General (10/1/82-10/13/82)	10/21/82	11/24/82

84040491209


KAG

AG-PAC was sent a chronic late filing notice on September 14, 1983, requesting reasons for lateness. On October 4, 1983, a response was received which explained that the reports were late due to a turnover in personnel, an oversight on the part of the treasurer, and a workload problem. AG-PAC further stated that in the future, they expect to be able to file all reports on a timely basis due to changes which have been instituted.

STATEMENT OF PRELIMINARY DISCOVERY PLAN

None needed

RECOMMENDATION

Since all of the reports have been filed and since the latest report was only 34 days late, it is recommended that a MUR  e opened.

84040491210

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 13 January 1984

ANALYST: Theresa Harley

I. COMMITTEE: American General Political Action
 Committee (C00024299)
 David M. Ferguson, Treasurer
 2727 Allen Parkway
 Houston, TX 77019

II. RELEVANT STATUTE: 2 U.S.C. 434 (a) (4) (B)
 11 CFR 104.5 (c) (3)

III. BACKGROUND:

Failure to Timely File Reports of Receipts and Disbursements

The American General Political Action Committee ("AG-PAC") failed to file eight (8) reports in a timely manner during the 1981-1982 election cycle (Attachments 2a-h). The filings were between 7 and 34 calendar days late. Below is a list of the reports in question, as well as the due dates and the dates filed.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
August Monthly (7/1/81-7/31/81)	8/20/81	8/28/81
October Monthly (9/1/81-9/30/81)	10/20/81	11/2/81
November Monthly (10/1/81-10/31/81)	11/20/81	12/4/81
December Monthly (11/1/81-11/30/81)	12/20/81	12/28/81
August Monthly (7/1/82-7/31/82)	8/20/82	8/27/82
September Monthly (8/1/82-8/31/82)	9/20/82	9/30/82
October Monthly (9/1/82-9/30/82)	10/20/82	10/28/82
12 Day Pre-General (10/1/82-10/13/82)	10/21/82	11/24/82

84040491211

AG-PAC was sent a chronic late filing notice on September 14, 1983 requesting reasons for lateness (Attachment 3). On October 4, 1983 a response was received which explained that the reports were late due to a turnover in personnel, an oversight on the part of the treasurer, and a workload problem. AG-PAC further stated that in the future, they expect to be able to file all reports on a timely basis due to changes which have been instituted (Attachment 4).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

84040491212

84040491213

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 29DEC83

PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILES COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
AMERICAN GENERAL POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: AMERICAN GENERAL INSURANCE CO						NON-PARTY QUALIFIED ID #000024299
1981	STATEMENT OF ORGANIZATION - AMENDMENT			3NOV81	2	81FEC/208/4397
	FEBRUARY MONTHLY	1,644	352	1JAN81 - 31JAN81	11	81FEC/191/3182
	FEBRUARY MONTHLY - AMENDMENT	1,644	352	1JAN81 - 31JAN81	6	83FEC/271/1456
	1'ST LETTER INFORMATIONAL NOTICE			1JAN81 - 31JAN81	1	82FEC/237/3450
	MARCH MONTHLY	1,746	500	1FEB81 - 28FEB81	10	81FEC/192/5056
	MARCH MONTHLY - AMENDMENT	1,746	500	1FEB81 - 28FEB81	4	83FEC/271/1463
	1'ST LETTER INFORMATIONAL NOTICE			1FEB81 - 28FEB81	1	82FEC/237/3451
	APRIL MONTHLY	1,798	100	1MARG1 - 31MARG1	10	81FEC/194/2683
	APRIL MONTHLY - AMENDMENT	1,798	100	1MARG1 - 31MARG1	6	83FEC/271/1468
	1'ST LETTER INFORMATIONAL NOTICE			1MARG1 - 31MARG1	1	82FEC/237/3452
	MAY MONTHLY	1,730	125	1APR81 - 30APR81	10	81FEC/196/1723
	MAY MONTHLY - AMENDMENT	1,730	625	1APR81 - 30APR81	6	81FEC/210/3378
	MAY MONTHLY - AMENDMENT	2,155	625	1APR81 - 30APR81	4	83FEC/271/1475
	1'ST LETTER INFORMATIONAL NOTICE			1APR81 - 30APR81	1	82FEC/237/3452
	JUNE MONTHLY	1,762	350	1MAY81 - 31MAY81	10	81FEC/197/2017
	JUNE MONTHLY - AMENDMENT	2,143	100	1MAY81 - 31MAY81	4	83FEC/271/1479
	1'ST LETTER INFORMATIONAL NOTICE			1MAY81 - 31MAY81	1	82FEC/237/3454
	1'ST LETTER INFORMATIONAL NOTICE			1MAY81 - 31MAY81	1	82FEC/237/3461
	JULY MONTHLY	1,722	200	1JUN81 - 30JUN81	11	81FEC/201/2798
	JULY MONTHLY - AMENDMENT	2,176	450	1JUN81 - 30JUN81	6	83FEC/271/1484
	1'ST LETTER INFORMATIONAL NOTICE			1JUN81 - 30JUN81	1	82FEC/237/3455
	AUGUST MONTHLY	1,904	0	1JUL81 - 31JUL81	11	81FEC/205/1003
	AUGUST MONTHLY - AMENDMENT	2,359	0	1JUL81 - 31JUL81	5	83FEC/271/1491
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL81 - 31JUL81	3	83FEC/284/0885
	1'ST LETTER INFORMATIONAL NOTICE			1JUL81 - 31JUL81	1	82FEC/237/3456
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 - 31JUL81	2	83FEC/282/5203
	SEPTEMBER MONTHLY	3,609	2,400	1AUG81 - 31AUG81	12	81FEC/206/1756
	SEPTEMBER MONTHLY - AMENDMENT	2,394	2,400	1AUG81 - 31AUG81	4	83FEC/242/1942
	SEPTEMBER MONTHLY - AMENDMENT	2,394	2,400	1AUG81 - 31AUG81	7	83FEC/271/1497
	REQUEST FOR ADDITIONAL INFORMATION			1AUG81 - 31AUG81	1	82FEC/236/2111
	1'ST LETTER INFORMATIONAL NOTICE			1AUG81 - 31AUG81	1	83FEC/257/3457
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1AUG81 - 31AUG81	2	82FEC/240/2332
	REQUEST FOR ADDITIONAL INFORMATION			1AUG81 - 31AUG81	1	83FEC/268/0694
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1AUG81 - 31AUG81	2	83FEC/269/1915
	OCTOBER MONTHLY	5,541	0	1SEPT81 - 30SEPT81	10	81FEC/207/4817
	OCTOBER MONTHLY - AMENDMENT	5,799	0	1SEPT81 - 30SEPT81	6	83FEC/271/1505
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEPT81 - 30SEPT81	1	83FEC/284/1028
	1'ST LETTER INFORMATIONAL NOTICE			1SEPT81 - 30SEPT81	1	82FEC/237/3458
	REQUEST FOR ADDITIONAL INFORMATION			1SEPT81 - 30SEPT81	1	83FEC/283/0368
	NOVEMBER MONTHLY	4,869	2,365	1OCT81 - 31OCT81	14	81FEC/210/3364
	NOVEMBER MONTHLY - AMENDMENT	5,527	2,255	1OCT81 - 31OCT81	5	83FEC/271/1512
	NOVEMBER MONTHLY - AMENDMENT	-	-	1OCT81 - 31OCT81	1	83FEC/284/1037
	1'ST LETTER INFORMATIONAL NOTICE			1OCT81 - 31OCT81	1	82FEC/237/3459
	REQUEST FOR ADDITIONAL INFORMATION			1OCT81 - 31OCT81	1	83FEC/283/0365

84040491214

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 29DEC83

PAGE 2

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILES COVERAGE DATES	# OF PAGES	NUMERICAL LOCATION
	DECEMBER MONTHLY	1,916	750	10NOV81 - 10NOV81	9	81FEC/211/5630
	DECEMBER MONTHLY - AMENDMENT	2,574	750	10NOV81 - 30NOV81	6	83FEC/271/1521
	DECEMBER MONTHLY - AMENDMENT	-	-	10NOV81 - 30NOV81	1	83FEC/284/1026
	FIRST LETTER INFORMATIONAL NOTICE	-	-	10NOV81 - 30NOV81	1	82FEC/257/9460
	FIRST LETTER INFORMATIONAL NOTICE	-	-	10NOV81 - 30NOV81	1	82FEC/236/2202
	REQUEST FOR ADDITIONAL INFORMATION	-	-	10NOV81 - 30NOV81	1	83FEC/288/0364
	YEAR-END	2,292	1,050	1DEC81 - 31DEC81	8	82FEC/215/2930
	YEAR-END - AMENDMENT	2,550	1,550	1DEC81 - 31DEC81	8	83FEC/271/1528
	FIRST LETTER INFORMATIONAL NOTICE	-	-	1DEC81 - 31DEC81	1	82FEC/236/2204
1982	FEBRUARY MONTHLY	2,632	1,550	1JAN82 - 31JAN82	5	82FEC/224/9450
	FEBRUARY MONTHLY - AMENDMENT	2,632	1,050	1JAN82 - 31JAN82	5	83FEC/271/1537
	MARCH MONTHLY	2,649	750	1FEB82 - 28FEB82	6	82FEC/225/1487
	MARCH MONTHLY - AMENDMENT	2,649	750	1FEB82 - 28FEB82	5	83FEC/271/1543
	APRIL MONTHLY	17,150	16,043	1MAR82 - 31MAR82	11	82FEC/228/1060
	APRIL MONTHLY - AMENDMENT	17,150	16,143	1MAR82 - 31MAR82	9	83FEC/271/1549
	MAY MONTHLY	12,507	6,300	1APR82 - 30APR82	11	82FEC/231/1510
	MAY MONTHLY - AMENDMENT	12,507	6,300	1APR82 - 30APR82	9	83FEC/271/1559
	JUNE MONTHLY	5,603	10,285	1MAY82 - 31MAY82	9	82FEC/233/3742
	JUNE MONTHLY - AMENDMENT	5,603	10,285	1MAY82 - 31MAY82	7	83FEC/271/1569
	JULY MONTHLY	5,709	16,712	1JUN82 - 30JUN82	15	82FEC/239/2126
	JULY MONTHLY - AMENDMENT	5,709	16,962	1JUN82 - 30JUN82	13	83FEC/271/1577
	AUGUST MONTHLY	2,891	1,600	1JUL82 - 30AUG82	8	82FEC/242/0469
	AUGUST MONTHLY - AMENDMENT	2,891	627	1JUL82 - 13JUL82	8	83FEC/271/1591
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL82 - 31JUL82	1	83FEC/284/1025
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JUL82 - 31JUL82	1	83FEC/283/0363
	SEPTEMBER MONTHLY	2,621	-	1AUG82 - 31AUG82	7	82FEC/244/5396
	SEPTEMBER MONTHLY - AMENDMENT	2,880	1,000	1AUG82 - 31AUG82	7	83FEC/271/1600
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG82 - 31AUG82	1	83FEC/284/1029
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1AUG82 - 31AUG82	1	83FEC/281/0362
	OCTOBER MONTHLY	2,555	14,900	1SEP82 - 30SEP82	12	82FEC/253/0103
	OCTOBER MONTHLY - AMENDMENT	5,976	14,800	1SEP82 - 30SEP82	11	83FEC/271/1608
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP82 - 30SEP82	1	83FEC/284/1030
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1SEP82 - 30SEP82	1	83FEC/283/0361
	PRE-GENERAL	4,327	300	1OCT82 - 13OCT82	9	82FEC/254/2867
	PRE-GENERAL - AMENDMENT	4,113	300	1OCT82 - 13OCT82	7	83FEC/271/1620
	PRE-GENERAL - AMENDMENT	-	-	1OCT82 - 13OCT82	1	83FEC/284/1031
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1OCT82 - 13OCT82	1	83FEC/283/0360
	POST-GENERAL	3,584	8,905	14OCT82 - 22NOV82	12	83FEC/254/2855
	POST-GENERAL - AMENDMENT	3,584	8,655	14OCT82 - 22NOV82	10	83FEC/271/1628
	YEAR-END	6,536	1,300	23NOV82 - 31DEC82	12	83FEC/264/0223
	YEAR-END - AMENDMENT	3,348	1,300	23NOV82 - 31DEC82	10	83FEC/271/1639
	TOTAL	101,907	0	87,382	0	466 TOTAL PAGES

All reports reviewed (BASIC REVIEW)

Cash on hand at close of period \$21,332. (12-31-82)

Outstanding debts \$0

8 4 0 4 0 4 9 1 2 1 5

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)DATE 29DEC83
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
AMERICAN GENERAL POLITICAL ACTION COMMITTEE						
CONNECTED ORGANIZATION: AMERICAN GENERAL INSURANCE CO						
1983	STATEMENT OF ORGANIZATION - AMENDMENT			17JAN83	3	83FEC/261/3372
	STATEMENT OF ORGANIZATION - AMENDMENT			28SEP83	2	83FEC/283/3396
	FEBRUARY MONTHLY	2,688	1,500	1JAN83 -31JAN83	7	83FEC/267/3328
	FEBRUARY MONTHLY - AMENDMENT	2,688	1,500	1JAN83 -31MAR83	5	83FEC/271/1650
	MARCH MONTHLY	3,032	1,200	1FEB83 -28FEB83	3	83FEC/268/3861
	MARCH MONTHLY - AMENDMENT	3,287	1,200	1FEB83 -28FEB83	7	83FEC/270/4488
	MARCH MONTHLY - AMENDMENT	3,287	1,200	1FEB83 -28FEB83	6	83FEC/271/1656
	APRIL MONTHLY	4,028	6,043	1MAR83 -31MAR83	10	83FEC/270/4478
	APRIL MONTHLY - AMENDMENT	4,028	6,043	1MAR83 -31MAR83	9	83FEC/271/1663
	MAY MONTHLY	2,951	3,400	1APR83 -30APR83	9	83FEC/272/2438
	JUNE MONTHLY	2,752	600	1MAY83 -31MAY83	9	83FEC/273/5260
	JULY MONTHLY	3,130	6,450	1JUN83 -30JUN83	10	83FEC/272/3358
	AUGUST MONTHLY	3,092	5,600	1JUL83 -31JUL83	10	83FEC/282/0769
	AUGUST MONTHLY - AMENDMENT	3,092	3,500	1JUL83 -31JUL83	9	83FEC/282/2451
	SEPTEMBER MONTHLY	4,027	3,225	1AUG83 -31AUG83	13	83FEC/283/2439
	OCTOBER MONTHLY	4,489	6,834	1SEP83 -30SEP83	13	83FEC/285/2108
	NOVEMBER MONTHLY	4,173	6,050	1OCT83 -31OCT83	15	83FEC/287/3180
	DECEMBER MONTHLY	4,218	5,600	1NOV83 -30NOV83	13	83FEC/288/5147
	TOTAL	38,835	0	44,502	0	157 TOTAL PAGES

No reports reviewed

Cash on hand at close of period \$15,671. (01-30-83)

Outstanding debts \$0

81 AUG 28 11:08

(Summary Page)

Attachment 2a

Name of Committee (in Full)
American General Political Action Committee

Address (Number and Street)
2727 Allen Parkway

City, State and ZIP Code
Houston, TX. 77019

Check if address is different than previously reported.

FEC Identification Number
C00024299

This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (check appropriate boxes)

(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 July, 1981
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 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
<input checked="" type="checkbox"/> Covering Period <u>7/01/81</u> Through <u>7/31/81</u>			
— (a) Cash on Hand January 1, 19 <u>81</u>			\$ 6,795.56
○ (b) Cash on Hand at Beginning of Reporting Period		\$ 15,573.11	
+ (c) Total Receipts (from Line 18)		\$ 1,904.59	\$ 12,309.70
○ (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)		\$ 17,477.70	\$ 19,105.25
- Total Disbursements (from Line 28)		\$ -0-	\$ 1,627.56
Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..		\$ 17,477.70	\$ 17,477.70
Debits and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$	
Debits and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9630
Local 202-523-4058

Larry M. Karren

Name or Print Name of Treasurer

Larry M. Karren
SIGNATURE OF TREASURER

8/27/81
Date

JTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437c.

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

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

81 NOV 2 AIO: 5

(Summary Page)

Attachment 2b

1. Name of Committee (in Full)
American General Political Action Committee

Address (Number and Street)
2727 Allen Parkway

City, State and ZIP Code
Houston, TX. 77019

Check if address is different than previously reported.

2. FEC Identification Number
C00024299

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

4. TYPE OF REPORT (check appropriate boxes)

(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 September, 1981
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

17
2
1
9
4
0
4
0
4
0
8

SUMMARY

5. Covering Period 9/01/81 Through 9/30/81

6. (b) Cash on Hand January 1, 1981

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))

9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)

Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

	Column A This Period	Column B Calendar Year-to-Date
6. (b) Cash on Hand January 1, 19 <u>81</u>		\$ 6,795.56
(b) Cash on Hand at Beginning of Reporting Period	\$ 18,687.60	
(c) Total Receipts (from Line 18)	\$ 5,541.07	\$ 21,460.67
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 24,228.67	\$ 28,256.23
7. Total Disbursements (from Line 28)	\$ -0-	\$ 4,027.56
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 24,228.67	\$ 24,228.67
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Larry M. Karren
Type or Print Name of Treasurer

Larry M. Karren
SIGNATURE OF TREASURER

8/29/81
Date

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.

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

81 DEC 4 P1:

(Summary Page)

Attachment 2c

Name of Committee (In Full)
American General Political Action Committee

Address (Number and Street)
2727 Allen Parkway

City, State and ZIP Code
Houston, TX. 77019

Check if address is different than previously reported.

FEC Identification Number
C00024299

This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (check appropriate boxes)

(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 October, 1981
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

SUMMARY

Covering Period 10/01/81 Through 10/31/81

(a) Cash on Hand January 1, 1981

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)

Total Disbursements (from Line 28)

Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))

Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)

Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

	Column A This Period	Column B Calendar Year-to-Date
(a)		\$ 6,795.56
(b)	\$ 24,228.67	
(c)	\$ 4,869.27	\$ 26,329.94
(d)	\$ 29,097.94	\$ 33,125.50
Total Disbursements	\$ 2,365.00	\$ 6,892.56*
Cash on Hand at Close of Reporting Period	\$ 26,732.94	\$ 26,232.94*
Debts and Obligations Owed TO the Committee	\$	
Debts and Obligations Owed BY the Committee	\$	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

David M. Ferguson
Name or Print Name of Treasurer

David M. Ferguson
Signature of Treasurer

NATURE OF TREASURER

12/1/81
Date

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.

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FEC FORM 3X (3/80)

(Summary Page)

02 AUG 27 AM 1:28

1. Name of Committee (in Full)
American General Political Action Committee

Address (Number and Street)
3727 Allen Parkway

City, State and ZIP Code
Houston, Texas 77019

Check if address is different than previously reported.

2. FEC Identification Number
C 00024299

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

4. TYPE OF REPORT (check appropriate box(es))

(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 July 1982
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

HAND DELIVERED

84040491220

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>July 1, 1982 Through July 30, 1982</u>		
6. (a) Cash on Hand January 1, 19 <u>82</u>			\$ 28,641.52
(b) Cash on Hand at Beginning of Reporting Period		\$ 23,254.80	
(c) Total Receipts (from Line 18)		\$ 2,891.12	\$ 49,144.99
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)		\$ 26,145.92	\$ 77,786.51
7. Total Disbursements (from Line 28)		\$ 1,600.00	\$ 53,240.59
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))		\$ 24,545.92	\$ 24,545.92
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$	

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

For further information, contact:

Federal Election Commission
 Toll Free 800-424-9530
 Local 202-523-4068

DAVID M. FERGESON
 Type or Print Name of Treasurer

David M. Ferguson
 SIGNATURE OF TREASURER

8/26/82
 Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437f

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

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(Summary Page)

Name of Committee (in Full)
American General Political Action Committee

Address (Number and Street)
2727 Allen Parkway

City, State and ZIP Code
Houston, Texas 77019

Check if address is different than previously reported.

FEC Identification Number
C00024299

This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (check appropriate boxes)

(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 August 1982
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

2 SUMMARY

2 Covering Period Aug. 1, 1982 Through Aug. 31, 1982

— (a) Cash on Hand January 1, 1982

9 (b) Cash on Hand at Beginning of Reporting Period

4 (c) Total Receipts (from Line 18)

0 (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)

4 Total Disbursements (from Line 28)

0 Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ...

8 Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)

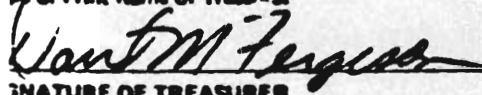
8 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

	Column A This Period	Column B Calendar Year-to-Date
(a)		\$ 28,641.52
(b)	\$ 24,545.92	
(c)	\$ 2,621.82	\$ 51,766.81
(d)	\$ 27,167.74	\$ 80,408.33
Total Disbursements	\$ -	\$ 53,240.59
Cash on Hand at Close of Reporting Period	\$ 27,167.74	\$ 27,167.74
Debts and Obligations Owed TO the Committee	\$	
Debts and Obligations Owed BY the Committee	\$	

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

For further information, contact:

Federal Election Commission
 Toll Free 800-424-9530
 Local 202-573-4088

David M. Ferguson
 or Print Name of Treasurer

 SIGNATURE OF TREASURER

Sept. 28, 1982
 Date

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.

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

RECEIVED AT THE FEC
82 OCT 28 P 1: 28

(Summary Page)

Attachment 2g

ALIGN AREA

ALIGN AREA

Name of Committee (in Full)

American General Political Action Committee

Address (Number and Street)

727 Allen Parkway

City, State and ZIP Code

Houston, Texas 77019

Check here if address is different than previously reported.

FEC Identification Number

This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) April 15 Quarterly Report October 15 Quarterly Report

July 15 Quarterly Report January 31 Year End Report

July 31 Mid Year Report (Non-Election Year Only)

Monthly Report for September

Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

Thirtieth day report following the General Election

on _____ in the State of _____

Termination Report

(b) Is this Report an Amendment?

YES

NO

SUMMARY

Covering Period Sept. 1, 1982 through Sept. 30, 1982

(a) Cash on hand January 1, 1982 \$ 28,641.52

(b) Cash on Hand at Beginning of Reporting Period \$ 27,167.74

(c) Total Receipts (from Line 1B) \$ 2,555.15 \$ 54,321.96

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and \$ 29,722.89 \$ 82,963.48

Lines 6(a) and 6(c) for Column B) Total Disbursements (from Line 2B) \$ 14,900.00 \$ 68,140.59

Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) \$ 14,822.89 \$ 14,822.89

Debts and Obligations Owed TO The Committee \$

(Itemize all on Schedule C or Schedule D) Debts and Obligations Owed BY the Committee \$

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

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4088

DAVID M. FERGESON
Name of Treasurer

David M Ferguson
NATURE OF TREASURER

10/26/82
Date

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)

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

13724 112:47

(Summary Page)

ALIGN AREA

Attachment 2h

ALIGN AREA

1. Name of Committee (In Full)

American General Political Action Committee

Address (Number and Street)

2727 Allen Parkway

City, State and ZIP Code

Houston, Texas 77019

Check here if address is different than previously reported.

2. FEC Identification Number

C 00024299

This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

- (a) April 15 Quarterly Report October 15 Quarterly Report
- July 15 Quarterly Report January 31 Year End Report
- July 31 Mid Year Report (Non Election Year Only)
- Monthly Report for _____
- Twelfth day report preceding General (Type of Election) election on Nov. 7, 1982 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

5 Covering Period October 1, 1982 through October 13, 1982

6 (a) Cash on hand January 1, 1982

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7 Total Disbursements (from Line 28)

8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9 Debts and Obligations Owed TO The Committee

(Itemize all on Schedule C or Schedule D)

10 Debts and Obligations Owed BY the Committee

(Itemize all on Schedule C or Schedule D)

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

David M. Ferguson

Type or Print Name of Treasurer

David M. Ferguson
SIGNATURE OF TREASURER

11-23-82
Date

For further information contact

Federal Election Commission

Washington, D.C. 20543

Area Code 202 435 4368

NOTE: Submit this report to the Federal Election Commission and to the State or local election officials in your jurisdiction.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

EQ-2

September 14, 1983

David M. Ferguson, Treasurer
American General Political Action
Committee
2727 Allen Parkway
Houston, TX 77019

Identification Number: C00024299

Reference: 1981-82 Election Cycle Reports

Dear Mr. Ferguson:

This letter is prompted by the Commission's review of the reports filed by your committee for the 1981-82 election cycle. A review of the reports listed below indicates that your committee repeatedly failed to file reports in a timely manner. Timely filing is a specific requirement of the Federal Election Campaign Act and essential to fulfilling the public disclosure concept embodied in the law. The Commission views late filing as a serious violation of the Act.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
August Monthly (7/1/81-7/31/81)	8/20/81	8/28/81
October Monthly (9/1/81-9/30/81)	10/20/81	11/2/81
November Monthly (10/1/81-10/31/81)	11/20/81	12/4/81
December Monthly (11/1/81-11/30/81)	12/20/81	12/28/81
August Monthly (7/1/82-7/31/82)	8/20/82	8/27/82
September Monthly (8/1/82-8/31/82)	9/20/82	9/30/82
October Monthly (9/1/82-9/30/82)	10/20/82	10/28/82
12 Day Pre-General (10/1/82-10/13/82)	10/21/82	11/24/82

This communication affords you the opportunity to present the reasons behind the late tenders noted above. Your response should be filed with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 within fifteen (15) days of the date of this letter. The Commission will consider your response

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to this notice before taking action in this matter. If you need assistance or have any questions regarding this matter, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,



Michael S. Filler
Chief
Party/Non-Party Branch
Reports Analysis Division

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33 OCT 4

AMERICAN GENERAL POLITICAL ACTION COMMITTEE

2727 ALLEN PARKWAY
HOUSTON, TEXAS 77019

September 29, 1983

Mr. Michael B. Filler
Chief, Party/Non-Party Branch
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: 1981-82 Election Cycle Reports for American General
Political Action Committee, C 00024299

Dear Mr. Filler:

This letter is in response to your letter dated September 14, 1983 concerning late filing of eight reports in the 1981-82 Election Cycle for American General Political Action Committee. Even though our best efforts were utilized during the reporting period, regrettably, we were able to file only two-thirds of the required reports on time.

In regard to the reports specifically identified in your letter:

- The first report mentioned, 7/1/81 - 7/31/81, was filed by my predecessor, who is no longer with this organization.
- The second report mentioned, 9/1/81 - 9/30/81, was due October 20, 1981, which was two days after I became Treasurer of this committee. Being new to these filings, I was immediately at a disadvantage and, as a result, was unable to file until November 2, 1981.
- The last report mentioned, the 12-day pre-general, was late due to an oversight on my part. Since we normally file monthly, I was not aware that a 12-day pre-general report was due. This error was discovered when I began preparing what I thought would be the 10/1/82 - 10/31/82 monthly report.

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Mr. Michael B. Filler
September 29, 1983
Page 2

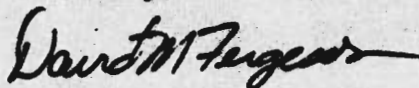
- * The remaining reports were late due to work overload involving my other duties and also because of a cumbersome manual recordkeeping system.

In the future, we expect to be able to make all reports on a timely basis due to changes which have been instituted. I have recently changed positions within the organization, which will provide me with the time necessary to report on a timely basis. In addition, extra personnel will be utilized to ensure prompt reporting. The committee's records will be processed on the computer by year end, which will make gathering the data for reporting much more efficient and effective. In addition, the committee's new chairman, Mr. William C. Phelps, has taken an active role in monitoring the proper filing of reports.

With these positive steps being taken to enhance our recordkeeping and reporting capabilities, we plan to fully comply with and, hopefully, exceed the "best efforts" requirements.

If I can be of further assistance in this matter, please let me know.

Sincerely,



David M. Ferguson
Treasurer

DMF:ab

copy: William C. Phelps, Chairman
Larry D. King, Counsel

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REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSELDATE: 13 January 1984ANALYST: Theresa Harley

I. COMMITTEE: American General Political Action
Committee (C00024299)
David M. Ferguson, Treasurer
2727 Allen Parkway
Houston, TX 77019

II. RELEVANT STATUTE: 2 U.S.C. 434 (a) (4) (B)
11 CFR 104.5 (c) (3)

III. BACKGROUND:**Failure to Timely File Reports of Receipts and Disbursements**

The American General Political Action Committee ("AG-PAC") failed to file eight (8) reports in a timely manner during the 1981-1982 election cycle (Attachments 2a-h). The filings were between 7 and 34 calendar days late. Below is a list of the reports in question, as well as the due dates and the dates filed.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
August Monthly (7/1/81-7/31/81)	8/20/81	8/28/81
October Monthly (9/1/81-9/30/81)	10/20/81	11/2/81
November Monthly (10/1/81-10/31/81)	11/20/81	12/4/81
December Monthly (11/1/81-11/30/81)	12/20/81	12/28/81
August Monthly (7/1/82-7/31/82)	8/20/82	8/27/82
September Monthly (8/1/82-8/31/82)	9/20/82	9/30/82
October Monthly (9/1/82-9/30/82)	10/20/82	10/28/82
12 Day Pre-General (10/1/82-10/13/82)	10/21/82	11/24/82

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AG-PAC was sent a chronic late filing notice on September 14, 1983 requesting reasons for lateness (Attachment 3). On October 4, 1983 a response was received which explained that the reports were late due to a turnover in personnel, an oversight on the part of the treasurer, and a workload problem. AG-PAC further stated that in the future, they expect to be able to file all reports on a timely basis due to changes which have been instituted (Attachment 4).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)DATE 29DEC83
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
AMERICAN GENERAL POLITICAL ACTION COMMITTEE				NON-PARTY QUALIFIED		ID #C00024299
CONNECTED ORGANIZATION:	AMERICAN GENERAL INSURANCE CO					
1981	STATEMENT OF ORGANIZATION - AMENDMENT			3NOV81	2	81FEC/208/4297
	FEBRUARY MONTHLY	1,644	352	1JAN81 -31JAN81	11	81FEC/191/5182
	FEBRUARY MONTHLY - AMENDMENT	1,644	352	1JAN81 -31JAN81	6	83FEC/271/1456
	1'ST LETTER INFORMATIONAL NOTICE			1JAN81 -31JAN81	1	82FEC/237/3450
	MARCH MONTHLY	1,746	500	1FEB81 -28FEB81	10	81FEC/192/5086
	MARCH MONTHLY - AMENDMENT	1,746	500	1FEB81 -28FEB81	4	83FEC/271/1463
	1'ST LETTER INFORMATIONAL NOTICE			1FEB81 -28FEB81	1	82FEC/237/3451
	APRIL MONTHLY	1,798	100	1MAR81 -31MAR81	10	81FEC/194/2663
	APRIL MONTHLY - AMENDMENT	1,798	100	1MAR81 -31MAR81	5	83FEC/271/1468
	1'ST LETTER INFORMATIONAL NOTICE			1MAR81 -31MAR81	1	82FEC/237/3452
	MAY MONTHLY	1,730	125	1APR81 -30APR81	10	81FEC/196/1723
	MAY MONTHLY - AMENDMENT	1,730	625	1APR81 -30APR81	6	81FEC/210/3378
	MAY MONTHLY - AMENDMENT	2,155	625	1APR81 -30APR81	4	83FEC/271/1474
	1'ST LETTER INFORMATIONAL NOTICE			1APR81 -30APR81	1	82FEC/237/3453
	JUNE MONTHLY	1,762	350	1MAY81 -31MAY81	10	81FEC/197/2017
	JUNE MONTHLY - AMENDMENT	2,143	100	1MAY81 -31MAY81	4	83FEC/271/1479
	1'ST LETTER INFORMATIONAL NOTICE			1MAY81 -31MAY81	1	82FEC/237/3454
	1'ST LETTER INFORMATIONAL NOTICE			1MAY81 -31MAY81	1	82FEC/237/3461
	JULY MONTHLY	1,722	200	1JUN81 -30JUN81	11	81FEC/201/2798
	JULY MONTHLY - AMENDMENT	2,176	450	1JUN81 -30JUN81	6	83FEC/271/1484
	1'ST LETTER INFORMATIONAL NOTICE			1JUN81 -30JUN81	1	82FEC/237/3455
	AUGUST MONTHLY	1,904	0	1JUL81 -31JUL81	11	81FEC/205/1003
	AUGUST MONTHLY - AMENDMENT	2,359	0	1JUL81 -31JUL81	5	83FEC/271/1491
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL81 -31JUL81	3	83FEC/284/0885
	1'ST LETTER INFORMATIONAL NOTICE			1JUL81 -31JUL81	1	82FEC/237/3456
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31JUL81	2	83FEC/282/5263
	SEPTEMBER MONTHLY	3,609	2,400	1AUG81 -31AUG81	12	81FEC/206/1736
	SEPTEMBER MONTHLY - AMENDMENT	2,394	2,400	1AUG81 -31AUG81	4	82FEC/242/1942
	SEPTEMBER MONTHLY - AMENDMENT	2,394	2,400	1AUG81 -31AUG81	7	83FEC/271/1497
	REQUEST FOR ADDITIONAL INFORMATION			1AUG81 -31AUG81	1	82FEC/236/2111
	1'ST LETTER INFORMATIONAL NOTICE			1AUG81 -31AUG81	1	82FEC/237/3457
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1AUG81 -31AUG81	2	82FEC/240/1332
	REQUEST FOR ADDITIONAL INFORMATION			1AUG81 -31AUG81	1	83FEC/268/0674
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1AUG81 -31AUG81	2	83FEC/267/1915
	OCTOBER MONTHLY	5,541	0	1SEP81 -30SEP81	12	81FEC/208/4017
	OCTOBER MONTHLY - AMENDMENT	5,799	0	1SEP81 -30SEP81	6	83FEC/271/1505
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP81 -30SEP81	1	83FEC/284/1028
	1'ST LETTER INFORMATIONAL NOTICE			1SEP81 -30SEP81	1	82FEC/237/3458
	REQUEST FOR ADDITIONAL INFORMATION			1SEP81 -30SEP81	1	83FEC/283/0366
	NOVEMBER MONTHLY	4,869	2,365	1OCT81 -31OCT81	14	81FEC/210/3364
	NOVEMBER MONTHLY - AMENDMENT	5,527	2,383	1OCT81 -31OCT81	8	83FEC/271/1512
	NOVEMBER MONTHLY - AMENDMENT	-	-	1OCT81 -31OCT81	1	83FEC/284/1027
	1'ST LETTER INFORMATIONAL NOTICE			1OCT81 -31OCT81	1	82FEC/237/3459
	REQUEST FOR ADDITIONAL INFORMATION			1OCT81 -31OCT81	1	83FEC/283/0365

ATTACHMENT 1

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 29DEC89

PAGE 3

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	DECEMBER MONTHLY	1,916	750	10NOV81 - 1NOV81	9	81FEC/211/5630
	DECEMBER MONTHLY - AMENDMENT	2,574	750	1NOV81 - 30NOV81	6	83FEC/271/1521
	DECEMBER MONTHLY - AMENDMENT	-	-	1NOV81 - 30NOV81	1	83FEC/284/1026
	1'ST LETTER INFORMATIONAL NOTICE	-	-	1NOV81 - 30NOV81	1	82FEC/237/3450
	1'ST LETTER INFORMATIONAL NOTICE REQUEST FOR ADDITIONAL INFORMATION	-	-	1NOV81 - 30NOV81	1	82FEC/236/3202
	YEAR-END	2,292	1,050	1NOV81 - 30NOV81	1	83FEC/283/0364
	YEAR-END - AMENDMENT	2,550	1,550	1DEC81 - 31DEC81	9	82FEC/217/2930
	1'ST LETTER INFORMATIONAL NOTICE	-	-	1DEC81 - 31DEC81	6	83FEC/271/1528
1982	FEBRUARY MONTHLY	2,632	1,550	1DEC81 - 31DEC81	1	82FEC/236/2204
	FEBRUARY MONTHLY - AMENDMENT	2,632	1,050	1JAN82 - 31JAN82	5	82FEC/224/3450
	MARCH MONTHLY	2,649	750	1JAN82 - 31JAN82	5	83FEC/271/1537
	MARCH MONTHLY - AMENDMENT	2,649	750	1FEB82 - 28FEB82	6	82FEC/225/1407
	APRIL MONTHLY	17,150	16,043	1FEB82 - 28FEB82	5	83FEC/271/1543
	APRIL MONTHLY - AMENDMENT	17,150	16,143	1MAR82 - 31MAR82	11	82FEC/228/1060
	MAY MONTHLY	12,507	6,300	1MAR82 - 31MAR82	9	83FEC/271/1549
	MAY MONTHLY - AMENDMENT	12,507	6,300	1APR82 - 30APR82	11	82FEC/231/1519
	JUNE MONTHLY	5,603	10,385	1APR82 - 30APR82	9	83FEC/221/1559
	JUNE MONTHLY - AMENDMENT	5,603	10,385	1MAY82 - 31MAY82	9	82FEC/233/3742
	JULY MONTHLY	5,709	16,712	1MAY82 - 31MAY82	7	83FEC/271/1569
	JULY MONTHLY - AMENDMENT	5,709	16,962	1JUN82 - 30JUN82	15	82FEC/239/2126
	AUGUST MONTHLY	2,891	1,606	1JUN82 - 30JUN82	13	83FEC/271/1577
	AUGUST MONTHLY - AMENDMENT	2,891	627	1JUL82 - 30AUG82	8	82FEC/242/0469
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL82 - 31JUL82	8	83FEC/271/1591
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JUL82 - 31JUL82	1	83FEC/234/1025
	SEPTEMBER MONTHLY	2,621	-	1JUL82 - 31JUL82	1	83FEC/283/0363
	SEPTEMBER MONTHLY - AMENDMENT	2,880	1,000	1AUG82 - 31AUG82	7	82FEC/244/5396
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG82 - 31AUG82	7	83FEC/271/1600
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1AUG82 - 31AUG82	1	83FEC/284/1029
	OCTOBER MONTHLY	2,555	14,900	1AUG82 - 31AUG82	1	83FEC/283/0362
	OCTOBER MONTHLY - AMENDMENT	5,976	14,800	1SEP82 - 30SEP82	12	82FEC/259/0103
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP82 - 30SEP82	11	83FEC/271/1608
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1SEP82 - 30SEP82	1	83FEC/284/1030
	PRE-GENERAL	4,327	300	1SEP82 - 30SEP82	1	85FEC/283/0361
	PRE-GENERAL - AMENDMENT	4,113	300	1OCT82 - 13OCT82	9	82FEC/254/2867
	PRE-GENERAL - AMENDMENT	-	-	1OCT82 - 13OCT82	7	83FEC/271/1620
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1OCT82 - 13OCT82	1	83FEC/284/1031
	POST-GENERAL	3,584	8,905	1OCT82 - 13OCT82	1	83FEC/283/0360
	POST-GENERAL - AMENDMENT	3,584	8,655	14OCT82 - 22NOV82	12	82FEC/254/2855
	YEAR-END	6,536	1,300	14OCT82 - 22NOV82	10	83FEC/271/1628
	YEAR-END - AMENDMENT	3,348	1,300	23NOV82 - 31DEC82	12	83FEC/264/0223
	TOTAL	101,907	0	23NOV82 - 31DEC82	10	82FEC/271/1639

All reports reviewed (Basic Review)

Cash on hand at close of period \$21,332. (12-31-82)

Outstanding debts \$0

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (93-84)DATE 29DEC83
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
AMERICAN GENERAL POLITICAL ACTION COMMITTEE				NON-PARTY QUALIFIED		ID #C00024299
CONNECTED ORGANIZATION: AMERICAN GENERAL INSURANCE CO						
1983	STATEMENT OF ORGANIZATION - AMENDMENT			17JAN83	3	83FEC/261/3372
	STATEMENT OF ORGANIZATION - AMENDMENT			28SEF83	2	83FEC/283/5308
	FEBRUARY MONTHLY	2,688	1,500	1JAN83 - 31JAN83	7	83FEC/267/0328
	FEBRUARY MONTHLY - AMENDMENT	2,688	1,500	1JAN83 - 31MAR83	5	83FEC/271/1650
	MARCH MONTHLY	3,032	1,200	1FEB83 - 28FEB83	8	83FEC/268/3861
	MARCH MONTHLY - AMENDMENT	3,287	1,200	1FEB83 - 28FEB83	7	83FEC/270/4488
	MARCH MONTHLY - AMENDMENT	3,287	1,200	1FEB83 - 28FEB83	6	83FEC/271/1656
	APRIL MONTHLY	4,028	6,043	1MAR83 - 31MAR83	10	83FEC/270/4478
	APRIL MONTHLY - AMENDMENT	4,028	6,043	1MAR83 - 31MAR83	9	83FEC/271/1663
	MAY MONTHLY	2,951	3,400	1APR83 - 30APR83	9	83FEC/272/2438
	JUNE MONTHLY	2,752	600	1MAY83 - 31MAY83	9	83FEC/273/5260
	JULY MONTHLY	3,130	6,450	1JUN83 - 30JUN83	10	83FEC/277/0458
	AUGUST MONTHLY	3,092	5,690	1JUL83 - 31JUL83	10	83FEC/282/0760
	AUGUST MONTHLY - AMENDMENT	3,092	3,600	1JUL83 - 31JUL83	9	83FEC/283/2451
	SEPTEMBER MONTHLY	4,027	3,225	1AUG83 - 31AUG83	12	83FEC/283/2439
	OCTOBER MONTHLY	4,489	6,834	1SEP83 - 30SEP83	13	83FEC/285/2108
	NOVEMBER MONTHLY	4,173	6,050	1OCT83 - 31OCT83	15	83FEC/287/3180
	DECEMBER MONTHLY	4,218	5,606	1NOV83 - 30NOV83	13	83FEC/288/5147
	TOTAL	38,835	0	44,502	0	157 TOTAL PAGES

No reports reviewed

Cash on hand at close of period \$15,671. (11-30-83)
Outstanding debts \$0

Name of Committee (in Full)
American General Political Action Committee

Address (Number and Street)
2727 Allen Parkway

City, State and ZIP Code
Houston, TX. 77019

Check if address is different than previously reported.

FEC Identification Number
C00024299

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

II. TYPE OF REPORT (check appropriate boxes)

(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 July, 1981
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

SUMMARY

Covering Period 7/01/81 Through 7/31/81

(a) Cash on Hand January 1, 1981

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)

Total Disbursements (from Line 20)

Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))

Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)

Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

	Column A This Period	Column B Calendar Year-to-Date
(a)		\$ 6,795.56
(b)	\$ 15,573.11	
(c)	\$ 1,904.59	\$ 12,309.70
(d)	\$ 17,477.70	\$ 19,105.25
Total Disbursements	\$ -0-	\$ 1,627.56
Cash on Hand at Close of Reporting Period	\$ 17,477.70	\$ 17,477.70
Debts and Obligations Owed TO the Committee	\$	
Debts and Obligations Owed BY the Committee	\$	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9630
Local 202-523-4088

Larry M. Karren

Name or Print Name of Treasurer

Larry M. Karren

SIGNATURE OF TREASURER

8/27/81

Date

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.

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1. Name of Committee (in Full)
 American General Political Action
 Committee

Address (Number and Street)
 2727 Allen Parkway

City, State and ZIP Code
 Houston, TX. 77019

Check if address is different than previously reported.

2. FEC Identification Number
 C00024299

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

4. TYPE OF REPORT (check appropriate boxes)

(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 September, 1981
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

SUMMARY

5. Covering Period 9/01/81 Through 9/30/81

6. (a) Cash on Hand January 1, 1981

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))

9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

	Column A This Period	Column B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 1981		\$ 6,795.56
6. (b) Cash on Hand at Beginning of Reporting Period	\$ 18,687.60	
6. (c) Total Receipts (from Line 18)	\$ 5,541.07	\$ 21,460.67
6. (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 24,228.67	\$ 28,256.23
7. Total Disbursements (from Line 28)	\$ -0-	\$ 4,027.56
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 24,228.67	\$ 24,228.67
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

For further information, contact:

Federal Election Commission
 Toll Free 800-424-9530
 Local 202-523-4068

Larry M. Karren
 Type or Print Name of Treasurer

Larry M. Karren
 SIGNATURE OF TREASURER

8/29/81
 Date

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.

Name of Committee (in Full)
American General Political Action Committee

Address (Number and Street)
2727 Allen Parkway

City, State and ZIP Code
Houston, TX. 77019

Check if address is different than previously reported.

FEC Identification Number
C00024299

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

4. TYPE OF REPORT (check appropriate boxes)

(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 October, 1981
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

13
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SUMMARY

Covering Period 10/01/81 Through 10/31/81

(b) Cash on Hand January 1, 19 <u>81</u>		\$ 6,795.56
(b) Cash on Hand at Beginning of Reporting Period	\$ 24,228.67	
(c) Total Receipts (from Line 18)	\$ 4,869.27	\$ 26,329.94
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 29,097.94	\$ 33,125.50
Total Disbursements (from Line 28)	\$ 2,365.00	\$ 6,892.56*
Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ...	\$ 26,732.94	\$ 26,232.94*
Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

Column A This Period	Column B Calendar Year-to-Date

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

For further information, contact:

David M. Ferguson
 Name or Print Name of Treasurer

David M. Ferguson
 SIGNATURE OF TREASURER

12/1/81
 Date

Federal Election Commission
 Toll Free 800-424-9530
 Local 202-523-4088

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.

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02 AUG 27 1982

HAND DELIVERED

1. Name of Committee (in Full)
**American General Political Action
 Committee**
 Address (Number and Street)
2727 Allen Parkway
 City, State and ZIP Code
Houston, Texas 77019
 Check if address is different than previously reported.

2. FEC Identification Number
C 00024299

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

4. TYPE OF REPORT (check appropriate box)

(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 July 1982
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

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SUMMARY

5. Covering Period July 1, 1982 Through July 30, 1982

6. (a) Cash on Hand January 1, 1982

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1B)

(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 2B)

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..

9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

	Column A This Period	Column B Calendar Year-to-Date
6(a)		\$ 28,641.52
6(b)	\$ 23,254.80	
6(c)	\$ 2,891.12	\$ 49,144.99
6(d)	\$ 26,145.92	\$ 77,786.51
7	\$ 1,600.00	\$ 53,240.59
8	\$ 24,545.92	\$ 24,545.92
9	\$	
10	\$	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4088

DAVID M. FERGESON
 Type or Print Name of Treasurer

David M. Ferguson
 SIGNATURE OF TREASURER

8/26/82
 Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437;

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

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Name of Committee (in Full)
American General Political Action Committee

Address (Number and Street)
2727 Allen Parkway

City, State and ZIP Code
Houston, Texas 77019

Check if address is different than previously reported.

FEC Identification Number
C00024299

This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (check appropriate boxes)
- (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 August 1982
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report
- (b) Is this Report an Amendment?
 YES NO

SUMMARY

Covering Period Aug. 1, 1982 Through Aug. 31, 1982

(a) Cash on Hand January 1, 1982

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)

Total Disbursements (from Line 28)

Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))

Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)

Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

	Column A This Period	Column B Calendar Year-to-Date
(a) Cash on Hand January 1, 1982		\$ 28,641.52
(b) Cash on Hand at Beginning of Reporting Period	\$ 24,545.92	
(c) Total Receipts (from Line 18)	\$ 2,621.82	\$ 51,766.81
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 27,167.74	\$ 80,408.33
Total Disbursements (from Line 28)	\$ -	\$ 53,240.59
Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 27,167.74	\$ 27,167.74
Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9630
Local 202-523-4088

Signature of Treasurer: David M. Ferguson
 Name of Treasurer: David M. Ferguson
 Title: TREASURER

Date: Sept. 28, 1982

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.

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02 OCT 82 11:28

Summary Page

Attachment 2g

NAME AREA

Name of Committee (in Full)
National General Political Action Committee

Address (Number and Street)
727 Allen Parkway
 City, State and ZIP Code
Douston, Texas 77019

Check here if address is different than previously reported.

FEC Identification Number

This committee qualified as a multicandidate committee during this Reporting Period on _____

4. TYPE OF REPORT (Check appropriate boxes)

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

(b) Is this Report an Amendment?
 YES NO

SUMMARY

Covering Period Sept. 1, 1982 through Sept. 30, 1982

(a) Cash on hand January 1, 19 82

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and
 Lines 6(a) and 6(c) for Column B)

Total Disbursements (from Line 28)

Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

Debts and Obligations Owed TO The Committee
 (Itemize all on Schedule C or Schedule D)

Debts and Obligations Owed BY the Committee
 (Itemize all on Schedule C or Schedule D)

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
(a) Cash on hand January 1, 1982		\$ 28,641.52
(b) Cash on Hand at Beginning of Reporting Period	\$ 27,167.74	
(c) Total Receipts (from Line 18)	\$ 2,555.15	\$ 54,321.96
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 29,722.89	\$ 82,963.48
Total Disbursements (from Line 28)	\$ 14,900.00	\$ 68,140.59
Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 14,822.89	\$ 14,822.89
Debts and Obligations Owed TO The Committee	\$	
Debts and Obligations Owed BY the Committee	\$	

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

DAVID M. FERGESON
 Name of Treasurer

David M. Ferguson
 NATURE OF TREASURER

10/26/82
 Date

For further information contact:
 Federal Election Commission
 Toll Free 800-424-9530
 Local 202-523-4088

TE Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 USC § 437g

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachment 3

EQ-2

September 14, 1983

David M. Ferguson, Treasurer
American General Political Action
Committee
2727 Allen Parkway
Houston, TX 77019

Identification Number: C00024299

Reference: 1981-82 Election Cycle Reports

Dear Mr. Ferguson:

This letter is prompted by the Commission's review of the reports filed by your committee for the 1981-82 election cycle. A review of the reports listed below indicates that your committee repeatedly failed to file reports in a timely manner. Timely filing is a specific requirement of the Federal Election Campaign Act and essential to fulfilling the public disclosure concept embodied in the law. The Commission views late filing as a serious violation of the Act.

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<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
August Monthly (7/1/81-7/31/81)	8/20/81	8/28/81
October Monthly (9/1/81-9/30/81)	10/20/81	11/2/81
November Monthly (10/1/81-10/31/81)	11/20/81	12/4/81
December Monthly (11/1/81-11/30/81)	12/20/81	12/28/81
August Monthly (7/1/82-7/31/82)	8/20/82	8/27/82
September Monthly (8/1/82-8/31/82)	9/20/82	9/30/82
October Monthly (9/1/82-9/30/82)	10/20/82	10/28/82
12 Day Pre-General (10/1/82-10/13/82)	10/21/82	11/24/82

This communication affords you the opportunity to present the reasons behind the late tenders noted above. Your response should be filed with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 within fifteen (15) days of the date of this letter. The Commission will consider your response

to this notice before taking action in this matter. If you need assistance or have any questions regarding this matter, please feel free to contact me on our toll-free number, (800) 426-9530. My local number is (202) 357-0026.

Sincerely,



Michael B. Filler
Chief
Party/Non-Party Branch
Reports Analysis Division

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03052833204



33 OCT 4

AMERICAN GENERAL POLITICAL ACTION COMMITTEE

2727 ALLEN PARKWAY
HOUSTON, TEXAS 77019

September 29, 1983

Mr. Michael B. Filler
Chief, Party/Non-Party Branch
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: 1981-82 Election Cycle Reports for American General
Political Action Committee, C 00024299

Dear Mr. Filler:

This letter is in response to your letter dated September 14, 1983 concerning late filing of eight reports in the 1981-82 Election Cycle for American General Political Action Committee. Even though our best efforts were utilized during the reporting period, regrettably, we were able to file only two-thirds of the required reports on time.

In regard to the reports specifically identified in your letter:

- * The first report mentioned, 7/1/81 - 7/31/81, was filed by my predecessor, who is no longer with this organization.
- * The second report mentioned, 9/1/81 - 9/30/81, was due October 20, 1981, which was two days after I became Treasurer of this committee. Being new to these filings, I was immediately at a disadvantage and, as a result, was unable to file until November 2, 1981.
- * The last report mentioned, the 12-day pre-general, was late due to an oversight on my part. Since we normally file monthly, I was not aware that a 12-day pre-general report was due. This error was discovered when I began preparing what I thought would be the 10/1/82 - 10/31/82 monthly report.

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* The remaining reports were late due to work overload involving my other duties and also because of a cumbersome manual recordkeeping system.

In the future, we expect to be able to make all reports on a timely basis due to changes which have been instituted. I have recently changed positions within the organization, which will provide me with the time necessary to report on a timely basis. In addition, extra personnel will be utilized to ensure prompt reporting. The committee's records will be processed on the computer by year end, which will make gathering the data for reporting much more efficient and effective. In addition, the committee's new chairman, Mr. William C. Phelps, has taken an active role in monitoring the proper filing of reports.

With these positive steps being taken to enhance our recordkeeping and reporting capabilities, we plan to fully comply with and, hopefully, exceed the "best efforts" requirements.

If I can be of further assistance in this matter, please let me know.

Sincerely,



David M. Ferguson
Treasurer

DMF:ab

copy: William C. Phelps, Chairman
Larry D. King, Counsel

84040491244.



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF OUR # 1661

Date Filmed 12/13/84 Camera No. --- 2

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